

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

ORIGINAL

3
4
5 MOTOROLA MOBILITY LLC AND GOOGLE LLC,
6 Petitioners

7 v.

8 MULTIFOLD INTERNATIONAL INC. PTE. LTD.,
9 Patent Owner

10
11 Case IPR2025-00040

12 U.S. Patent No. 9,134,756
13

14
15
16
17 DEPOSITION OF DR. JEFFREY J. RODRIGUEZ

18 TAKEN REMOTELY BY VIDEOCONFERENCE

19 August 6, 2025
20
21
22
23

24 Reported by: Mary Ann Payonk

25 Job No. 2598

August 6, 2025

11:30 a.m. Eastern

DEPOSITION OF DR. JEFFREY J. RODRIGUEZ, taken
remotely by videoconference pursuant to Notice and
agreement of counsel, stenographically reported by Mary
Ann Payonk, Shorthand Reporter and Notary Public, CA CSR
No. 13431.

All attorneys participating in this deposition
acknowledge that the reporter is not physically present
in the deposition room and there is no objection to the
oath being administered remotely.

1 APPEARANCES:

2 ON BEHALF OF MOTOROLA:

3 GEOFFREY MOSS, ESQ.

4 ORRICK, HERRINGTON & SUTCLIFFE LLP

5 2050 Main Street, Suite 1100

6 Irvine, CA 92614

8 ON BEHALF OF MULTIFOLD:

9 MINGHUI YANG, ESQ.

10 CARMICHAEL IP, PLLC

11 8607 Westwood Center Drive, Suite 270

12 Tysons, VA 22182

14 ON BEHALF OF GOOGLE:

15 DAVID VALENTE, ESQ.

16 PAUL HASTINGS LLP

17 2050 M Street, N.W.

18 Washington, D.C. 20036

20 ALSO PRESENT:

21 Anniliese Coleman, BlueBear Law

INDEX TO EXAMINATIONS

DEPONENT	PAGE
DR. JEFFREY J. RODRIGUEZ	
Examination by Attorney Yang	5

INDEX TO REFERENCED EXHIBITS

Exhibit No. 1010	8
Exhibit No. 1001	47
Exhibit No. 1004	37
Exhibit No. 1005	69
Exhibit No. 1007	12

1 THE REPORTER: My name is Mary Ann Payonk, and
2 my California license number is 13431. I will now swear
3 the witness.

4 DR. JEFFREY J. RODRIGUEZ,

5 called as a witness, having been duly
6 sworn, was examined and testified as
7 follows:

8 EXAMINATION

9 BY ATTORNEY YANG:

10 Q. Good morning. How are you today?

11 A. Fine.

12 Q. That's good. Could I start by asking, how
13 many times have you been deposed?

14 A. I don't remember the exact count. Somewhere,
15 I don't know, somewhere around 10 or 20.

16 Q. And how many of those have been for IPRs?

17 A. I don't recall.

18 Q. Do you recall a percentage?

19 A. No.

20 Q. Would it be more or less than 50 percent?

21 A. I don't recall.

22 Q. Have they all been for IPRs or have some of
23 them been for other proceedings?

24 A. Some have been for other proceedings.

25 Q. And what are those proceedings?

1 A. Some were for District Court cases.

2 Q. Do you understand that you're under oath?

3 A. Yes.

4 Q. And do you understand that you are required to
5 answer my questions unless petitioner's counsel
6 explicitly instructs you not to?

7 A. Yes.

8 Q. Is there any reason that you cannot give
9 truthful, complete, and accurate testimony today?

10 A. No.

11 Q. And can you confirm that you have no
12 applications open other than Zoom?

13 A. I -- one moment here, let's -- that's one
14 thing I didn't get prepared. One moment. I do have
15 electronic versions of my declaration and the prior art
16 references Yook, Lee, Purcell, and Aguilar, as well as
17 the '756 patent.

18 Q. And do you have anything open other than Zoom
19 and those electronic documents?

20 A. I do not.

21 Q. Thank you.

22 And can you confirm that you will not
23 communicate with anyone regarding this IPR until after
24 the deposition?

25 ATTORNEY MOSS: Objection, form.

1 A. Can you clarify what you mean by "anyone"?

2 BY ATTORNEY YANG:

3 Q. You won't talk to anyone about this IPR until
4 after I conclude my questioning.

5 A. I will not speak with anyone about the
6 substance of this IPR until after it's over.

7 Q. Okay, thank you. I appreciate that.
8 Have you submitted expert declarations in any
9 other IPR on behalf of Google?

10 ATTORNEY MOSS: Objection, form.

11 A. Yes, I have.

12 BY ATTORNEY YANG:

13 Q. Have you submitted expert declarations in an
14 IPR unrelated to Multifold on behalf of Google?

15 A. I don't recall.

16 Q. Do you have a monetary interest in Google?

17 A. No.

18 Q. Have you submitted expert declarations in any
19 IPR unrelated to Multifold on behalf of Motorola?

20 A. Can you repeat that question, please?

21 Q. Sure.

22 Have you submitted any expert declarations in
23 an IPR unrelated to Multifold on behalf of Motorola?

24 A. I don't recall.

25 Q. Okay. Do you have a monetary interest in

1 Motorola?

2 A. No.

3 Q. Have you ever submitted an expert declaration
4 on behalf of a patent owner in an IPR?

5 A. Probably, but I don't recall.

6 Q. Is it fair to say that you wouldn't recall
7 what percentage of IPRs you've submitted on behalf of
8 patent owners?

9 A. I don't recall.

10 ATTORNEY YANG: Okay. Could I ask you to take
11 a look at Exhibit 1010, which I believe is your CV?

12 THE WITNESS: Okay.

13 (Exhibit No. 1010, previously marked, was
14 referenced and indexed.)

15 BY ATTORNEY YANG:

16 Q. And let me know when you have it open.

17 A. It's open.

18 Q. Great.

19 According to your CV, you're currently at the
20 University of Arizona.

21 Is that correct?

22 A. Yes.

23 Q. Do you currently teach courses at the
24 University of Arizona?

25 A. Yes.

1 Q. Do you teach any courses on user interface
2 technologies?

3 A. Let me clarify my prior answer. I regularly
4 teach courses at the University of Arizona, but during
5 the summer, I do not.

6 Q. That was very helpful. So I'll repeat the
7 other question that I asked.

8 Do you teach any courses on user interface
9 technologies?

10 ATTORNEY MOSS: Objection, form.

11 A. User interface technologies are discussed in
12 part in at least one of the courses that I regularly
13 teach.

14 BY ATTORNEY YANG:

15 Q. And could you give me the name and a brief
16 synopsis of that course?

17 A. Digital Image Analysis. That course concerns
18 techniques for analyzing digital images.

19 Q. And how are user interface technologies
20 relevant to that course?

21 A. In that course, we discuss at length various
22 techniques for performing operations such as edge
23 detection and image segmentation, among others.

24 And in doing image segmentation and edge
25 detection of images, it's very common to use a graphical

1 user interface to facilitate those operations.

2 Q. Okay, thank you.

3 Are you currently conducting research at the
4 University of Arizona?

5 A. Yes, I am.

6 Q. And have you either personally conducted or
7 supervised research on user interface technologies?

8 A. Yes.

9 Q. And could you briefly describe that research?

10 A. We use graphical user interface technologies
11 throughout the work that we do in my research lab.

12 For example, for image edge detection and
13 image segmentation implementations, it's common to
14 provide a graphical user interface to allow the user to
15 edit an edge map or edit an image segmentation.

16 Q. And what is an edge map?

17 A. An edge map is a representation of all the
18 pixels in an image where there's a sharp change in some
19 parameter, such as the intensity or brightness.

20 Q. I believe that your declaration says you're
21 the named inventor of one patent.

22 Is that correct?

23 A. That's correct.

24 Q. So just to confirm, it's just the one. There
25 are not more than one?

1 A. Just one.

2 Q. Could I ask when you obtained this patent?

3 A. It was issued February 12, 2019.

4 Q. And are you reading something for the
5 February 12, 2019 date?

6 A. Yes.

7 Q. And what are you reading?

8 A. My CV.

9 Q. Okay, thank you. I appreciate that.
10 What did you do to prepare for this
11 deposition?

12 A. Well, for one, I reviewed relevant documents.

13 Q. Do you know how long you spent preparing for
14 this deposition?

15 A. I can't cite a specific number.

16 Q. Do you have a rough estimate?

17 A. I don't want to speculate.

18 Q. That's fair.

19 Would you say it was more than 100 hours?

20 A. Probably, rough order of magnitude, more than
21 10, less than 100.

22 Q. Okay, thank you. That's very helpful.

23 Did you speak to anyone that is not an
24 attorney to prepare for this deposition?

25 A. No.

1 ATTORNEY YANG: Okay. Could we please take a
2 look at Exhibit 1007.

3 THE WITNESS: Which document is that?

4 ATTORNEY YANG: I believe it's the Purcell
5 reference. And let me know when you have it open,
6 please.

7 THE WITNESS: Okay.

8 (Exhibit No. 1007, previously marked, was
9 referenced and indexed.)

10 BY ATTORNEY YANG:

11 Q. Do you personally know the inventors of
12 Purcell?

13 A. I do not believe I know the inventors.

14 Q. Okay. And were you aware of Purcell, this
15 document, prior to your work in this IPR?

16 A. I don't recall seeing this reference prior to
17 this matter.

18 Q. And you did review Purcell to prepare for this
19 deposition.

20 Is that right?

21 A. Correct.

22 Q. Is it fair to say that you're familiar with
23 Purcell?

24 ATTORNEY MOSS: Objection, form.

25 A. As I said, I did review this reference.

1 BY ATTORNEY YANG:

2 Q. Okay. When you reviewed Purcell, did you read
3 it in its entirety or did you skim it?

4 ATTORNEY MOSS: Objection, form.

5 A. I believe I've read it in its entirety, but
6 there may be small portions that I skimmed past. I
7 can't recall.

8 BY ATTORNEY YANG:

9 Q. Okay. Could we please take a look at Figure 2
10 of Purcell on page 3.

11 A. Okay.

12 Q. So looking at Figure 2, there's a left monitor
13 115.

14 Do you see that?

15 A. Yes.

16 Q. Is left monitor 115 a physical screen?

17 ATTORNEY MOSS: Objection, form.

18 A. Yes. Purcell explains that monitors 115 and
19 117 are part of a screen.

20 BY ATTORNEY YANG:

21 Q. And is left monitor 115 also monitor 115 shown
22 in Figure 1?

23 A. Yes, that's my understanding.

24 Q. Okay. Going back to Figure 2, is right
25 monitor 117 also a physical screen?

1 ATTORNEY MOSS: Objection, form.

2 A. To clarify, monitor 115 and monitor 117 are
3 both part of a physical screen. These are each a
4 display that is on a physical screen.

5 BY ATTORNEY YANG:

6 Q. I guess my question is are they separate
7 devices that you put together, or are they the same
8 device?

9 ATTORNEY MOSS: Objection, form.

10 A. In Purcell, these are depicted as two separate
11 monitors or screens.

12 BY ATTORNEY YANG:

13 Q. And you can put these two separate monitors
14 next to each other as shown in Figure 2 and they would
15 be one display.

16 Is that right?

17 ATTORNEY MOSS: Objection, form.

18 A. One could put monitor 115 next to monitor 117
19 as shown in Figure 2 and one would then have two
20 displays right next to each other.

21 BY ATTORNEY YANG:

22 Q. Okay. And can you confirm right monitor 117
23 in Figure 2 is also monitor 117 shown in Figure 1?

24 A. Yes, that's my understanding.

25 Q. Okay. And in Figure 2, do you see the numbers

1 2560 by 1024?

2 A. Yes.

3 Q. Do those numbers refer to the pixel dimensions
4 of the combined monitors?

5 A. Yes, that's my understanding.

6 Q. And each of the monitors is 1280 by 1024
7 pixels.

8 Is that right?

9 A. Yes, that's my understanding.

10 Q. And you see in Figure 2 there's labels for a
11 primary application and a secondary application.

12 Do you see that?

13 A. I see the labels for primary application
14 window and secondary application window.

15 Q. Are the primary application and secondary
16 application instances of a same application or are they
17 different applications?

18 ATTORNEY MOSS: Objection, form.

19 A. It could be either.

20 BY ATTORNEY YANG:

21 Q. Okay, that's helpful. Thank you.

22 In Figure 1, would a touchscreen be input
23 processor 120?

24 ATTORNEY MOSS: Counsel, I didn't hear your
25 question. Could you repeat that?

1 ATTORNEY YANG: Sure.

2 BY ATTORNEY YANG:

3 Q. In Figure 1, would a touchscreen be input
4 processor 120?

5 ATTORNEY MOSS: Objection, form.

6 THE WITNESS: I don't understand the question.
7 Can you rephrase it?

8 ATTORNEY YANG: Sure.

9 BY ATTORNEY YANG:

10 Q. Could input processor 120 be a touchscreen?

11 A. My understanding is that input processor 120
12 is a processor rather than a touchscreen. Purcell does
13 mention that the device includes a touchscreen, but it
14 doesn't say that that's input processor 120.

15 Q. Thank you. That makes sense.

16 So if I wanted to implement a touchscreen in
17 Figure 1, would it be connected to input processor 120?

18 ATTORNEY MOSS: Objection, form. Scope.

19 A. Purcell explains that the input processor 120
20 receives command data representing a command to initiate
21 execution of a function where the user enters the
22 command using a keyboard, a mouse, a touchscreen, a
23 microphone, or a voice recognition application;
24 therefore, the input processor 120 needs to be able to
25 communicate with the touchscreen.

1 BY ATTORNEY YANG:

2 Q. Okay, thank you. That was very helpful.

3 Could you please take a look at Exhibit 1006.
4 I believe that's the Aguilar reference.

5 A. Okay.

6 Q. Do you personally know the inventors? Or the
7 inventor. I guess there's just one.

8 A. I do not believe I know the inventor.

9 Q. And were you aware of Aguilar prior to your
10 work in this IPR?

11 A. I don't recall seeing this reference prior to
12 this matter.

13 Q. Did you review this reference for this
14 deposition?

15 A. Yes.

16 Q. Okay. Could I direct you to Figure 5 on page
17 10.

18 A. Okay.

19 Q. In Figure 5, do you see that there's an arrow
20 between Figure 5 and Figure 5A?

21 A. Yes.

22 Q. And there's another arrow between Figure 5A
23 and Figure 5B.

24 A. Yes.

25 Q. Are the arrows indicating that Figure 5A, 5 --

1 I'm sorry.

2 Are the arrows indicating that Figure 5,
3 Figure 5A, and Figure 5B are in that sequence?

4 A. The text of Aguilar explains that Figures 5,
5 5A, and 5B are depicting the process whereby a user may
6 be allowed to split the screen into at least two display
7 segments by using the two-finger dragging down gesture.
8 So my understanding is that the two-finger dragging down
9 gesture is what is depicted in Figure 5.

10 And upon dragging the two fingers down, the
11 left display will show the other application options.
12 And this is depicted in Figure 5A, where we see audio
13 432 as another application that can be selected.

14 And then Figure 5B shows that the result of
15 selecting the audio application is that audio 432 is
16 then displayed in the left display.

17 Q. I guess my question then is does Figure 5, 5A,
18 and 5B show three steps that are performed in the order
19 given by the arrows?

20 ATTORNEY MOSS: Objection, form.

21 A. Aguilar does not say that there are three
22 steps, so no, I do not interpret it that way.

23 BY ATTORNEY YANG:

24 Q. Okay. Do these figures show three screens
25 that appear in the order given by the arrows?

1 ATTORNEY MOSS: Objection, form.

2 THE WITNESS: Can you repeat that question,
3 please?

4 BY ATTORNEY YANG:

5 Q. Do these figures show three screens in the
6 order given by the arrows?

7 ATTORNEY MOSS: Objection, form.

8 A. No, I don't believe that these figures are
9 trying to show three screens.

10 BY ATTORNEY YANG:

11 Q. Okay. What is the purpose of the arrows
12 between Figures 5, 5A, and 5B?

13 ATTORNEY MOSS: Objection, form.

14 A. My understanding is that the first arrow
15 between Figure 5 and Figure 5A is showing that Figure 5A
16 depicts what happens as a result of dragging the two
17 fingers down in Figure 5.

18 BY ATTORNEY YANG:

19 Q. And what is the purpose of the arrow between
20 Figures 5A and 5B?

21 ATTORNEY MOSS: Objection, form.

22 A. The text of Aguilar says that the screen
23 splitting process may stop when one of the application
24 panels, e.g., audio 432 is mainly shown on one side of
25 the screen 510. And that, I believe, is what is

1 depicted in Figure 5B.

2 BY ATTORNEY YANG:

3 Q. My question was about the arrow between
4 Figures 5A and 5B.

5 What is the purpose of the arrow between
6 Figure 5A and 5B?

7 ATTORNEY MOSS: Objection, form.

8 A. Aguilar does not explain a purpose for the
9 arrows so I did not assign any particular significance
10 to either of these two arrows.

11 BY ATTORNEY YANG:

12 Q. You said earlier that the first arrow is
13 showing that Figure 5A depicts what happens as a result
14 of dragging two fingers down in Figure 5.

15 Is that right?

16 A. Well, let me clarify what I said then.
17 Figure 5A, my understanding is that Figure 5A depicts
18 the consequence of dragging the two fingers down.
19 That's what I meant.

20 Q. Okay. Then is it fair to say that Figure 5B
21 depicts the consequence of Figure 5A?

22 A. No.

23 Q. Why not?

24 A. As I said, Figure 5B depicts what happens when
25 the screen splitting process stops when one of the

1 application panels, e.g., audio 432, is mainly shown on
2 one side of the screen 510.

3 Q. Is there a relationship between Figures 5A and
4 5B?

5 ATTORNEY MOSS: Objection, form.

6 A. Yes. The relationship between Figures 5A and
7 5B is that they both depict the process discussed in
8 column 6, the last paragraph of that column.

9 BY ATTORNEY YANG:

10 Q. Is it fair to say that Figure 5A is earlier in
11 the process than Figure 5B?

12 A. Aguilar does not say that Figure 5A is earlier
13 in the process than Figure 5B.

14 Q. Isn't putting an arrow between Figure 5A and
15 Figure 5B kind of confusing then?

16 ATTORNEY MOSS: Objection, form.

17 A. No.

18 BY ATTORNEY YANG:

19 Q. Why not?

20 A. Because it didn't confuse me.

21 Q. Could you take a look at item 530 prime in
22 Figure 5A?

23 A. I cannot find item 535 in Figure 5A.

24 Q. I'm sorry, then the item I was talking about
25 was figure -- item 530 prime.

1 A. Okay.

2 Q. And once you see item 530 prime there, it
3 points to a spindle with audio 432.

4 Do you see that?

5 A. It points to a spindle where audio 432 is
6 shown on one face of the spindle.

7 Q. Is audio 432 in Figure 5A the same audio 432
8 in item 530 prime in Figure 5B?

9 ATTORNEY MOSS: Objection, form.

10 A. That's my understanding.

11 BY ATTORNEY YANG:

12 Q. Okay. Could we please take a look at
13 Figure 4E.

14 A. Okay.

15 Q. And you see audio 432 in Figure 4E, right?

16 A. Yes.

17 Q. Is that spindle in Figure 4E the same as the
18 spindle in Figure 530 prime in Figure 5A?

19 A. Not necessarily. I don't believe Aguilar says
20 they have to be the same.

21 Q. Is audio 432 the same between Figures 4E and
22 5A?

23 A. I don't believe Aguilar says that they have to
24 be the same.

25 Q. Is the spindle in Figure 5A implemented like

1 the spindle in Figure 4E?

2 ATTORNEY MOSS: Objection, form.

3 THE WITNESS: Perhaps you could rephrase the
4 question. I'm not sure I understand what you mean by
5 "implemented" and "like."

6 ATTORNEY YANG: I see.

7 BY ATTORNEY YANG:

8 Q. Is the spindle in Figure 5A in the same format
9 as the spindle in Figure 4E?

10 ATTORNEY MOSS: Objection, form.

11 THE WITNESS: Can you clarify what you mean by
12 "format"?

13 ATTORNEY YANG: Okay.

14 BY ATTORNEY YANG:

15 Q. Does audio 432 appear in both the spindle in
16 Figure 5A and the spindle in Figure 4E?

17 A. Yes. The text, audio (432), appears in both
18 of those figures.

19 Q. Okay. Looking at Figure 5, is navigation 431
20 part of another spindle?

21 ATTORNEY MOSS: Objection, form.

22 A. In the last paragraph of column 6, only one
23 spindle is mentioned.

24 BY ATTORNEY YANG:

25 Q. Okay. So is navigation 431 in Figure 5 part

1 of the spindle in column 6?

2 ATTORNEY MOSS: Objection, form.

3 A. The last paragraph of column 6 does not say
4 that navigation 431 is part of the spindle that includes
5 audio 432.

6 BY ATTORNEY YANG:

7 Q. Okay. Is navigation 431 in Figure 5 part of a
8 spindle, any spindle?

9 A. The last paragraph of column 6, which
10 discusses this figure, does not say that navigation 431
11 is part of a spindle.

12 Q. Okay. Could I direct you to Figure 4D.

13 A. Okay.

14 Q. In Figure 4D, doesn't Figure 4D show
15 navigation 431 as part of a spindle?

16 A. Yes, it does.

17 Q. Okay. Going back to Figure 5, could I ask
18 what 410 is in Figure 5?

19 A. Element 410 is the screen.

20 Q. And what is element 406?

21 A. Aguilar explains that element 406 is a display
22 unit.

23 Q. And would you agree that element 406 in
24 Figure 5, element 406 in Figure 5A, and element 406 in
25 Figure 5B are the same display unit?

1 ATTORNEY MOSS: Objection, form.

2 A. Yes. 406 in each of those three figures could
3 be the same display unit.

4 BY ATTORNEY YANG:

5 Q. Okay. And would you agree that screen 410 in
6 Figure 5, screen 510 in Figure 5A, and screen 530 in
7 Figure 5B are different screens?

8 ATTORNEY MOSS: Objection, form.

9 THE WITNESS: Can you rephrase that question?
10 I'm not sure what you're asking.

11 BY ATTORNEY YANG:

12 Q. I'm asking are screens 410 in Figure 5, 510 in
13 Figure 5A, and 530 in Figure 5B different because they
14 show different things on the screen?

15 ATTORNEY MOSS: Objection, form.

16 A. They do show different things.

17 BY ATTORNEY YANG:

18 Q. And they're assigned different numbers in each
19 of those figures.

20 Is that right?

21 A. 410, 510, and 530 are different numbers.

22 Q. Okay. Could we look at Figure 5C.

23 A. Okay.

24 Q. Is there a relationship between Figure 5C and
25 Figure 5B?

1 A. Did you say B --

2 ATTORNEY MOSS: Objection.

3 A. -- as in Bravo?

4 Q. Yes, Bravo.

5 ATTORNEY MOSS: Objection, form.

6 A. Yes. They both relate to the device discussed
7 in Aguilar.

8 BY ATTORNEY YANG:

9 Q. And would you agree that the display unit 406
10 in Figure 5E is the same as the display unit 406 in
11 Figure 5B, as in Bravo?

12 ATTORNEY MOSS: Objection, form.

13 A. They could be the display unit. They -- they
14 could be the same display unit.

15 BY ATTORNEY YANG:

16 Q. And could you explain how Figure 5C and
17 Figure 5D are related?

18 A. They both relate to the device discussed in
19 Aguilar.

20 Q. In Figure 5C, do you see the hand with the
21 finger?

22 A. Yes.

23 Q. What is the hand with the finger doing?

24 A. It is pressing or tapping.

25 Q. And how does Aguilar's invention respond to

1 the pressing or tapping?

2 ATTORNEY MOSS: Objection, form.

3 A. In the top paragraph of column 7, Aguilar
4 explains that the user can view the content of each
5 application panel in the smaller spindle by either
6 pressing or tapping twice on the corresponding
7 application panel.

8 BY ATTORNEY YANG:

9 Q. So would you agree that item 510 prime is a
10 spindle?

11 ATTORNEY MOSS: Objection, form.

12 A. Aguilar, at the top paragraph of column 7,
13 says that element 510 prime is the screen, the left side
14 of the screen.

15 BY ATTORNEY YANG:

16 Q. I apologize. You're right.

17 Would you agree that element 530 is a spindle?

18 ATTORNEY MOSS: Objection, form.

19 A. Are you still referring to Figure 5C?

20 Q. Yes.

21 A. Aguilar does not identify what element 530 is
22 supposed to point to in Figure 5C.

23 Q. And how would a person of ordinary skill
24 understand element 530 in Figure 5C?

25 A. The top paragraph of column 7 explains what

1 Figure 5C is depicting.

2 Q. And to a person of ordinary skill, what is
3 element 530 in figure C?

4 ATTORNEY MOSS: Objection, form.

5 A. As I said, it's unclear what 530 is intended
6 to be labeling, but that's not important in
7 understanding what Figure 5C is depicting.

8 ATTORNEY YANG: Okay. We've been on the
9 record for a little bit over an hour. Do you want to
10 take a break?

11 THE WITNESS: Okay.

12 ATTORNEY YANG: And can we come back at 9:45?

13 THE WITNESS: Okay.

14 ATTORNEY YANG: Okay. Thank you.

15 (Recess taken.)

16 BY ATTORNEY YANG:

17 Q. Welcome back.

18 During the break, did you speak with anyone
19 about this deposition?

20 A. No.

21 Q. Thank you. And also thank you for taking the
22 time to explain Purcell and Aguilar so far.

23 Could we please take a look at Figure 5 of
24 Aguilar. I think we were actually at Figure 5, so
25 Figure 5E.

1 A. E, as in echo?

2 Q. Yes, E as in echo.

3 A. Okay.

4 Q. In Figure 5E, what is depicted by the hand?

5 ATTORNEY MOSS: Objection, form.

6 THE WITNESS: I don't see a full hand. I see
7 two fingers. Can you clarify your question?

8 ATTORNEY YANG: Sure.

9 BY ATTORNEY YANG:

10 Q. In Figure 5E, what is depicted by the two
11 fingers?

12 A. The two fingers in Figure 5E are depicting a
13 user initiating a gesture.

14 Q. Does Figure 5F show the result of a user
15 gesture in Figure 5E?

16 ATTORNEY MOSS: Objection, form.

17 A. Yes.

18 BY ATTORNEY YANG:

19 Q. Okay. Could we turn to Figure 6.

20 A. Okay.

21 Q. Do you see the finger in Figure 6?

22 A. Yes.

23 Q. Is the finger in Figure 6 also a user gesture?

24 A. I wouldn't say that a finger is a gesture.
25 That sounds awkward to me.

1 Q. Okay, let me rephrase that.

2 Does the finger in Figure 6 depict a user
3 gesture?

4 A. The finger in Figure 6 is depicting initiating
5 a gesture.

6 Q. Okay. And does Figure 6A show the result of
7 the gesture in initiating -- (electronic interference -
8 audio distortion) 6?

9 (Reporter clarification.)

10 BY ATTORNEY YANG:

11 Q. Does Figure 6A show the result of the gesture
12 initiated in Figure 6?

13 A. The text in Aguilar doesn't appear to
14 explicitly say whether Figure 6A is the consequence of
15 the gesture in Figure 6; however, if we look in column 7
16 at the -- one moment.

17 In figure -- in column 7, fourth paragraph,
18 Aguilar does refer to Figures 6 and 6A and says the user
19 can spin the smaller spindle 530 prime to select a
20 different application by dragging down the screen 510
21 prime with one finger. So it's clear that this is what
22 is depicted in Figures 6 and 6A.

23 Q. So based on the passage you just read, is it
24 fair to say that in Figure 6, it's depicting the user
25 spinning the spindle?

1 ATTORNEY MOSS: Objection, form.

2 A. Not necessarily.

3 BY ATTORNEY YANG:

4 Q. And then what action is the finger performing
5 in Figure 6?

6 A. Dragging down the screen with one finger.

7 Q. Is the user dragging down the screen with one
8 finger consistent with spinning the spindle?

9 A. Aguilar says that the user can spin the
10 smaller spindle by dragging down the screen.

11 Q. Okay. And looking at Figure 6B, what does the
12 finger in Figure 6B depict?

13 A. In Figure 6B, the user is using a finger to
14 slide the phone application to the right so as to close
15 the navigation application.

16 Q. And does Figure 6C show a screen after the
17 user slides the phone application to the right?

18 A. Figure 6C shows that the two display segments
19 have been merged so that the phone application covers
20 all of screen 410.

21 Q. And are the two display segments merged
22 because the user slides the phone application to the
23 right?

24 A. Yes.

25 Q. And what is the relationship between Figure 6A

1 and Figure 6B?

2 ATTORNEY MOSS: Objection, form.

3 A. Figures 6A and 6B both relate to the device
4 discussed in Aguilar.

5 BY ATTORNEY YANG:

6 Q. Do you see the arrow between Figures 6A and 6B
7 that's pointing from 6A to 6B?

8 A. Yes.

9 Q. How would a person of ordinary skill
10 understand that arrow?

11 A. I believe that Aguilar does not discuss that
12 arrow specifically, so -- so I don't see a discussion of
13 that arrow.

14 Q. Is it fair to say that a person of ordinary
15 skill would have no understanding of that arrow because
16 it's not discussed by Aguilar?

17 ATTORNEY MOSS: Objection, form.

18 A. The arrow is simply a graphical addition
19 that's unlabeled, and the understanding of these figures
20 is very clear from the text in Aguilar. So a person of
21 ordinary skill in the art would have no problem
22 understanding what these figures are showing because
23 Aguilar explains the figures.

24 BY ATTORNEY YANG:

25 Q. Okay. Does that arrow have any meaning to a

1 person of ordinary skill?

2 ATTORNEY MOSS: Objection, form.

3 A. Well, to me, it simply depicts -- it may
4 simply depict a transition from one illustration to
5 another illustration.

6 BY ATTORNEY YANG:

7 Q. And there's no prompt for that transition.
8 Is that correct?

9 ATTORNEY MOSS: Objection, form.

10 A. What do you mean by "prompt"?

11 BY ATTORNEY YANG:

12 Q. Is it fair to say that Aguilar doesn't
13 disclose how Figure 6A transitions to Figure 6B?

14 ATTORNEY MOSS: Objection, form.

15 A. It's not clear that Figure 6A does transition
16 to Figure 6B. Can you point me to where Aguilar says
17 that Figure 6A transitions to Figure 6B?

18 BY ATTORNEY YANG:

19 Q. I apologize. I used the word "transition"
20 because you said that was -- you -- I withdraw that.

21 Let's move on to Figure 7. And let me know
22 when you see Figure 7.

23 A. Okay.

24 Q. Looking at Figure 7, what does the finger at
25 Figure 7 depict?

1 A. It's depicting the start of a gesture.

2 Q. And does Figure 7A show the result of the
3 gesture started in Figure 7?

4 A. Yes. Well, let me clarify. It shows an
5 intermediate depiction of what happens when the user
6 drags the audio panel down.

7 Q. Okay. And what is the difference between what
8 happens in Figures 7 and 7A versus what happens in
9 Figures 6 and 6A?

10 ATTORNEY MOSS: Objection, form.

11 A. In Figures 7A and 7B, we see an illustration
12 where the user can split the display segment into two
13 portions, which is different from what is depicted in
14 Figures 6A and 6B.

15 BY ATTORNEY YANG:

16 Q. Right. I was asking about Figures 7 and 7A
17 versus 6 and 6A.

18 ATTORNEY MOSS: Objection, form to the extent
19 that's a question.

20 A. The difference is that Figure 7A shows a
21 center line 440 whereas Figure 6A does not. And this is
22 significant.

23 BY ATTORNEY YANG:

24 Q. And what is the significance of center line
25 440?

1 A. The spindle stops when the phone panel is
2 close to the center line 440, as shown in Figures 7A and
3 7B.

4 Q. So that looking at Figure 7B, what does the
5 finger in 7B depict?

6 A. The finger in Figure 7B depicts a gesture.

7 Q. And does Figure 7C show the result of a
8 gesture in Figure 7B?

9 A. Yes.

10 Q. Why does Figure 7B show both phone 434 and
11 audio 432?

12 ATTORNEY MOSS: Objection, form.

13 A. Figure 7B shows both the phone application and
14 the audio application because that is what this figure
15 is trying to show, namely, that the display segment can
16 be split into two portions which contain those separate
17 applications.

18 BY ATTORNEY YANG:

19 Q. Is it fair to say that Figure 7B shows three
20 applications, navigation 431, phone 434, and audio 432?

21 A. Yes.

22 ATTORNEY MOSS: Objection, form.

23 BY ATTORNEY YANG:

24 Q. The gesture in Figure 7B moves audio 432 to
25 the position where navigation 431 was in Figure 7C.

1 Is that right?

2 A. The construction of that question confuses me.

3 Q. I apologize. I'll withdraw that question and
4 I'll ask it a different way because you are right. That
5 construction was not the clearest.

6 After the gesture in Figure 7B, Figure 7C
7 shows audio 432 in the position that navigation 431 was
8 in Figure 7B.

9 Is that right?

10 ATTORNEY MOSS: Objection, form.

11 A. Figure 7C shows audio 432 on the right display
12 segment whereas Figure 7B shows the navigation 431
13 application on the right display segment.

14 BY ATTORNEY YANG:

15 Q. And what happens to the navigation 431
16 application in Figure 7C?

17 ATTORNEY MOSS: Objection, form.

18 THE WITNESS: What do you mean by "what
19 happens"?

20 BY ATTORNEY YANG:

21 Q. Well, the navigation 431 isn't shown in
22 Figure 7C, so my question was, what happened to it?

23 A. It's been replaced by the audio application.

24 Q. And what do you mean by "replaced"?

25 A. It's been closed, and the audio application

1 has moved to that display segment.

2 ATTORNEY YANG: Okay. Could you please take
3 out now Exhibit 1004, which would be Yook.

4 THE WITNESS: Okay.
5 (Exhibit No. 1004, previously marked, was
6 referenced and indexed.)

7 BY ATTORNEY YANG:

8 Q. And when you have it open, do you personally
9 know the inventors of Yook?

10 A. I do not believe I know these inventors.

11 Q. And were you aware of Yook prior to your work
12 in this IPR?

13 A. I do not recall seeing this reference prior to
14 this matter.

15 Q. Okay. And you reviewed Yook to prepare for
16 this deposition.

17 Is that right?

18 A. Correct.

19 Q. Okay. Could we please take a look at Figure 1
20 of Yook.

21 A. Okay.

22 Q. Figure 1 shows a mobile terminal 100.

23 Is that correct?

24 A. Yes.

25 Q. Does mobile terminal 100 in Figure 1 only have

1 one physical screen?

2 ATTORNEY MOSS: Objection, form.

3 A. Yes. There is one physical screen.

4 BY ATTORNEY YANG:

5 Q. And that is screen 140.

6 Is that right?

7 A. Yes. 140 is a touchscreen.

8 Q. And what is 120 in Figure 1?

9 A. 120 is an input unit.

10 Q. And is there a visual indicator that signifies
11 the display can be maximized in Figure 1?

12 A. Yes. Yook's device does have a visual
13 indicator for maximizing.

14 Q. I guess my question was slightly different.
15 It was -- well, let me rephrase it.

16 What is the visual indicator for maximizing in
17 Figure 1?

18 A. Figure 1 shows a touchscreen 140 that can be
19 configured as shown in Figure 4E to include a merge
20 button. And that's one example of a visual indicator.

21 Q. So if I understand that correctly, if you put
22 the visual indicator from Figure 4E on the screen in
23 Figure 1, then Figure 1 would show a visual indicator.

24 Is that right?

25 A. Yes.

1 Q. Okay. Does Yook suggest changing the
2 dimensions of the visual indicator in Figure 4E?

3 ATTORNEY MOSS: Objection, form.

4 A. Changing it from what?

5 Q. For example, increasing the length, increasing
6 the width.

7 A. I don't recall.

8 Q. Okay, let's move on to Figure 3 of Yook.

9 Looking at Figure 3 of Yook, let me know when
10 you get there.

11 A. Okay.

12 Q. What is A.App in Figure 3 of Yook?

13 A. It refers to an application identified by the
14 letter A.

15 Q. And is B.App a different application than
16 A.App?

17 A. B.App refers to an application that's
18 identified with the letter B.

19 Q. Okay. And do you see a bar on top of A.App
20 and B.App?

21 ATTORNEY MOSS: Objection, form.

22 A. I see some -- a couple of horizontal lines.
23 BY ATTORNEY YANG:

24 Q. And the horizontal lines form a very elongated
25 rectangle, right?

1 A. Yes.

2 Q. And do you know what that is?

3 A. I don't recall the reference specifically
4 discussing that region in Figure 3.

5 Q. Do you know what is depicted by the elongated
6 rectangle to a person of ordinary skill?

7 ATTORNEY MOSS: Objection, form.

8 A. It appears to be a status bar.

9 BY ATTORNEY YANG:

10 Q. And what is a status bar?

11 A. A portion of the display that indicates the
12 status of things.

13 Q. And what do you mean by "the status of
14 things"?

15 A. The status of different aspects of operation.

16 Q. By that, do you mean the operation of the
17 device?

18 A. Could be.

19 Q. Okay. Could we take a look at Figure 4A on
20 page 5.

21 A. Okay.

22 Q. Do you see element 401 on the -- if you were
23 to rotate the figure 90 degrees, on the left side of
24 Figure 4A?

25 A. I don't understand.

1 Q. I'm sorry.

2 First of all, Figure 4A is positioned such
3 that it's oriented to the left rather than -- it's
4 oriented left to right instead of top to bottom.

5 Do you see that?

6 ATTORNEY MOSS: Objection, form.

7 A. No. I don't understand what you're referring
8 to.

9 BY ATTORNEY YANG:

10 Q. Do you see Figure 4A on page 5?

11 A. Yes.

12 Q. And the words "Figure 4A," those words don't
13 have the normal orientation when you're reading a page
14 in portrait.

15 ATTORNEY MOSS: Objection, form.

16 A. The page is in landscape mode, if that's what
17 you're referring to.

18 BY ATTORNEY YANG:

19 Q. Yes, thank you. I am referring to the fact
20 that the page is in landscape mode so if you were to
21 look at it in portrait, the words are not correctly
22 oriented.

23 So if you were to look at it in landscape, do
24 you see 401 on the left side of Figure 4A?

25 A. Yes.

1 Q. What are the dotted line -- what is the dotted
2 box in 401?

3 A. At paragraph 44, it explains that the menu
4 items AB, CB, and CD are dual menu items.

5 Q. And there's a -- in Figure 4A, there's an
6 arrow between 401 and 403.

7 Do you see that?

8 A. Yes.

9 Q. And on top of the arrow, there's -- there are
10 the words "AB selection."

11 What does "AB selection" mean?

12 A. It refers to a user selecting a dual menu item
13 AB.

14 Q. And would that refer to the AB within the
15 dotted box in 401?

16 A. Yes.

17 Q. And so after you select AB in the dotted box
18 in 401, you would get 403.

19 Is that right?

20 A. The result of selecting dual menu item AB is
21 that application A and application B will be displayed
22 as shown in element 403.

23 Q. Okay. And then looking at Figure 4B, between
24 elements 413 and 415, there are two arrows.

25 Do you see those two arrows?

1 A. Yes.

2 Q. And on top of the first arrow, it says "home
3 key" and on the bottom of the second arrow there's also
4 the words "home key."

5 What does "home key" mean in this figure?

6 A. It refers to a home key that's provided on the
7 device.

8 Q. And each of these arrows corresponds to
9 pressing the home key.

10 Is that right?

11 ATTORNEY MOSS: Objection, form.

12 A. I wouldn't say it that way.

13 BY ATTORNEY YANG:

14 Q. How would you say it?

15 A. If application A is displayed across the full
16 screen as shown in 413, then -- and -- well, let's start
17 over.

18 If you begin in element 411 with application C
19 being displayed across the full screen, and then if you
20 launch application A, then application A will occupy the
21 full screen, thereby hiding application C from view.

22 And then, if the user presses the home key,
23 then application C will be revealed by splitting the
24 screen into two display areas so that application A can
25 be shown on the left and application C is revealed on

1 the right.

2 Q. Okay, thank you. That was very helpful.

3 Could we look now at Figure 4C.

4 A. Okay.

5 Q. Between 421 and 423 there's an arrow labeled
6 "subtask activation."

7 Could you explain what subtask activation is?

8 A. In paragraph 50, it explains an example where
9 the user generates an input signal to activate a message
10 composition program. And the terminal can display a
11 functional view area, which is a message composition
12 view area. So that's one example.

13 Q. So in that example, is the message composition
14 program a subtask?

15 A. Yes.

16 Q. And staying with that example, and looking
17 back at Figure 4C, there's an arrow between 423 and 425
18 labeled "subtask end."

19 That would be the end of the message
20 composition program. Is that right?

21 A. Yes. Well, that refers to the message
22 composition program being completed.

23 Q. Okay. And then at Figure 4D between 431 and
24 433, there's an arrow labeled "event generation."

25 What is event generation?

1 A. At paragraph 52, it explains an example where
2 an incoming call is received and it then outputs a
3 functional view area related to call event handling as
4 depicted in the figure.

5 Q. Could you please take a look at Figure 7B on
6 page 12.

7 What is 76 in Figure 7B?

8 ATTORNEY MOSS: Objection, form.

9 A. I believe you're asking about a figure that I
10 did -- that I did not refer to in my declaration so
11 you'll need to give me some time to review this figure
12 and the associated text in the reference.

13 BY ATTORNEY YANG:

14 Q. Okay. Before I do that, could I ask, did you
15 review Figure 7 and the associated text to prepare for
16 this deposition?

17 A. Briefly, yes. But I need to review it in a
18 more detailed manner in order to give you a complete
19 answer to your question.

20 Q. Okay. Please review Figure 7 and the text.
21 And take as much time as you need to answer my questions
22 on this figure.

23 A. Okay. What is your question about Figure 7B?

24 Q. My question is what is 76 in Figure 7B?

25 ATTORNEY MOSS: Objection, form. Scope.

1 A. Element 76 refers to a map viewing view area.

2 BY ATTORNEY YANG:

3 Q. And what is element 73 in Figure 7B?

4 ATTORNEY MOSS: Objection, form. Scope.

5 A. Element 73 in Figure 7B is an email handling
6 view area.

7 BY ATTORNEY YANG:

8 Q. And do you see the status bar between 73 and
9 76 in Figure 7B?

10 A. I don't see anything labeled as a status bar.
11 Can you be more specific?

12 Q. Do you see an elongated box in the middle that
13 says "1:20 PM"?

14 A. Yes.

15 Q. Would a person of ordinary skill understand
16 that to be a status bar?

17 ATTORNEY MOSS: Objection, form. Scope.

18 A. In my opinion, it could be a status bar.

19 BY ATTORNEY YANG:

20 Q. And is that status bar in the map viewing area
21 76 or is that status bar in the email handling view area
22 73?

23 ATTORNEY MOSS: Objection, form. Scope.

24 A. My understanding is that it is in neither
25 region 73 nor 76 because paragraph 83 refers to the

1 boundary region between area 73 and area 76.

2 ATTORNEY YANG: Okay, I think we have been on
3 the record for another hour so do you want to take
4 another 10-minute break?

5 THE WITNESS: Okay.

6 ATTORNEY YANG: Okay. And we can come back
7 at -- oh, I hate time conversions. 2:05 p.m. Eastern,
8 which would be 11:05 AM Pacific.

9 THE WITNESS: Okay.

10 (Recess taken.)

11 ATTORNEY YANG: Could you please take a look
12 at Exhibit 1001, which is the '756 patent.

13 THE WITNESS: Okay.

14 (Exhibit No. 1001, previously marked, was
15 referenced and indexed.)

16 BY ATTORNEY YANG:

17 Q. Did you review the '756 patent to review --
18 sorry, to prepare for this deposition?

19 A. Yes.

20 Q. And to confirm, you reviewed the whole thing.
21 Is that right?

22 A. Yes, of course; however, there may be certain
23 portions that I skimmed through faster than others.

24 Q. Okay. That's understandable.

25 Do you personally know the inventor of the

1 '756 patent?

2 A. I don't believe I know the inventor.

3 Q. Okay. And were you aware of the '756 patent
4 prior to your work in this IPR?

5 A. I don't recall seeing this reference prior to
6 this matter.

7 Q. Okay. And could we take a look at line 25 on
8 page 42. I got the line wrong. Line 35 on page 47.

9 A. Can you clarify what you mean by "page"?

10 Q. It's the page number at the bottom that's
11 stamped Exhibit 1001, then there's a P47.

12 A. Okay.

13 ATTORNEY MOSS: Objection, form.

14 THE WITNESS: Okay which -- tell me again
15 which page it was.

16 BY ATTORNEY YANG:

17 Q. It was page 47 based on the page numbering at
18 the bottom right side of the page that says
19 Exhibit 1001, then P47. You should see column 35.

20 A. Got it.

21 Q. So looking at line 23 on column 35, there's
22 Claim 1 that says: A method of displaying a plurality
23 of desktops and/or applications each having at least one
24 window on a multi-display device comprising.

25 Do you see that?

1 A. Yes.

2 Q. To a person of ordinary skill, what is a
3 desktop?

4 ATTORNEY MOSS: Objection, form.

5 A. At column 4, the patent defines the term
6 "desktop" and says it is -- it refers to a metaphor used
7 to portray systems, a desktop is generally considered a
8 surface that typically includes pictures called icons,
9 widgets, folders, etc., that can activate -- that can
10 activate, show applications, windows, cabinets, files,
11 folders, documents and other graphical items, and then
12 goes on further to discuss it.

13 BY ATTORNEY YANG:

14 Q. Okay, thank you.

15 And what is a display?

16 ATTORNEY MOSS: Objection, form.

17 A. At the top of column 5, the patent defines the
18 term "display" as referring to a portion of one or more
19 screens used to display the output of a computer to a
20 user. And the rest of that paragraph gives further
21 clarity about the definition of "display."

22 BY ATTORNEY YANG:

23 Q. And what is the difference between a display
24 and a screen in the context of the '756 patent?

25 ATTORNEY MOSS: Objection, form. Scope.

1 A. At column 4 starting at line 36, the patent
2 defines the term "screen" as referring to a physical
3 structure that includes one or more hardware components
4 that provide the device with the ability to render a
5 user interface and/or receive user input. And the rest
6 of that paragraph gives further clarity about that
7 definition.

8 BY ATTORNEY YANG:

9 Q. So is it fair to say that a screen is physical
10 and a display is not?

11 ATTORNEY MOSS: Objection, form.

12 A. No, I wouldn't say it that way.

13 BY ATTORNEY YANG:

14 Q. Would you agree that a screen is physical?

15 A. The patent defines the term "screen" as
16 referring to a physical structure.

17 Q. Can a display be physical?

18 ATTORNEY MOSS: Objection, form. Scope.

19 A. The patent defines the term "display" as
20 referring to a portion of one or more screens used to
21 display the output of a computer to a user.

22 BY ATTORNEY YANG:

23 Q. Could you look at column 35, line 26.

24 A. Line 36?

25 Q. 26. It's the first step of Claim 1 that says:

1 Receiving by a processor a first input that represents
2 an instruction to reveal one of a desktop or application
3 on a first display of the multi-display device.

4 A. Okay.

5 Q. What is a processor?

6 ATTORNEY MOSS: Objection, form. Scope.

7 A. A processor is a device that can execute
8 instructions.

9 BY ATTORNEY YANG:

10 Q. And what are instructions?

11 ATTORNEY MOSS: Objection, form. Scope.

12 A. Instructions are the elements of programming
13 code that determine a function or operation to be
14 performed by the processor.

15 BY ATTORNEY YANG:

16 Q. Okay. Could we look at the last step of
17 Claim 1? It says: Displaying by the processor the
18 selected one of the first or second desktops or
19 applications in a maximized condition.

20 That should be column 35 between lines 43
21 and 45.

22 A. Okay.

23 Q. What is a maximized condition?

24 ATTORNEY MOSS: Objection, form. Scope.

25 A. In column 8 in the second paragraph, the

1 patent refers to Figure 10A, which provides an example
2 of maximizing, and explains that the application that's
3 displayed can be maximized to be shown in a larger view
4 across both the primary and secondary screens.

5 BY ATTORNEY YANG:

6 Q. Okay. Could we look at Claim 2 starting on
7 column 45, line 46.

8 A. Okay.

9 Q. It says: The method of Claim 1 wherein at
10 least one of the first, second, and third inputs is
11 achieved by at least a user input gesture.

12 What is a user input gesture?

13 ATTORNEY MOSS: Objection, form. Scope.

14 A. In the middle of column 5, the patent defines
15 the term "gesture" to refer to a user action that
16 expresses an intended idea, action, meaning, result,
17 and/or outcome. And the rest of that paragraph gives
18 further clarification to the meaning of "gesture."

19 BY ATTORNEY YANG:

20 Q. And how is a user input gesture different than
21 input alone?

22 ATTORNEY MOSS: Objection, form. Scope.

23 A. A gesture requires a user action.

24 BY ATTORNEY YANG:

25 Q. If I typed into a keyboard, that's a user

1 interaction. Correct?

2 ATTORNEY MOSS: Objection, form. Scope.

3 THE WITNESS: Can you repeat the question?

4 BY ATTORNEY YANG:

5 Q. If I typed into a keyboard, that is a user
6 action, isn't it?

7 ATTORNEY MOSS: Same objections.

8 A. Yes, I would say so.

9 BY ATTORNEY YANG:

10 Q. So is typing into a keyboard a gesture?

11 ATTORNEY MOSS: Objection, form. Scope.

12 A. I'm not sure. Haven't thought about that.
13 That didn't arise in my analysis.

14 BY ATTORNEY YANG:

15 Q. Okay. Can you think of an input that isn't a
16 user input gesture?

17 ATTORNEY MOSS: Objection, form. Scope.

18 A. Well, based on the definition in the patent,
19 any input that's not a user action would not be a
20 gesture. That would be one example.

21 BY ATTORNEY YANG:

22 Q. How would a user provide an input without
23 acting?

24 ATTORNEY MOSS: Objection, form. Scope.

25 A. That's a hypothetical. One would have to

1 speculate. I'm not sure.

2 BY ATTORNEY YANG:

3 Q. Going back to my question, are you aware of
4 any inputs that isn't a user input gesture?

5 ATTORNEY MOSS: Objection, form. Scope.

6 A. I haven't thought about that. I would have to
7 go and do a deeper analysis so I wouldn't want to
8 speculate right now.

9 BY ATTORNEY YANG:

10 Q. Okay, I guess that's fair.

11 Could we look at column 35, line 50. 49 and
12 50. This is Claim 3.

13 A. Okay.

14 Q. Claim 3 says: The method of Claim 1 wherein
15 the third input is a user gesture comprising at least
16 one of a tap or long hold gesture.

17 What is a tap?

18 ATTORNEY MOSS: Objection, form. Scope.

19 A. Well, the patent explains an example of what
20 could be a tap. In column 16 at line 25, the patent
21 equates a tap with a short press, so that's one example.

22 BY ATTORNEY YANG:

23 Q. And what is a long hold?

24 ATTORNEY MOSS: Objection, form. Scope.

25 A. The patent doesn't appear to explicitly define

1 a long hold; however, a person of ordinary skill would
2 understand that it refers to a gesture that is longer in
3 duration than a simple tap.

4 BY ATTORNEY YANG:

5 Q. I see.

6 And are you aware of any user gestures that
7 isn't a tap or a long hold?

8 ATTORNEY MOSS: Objection, form. Scope.

9 A. I haven't thought about that. That's
10 something I'd have to take time to analyze.

11 BY ATTORNEY YANG:

12 Q. Well, looking at Claim 3, it says: A user
13 gesture comprising at least one of a tap or a long hold
14 gesture.

15 If the only examples of user gesture are tap
16 and long hold, isn't Claim 3 superfluous because it's
17 saying the thing comprises itself?

18 ATTORNEY MOSS: Objection, form. Scope.

19 THE WITNESS: I don't understand what you mean
20 by that statement.

21 BY ATTORNEY YANG:

22 Q. I guess my question is, if Claim 3 says, user
23 gesture comprising at least one of a tap or a long hold,
24 there has to be a user gesture other than a tap or a
25 long hold; otherwise, it would say that the user gesture

1 comprises the only things that it is.

2 Is that right?

3 ATTORNEY MOSS: Objection, form. Scope.

4 A. I'm not an attorney, and you're asking for a
5 legal opinion here, so I wouldn't be able to comment on
6 that.

7 BY ATTORNEY YANG:

8 Q. But it is your opinion -- but you aren't aware
9 of any -- let me rephrase.

10 You aren't aware of any user gestures that
11 isn't a tap or long hold, right?

12 ATTORNEY MOSS: Objection, form. Scope.

13 A. I'm sure there are many types of gestures. I
14 just haven't analyzed that.

15 BY ATTORNEY YANG:

16 Q. Okay. That's fair.

17 Could you look at Claim -- I'm sorry,
18 column 36, line 10. This would be part of Claim 7.

19 A. Okay.

20 Q. This particular step in line 10 says:
21 Instructions configured to receive a third predetermined
22 input that represents an instruction to maximize a
23 selected one of the first or second desktops or
24 applications resulting in the selected one being
25 displayed on both of the first and second displays

1 according to the instructions configured to respond to
2 the third predetermined input.

3 And then there's a colon and an -- I'm sorry,
4 there's a semicolon and an "and."

5 A. Okay.

6 Q. What does "according to the instruction
7 configured to respond to the third predetermined input"
8 mean?

9 ATTORNEY MOSS: Objection, form. Scope.

10 A. It means in accordance with those
11 instructions.

12 BY ATTORNEY YANG:

13 Q. So does that say that the selected one being
14 displayed is in accordance with the instructions?

15 ATTORNEY MOSS: Objection, form. Scope.

16 THE WITNESS: Can you rephrase that question?

17 BY ATTORNEY YANG:

18 Q. You said that "according to the instruction
19 configured to respond to the third predetermined input"
20 means being in accordance with the instruction, and I'm
21 trying to figure out what is in accordance with the
22 instruction.

23 ATTORNEY MOSS: Objection, form. Scope.

24 A. In my opinion, the "according" phrase is
25 acting as an adverb, not as an adjective.

1 BY ATTORNEY YANG:

2 Q. And then what is the "according" phrase
3 modifying?

4 A. "Being displayed."

5 Q. So is it fair to say that being displayed has
6 to be according to the instruction?

7 A. Yes.

8 ATTORNEY MOSS: Objection, form. Scope.

9 BY ATTORNEY YANG:

10 Q. Okay, let me direct you to column 36, line 22.
11 This is Claim 8. Claim 8 says: The computer-readable
12 medium of Claim 7 wherein in at least one of the first
13 or second displays has a visual indicator displayed
14 thereon and signifying that a desktop or application
15 appearing on that display can be maximized by a user
16 gesture according to the instructions configured to
17 receive a third predetermined input.

18 A. Okay.

19 Q. What does "according to the instructions
20 configured to respond to the third predetermined input"
21 mean?

22 ATTORNEY MOSS: Objection, form. Scope.

23 A. It means in accordance with those
24 instructions.

25 BY ATTORNEY YANG:

1 Q. And what is in accordance with those
2 instructions?

3 ATTORNEY MOSS: Objection, form. Scope.

4 A. Be maximized.

5 BY ATTORNEY YANG:

6 Q. And how can being maximized be in accordance
7 with the instructions?

8 ATTORNEY MOSS: Objection, form.

9 A. Because according to the claim, in order for
10 the desktop or application to be maximized, there must
11 be instructions configured to receive a third
12 predetermined input, so those instructions would first
13 have to cause that third predetermined input to be
14 received before the desktop or application can be
15 maximized.

16 BY ATTORNEY YANG:

17 Q. Can we look at Claim 9? It says: The
18 computer-readable medium of Claim 7 wherein a forth
19 predetermined input is an instruction to minimize a
20 selected one of the first or second desktops or
21 applications resulting in the selected one being
22 displayed only one of the first and second displays
23 according to the instructions configured to respond to
24 the third predetermined input.

25 A. Okay.

1 Q. What's the difference between "instructions
2 configured to respond to the third predetermined input"
3 in Claim 9 and "instructions configured to receive a
4 third predetermined input" in Claim 8?

5 ATTORNEY MOSS: Objection, form. Scope.

6 A. They mean slightly different things.
7 "Respond" means to do something in response to the
8 input, whereas "receive" means that it must receive the
9 input.

10 BY ATTORNEY YANG:

11 Q. So if a desktop or application is maximized,
12 is it always in accordance with instructions configured
13 to respond to the third predetermined input?

14 ATTORNEY MOSS: Objection, form. Scope.

15 THE WITNESS: That question doesn't make sense
16 to me. Could you rephrase it?

17 ATTORNEY YANG: Yeah. I'll withdraw that
18 question and I'll ask a slightly different question.

19 BY ATTORNEY YANG:

20 Q. What are the instructions configured to
21 respond to the third predetermined input?

22 ATTORNEY MOSS: Objection, form. Scope.

23 A. Which device are you referring to?

24 Q. I'm referring to the language of Claim 8.
25 Claim 8 says: The instructions configured to receive a

1 third predetermined input.

2 A. And you're asking what those instructions are?

3 Q. Yes.

4 ATTORNEY MOSS: Objection, form. Scope.

5 A. The patent specification does not explicitly
6 provide a computer program listing that shows the
7 specific computer instructions that would form the
8 computer program.

9 BY ATTORNEY YANG:

10 Q. And what do those instructions do?

11 ATTORNEY MOSS: Objection, form. Scope.

12 A. In Claim 8? The --

13 Q. Yes.

14 A. The instructions receive a third predetermined
15 input.

16 Q. And what is the third predetermined input?

17 ATTORNEY MOSS: Objection, form. Scope.

18 THE WITNESS: Are you asking me to find an
19 example in the patent specification that shows what a
20 third predetermined input could look like?

21 ATTORNEY YANG: Let me ask a different
22 question then.

23 BY ATTORNEY YANG:

24 Q. Could you please take a look at line 10 of
25 column 36. Starting with the word "instructions," it

1 says: Instructions configured to receive a third
2 predetermined input that represents an instruction to
3 maximize a selected one of the first or second desktops
4 or applications resulting in the selected one being
5 displayed on both of the first and second displays
6 according to the instructions configured to respond to
7 the third predetermined input.

8 A. Okay.

9 Q. Doesn't that say that the instructions
10 configured to receive a third predetermined input
11 represent an instruction to maximize a selected one of
12 the first or second desktops or applications?

13 ATTORNEY MOSS: Objection, form. Scope.

14 THE WITNESS: Okay, can you ask the question
15 again?

16 ATTORNEY YANG: Okay.

17 BY ATTORNEY YANG:

18 Q. Doesn't column 36, line 10 say instructions
19 configured to receive a third predetermined input
20 represents an instruction to maximize a selected one of
21 the first or second desktops or applications?

22 ATTORNEY MOSS: Objection, form. Scope.

23 A. No.

24 BY ATTORNEY YANG:

25 Q. Is it because I omitted the word "that"?

1 A. That's part of the problem.

2 Q. Okay. What does "instructions configured to
3 receive a third predetermined input that represents an
4 instruction to maximize a selected one of the first or
5 second desktops or applications" tell you about the
6 relationship between "instructions configured to receive
7 a third predetermined input" and "an instruction to
8 maximize a selected one of the first or second desktops
9 or applications"?

10 ATTORNEY MOSS: Objection, form. Scope.

11 THE WITNESS: I don't understand what you're
12 asking.

13 BY ATTORNEY YANG:

14 Q. I'm trying to understand what this phrase
15 means, because it's a little confusing to me.

16 A. It's very clear to me.

17 Q. Okay. Could you explain what "instructions
18 configured to receive a third predetermined input that
19 represent an instruction to maximize a selected one of
20 the first or second desktops or applications," what does
21 that mean?

22 ATTORNEY MOSS: Objection, form.

23 A. It means exactly what it says. I mean, I
24 wouldn't want to paraphrase it because then that would
25 be changing the meaning.

1 BY ATTORNEY YANG:

2 Q. And what is the meaning?

3 ATTORNEY MOSS: Objection, form.

4 A. The meaning is instructions configured to
5 receive a third predetermined input that represents an
6 instruction to maximize a selected one of the first or
7 second desktops, etc.

8 BY ATTORNEY YANG:

9 Q. I guess I'm specifically confused about the
10 words "that represents."

11 What does "that represents" mean?

12 ATTORNEY MOSS: Objection, form. Scope.

13 A. It's a clause that modifies "input."

14 BY ATTORNEY YANG:

15 Q. In what way?

16 ATTORNEY MOSS: Objection, form.

17 A. By clarifying that it represents an
18 instruction to maximize a selected one of the first or
19 second desktops or applications.

20 BY ATTORNEY YANG:

21 Q. By "it," you mean the instructions configured
22 to receive a third predetermined input?

23 A. No.

24 Q. What do you mean by "it"?

25 A. A third predetermined input.

1 Q. So you're saying a third predetermined input
2 that represents an instruction to maximize a selected
3 one of the first or second desktops.

4 So the input represents an instruction to
5 maximize a selected one of the first or second desktops
6 or applications. Is that right?

7 ATTORNEY MOSS: Objection, form.

8 A. As the claim language says, instructions or --
9 instructions configured to receive a third predetermined
10 input that represents an instruction to maximize a
11 selected one of the first or second desktops or
12 applications.

13 BY ATTORNEY YANG:

14 Q. And the first word, "instruction," in line 10,
15 those instructions are instructions configured to
16 receive the third predetermined input?

17 ATTORNEY MOSS: Objection, form. Scope.

18 BY ATTORNEY YANG:

19 Q. Is that right?

20 A. Well, if you want to be picky, those
21 instructions are configured to receive a third
22 predetermined input.

23 BY ATTORNEY YANG:

24 Q. And it's the third predetermined input, not
25 the word "instructions" at the beginning of line 10,

1 that represents an instruction to maximize a selected
2 one of the first or second desktops or applications.

3 Is that right?

4 ATTORNEY MOSS: Objection, form.

5 A. That's my understanding.

6 BY ATTORNEY YANG:

7 Q. Okay. Then going back to Claim 8, how can the
8 display be maximized according to the instructions
9 configured to receive a third predetermined input?

10 ATTORNEY MOSS: Objection, form. Scope.

11 A. Are you asking how the device in the '756
12 patent does it?

13 BY ATTORNEY YANG:

14 Q. Yeah. If you could give me an example of
15 that, that would help, because I'm struggling with this
16 clause here.

17 ATTORNEY MOSS: Objection, form. Scope.

18 A. We can search. I'm sure they give an example
19 of maximizing.

20 BY ATTORNEY YANG:

21 Q. So just to be clear, that wasn't my full
22 question. I know it gives examples of maximizing. My
23 confusion is how it's maximized according to the
24 instructions configured to receive a third predetermined
25 input. That's the part that I don't understand.

1 ATTORNEY MOSS: Objection to form to the
2 extent that that's a question.

3 THE WITNESS: So what is your question?
4 BY ATTORNEY YANG:

5 Q. My question is how can a display be maximized
6 according to the instructions configured to receive a
7 third predetermined input?

8 ATTORNEY MOSS: Objection, form. Scope.

9 A. One example is those instructions could be
10 configured to receive a third predetermined input that
11 indicates a desire by the user to maximize the display.
12 Or, more specifically, to maximize a desktop or
13 application appearing on that display.

14 BY ATTORNEY YANG:

15 Q. But doesn't the first -- doesn't one part of
16 that say the display can be maximized by a user gesture?

17 ATTORNEY MOSS: Objection, form. Scope.

18 A. The Claim 8 -- Claim 8 says that display can
19 be maximized by a user gesture.

20 BY ATTORNEY YANG:

21 Q. If the claim already says that a display can
22 be maximized by a user gesture, what is the meaning of
23 the additional part, "according to the instructions
24 configured to receive a third predetermined input"?

25 ATTORNEY MOSS: Objection, form. Scope.

1 A. Claim 8 is a dependent claim that derives from
2 Claim 7. So in Claim 8, the phrase "the instructions
3 configured to receive a third predetermined input"
4 refers back to Claim 7. So that's different from "a
5 user gesture" that's an additional limitation in
6 Claim 8. That's why it's a dependent claim. Dependent
7 claims introduce additional limitations.

8 BY ATTORNEY YANG:

9 Q. But if you look at column 36, line 10 -- I'm
10 sorry, line 11, it already says "an instruction to
11 maximize a selected one of the first or second desktops
12 or applications."

13 So what is the additional limitation that's
14 being introduced by Claim 8?

15 ATTORNEY MOSS: Objection, form. Scope.

16 A. One example of an additional limitation in
17 Claim 8 would be a visual indicator.

18 BY ATTORNEY YANG:

19 Q. That makes sense.

20 Is "according to the instructions configured
21 to receive a third predetermined input" also an
22 additional limitation in Claim 8?

23 ATTORNEY MOSS: Objection, form. Scope.

24 A. Well, the element "instructions configured to
25 receive a third predetermined input" appears in Claim 7,

1 if that's what you're referring to.

2 BY ATTORNEY YANG:

3 Q. Sorry, my mistake.

4 My question was the entire phrase starting
5 with "according to." The "according to" requirement
6 with the remaining "to the instructions configure to
7 receive a third predetermined input," that's an
8 additional limitation in Claim 8 that's not in Claim 7.

9 Is that right?

10 ATTORNEY MOSS: Objection, form. Scope.

11 A. Yes. The "according to" requirement is an
12 additional limitation of Claim 8.

13 ATTORNEY YANG: Okay. Could we please take a
14 look at Exhibit 1005, which is the Lee patent
15 application.

16 THE WITNESS: Okay.

17 (Exhibit No. 1005, previously marked, was
18 referenced and indexed.)

19 BY ATTORNEY YANG:

20 Q. And do you personally know any of the Lee
21 inventors?

22 A. I don't believe I know any of the inventors.

23 Q. I apologize for this repetitive question, but
24 I actually got a response yes once so I'm very curious.

25 And were you aware of Lee prior to your work

1 in this IPR?

2 A. I don't believe I saw this reference prior to
3 this matter.

4 Q. Okay. Could we turn to page 3, Figure 2 of
5 Lee.

6 A. Okay.

7 Q. Does Figure 2 of Lee show -- I'm sorry.
8 Does Figure 2 of Lee show an embodiment of
9 Lee's invention?

10 ATTORNEY MOSS: Objection, form.

11 A. Paragraph 13 says at Figure 2 is: An
12 exemplary perspective view of the mobile terminal in
13 accordance with an embodiment of the present invention.

14 BY ATTORNEY YANG:

15 Q. And how many physical screens are shown in
16 Figure 2?

17 ATTORNEY MOSS: Objection, form.

18 A. Paragraph 28 explains that the device includes
19 a first display screen 105 and a second display screen
20 106.

21 BY ATTORNEY YANG:

22 Q. And what is displayed on display screen 105 in
23 Figure 2?

24 ATTORNEY MOSS: Objection, form.

25 A. It appears to be some text.

1 BY ATTORNEY YANG:

2 Q. And what is displayed on display screen 106 in
3 Figure 2?

4 A. The second display screen 106 shows various
5 buttons.

6 Q. Could we please look at Figure 6 on page 7.

7 A. Okay.

8 Q. Could you confirm that Figure 6 also shows two
9 display screens, 105 and 106?

10 A. Yes, it does.

11 Q. And what is the dotted box 204?

12 A. In paragraph 48, it refers to box 204 as the
13 initial auxiliary information.

14 Q. And that's the information for the music
15 program displayed in 105 and 106.

16 Is that right?

17 ATTORNEY MOSS: Objection, form. Scope.

18 A. No. I don't see where the reference says
19 that.

20 BY ATTORNEY YANG:

21 Q. Okay. I guess my other question would be what
22 is the auxiliary information 204 then?

23 What is it information of?

24 ATTORNEY MOSS: Objection, form. Scope.

25 A. It would depend on the application.

1 BY ATTORNEY YANG:

2 Q. And so there is an application open in
3 Figure 6, isn't there?

4 A. There appears to be.

5 Q. And so would one of ordinary skill conclude
6 that the information shown in 204 is the information of
7 that application?

8 ATTORNEY MOSS: Objection, form. Scope.

9 A. It's the initial auxiliary information.

10 BY ATTORNEY YANG:

11 Q. Okay. And Figure 6 also has a arrow, dotted
12 arrow.

13 Do you see that?

14 A. Yes.

15 Q. And what is that?

16 A. The dotted arrow appears to simply be a
17 graphical element to refer to what the text is
18 describing in paragraph 48.

19 Q. Okay. Could we take a look at Figure 11 on
20 page 11.

21 A. Okay.

22 Q. And can you confirm for me that the same thing
23 is displayed on 105 in Figures 11A, B, C, and D?

24 ATTORNEY MOSS: Objection, form. Scope.

25 A. The same as what?

1 Q. As each other.

2 ATTORNEY MOSS: Objection, form. Scope.

3 A. The graphics appear the same on the left
4 portion 105.

5 BY ATTORNEY YANG:

6 Q. Okay. And what is shown in 105?

7 ATTORNEY MOSS: Objection, form. Scope.

8 A. It looks like a -- part of it includes a --
9 what looks like a line drawing of a woman.

10 BY ATTORNEY YANG:

11 Q. And in Figure 11A, what's shown in 106?

12 ATTORNEY MOSS: Objection, form. Scope.

13 A. Paragraph 54 explains that the second display
14 screen 106 shows a screen for inputting texts to create
15 the message in Figure 11A.

16 BY ATTORNEY YANG:

17 Q. And is the message in 106 in Figure 11A the
18 same or a different program than what's shown in 105?

19 ATTORNEY MOSS: Objection, form. Scope.

20 A. As paragraph 54 explains, this figure is
21 illustrating multitasking, and the process of creating
22 or sending a message is an additional task.

23 BY ATTORNEY YANG:

24 Q. Okay. And does Figure 11B show the same
25 message program in 106 as Figure 11A in 106?

1 ATTORNEY MOSS: Objection, form. Scope.

2 A. Figure 11B shows a message handling display
3 that's similar to what's in Figure 11A on screen 106.
4 But in Figure 11B, we see that there is additional text
5 that has been entered into the message handling
6 application.

7 BY ATTORNEY YANG:

8 Q. So to confirm, it's the same message handling
9 application 106 in -- in 106 in both 11A and B, but in
10 11B, the user has entered text into it?

11 ATTORNEY MOSS: Objection, form. Scope.

12 A. As I said, in 11B, we see that there's
13 additional text entered into the display that we do not
14 see in Figure 11 -- or in Figure 11A.

15 BY ATTORNEY YANG:

16 Q. And in Figure 11C in 106, does that show the
17 message being sent?

18 ATTORNEY MOSS: Objection, form. Scope.

19 A. Paragraph 54 says that the user can complete
20 the message transmission as shown in Figure 11C.

21 BY ATTORNEY YANG:

22 Q. Okay. Do you have a copy of your declaration?

23 A. I do.

24 Q. Great.

25 Could you look at page 6.

1 A. Okay.

2 Q. So on page 6, Section XIV is titled Ground 5:
3 Claims 1 through 3, 6, 7 and 9 are Anticipated by
4 Aguilar.

5 And so Claim 8 is not included in ground 5, is
6 that right?

7 A. On page 6, the caption for Section XIV says
8 that -- for ground 5 says that Claims 1 to 3, 6, 7, and
9 9 are anticipated by Aguilar.

10 Q. And so I just wanted to confirm. Claim 8 is
11 not in that section, is that right?

12 A. That is correct.

13 Q. Okay. So then looking on the next page, page
14 7, Section XV is titled Ground 6: Claims 1 to 3, 6, 7
15 and 9 are Obvious Over Aguilar. And I just wanted to
16 confirm again that Claim 8 is not included in
17 Section XV.

18 Is that right?

19 ATTORNEY MOSS: Objection, form.

20 A. That is correct.

21 ATTORNEY YANG: Okay, thank you. That was
22 very helpful. I have no further questions.

23 ATTORNEY MOSS: Mitch, let's go off the record
24 for like five minutes just to make sure I have no
25 redirect and then we can probably wrap this up.

1 ATTORNEY YANG: Okay. Yeah, sure. Take your
2 time. Thank you.

3 (Recess taken.)

4 ATTORNEY MOSS: I have no questions.

5 Dr. Rodriguez, you had something to say?

6 THE WITNESS: Yes. Regarding my declaration,
7 I just wanted to point out that there were two typos or
8 clerical errors at paragraph 148 and 161.

9 The phrase "a VRAM," V-R-A-M, (video random
10 access memory) should be changed to "ROM," R-O-M, "918."
11 Somehow, there was a clerical error in the drafting that
12 affected paragraphs 148 and 161.

13 ATTORNEY MOSS: Do those clarified areas
14 change any of the opinions in your declaration?

15 THE WITNESS: They do not.

16 ATTORNEY MOSS: All right. Nothing further.

17 ATTORNEY YANG: I think that ends the
18 deposition then.

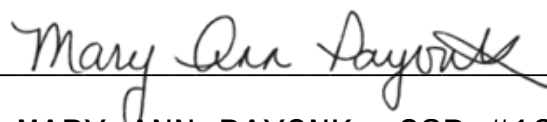
19
20 (Deposition adjourned at 3:32 p.m.)
21
22
23
24
25

- REPORTER'S CERTIFICATE -

I, MARY ANN PAYONK, shorthand reporter and Notary Public, CA CSR No. 13431, do hereby certify that the witness whose deposition is hereinbefore set forth was sworn by agreement of all parties, that the proceedings were reported stenographically by me, and that this transcript is a true, correct, and full record of the testimony given.

I further certify that I am not related to any of the parties to this action by blood or by marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 12th day of August, 2025.

A handwritten signature in cursive script, reading "Mary Ann Payonk", is written over a horizontal line.

MARY ANN PAYONK, CSR #13431

Virginia Notary Registration No. 219251

My Commission expires 8/21/2026

ERRATA SHEET FOR: DR. JEFFREY J. RODRIGUEZ
CASE CAPTION: Motorola and Google vs. Multifold
DEPOSITION DATE: August 6, 2025

Page _____ Line _____ Reason _____
From _____ to _____
Page _____ Line _____ Reason _____
From _____ to _____

Page _____ Line _____ Reason _____
From _____ to _____
Page _____ Line _____ Reason _____
From _____ to _____

Page _____ Line _____ Reason _____
From _____ to _____
Page _____ Line _____ Reason _____
From _____ to _____

Page _____ Line _____ Reason _____
From _____ to _____
Page _____ Line _____ Reason _____
From _____ to _____

Page _____ Line _____ Reason _____
From _____ to _____
Page _____ Line _____ Reason _____
From _____ to _____

Page _____ Line _____ Reason _____
From _____ to _____
Page _____ Line _____ Reason _____
From _____ to _____

Signature of Deponent

Date

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I,

DR. JEFFREY J. RODRIGUEZ,

state that I have read the foregoing deposition and
declare under penalty of perjury:

That the foregoing is my deposition under
oath;

That I have read same and have made the
necessary corrections, additions or changes to my
answers that I deem necessary;

That my answers as indicated are true and
correct.

Executed at _____ this
_____ day of _____, 2025.

DR. JEFFREY J. RODRIGUEZ

<u>WORD INDEX</u>			
< 1 >	1	13:22	74:14
		14:23 15:22	11:05 47:8
		16:3, 17	11:30 2:5
		37:19, 22, 25	1100 3:5
		38:8, 11, 17,	115 13:13, 16,
		18, 23 48:22	18, 21 14:2,
		50:25 51:17	18
		52:9 54:14	117 13:19, 25
		75:3, 8, 14	14:2, 18, 22,
	1:20	46:13	23
	10	5:15	11A 72:23
		11:21 17:17	73:11, 15, 17,
		56:18, 20	25 74:3, 9, 14
		61:24 62:18	11B 73:24
		65:14, 25	74:2, 4, 10, 12
		68:9	11C 74:16, 20
	100	11:19, 21	12 4:11
		37:22, 25	11:3, 5 45:6
	1001	4:8	120 15:23
		47:12, 14	16:4, 10, 11,
		48:11, 19	14, 17, 19, 24
	1004	4:9	38:8, 9
		37:3, 5	1280 15:6
	1005	4:10	12th 77:14
		69:14, 17	13 70:11
	1006	17:3	13431 2:11
	1007	4:11	5:2 77:3, 17
		12:2, 8	140 38:5, 7,
	1010	4:7	18
		8:11, 13	148 76:8, 12
	1024	15:1, 6	16 54:20
	105	70:19, 22	161 76:8, 12
		71:9, 15	
		72:23 73:4,	< 2 >
		6, 18	2 13:9, 12,
	106	70:20	24 14:14, 19,
		71:2, 4, 9, 15	23, 25 15:10
		73:11, 14, 17,	52:6 70:4, 7,
		25 74:3, 9, 16	8, 11, 16, 23
	10A	52:1	71:3
	10-minute	47:4	2:05 47:7
	11	68:10	20 5:15
		72:19, 20	20036 3:18
			2019 11:3, 5
			2025 1:19
			2:4 77:14
			78:3 79:13
			204 71:11, 12,
			22 72:6
			2050 3:5, 17
			219251 77:18
			22 58:10
			22182 3:12
			23 48:21
			25 48:7
			54:20
			2560 15:1
			2598 1:25
			26 50:23, 25
			270 3:11
			28 70:18
			< 3 >
			3 13:10
			39:8, 9, 12
			40:4 54:12,
			14 55:12, 16,
			22 70:4
			75:3, 8, 14
			3:32 76:20
			35 48:8, 19,
			21 50:23
			51:20 54:11
			36 50:1, 24
			56:18 58:10
			61:25 62:18
			68:9
			37 4:9
			< 4 >
			4 49:5 50:1
			401 40:22
			41:24 42:2,
			6, 15, 18
			403 42:6, 18,
			22
			406 24:20, 21,
			23, 24 25:2
			26:9, 10
			410 24:18, 19
			25:5, 12, 21
			31:20
			411 43:18
			413 42:24
			43:16
			415 42:24
			42 48:8
			421 44:5
			423 44:5, 17
			425 44:17
			43 51:20
			431 23:19, 25
			24:4, 7, 10,
			15 35:20, 25
			36:7, 12, 15,
			21 44:23
			432 18:13, 15
			19:24 21:1
			22:3, 5, 7, 15,
			21 23:15, 17
			24:5 35:11,
			20, 24 36:7,
			11
			433 44:24
			434 35:10, 20
			44 42:3
			440 34:21, 25
			35:2
			45 51:21
			52:7
			46 52:7
			47 4:8 48:8,
			17
			48 71:12
			72:18
			49 54:11
			4A 40:19, 24
			41:2, 10, 12,
			24 42:5
			4B 42:23
			4C 44:3, 17
			4D 24:12, 14
			44:23
			4E 22:13, 15,
			17, 21 23:1,
			9, 16 38:19,
			22 39:2
			< 5 >

5 4:4 17:16, 19, 20, 25 18:2, 4, 9, 17 19:12, 15, 17 20:14 23:19, 25 24:7, 17, 18, 24 25:6, 12 28:23, 24 40:20 41:10 49:17 52:14 75:2, 5, 8 50 5:20 44:8 54:11, 12 510 19:25 21:2 25:6, 12, 21 27:9, 13 30:20 52 45:1 530 21:21, 25 22:2, 8, 18 25:6, 13, 21 27:17, 21, 24 28:3, 5 30:19 535 21:23 54 73:13, 20 74:19 5A 17:20, 22, 25 18:3, 5, 12, 17 19:12, 15, 20 20:4, 6, 13, 17, 21 21:3, 6, 10, 12, 14, 22, 23 22:7, 18, 22, 25 23:8, 16 24:24 25:6, 13 5B 17:23 18:3, 5, 14, 18 19:12, 20 20:1, 4, 6, 20, 24 21:4, 7, 11, 13, 15 22:8 24:25 25:7, 13, 25 26:11	5C 25:22, 24 26:16, 20 27:19, 22, 24 28:1, 7 5D 26:17 5E 26:10 28:25 29:4, 10, 12, 15 5F 29:14 < 6 > 6 1:19 2:4 21:8 23:22 24:1, 3, 9 29:19, 21, 23 30:2, 4, 8, 12, 15, 18, 22, 24 31:5 34:9, 17 71:6, 8 72:3, 11 74:25 75:2, 3, 7, 8, 14 78:3 69 4:10 6A 30:6, 11, 14, 18, 22 31:25 32:3, 6, 7 33:13, 15, 17 34:9, 14, 17, 21 6B 31:11, 12, 13 32:1, 3, 6, 7 33:13, 16, 17 34:14 6C 31:16, 18 < 7 > 7 27:3, 12, 25 30:15, 17 33:21, 22, 24, 25 34:3, 8, 16 45:15, 20 56:18 58:12 59:18 68:2, 4, 25 69:8 71:6 75:3, 8, 14	73 46:3, 5, 8, 22, 25 47:1 756 6:17 47:12, 17 48:1, 3 49:24 66:11 76 45:7, 24 46:1, 9, 21, 25 47:1 7A 34:2, 8, 11, 16, 20 35:2 7B 34:11 35:3, 4, 5, 6, 8, 10, 13, 19, 24 36:6, 8, 12 45:5, 7, 23, 24 46:3, 5, 9 7C 35:7, 25 36:6, 11, 16, 22 < 8 > 8 4:7 51:25 58:11 60:4, 24, 25 61:12 66:7 67:18 68:1, 2, 6, 14, 17, 22 69:8, 12 75:5, 10, 16 8/21/2026 77:19 83 46:25 8607 3:11 < 9 > 9 59:17 60:3 75:3, 9, 15 9,134,756 1:12 9:45 28:12 90 40:23 918 76:10 92614 3:6	< A > A.App 39:12, 16, 19 a.m 2:5 AB 42:4, 10, 11, 13, 14, 17, 20 ability 50:4 able 16:24 56:5 access 76:10 accurate 6:9 achieved 52:11 acknowledge 2:13 acting 53:23 57:25 action 31:4 52:15, 16, 23 53:6, 19 77:10 activate 44:9 49:9, 10 activation 44:6, 7 addition 32:18 additional 67:23 68:5, 7, 13, 16, 22 69:8, 12 73:22 74:4, 13 additions 79:8 adjective 57:25 adjourned 76:20 administered 2:15 adverb 57:25 agree 24:23 25:5 26:9 27:9, 17 50:14 agreement 2:9 77:5
---	--	---	---

Aguilar 6:16 17:4, 9 18:4, 21 19:22 20:8 21:12 22:19, 23 24:21 26:7, 19 27:3, 12, 21 28:22, 24 30:13, 18 31:9 32:4, 11, 16, 20, 23 33:12, 16 75:4, 9, 15 Aguilar's 26:25 allow 10:14 allowed 18:6 Analysis 9:17 53:13 54:7 analyze 55:10 analyzed 56:14 analyzing 9:18 and/or 48:23 50:5 52:17 Ann 1:24 2:10 5:1 77:2, 17 Anniliese 3:21 answer 6:5 9:3 45:19, 21 answers 79:9, 10 Anticipated 75:3, 9 apologize 27:16 33:19 36:3 69:23 APPEAL 1:2 appear 18:25 23:15 30:13 54:25 73:3 APPEARANCES 3:1 appearing 58:15 67:13 appears 23:17 40:8 68:25	70:25 72:4, 16 application 15:11, 13, 14, 15, 16 16:23 18:11, 13, 15 19:23 21:1 27:5, 7 30:20 31:14, 15, 17, 19, 22 35:13, 14 36:13, 16, 23, 25 39:13, 15, 17 42:21 43:15, 18, 20, 21, 23, 24, 25 51:2 52:2 58:14 59:10, 14 60:11 67:13 69:15 71:25 72:2, 7 74:6, 9 applications 6:12 15:17 35:17, 20 48:23 49:10 51:19 56:24 59:21 62:4, 12, 21 63:5, 9, 20 64:19 65:6, 12 66:2 68:12 appreciate 7:7 11:9 area 44:11, 12 45:3 46:1, 6, 20, 21 47:1 areas 43:24 76:13 Arizona 8:20, 24 9:4 10:4 arrow 17:19, 22 19:14, 19 20:3, 5, 12 21:14 32:6, 10, 12, 13, 15,	18, 25 42:6, 9 43:2, 3 44:5, 17, 24 72:11, 12, 16 arrows 17:25 18:2, 19, 25 19:6, 11 20:9, 10 42:24, 25 43:8 art 6:15 32:21 asked 9:7 asking 5:12 25:10, 12 34:16 45:9 56:4 61:2, 18 63:12 66:11 aspects 40:15 assign 20:9 assigned 25:18 associated 45:12, 15 Attorney 4:4 5:9 6:25 7:2, 10, 12 8:10, 15 9:10, 14 11:24 12:1, 4, 10, 24 13:1, 4, 8, 17, 20 14:1, 5, 9, 12, 17, 21 15:18, 20, 24 16:1, 2, 5, 8, 9, 18 17:1 18:20, 23 19:1, 4, 7, 10, 13, 18, 21 20:2, 7, 11 21:5, 9, 16, 18 22:9, 11 23:2, 6, 7, 10, 13, 14, 21, 24 24:2, 6 25:1, 4, 8, 11, 15,	17 26:2, 5, 8, 12, 15 27:2, 8, 11, 15, 18 28:4, 8, 12, 14, 16 29:5, 8, 9, 16, 18 30:10 31:1, 3 32:2, 5, 17, 24 33:2, 6, 9, 11, 14, 18 34:10, 15, 18, 23 35:12, 18, 22, 23 36:10, 14, 17, 20 37:2, 7 38:2, 4 39:3, 21, 23 40:7, 9 41:6, 9, 15, 18 43:11, 13 45:8, 13, 25 46:2, 4, 7, 17, 19, 23 47:2, 6, 11, 16 48:13, 16 49:4, 13, 16, 22, 25 50:8, 11, 13, 18, 22 51:6, 9, 11, 15, 24 52:5, 13, 19, 22, 24 53:2, 4, 7, 9, 11, 14, 17, 21, 24 54:2, 5, 9, 18, 22, 24 55:4, 8, 11, 18, 21 56:3, 4, 7, 12, 15 57:9, 12, 15, 17, 23 58:1, 8, 9, 22, 25 59:3, 5, 8, 16 60:5, 10, 14, 17, 19, 22 61:4, 9, 11, 17, 21, 23 62:13, 16, 17, 22, 24 63:10,
--	---	---	---

13, 22 64:1, 3, 8, 12, 14, 16, 20 65:7, 13, 17, 18, 23 66:4, 6, 10, 13, 17, 20 67:1, 4, 8, 14, 17, 20, 25 68:8, 15, 18, 23 69:2, 10, 13, 19 70:10, 14, 17, 21, 24 71:1, 17, 20, 24 72:1, 8, 10, 24 73:2, 5, 7, 10, 12, 16, 19, 23 74:1, 7, 11, 15, 18, 21 75:19, 21, 23 76:1, 4, 13, 16, 17 attorneys 2:12 audio 18:12, 15 19:24 21:1 22:3, 5, 7, 15, 21 23:15, 17 24:5 30:8 34:6 35:11, 14, 20, 24 36:7, 11, 23, 25 August 1:19 2:4 77:14 78:3 auxiliary 71:13, 22 72:9 aware 12:14 17:9 37:11 48:3 54:3 55:6 56:8, 10 69:25 awkward 29:25 < B >	B.App 39:15, 17, 20 back 13:24 24:17 28:12, 17 44:17 47:6 54:3 66:7 68:4 bar 39:19 40:8, 10 46:8, 10, 16, 18, 20, 21 based 30:23 48:17 53:18 beginning 65:25 BEHALF 3:2, 8, 14 7:9, 14, 19, 23 8:4, 7 believe 8:11 10:20 12:4, 13 13:5 17:4, 8 19:8, 25 22:19, 23 32:11 37:10 45:9 48:2 69:22 70:2 bit 28:9 blood 77:10 BlueBear 3:21 BOARD 1:2 bottom 41:4 43:3 48:10, 18 boundary 47:1 box 42:2, 15, 17 46:12 71:11, 12 Bravo 26:3, 4, 11 break 28:10, 18 47:4 brief 9:15 briefly 10:9 45:17 brightness 10:19	button 38:20 buttons 71:5 < C > CA 2:10 3:6 77:3 cabinets 49:10 California 5:2 call 45:2, 3 called 5:5 49:8 caption 75:7 78:2 CARMICHAEL 3:10 Case 1:11 78:2 cases 6:1 cause 59:13 CB 42:4 CD 42:4 Center 3:11 34:21, 24 35:2 certain 47:22 CERTIFICATE 77:1 certify 77:3, 9 change 10:18 76:14 changed 76:10 changes 79:8 changing 39:1, 4 63:25 cite 11:15 Claim 48:22 50:25 51:17 52:6, 9 54:12, 14 55:12, 16, 22 56:17, 18 58:11, 12 59:9, 17, 18 60:3, 4, 24, 25 61:12 65:8 66:7	67:18, 21 68:1, 2, 4, 6, 14, 17, 22, 25 69:8, 12 75:5, 10, 16 claims 68:7 75:3, 8, 14 clarification 30:9 52:18 clarified 76:13 clarify 7:1 9:3 14:2 20:16 23:11 29:7 34:4 48:9 clarifying 64:17 clarity 49:21 50:6 clause 64:13 66:16 clear 30:21 32:20 33:15 63:16 66:21 clearest 36:5 clerical 76:8, 11 close 31:14 35:2 closed 36:25 code 51:13 Coleman 3:21 colon 57:3 column 21:8 23:22 24:1, 3, 9 27:3, 12, 25 30:15, 17 48:19, 21 49:5, 17 50:1, 23 51:20, 25 52:7, 14 54:11, 20 56:18 58:10 61:25 62:18
---	---	---	--

68:9	60:2, 3, 12,	corrections	deeper 54:7
combined 15:4	20, 25 62:1,	79:8	define 54:25
come 28:12	6, 10, 19	correctly	defines 49:5,
47:6	63:2, 6, 18	38:21 41:21	17 50:2, 15,
command 16:20,	64:4, 21	corresponding	19 52:14
22	65:9, 15, 21	27:6	definition
comment 56:5	66:9, 24	corresponds	49:21 50:7
Commission	67:6, 10, 24	43:8	53:18
77:19	68:3, 20, 24	counsel 2:9	degrees 40:23
common 9:25	confirm 6:11,	6:5 15:24	depend 71:25
10:13	22 10:24	count 5:14	dependent
communicate	14:22 47:20	couple 39:22	68:1, 6
6:23 16:25	71:8 72:22	course 9:16,	depict 21:7
complete 6:9	74:8 75:10,	17, 20, 21	30:2 31:12
45:18 74:19	16	47:22	33:4, 25 35:5
completed	confuse 21:20	courses 8:23	depicted
44:22	confused 64:9	9:1, 4, 8, 12	14:10 18:9,
components	confuses 36:2	Court 6:1	12 20:1
50:3	confusing	covers 31:19	29:4, 10
composition	21:15 63:15	create 73:14	30:22 34:13
44:10, 11, 13,	confusion	creating 73:21	40:5 45:4
20, 22	66:23	CSR 2:10	depicting
comprises	connected	77:3, 17	18:5 28:1, 7
55:17 56:1	16:17	curious 69:24	29:12 30:4,
comprising	consequence	currently	24 34:1
48:24 54:15	20:18, 21	8:19, 23 10:3	depiction 34:5
55:13, 23	30:14	CV 8:11, 19	depicts 19:16
computer	considered	11:8	20:13, 17, 21,
49:19 50:21	49:7	< D >	24 33:3 35:6
61:6, 7, 8	consistent	D.C 3:18	DEPONENT 4:2
computer-	31:8	data 16:20	78:24
readable	construction	date 11:5	deposed 5:13
58:11 59:18	36:2, 5	78:3, 24	DEPOSITION
concerns 9:17	contain 35:16	DAVID 3:15	1:17 2:7, 12,
conclude 7:4	content 27:4	day 77:14	14 6:24
72:5	context 49:24	79:13	11:11, 14, 24
condition	conversions	declaration	12:19 17:14
51:19, 23	47:7	6:15 8:3	28:19 37:16
conducted 10:6	copy 74:22	10:20 45:10	45:16 47:18
conducting	correct 8:21	74:22 76:6,	76:18, 20
10:3	10:22, 23	14	77:4 78:3
configure 69:6	12:21 33:8	declarations	79:3, 5
configured	37:18, 23	7:8, 13, 18, 22	derives 68:1
38:19 56:21	53:1 75:12,	declare 79:4	describe 10:9
57:1, 7, 19	20 77:7	deem 79:9	describing
58:16, 20	79:11		72:18
59:11, 23			desire 67:11

desktop 49:3, 6, 7 51:2 58:14 59:10, 14 60:11 67:12 desktops 48:23 51:18 56:23 59:20 62:3, 12, 21 63:5, 8, 20 64:7, 19 65:3, 5, 11 66:2 68:11 detailed 45:18 detection 9:23, 25 10:12 determine 51:13 device 14:8 16:13 26:6, 18 32:3 38:12 40:17 43:7 48:24 50:4 51:3, 7 60:23 66:11 70:18 devices 14:7 difference 34:7, 20 49:23 60:1 different 15:17 25:7, 13, 14, 16, 18, 21 30:20 34:13 36:4 38:14 39:15 40:15 52:20 60:6, 18 61:21 68:4 73:18 Digital 9:17, 18 dimensions 15:3 39:2 direct 17:16	24:12 58:10 disclose 33:13 discuss 9:21 32:11 49:12 discussed 9:11 21:7 26:6, 18 32:4, 16 discusses 24:10 discussing 40:4 discussion 32:12 display 14:4, 15 18:6, 11, 16 24:21, 25 25:3 26:9, 10, 13, 14 31:18, 21 34:12 35:15 36:11, 13 37:1 38:11 40:11 43:24 44:10 49:15, 18, 19, 21, 23 50:10, 17, 19, 21 51:3 58:15 66:8 67:5, 11, 13, 16, 18, 21 70:19, 22 71:2, 4, 9 73:13 74:2, 13 displayed 18:16 42:21 43:15, 19 52:3 56:25 57:14 58:4, 5, 13 59:22 62:5 70:22 71:2, 15 72:23 displaying 48:22 51:17	displays 14:20 56:25 58:13 59:22 62:5 distortion 30:8 District 6:1 document 12:3, 15 documents 6:19 11:12 49:11 doing 9:24 26:23 dotted 42:1, 15, 17 71:11 72:11, 16 DR 1:17 2:7 4:3 5:4 76:5 78:1 79:2, 16 drafting 76:11 dragging 18:7, 8, 10 19:16 20:14, 18 30:20 31:6, 7, 10 drags 34:6 drawing 73:9 Drive 3:11 dual 42:4, 12, 20 duly 5:5 duration 55:3 < E > e.g 19:24 21:1 earlier 20:12 21:10, 12 Eastern 2:5 47:7 echo 29:1, 2 edge 9:22, 24 10:12, 15, 16, 17 edit 10:15	either 10:6 15:19 20:10 27:5 electronic 6:15, 19 30:7 Element 24:19, 20, 21, 23, 24 27:13, 17, 21, 24 28:3 40:22 42:22 43:18 46:1, 3, 5 68:24 72:17 elements 42:24 51:12 elongated 39:24 40:5 46:12 email 46:5, 21 embodiment 70:8, 13 ends 76:17 entered 74:5, 10, 13 enters 16:21 entire 69:4 entirety 13:3, 5 equates 54:21 ERRATA 78:1 error 76:11 errors 76:8 ESQ 3:3, 9, 15 estimate 11:16 event 44:24, 25 45:3 exact 5:14 exactly 63:23 Examination 4:4 5:8 EXAMINATIONS 4:1 examined 5:6 example 10:12 38:20 39:5 44:8, 12, 13, 16 45:1
---	--	---	---

52:1 53:20 54:19, 21 61:19 66:14, 18 67:9 68:16 examples 55:15 66:22 execute 51:7 Executed 79:12 execution 16:21 exemplary 70:12 Exhibit 4:7, 8, 9, 10, 11 8:11, 13 12:2, 8 17:3 37:3, 5 47:12, 14 48:11, 19 69:14, 17 EXHIBITS 4:6 expert 7:8, 13, 18, 22 8:3 expires 77:19 explain 20:8 26:16 28:22 44:7 63:17 explains 13:18 16:19 18:4 24:21 27:4, 25 32:23 42:3 44:8 45:1 52:2 54:19 70:18 73:13, 20 explicitly 6:6 30:14 54:25 61:5 expresses 52:16 extent 34:18 67:2 < F > face 22:6	facilitate 10:1 fact 41:19 fair 8:6 11:18 12:22 20:20 21:10 30:24 32:14 33:12 35:19 50:9 54:10 56:16 58:5 familiar 12:22 far 28:22 faster 47:23 February 11:3, 5 Figure 13:9, 12, 22, 24 14:14, 19, 23, 25 15:10, 22 16:3, 17 17:16, 19, 20, 22, 23, 25 18:2, 3, 9, 12, 14, 17 19:15, 17 20:1, 6, 13, 14, 17, 20, 21, 24 21:10, 11, 12, 13, 14, 15, 22, 23, 25 22:7, 8, 13, 15, 17, 18, 25 23:1, 8, 9, 16, 19, 25 24:7, 10, 12, 14, 17, 18, 24, 25 25:6, 7, 12, 13, 22, 24, 25 26:10, 11, 16, 17, 20 27:19, 22, 24 28:1, 3, 7, 23, 24, 25 29:4, 10, 12, 14, 15, 19, 21, 23 30:2, 4, 6, 11, 12, 14, 15, 17, 24 31:5, 11, 12,	13, 16, 18, 25 32:1 33:13, 15, 16, 17, 21, 22, 24, 25 34:2, 3, 20, 21 35:4, 6, 7, 8, 10, 13, 14, 19, 24, 25 36:6, 8, 11, 12, 16, 22 37:19, 22, 25 38:8, 11, 17, 18, 19, 22, 23 39:2, 8, 9, 12 40:4, 19, 23, 24 41:2, 10, 12, 24 42:5, 23 43:5 44:3, 17, 23 45:4, 5, 7, 9, 11, 15, 20, 22, 23, 24 46:3, 5, 9 52:1 57:21 70:4, 7, 8, 11, 16, 23 71:3, 6, 8 72:3, 11, 19 73:11, 15, 17, 20, 24, 25 74:2, 3, 4, 14, 16, 20 Figures 18:4, 24 19:5, 8, 12, 20 20:4 21:3, 6 22:21 23:18 25:2, 19 30:18, 22 32:3, 6, 19, 22, 23 34:8, 9, 11, 14, 16 35:2 72:23 files 49:10 find 21:23 61:18 Fine 5:11	finger 26:21, 23 29:21, 23, 24 30:2, 4, 21 31:4, 6, 8, 12, 13 33:24 35:5, 6 fingers 18:10 19:17 20:14, 18 29:7, 11, 12 first 19:14 20:12 41:2 43:2 50:25 51:1, 3, 18 52:10 56:23, 25 58:12 59:12, 20, 22 62:3, 5, 12, 21 63:4, 8, 20 64:6, 18 65:3, 5, 11, 14 66:2 67:15 68:11 70:19 five 75:24 folders 49:9, 11 follows 5:7 foregoing 79:3, 5 form 6:25 7:10 9:10 12:24 13:4, 17 14:1, 9, 17 15:18 16:5, 18 18:20 19:1, 7, 13, 21 20:7 21:5, 16 22:9 23:2, 10, 21 24:2 25:1, 8, 15 26:5, 12 27:2, 11, 18 28:4 29:5, 16 31:1 32:2, 17
--	--	--	--

33:2, 9, 14 34:10, 18 35:12, 22 36:10, 17 38:2 39:3, 21, 24 40:7 41:6, 15 43:11 45:8, 25 46:4, 17, 23 48:13 49:4, 16, 25 50:11, 18 51:6, 11, 24 52:13, 22 53:2, 11, 17, 24 54:5, 18, 24 55:8, 18 56:3, 12 57:9, 15, 23 58:8, 22 59:3, 8 60:5, 14, 22 61:4, 7, 11, 17 62:13, 22 63:10, 22 64:3, 12, 16 65:7, 17 66:4, 10, 17 67:1, 8, 17, 25 68:15, 23 69:10 70:10, 17, 24 71:17, 24 72:8, 24 73:2, 7, 12, 19 74:1, 11, 18 75:19 format 23:8, 12 forth 59:18 77:4 fourth 30:17 full 29:6 43:15, 19, 21 66:21 77:7 function 16:21 51:13	functional 44:11 45:3 further 49:12, 20 50:6 52:18 75:22 76:16 77:9 < G > generally 49:7 generates 44:9 generation 44:24, 25 GEOFFREY 3:3 gesture 18:7, 9 29:13, 15, 23, 24 30:3, 5, 7, 11, 15 34:1, 3 35:6, 8, 24 36:6 52:11, 12, 15, 18, 20, 23 53:10, 16, 20 54:4, 15, 16 55:2, 13, 14, 15, 23, 24, 25 58:16 67:16, 19, 22 68:5 gestures 55:6 56:10, 13 give 6:8 9:15 45:11, 18 66:14, 18 given 18:19, 25 19:6 77:8 gives 49:20 50:6 52:17 66:22 go 54:7 75:23 goes 49:12 Going 13:24 24:17 54:3 66:7 Good 5:10, 12 GOOGLE 1:5 3:14 7:9, 14, 16 78:2	graphical 9:25 10:10, 14 32:18 49:11 72:17 graphics 73:3 Great 8:18 74:24 Ground 75:2, 5, 8, 14 guess 14:6 17:7 18:17 38:14 54:10 55:22 64:9 71:21 < H > hand 26:20, 23 29:4, 6 77:14 handling 45:3 46:5, 21 74:2, 5, 8 happened 36:22 happens 19:16 20:13, 24 34:5, 8 36:15, 19 hardware 50:3 HASTINGS 3:16 hate 47:7 hear 15:24 help 66:15 helpful 9:6 11:22 15:21 17:2 44:2 75:22 hereinbefore 77:4 hereunto 77:13 HERRINGTON 3:4 hiding 43:21 hold 54:16, 23 55:1, 7, 13, 16, 23, 25 56:11 home 43:2, 4, 5, 6, 9, 22	horizontal 39:22, 24 hour 28:9 47:3 hours 11:19 hypothetical 53:25 < I > icons 49:8 idea 52:16 identified 39:13, 18 identify 27:21 illustrating 73:21 illustration 33:4, 5 34:11 Image 9:17, 23, 24 10:12, 13, 15, 18 images 9:18, 25 implement 16:16 implementations 10:13 implemented 22:25 23:5 important 28:6 include 38:19 included 75:5, 16 includes 16:13 24:4 49:8 50:3 70:18 73:8 incoming 45:2 increasing 39:5 INDEX 4:1, 6 indexed 8:14 12:9 37:6 47:15 69:18 indicated 79:10
---	--	--	--

indicates 40:11 67:11	inputting 73:14	interference 30:7	79:2, 16
indicating 17:25 18:2	instances 15:16	intermediate 34:5	Job 1:25
indicator 38:10, 13, 16, 20, 22, 23 39:2 58:13 68:17	instruction 51:2 56:22 57:6, 18, 20, 22 58:6 59:19 62:2, 11, 20 63:4, 7, 19 64:6, 18 65:2, 4, 10, 14 66:1 68:10	INTERNATIONAL 1:8	< K >
information 71:13, 14, 22, 23 72:6, 9	instructions 51:8, 10, 12 56:21 57:1, 11, 14 58:16, 19, 24 59:2, 7, 11, 12, 23 60:1, 3, 12, 20, 25 61:2, 7, 10, 14, 25 62:1, 6, 9, 18 63:2, 6, 17 64:4, 21 65:8, 9, 15, 21, 25 66:8, 24 67:6, 9, 23 68:2, 20, 24 69:6	interpret 18:22	key 43:3, 4, 5, 6, 9, 22
initial 71:13 72:9	instructs 6:6	introduce 68:7	keyboard 16:22 52:25 53:5, 10
initiate 16:20	intended 28:5 52:16	introduced 68:14	kind 21:15
initiated 30:12	intensity 10:19	invention 26:25 70:9, 13	know 5:15 8:16 11:13 12:5, 11, 13 17:6, 8 33:21 37:9, 10 39:9 40:2, 5 47:25 48:2 66:22 69:20, 22
initiating 29:13 30:4, 7	interaction 53:1	inventor 10:21 17:7, 8 47:25 48:2	< L >
input 15:22 16:3, 10, 11, 14, 17, 19, 24 38:9 44:9 50:5 51:1 52:11, 12, 20, 21 53:15, 16, 19, 22 54:4, 15 56:22 57:2, 7, 19 58:17, 20 59:12, 13, 19, 24 60:2, 4, 8, 9, 13, 21 61:1, 15, 16, 20 62:2, 7, 10, 19 63:3, 7, 18 64:5, 13, 22, 25 65:1, 4, 10, 16, 22, 24 66:9, 25 67:7, 10, 24 68:3, 21, 25 69:7	interest 7:16, 25	inventors 12:11, 13 17:6 37:9, 10 69:21, 22	lab 10:11
inputs 52:10 54:4	interested 77:11	IP 3:10	labeled 44:5, 18, 24 46:10
	interface 9:1, 8, 11, 19 10:1, 7, 10, 14 50:5	IPR 6:23 7:3, 6, 9, 14, 19, 23 8:4 12:15 17:10 37:12 48:4 70:1	labeling 28:6
		IPR2025-00040 1:11	labels 15:10, 13
		IPRs 5:16, 22 8:7	landscape 41:16, 20, 23
		Irvine 3:6	language 60:24 65:8
		issued 11:3	larger 52:3
		item 21:21, 23, 24, 25 22:2, 8 27:9 42:12, 20	launch 43:20
		items 42:4 49:11	Law 3:21
		its 13:3, 5	Lee 6:16 69:14, 20, 25 70:5, 7, 8
		< J >	Lee's 70:9
		JEFFREY 1:17 2:7 4:3 5:4 78:1	left 13:12, 16, 21 18:11, 16 27:13 40:23 41:3, 4, 24 43:25 73:3
			legal 56:5

length 9:21 39:5 letter 39:14, 18 license 5:2 limitation 68:5, 13, 16, 22 69:8, 12 limitations 68:7 line 34:21, 24 35:2 42:1 48:7, 8, 21 50:1, 23, 24 52:7 54:11, 20 56:18, 20 58:10 61:24 62:18 65:14, 25 68:9, 10 73:9 78:3, 6, 9, 12, 15, 18, 21 lines 39:22, 24 51:20 listing 61:6 little 28:9 63:15 LLC 1:5 LLP 3:4, 16 long 11:13 54:16, 23 55:1, 7, 13, 16, 23, 25 56:11 longer 55:2 look 8:11 12:2 13:9 17:3 21:21 22:12 25:22 28:23 30:15 37:19 40:19 41:21, 23 44:3 45:5 47:11 48:7 50:23 51:16 52:6 54:11	56:17 59:17 61:20, 24 68:9 69:14 71:6 72:19 74:25 looking 13:12 23:19 31:11 33:24 35:4 39:9 42:23 44:16 48:21 55:12 75:13 looks 73:8, 9 < M > magnitude 11:20 Main 3:5 manner 45:18 map 10:15, 16, 17 46:1, 20 marked 8:13 12:8 37:5 47:14 69:17 marriage 77:11 Mary 1:24 2:9 5:1 77:2, 17 matter 12:17 17:12 37:14 48:6 70:3 77:12 maximize 56:22 62:3, 11, 20 63:4, 8, 19 64:6, 18 65:2, 5, 10 66:1 67:11, 12 68:11 maximized 38:11 51:19, 23 52:3 58:15 59:4, 6, 10, 15 60:11 66:8, 23 67:5, 16, 19, 22	maximizing 38:13, 16 52:2 66:19, 22 mean 7:1 23:4, 11 33:10 36:18, 24 40:13, 16 42:11 43:5 48:9 55:19 57:8 58:21 60:6 63:21, 23 64:11, 21, 24 meaning 32:25 52:16, 18 63:25 64:2, 4 67:22 means 57:10, 20 58:23 60:7, 8 63:15, 23 meant 20:19 medium 58:12 59:18 memory 76:10 mention 16:13 mentioned 23:23 menu 42:3, 4, 12, 20 merge 38:19 merged 31:19, 21 message 44:9, 11, 13, 19, 21 73:15, 17, 22, 25 74:2, 5, 8, 17, 20 metaphor 49:6 method 48:22 52:9 54:14 microphone 16:23 middle 46:12 52:14	MINGHUI 3:9 minimize 59:19 minutes 75:24 mistake 69:3 Mitch 75:23 mobile 37:22, 25 70:12 MOBILITY 1:5 mode 41:16, 20 modifies 64:13 modifying 58:3 moment 6:13, 14 30:16 monetary 7:16, 25 monitor 13:12, 16, 21, 25 14:2, 18, 22, 23 monitors 13:18 14:11, 13 15:4, 6 morning 5:10 MOSS 3:3 6:25 7:10 9:10 12:24 13:4, 17 14:1, 9, 17 15:18, 24 16:5, 18 18:20 19:1, 7, 13, 21 20:7 21:5, 16 22:9 23:2, 10, 21 24:2 25:1, 8, 15 26:2, 5, 12 27:2, 11, 18 28:4 29:5, 16 31:1 32:2, 17 33:2, 9, 14 34:10, 18 35:12, 22 36:10, 17 38:2 39:3, 21 40:7
---	--	---	---

41:6, 15 43:11 45:8, 25 46:4, 17, 23 48:13 49:4, 16, 25 50:11, 18 51:6, 11, 24 52:13, 22 53:2, 7, 11, 17, 24 54:5, 18, 24 55:8, 18 56:3, 12 57:9, 15, 23 58:8, 22 59:3, 8 60:5, 14, 22 61:4, 11, 17 62:13, 22 63:10, 22 64:3, 12, 16 65:7, 17 66:4, 10, 17 67:1, 8, 17, 25 68:15, 23 69:10 70:10, 17, 24 71:17, 24 72:8, 24 73:2, 7, 12, 19 74:1, 11, 18 75:19, 23 76:4, 13, 16 MOTOROLA 1:5 3:2 7:19, 23 8:1 78:2 mouse 16:22 move 33:21 39:8 moved 37:1 moves 35:24 multi-display 48:24 51:3 MULTIFOLD 1:8 3:8 7:14, 19, 23 78:2 multitasking 73:21 music 71:14	< N > N.W 3:17 name 5:1 9:15 named 10:21 navigation 23:19, 25 24:4, 7, 10, 15 31:15 35:20, 25 36:7, 12, 15, 21 necessarily 22:19 31:2 necessary 79:8, 9 need 45:11, 17, 21 needs 16:24 neither 46:24 normal 41:13 Notary 2:10 77:3, 18 Notice 2:8 number 5:2 11:15 48:10 numbering 48:17 numbers 14:25 15:3 25:18, 21 < O > oath 2:15 6:2 79:6 objection 2:14 6:25 7:10 9:10 12:24 13:4, 17 14:1, 9, 17 15:18 16:5, 18 18:20 19:1, 7, 13, 21 20:7 21:5, 16 22:9	23:2, 10, 21 24:2 25:1, 8, 15 26:2, 5, 12 27:2, 11, 18 28:4 29:5, 16 31:1 32:2, 17 33:2, 9, 14 34:10, 18 35:12, 22 36:10, 17 38:2 39:3, 21 40:7 41:6, 15 43:11 45:8, 25 46:4, 17, 23 48:13 49:4, 16, 25 50:11, 18 51:6, 11, 24 52:13, 22 53:2, 11, 17, 24 54:5, 18, 24 55:8, 18 56:3, 12 57:9, 15, 23 58:8, 22 59:3, 8 60:5, 14, 22 61:4, 11, 17 62:13, 22 63:10, 22 64:3, 12, 16 65:7, 17 66:4, 10, 17 67:1, 8, 17, 25 68:15, 23 69:10 70:10, 17, 24 71:17, 24 72:8, 24 73:2, 7, 12, 19 74:1, 11, 18 75:19 objections 53:7 obtained 11:2 Obvious 75:15	occupy 43:20 OFFICE 1:1 oh 47:7 Okay 7:7, 25 8:10, 12 10:2 11:9, 22 12:1, 7, 14 13:2, 9, 11, 24 14:22, 25 15:21 17:2, 5, 16, 18 18:24 19:11 20:20 22:1, 12, 14 23:13, 19, 25 24:7, 12, 13, 17 25:5, 22, 23 28:8, 11, 13, 14 29:3, 19, 20 30:1, 6 31:11 32:25 33:23 34:7 37:2, 4, 15, 19, 21 39:1, 8, 11, 19 40:19, 21 42:23 44:2, 4, 23 45:14, 20, 23 47:2, 5, 6, 9, 13, 24 48:3, 7, 12, 14 49:14 51:4, 16, 22 52:6, 8 53:15 54:10, 13 56:16, 19 57:5 58:10, 18 59:25 62:8, 14, 16 63:2, 17 66:7 69:13, 16 70:4, 6 71:7, 21 72:11, 19, 21 73:6, 24 74:22 75:1,
--	---	--	--

13, 21 76:1 omitted 62:25 once 22:2 69:24 open 6:12, 18 8:16, 17 12:5 37:8 72:2 operation 40:15, 16 51:13 operations 9:22 10:1 opinion 46:18 56:5, 8 57:24 opinions 76:14 options 18:11 order 11:20 18:18, 25 19:6 45:18 59:9 ordinary 27:23 28:2 32:9, 14, 21 33:1 40:6 46:15 49:2 55:1 72:5 orientation 41:13 oriented 41:3, 4, 22 ORRICK 3:4 outcome 52:17 77:12 output 49:19 50:21 outputs 45:2 Owner 1:9 8:4 owners 8:8 < P > p.m 47:7 76:20 P47 48:11, 19 Pacific 47:8	PAGE 4:2 13:10 17:16 40:20 41:10, 13, 16, 20 45:6 48:8, 9, 10, 15, 17, 18 70:4 71:6 72:20 74:25 75:2, 7, 13 78:3, 6, 9, 12, 15, 18, 21 panel 27:5, 7 34:6 35:1 panels 19:24 21:1 paragraph 21:8 23:22 24:3, 9 27:3, 12, 25 30:17 42:3 44:8 45:1 46:25 49:20 50:6 51:25 52:17 70:11, 18 71:12 72:18 73:13, 20 74:19 76:8 paragraphs 76:12 parameter 10:19 paraphrase 63:24 part 9:12 13:19 14:3 23:20, 25 24:4, 7, 11, 15 56:18 63:1 66:25 67:15, 23 73:8 participating 2:12 particular 20:9 56:20 parties 77:5,	10 passage 30:23 PATENT 1:1, 2, 9, 12 6:17 8:4, 8 10:21 11:2 47:12, 17 48:1, 3 49:5, 17, 24 50:1, 15, 19 52:1, 14 53:18 54:19, 20, 25 61:5, 19 66:12 69:14 PAUL 3:16 Payonk 1:24 2:10 5:1 77:2, 17 penalty 79:4 percent 5:20 percentage 5:18 8:7 performed 18:18 51:14 performing 9:22 31:4 perjury 79:4 person 27:23 28:2 32:9, 14, 20 33:1 40:6 46:15 49:2 55:1 personally 10:6 12:11 17:6 37:8 47:25 69:20 perspective 70:12 Petitioners 1:6 petitioner's 6:5 phone 31:14, 17, 19, 22 35:1, 10, 13, 20	phrase 57:24 58:2 63:14 68:2 69:4 76:9 physical 13:16, 25 14:3, 4 38:1, 3 50:2, 9, 14, 16, 17 70:15 physically 2:13 picky 65:20 pictures 49:8 pixel 15:3 pixels 10:18 15:7 please 7:20 12:1, 6 13:9 17:3 19:3 22:12 28:23 37:2, 19 45:5, 20 47:11 61:24 69:13 71:6 PLLC 3:10 plurality 48:22 PM 46:13 point 27:22 33:16 76:7 pointing 32:7 points 22:3, 5 portion 40:11 49:18 50:20 73:4 portions 13:6 34:13 35:16 47:23 portrait 41:14, 21 portray 49:7 position 35:25 36:7 positioned 41:2 predetermined 56:21 57:2,
--	--	---	--

7, 19 58:17, 20 59:12, 13, 19, 24 60:2, 4, 13, 21 61:1, 14, 16, 20 62:2, 7, 10, 19 63:3, 7, 18 64:5, 22, 25 65:1, 9, 16, 22, 24 66:9, 24 67:7, 10, 24 68:3, 21, 25 69:7 prepare 11:10, 24 12:18 37:15 45:15 47:18 prepared 6:14 preparing 11:13 present 2:13 3:20 70:13 press 54:21 presses 43:22 pressing 26:24 27:1, 6 43:9 previously 8:13 12:8 37:5 47:14 69:17 primary 15:11, 13, 15 52:4 prime 21:21, 25 22:2, 8, 18 27:9, 13 30:19, 21 prior 6:15 9:3 12:15, 16 17:9, 11 37:11, 13 48:4, 5 69:25 70:2 Probably 8:5 11:20 75:25	problem 32:21 63:1 proceedings 5:23, 24, 25 77:6 process 18:5 19:23 20:25 21:7, 11, 13 73:21 processor 15:23 16:4, 10, 11, 12, 14, 17, 19, 24 51:1, 5, 7, 14, 17 program 44:10, 14, 20, 22 61:6, 8 71:15 73:18, 25 programming 51:12 prompt 33:7, 10 provide 10:14 50:4 53:22 61:6 provided 43:6 provides 52:1 PTE 1:8 Public 2:10 77:3 Purcell 6:16 12:4, 12, 14, 18, 23 13:2, 10, 18 14:10 16:12, 19 28:22 purpose 19:11, 19 20:5, 8 pursuant 2:8 put 14:7, 13, 18 38:21 putting 21:14 < Q >	question 7:20 9:7 14:6 15:25 16:6 18:17 19:2 20:3 23:4 25:9 29:7 34:19 36:2, 3, 22 38:14 45:19, 23, 24 53:3 54:3 55:22 57:16 60:15, 18 61:22 62:14 66:22 67:2, 3, 5 69:4, 23 71:21 questioning 7:4 questions 6:5 45:21 75:22 76:4 < R > random 76:9 read 13:2, 5 30:23 79:3, 7 reading 11:4, 7 41:13 reason 6:8 78:3, 6, 9, 12, 15, 18, 21 recall 5:17, 18, 21 7:15, 24 8:5, 6, 9 12:16 13:7 17:11 37:13 39:7 40:3 48:5 receive 50:5 56:21 58:17 59:11 60:3, 8, 25 61:14 62:1, 10, 19 63:3, 6, 18 64:5, 22 65:9, 16, 21 66:9, 24	67:6, 10, 24 68:3, 21, 25 69:7 received 45:2 59:14 receives 16:20 Receiving 51:1 Recess 28:15 47:10 76:3 recognition 16:23 record 28:9 47:3 75:23 77:7 rectangle 39:25 40:6 redirect 75:25 refer 15:3 30:18 42:14 45:10 52:15 72:17 reference 12:5, 16, 25 17:4, 11, 13 37:13 40:3 45:12 48:5 70:2 71:18 REFERENCED 4:6 8:14 12:9 37:6 47:15 69:18 references 6:16 referring 27:19 41:7, 17, 19 49:18 50:2, 16, 20 60:23, 24 69:1 refers 39:13, 17 42:12 43:6 44:21 46:1, 25 49:6 52:1 55:2 68:4 71:12
--	--	---	---

regarding	representing	25:20 27:16	70:11 71:18
6:23 76:6	16:20	31:14, 17, 23	74:19 75:7, 8
region 40:4	represents	34:16 36:1,	Scope 16:18
46:25 47:1	51:1 56:22	4, 9, 11, 13	45:25 46:4,
Registration	62:2, 20	37:17 38:6,	17, 23 49:25
77:18	63:3 64:5,	24 39:25	50:18 51:6,
regularly 9:3,	10, 11, 17	41:4 42:19	11, 24 52:13,
12	65:2, 4, 10	43:10 44:1,	22 53:2, 11,
relate 26:6,	66:1	20 47:21	17, 24 54:5,
18 32:3	required 6:4	48:18 54:8	18, 24 55:8,
related 26:17	requirement	56:2, 11	18 56:3, 12
45:3 77:9	69:5, 11	65:6, 19	57:9, 15, 23
relationship	requires 52:23	66:3 69:9	58:8, 22
21:3, 6	research 10:3,	71:16 75:6,	59:3 60:5,
25:24 31:25	7, 9, 11	11, 18 76:16	14, 22 61:4,
63:6	respond 26:25	RODRIGUEZ	11, 17 62:13,
relevant 9:20	57:1, 7, 19	1:17 2:7	22 63:10
11:12	58:20 59:23	4:3 5:4	64:12 65:17
remaining 69:6	60:2, 7, 13,	76:5 78:1	66:10, 17
remember 5:14	21 62:6	79:2, 16	67:8, 17, 25
REMOTELY 1:18	response 60:7	ROM 76:10	68:15, 23
2:8, 15	69:24	R-O-M 76:10	69:10 71:17,
render 50:4	rest 49:20	room 2:14	24 72:8, 24
repeat 7:20	50:5 52:17	rotate 40:23	73:2, 7, 12,
9:6 15:25	result 18:14	rough 11:16,	19 74:1, 11,
19:2 53:3	19:16 20:13	20	18
repetitive	29:14 30:6,		screen 13:16,
69:23	11 34:2	< S >	19, 25 14:3,
rephrase 16:7	35:7 42:20	saw 70:2	4 18:6
23:3 25:9	52:16	saying 55:17	19:22, 25
30:1 38:15	resulting	65:1	20:25 21:2
56:9 57:16	56:24 59:21	says 10:20	24:19 25:5,
60:16	62:4	19:22 22:19,	6, 14 27:13,
replaced	reveal 51:2	23 27:13	14 30:20
36:23, 24	revealed	30:18 31:9	31:6, 7, 10,
Reported 1:24	43:23, 25	33:16 43:2	16, 20 38:1,
2:9 77:6	review 12:18,	46:13 48:18,	3, 5, 22
Reporter 2:10,	25 17:13	22 49:6	43:16, 19, 21,
13 5:1 30:9	45:11, 15, 17,	50:25 51:17	24 49:24
77:2	20 47:17	52:9 54:14	50:2, 9, 14,
REPORTER'S	reviewed	55:12, 22	15 70:19, 22
77:1	11:12 13:2	56:20 58:11	71:2, 4
represent	37:15 47:20	59:17 60:25	73:14 74:3
62:11 63:19	right 12:20	62:1 63:23	screens 14:11
representation	13:24 14:16,	65:8 67:18,	18:24 19:5,
10:17	20, 22 15:8	21 68:10	9 25:7, 12
	20:15 22:15		49:19 50:20

52:4 70:15	select 30:19	22:6 35:2	slightly
71:9	42:17	36:21 38:19	38:14 60:6,
search 66:18	selected	42:22 43:16,	18
second 43:3	18:13 51:18	25 52:3	small 13:6
51:18, 25	56:23, 24	70:15 72:6	smaller 27:5
52:10 56:23,	57:13 59:20,	73:6, 11, 18	30:19 31:10
25 58:13	21 62:3, 4,	74:20	sorry 18:1
59:20, 22	11, 20 63:4,	shows 18:14	21:24 41:1
62:3, 5, 12,	8, 19 64:6,	31:18 34:4,	47:18 56:17
21 63:5, 8,	18 65:2, 5,	20 35:13, 19	57:3 68:10
20 64:7, 19	11 66:1	36:7, 11, 12	69:3 70:7
65:3, 5, 11	68:11	37:22 38:18	sounds 29:25
66:2 68:11	selecting	61:6, 19	speak 7:5
70:19 71:4	18:15 42:12,	71:4, 8	11:23 28:18
73:13	20	73:14 74:2	specific
secondary	selection	side 19:24	11:15 46:11
15:11, 14, 15	42:10, 11	21:2 27:13	61:7
52:4	semicolon 57:4	40:23 41:24	specifically
Section 75:2,	sending 73:22	48:18	32:12 40:3
7, 11, 14, 17	sense 16:15	signal 44:9	64:9 67:12
see 13:14	60:15 68:19	Signature	specification
14:25 15:10,	sent 74:17	78:24	61:5, 19
12, 13 17:19	separate 14:6,	significance	speculate
18:12 22:2,	10, 13 35:16	20:9 34:24	11:17 54:1, 8
4, 15 23:6	sequence 18:3	significant	spent 11:13
26:20 29:6,	set 77:4, 13	34:22	spin 30:19
21 32:6, 12	sharp 10:18	signifies	31:9
33:22 34:11	SHEET 78:1	38:10	spindle 22:3,
39:19, 22	short 54:21	signifying	5, 6, 17, 18,
40:22 41:5,	Shorthand	58:14	25 23:1, 8, 9,
10, 24 42:7,	2:10 77:2	similar 74:3	15, 16, 20, 23
25 46:8, 10,	show 18:11,	simple 55:3	24:1, 4, 8, 11,
12 48:19, 25	18, 24 19:5,	simply 32:18	15 27:5, 10,
55:5 71:18	9 24:14	33:3, 4 72:16	17 30:19, 25
72:13 74:4,	25:14, 16	skill 27:23	31:8, 10 35:1
12, 14	29:14 30:6,	28:2 32:9,	spinning
seeing 12:16	11 31:16	15, 21 33:1	30:25 31:8
17:11 37:13	34:2 35:7,	40:6 46:15	split 18:6
48:5	10, 15 38:23	49:2 55:1	34:12 35:16
segment 34:12	49:10 70:7,	72:5	splitting
35:15 36:12,	8 73:24	skim 13:3	19:23 20:25
13 37:1	74:16	skimmed 13:6	43:23
segmentation	showing 19:15	47:23	stamped 48:11
9:23, 24	20:13 32:22	slide 31:14	start 5:12
10:13, 15	shown 13:21	slides 31:17,	34:1 43:16
segments 18:7	14:14, 19, 23	22	started 34:3
31:18, 21	19:24 21:1		

starting 50:1	75:24 76:1	44:10 70:12	three 18:18,
52:6 61:25	surface 49:8	testified 5:6	21, 24 19:5,
69:4	SUTCLIFFE 3:4	testimony 6:9	9 25:2 35:19
state 79:3	swear 5:2	77:8	time 28:22
statement	sworn 5:6	text 18:4	45:11, 21
55:20	77:5	19:22 23:17	47:7 55:10
STATES 1:1	synopsis 9:16	30:13 32:20	76:2
status 40:8,	systems 49:7	45:12, 15, 20	times 5:13
10, 12, 13, 15		70:25 72:17	titled 75:2,
46:8, 10, 16,	< T >	74:4, 10, 13	14
18, 20, 21	take 8:10	texts 73:14	today 5:10
staying 44:16	12:1 13:9	Thank 6:21	6:9
	17:3 21:21	7:7 10:2	top 27:3, 12,
stenographically	22:12 28:10,	11:9, 22	25 39:19
2:9 77:6	23 37:2, 19	15:21 16:15	41:4 42:9
step 50:25	40:19 45:5,	17:2 28:14,	43:2 49:17
51:16 56:20	21 47:3, 11	21 41:19	touchscreen
steps 18:18,	48:7 55:10	44:2 49:14	15:22 16:3,
22	61:24 69:13	75:21 76:2	10, 12, 13, 16,
stop 19:23	72:19 76:1	thereon 58:14	22, 25 38:7,
stops 20:25	TAKEN 1:18	thing 6:14	18
35:1	2:7 28:15	47:20 55:17	TRADEMARK 1:1
Street 3:5, 17	47:10 76:3	72:22	transcript
structure	talk 7:3	things 25:14,	77:7
50:3, 16	talking 21:24	16 40:12, 14	transition
struggling	tap 54:16, 17,	56:1 60:6	33:4, 7, 15, 19
66:15	20, 21 55:3,	think 28:24	transitions
submitted 7:8,	7, 13, 15, 23,	47:2 53:15	33:13, 17
13, 18, 22	24 56:11	76:17	transmission
8:3, 7	tapping 26:24	third 52:10	74:20
substance 7:6	27:1, 6	54:15 56:21	TRIAL 1:2
subtask 44:6,	task 73:22	57:2, 7, 19	true 77:7
7, 14, 18	teach 8:23	58:17, 20	79:10
suggest 39:1	9:1, 4, 8, 13	59:11, 13, 24	truthful 6:9
Suite 3:5, 11	techniques	60:2, 4, 13,	trying 19:9
summer 9:5	9:18, 22	21 61:1, 14,	35:15 57:21
superfluous	technologies	16, 20 62:1,	63:14
55:16	9:2, 9, 11, 19	7, 10, 19	turn 29:19
supervised	10:7, 10	63:3, 7, 18	70:4
10:7	tell 48:14	64:5, 22, 25	twice 27:6
supposed 27:22	63:5	65:1, 9, 16,	two 14:10, 13,
Sure 7:21	term 49:5, 18	21, 24 66:9,	19 18:6, 10
16:1, 8 23:4	50:2, 15, 19	24 67:7, 10,	19:16 20:10,
25:10 29:8	52:15	24 68:3, 21,	14, 18 29:7,
53:12 54:1	terminal	25 69:7	10, 12 31:18,
56:13 66:18	37:22, 25	thought 53:12	21 34:12
		54:6 55:9	35:16 42:24,

25 43:24 71:8 76:7 two-finger 18:7, 8 typed 52:25 53:5 types 56:13 typically 49:8 typing 53:10 typos 76:7 Tysons 3:12 < U > U.S 1:12 unclear 28:5 understand 6:2, 4 16:6 23:4 27:24 32:10 38:21 40:25 41:7 46:15 55:2, 19 63:11, 14 66:25 understandable 47:24 understanding 13:23 14:24 15:5, 9 16:11 18:8 19:14 20:17 22:10 28:7 32:15, 19, 22 46:24 66:5 unit 24:22, 25 25:3 26:9, 10, 13, 14 38:9 UNITED 1:1 University 8:20, 24 9:4 10:4 unlabeled 32:19 unrelated 7:14, 19, 23 use 9:25 10:10	user 9:1, 8, 11, 19 10:1, 7, 10, 14 16:21 18:5 27:4 29:13, 14, 23 30:2, 18, 24 31:7, 9, 13, 17, 22 34:5, 12 42:12 43:22 44:9 49:20 50:5, 21 52:11, 12, 15, 20, 23, 25 53:5, 16, 19, 22 54:4, 15 55:6, 12, 15, 22, 24, 25 56:10 58:15 67:11, 16, 19, 22 68:5 74:10, 19 < V > VA 3:12 VALENTE 3:15 various 9:21 71:4 versions 6:15 versus 34:8, 17 video 76:9 VIDEOCONFERENCE 1:18 2:8 view 27:4 43:21 44:11, 12 45:3 46:1, 6, 21 52:3 70:12 viewing 46:1, 20 Virginia 77:18 visual 38:10, 12, 16, 20, 22, 23 39:2 58:13 68:17	voice 16:23 VRAM 76:9 V-R-A-M 76:9 vs 78:2 < W > want 11:17 28:9 47:3 54:7 63:24 65:20 wanted 16:16 75:10, 15 76:7 Washington 3:18 way 18:22 36:4 43:12 50:12 64:15 77:11 Welcome 28:17 well 6:16 11:12 20:16 33:3 34:4 36:21 38:15 43:16 44:21 53:18 54:19 55:12 65:20 68:24 Westwood 3:11 We've 28:8 WHEREOF 77:13 widgets 49:9 width 39:6 window 15:14 48:24 windows 49:10 withdraw 33:20 36:3 60:17 witness 5:3, 5 8:12 12:3, 7 16:6 19:2 23:3, 11 25:9 28:11, 13 29:6 36:18 37:4 47:5, 9, 13	48:14 53:3 55:19 57:16 60:15 61:18 62:14 63:11 67:3 69:16 76:6, 15 77:4, 13 woman 73:9 word 33:19 61:25 62:25 65:14, 25 words 41:12, 21 42:10 43:4 64:10 work 10:11 12:15 17:10 37:11 48:4 69:25 wrap 75:25 wrong 48:8 < X > XIV 75:2, 7 XV 75:14, 17 < Y > YANG 3:9 4:4 5:9 7:2, 12 8:10, 15 9:14 12:1, 4, 10 13:1, 8, 20 14:5, 12, 21 15:20 16:1, 2, 8, 9 17:1 18:23 19:4, 10, 18 20:2, 11 21:9, 18 22:11 23:6, 7, 13, 14, 24 24:6 25:4, 11, 17 26:8, 15 27:8, 15 28:8, 12, 14, 16 29:8, 9, 18 30:10 31:3 32:5,
---	--	--	---

24 33:6, 11,
 18 34:15, 23
 35:18, 23
 36:14, 20
 37:2, 7 38:4
 39:23 40:9
 41:9, 18
 43:13 45:13
 46:2, 7, 19
 47:2, 6, 11,
 16 48:16
 49:13, 22
 50:8, 13, 22
 51:9, 15
 52:5, 19, 24
 53:4, 9, 14,
 21 54:2, 9,
 22 55:4, 11,
 21 56:7, 15
 57:12, 17
 58:1, 9, 25
 59:5, 16
 60:10, 17, 19
 61:9, 21, 23
 62:16, 17, 24
 63:13 64:1,
 8, 14, 20
 65:13, 18, 23
 66:6, 13, 20
 67:4, 14, 20
 68:8, 18
 69:2, 13, 19
 70:14, 21
 71:1, 20
 72:1, 10
 73:5, 10, 16,
 23 74:7, 15,
 21 75:21
 76:1, 17
Yeah 60:17
 66:14 76:1
Yook 6:16
 37:3, 9, 11,
 15, 20 39:1,
 8, 9, 12
Yook's 38:12

< Z >

Zoom 6:12, 18