

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

ORIGINAL

MOTOROLA MOBILITY LLC AND GOOGLE LLC,
Petitioners

v.

MULTIFOLD INTERNATIONAL INC. PTE. LTD.,
Patent Owner

Case IPR2025-00059

U.S. Patent No. 9,141,135

DEPOSITION OF DR. SANDEEP CHATTERJEE
TAKEN REMOTELY BY VIDEOCONFERENCE

July 30, 2025

Reported by: Mary Ann Payonk

Job No. 2596

July 30, 2025

9:03 a.m. Eastern

DEPOSITION OF DR. SANDEEP CHATTERJEE, 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.

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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. SANDEEP CHATTERJEE,

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, Dr. Chatterjee. How are you
11 today?

12 A. Good morning. I'm doing well, thank you.

13 Q. That's good.

14 I looked at your CV, and you have a lot of
15 litigation experience but it's not broken down by
16 District Court versus PTAB.

17 Is this your first deposition in an IPR?

18 A. No.

19 Q. That's what I thought.

20 How many times have you been deposed in an
21 IPR?

22 A. I really don't know off the top of my head.

23 Q. Can you give me an estimate?

24 A. I haven't tracked that so I really don't know
25 off the top of my head.

1 Q. Would it be more than five?

2 A. Yes.

3 Q. Would it be more than 10?

4 A. Yes.

5 Q. Okay. So is it fair to say that you're
6 familiar with the ground rules for testifying in an IPR?

7 A. So I'm not sure what you mean, for an IPR. I
8 am familiar with how depositions work. I'm not sure
9 what you mean is different for an IPR than for other
10 types of depositions.

11 Q. I see.

12 Well, do you understand that you're under
13 oath?

14 A. Yes.

15 Q. And do you understand that you're required to
16 answer my questions unless petitioner's counsel
17 explicitly instructs you not to?

18 A. Okay.

19 Q. Is there any reason you cannot give truthful,
20 complete, and accurate testimony today?

21 A. I don't think so, no.

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

25 A. Yes.

1 Q. Okay. And how many times have you testified
2 in District Court litigation?

3 A. So are you asking about depositions for
4 District Court or are you talking about actual trials?

5 Q. Well, let's break that down and start with
6 depositions in District Court first.

7 A. Even for depositions, I really don't know off
8 the top of my head.

9 Q. Would it be more than 10?

10 A. For depositions? Yes.

11 Q. And what about testimony in trials?

12 A. So by trials, are you not including, for
13 example, ITC hearings or, like, international
14 arbitrations?

15 Are you talking about only District Court in
16 the US trials?

17 Q. That's right, just trials in District Court in
18 the US.

19 A. And not including State Court, though?

20 Q. Well, State and Federal.

21 A. I think that is probably -- again, I don't
22 know this, but it's probably in the 10-ish.

23 Q. Okay. And you mentioned ITC. Have you
24 testified in an ITC proceeding?

25 A. I have, yes.

1 Q. Okay. Did you provide a declaration in
2 IPR2025-00059?

3 A. Yes, I did.

4 Q. And did you provide an opinion that certain
5 claims of the '135 patent are invalid in view of three
6 patent publications?

7 ATTORNEY VALENTE: Objection to form.

8 A. I believe I have set forth certain opinions.
9 I believe my opinions are related to -- I believe there
10 may be three patents. I haven't memorized my
11 declaration, but if you point me to it, I can take a
12 look at it.

13 BY ATTORNEY YANG:

14 Q. Okay, we'll get there.

15 So for these patents that you relied on for
16 your opinion, did you perform a prior art search and
17 find these publications yourself or were they provided
18 to you?

19 A. Which publications are you talking about?

20 Q. The ones in your declaration.

21 A. So the ones -- so when you say the ones in my
22 declaration -- oh, and by the way, I have a hard copy of
23 my declaration in front of me just so you know.

24 So when you're talking about the ones in my
25 declaration, I assume you're talking about the table

1 listed in paragraph 16.

2 Q. That's right. But I'm specifically talking
3 about three of them, Yook, Bauer, and Lee. Those are
4 Exhibits 1005, 1007, and 1008.

5 A. And what was your question again?

6 Q. Did you perform a prior art search and find
7 these, or were they provided to you?

8 ATTORNEY VALENTE: Objection to form.

9 A. I don't recall off the top of my head. I
10 believe, if I remember correctly, I submitted this
11 declaration quite some time ago. I don't remember.

12 BY ATTORNEY YANG:

13 Q. Do you recall whether you performed a prior
14 art search?

15 A. I believe I did, yes.

16 Q. Why did you perform a prior art search?

17 ATTORNEY VALENTE: Objection to form. Caution
18 the witness also not to reveal the substance of any
19 communications with counsel.

20 A. Well, I want to be clear. It's -- what I
21 searched for was materials prior to the date that is set
22 forth in the declaration. And that's part of what I do
23 with regards to analyzing patents, whether it's for an
24 IPR or even for District Court cases.

25 BY ATTORNEY YANG:

1 Q. So is it fair to say that when you're
2 analyzing a patent for one of your IPRs, you always
3 perform a prior art search?

4 ATTORNEY VALENTE: Objection to form.

5 A. I don't know always, but -- and I don't recall
6 exactly, like I said, for this case because it was
7 several months ago when I did this declaration. But I
8 would say sometimes or oftentimes I do, yes.

9 BY ATTORNEY YANG:

10 Q. Okay. And is it your usual practice to
11 perform a prior art search?

12 ATTORNEY VALENTE: Objection to form.

13 A. I think -- again, I do look at potential art
14 for cases, but it really depends on the specifics of the
15 case and what the issues are that I've been asked to
16 look at.

17 BY ATTORNEY YANG:

18 Q. Okay. Can you describe the usual steps that
19 you take in your prior art searches?

20 ATTORNEY VALENTE: Objection to form.

21 A. I'm not sure that they're usual steps per se,
22 but in terms of there -- there are oftentimes where I am
23 aware of, myself, of potential art, whether it's system
24 art or something else.

25 And then other times, I may search using, for

1 example, Google or other search tools. So these are,
2 like, some of the -- some of the ways that I perform
3 searches.

4 BY ATTORNEY YANG:

5 Q. Okay. In this IPR, were you aware of
6 potential art?

7 ATTORNEY VALENTE: Objection to form.

8 A. What do you mean by was I aware of potential
9 art?

10 BY ATTORNEY YANG:

11 Q. I believe in response to my last question you
12 said that sometimes you were aware of potential art,
13 or -- and then other times you use Google or other
14 search tools.

15 And I'm asking for this particular one, were
16 you aware of any?

17 A. So again, I don't remember off the top of my
18 head. Again, this was many months ago. But just
19 looking at the table that is set forth in paragraph 16,
20 I do remember what is set forth in Exhibit 1013. And
21 what I mean by that is the actual Nokia 9000
22 Communicator, so that is something that I was aware of
23 as well.

24 Q. Okay. Do you remember using Google or another
25 search tool?

1 ATTORNEY VALENTE: Objection to form.

2 A. For this case, again, I don't recall off the
3 top of my head. It was several months ago.

4 BY ATTORNEY YANG:

5 Q. What do you recall about the prior art search
6 that you did for this case?

7 ATTORNEY VALENTE: Objection to form.

8 A. So I think -- like I mentioned, I don't recall
9 what exactly I did for this case, given that it was
10 several months ago.

11 I did explain to you that I do have a
12 recollection that I knew about the Nokia 9000 device.
13 So again, like I've explained to you, I don't recall.
14 This was many months ago.

15 BY ATTORNEY YANG:

16 Q. So is it fair to say that besides your
17 knowledge of the Nokia 9000, you don't recall anything
18 else?

19 ATTORNEY VALENTE: Objection to form.

20 A. I'm not sure I understand your question. I
21 don't recall anything else?

22 BY ATTORNEY YANG:

23 Q. About the prior art search that you undertook.
24 I apologize.

25 A. Well, there are patents and patent application

1 publications that are listed in the table below
2 paragraph 16 of my declaration.

3 Q. That's true.

4 But do you recall searching for those patents
5 and publications in that table in a prior art search?

6 A. So I think I've answered for you that I don't
7 recall what precisely I did for this case apart from
8 what I've explained to you already.

9 Q. Okay. I apologize. I'm just confirming that.

10 Oh, sorry. One other thing. Can you confirm
11 that the hard copy of your declaration that you're
12 looking at is unmarked?

13 A. I was provided it just like 15, 20 minutes
14 ago. I'm skimming through it. I don't see any
15 markings. It's a color copy and so I don't see any
16 markings, no.

17 Q. And you did not make any markings in your
18 declaration, in the copy of the declaration that you
19 have?

20 A. No. Like I said, I was provided this only
21 about 15 or so minutes ago, like right before we started
22 the Zoom call.

23 Q. Okay, thank you.

24 And how long did you spend preparing for this
25 deposition?

1 A. I don't recall off the top of my head the
2 exact number of hours.

3 Q. Can you provide an estimate?

4 A. Probably like 30, 40 hours, probably.

5 Q. And what did you do during these 30 to 40
6 hours?

7 A. I reviewed my declaration. I reviewed the
8 materials cited in my declaration. Those are some of
9 the activities I did.

10 Q. Do you recall doing anything else besides
11 reviewing your declaration and the materials cited?

12 ATTORNEY VALENTE: Objection to form.

13 A. Well, I -- I think I reviewed generally the
14 information relevant for this IPR, this -- and relevant
15 to my declaration.

16 BY ATTORNEY YANG:

17 Q. Did you meet with anyone other than attorneys
18 when preparing for this deposition?

19 A. I did not, no.

20 Q. How long did you spend writing your
21 declaration?

22 A. Again, like I explained, this was many months
23 ago. I don't recall.

24 Yes, I'm looking at the date on the last page.
25 It's October. October 17, 2024. That's almost a year

1 ago. I don't recall.

2 Q. Did you meet with anyone other than attorneys
3 when writing your declaration?

4 A. I don't believe so, no.

5 Q. And what did you do while writing your
6 declaration?

7 What's your process for writing a declaration
8 like?

9 ATTORNEY VALENTE: Objection to form. Also
10 caution the witness not to reveal anything done at the
11 direction of counsel.

12 A. Well, I believe -- again, I don't have a
13 recollection. This is almost a year ago. But I first
14 would perform analysis and then, based on the analysis,
15 set forth the analysis in writing in the declaration.

16 BY ATTORNEY YANG:

17 Q. When you said perform the analysis, what do
18 you mean by that?

19 A. Well, for example, reviewing the art that I've
20 discussed in this declaration and analyzing what one of
21 ordinary skill would have understood, and then -- those
22 are examples of the analysis. And there's a lot of that
23 kind of analysis set forth in my declaration.

24 Q. Okay. Do you have a copy of Exhibit 1003? I
25 believe that's your CV.

1 ATTORNEY VALENTE: Counsel, Dr. Chatterjee has
2 electronic copies of all the exhibits, his declaration,
3 on his computer. These are all clean copies. And I
4 wanted to confirm to you that the paper copy he has of
5 his declaration is a clean copy.

6 ATTORNEY YANG: Okay, thank you. I appreciate
7 that.

8 A. So to answer your question, I -- the hard copy
9 I have does not have my CV, and I don't seem to have my
10 CV here.

11 ATTORNEY VALENTE: Had we not got that for
12 you?

13 THE WITNESS: It's not on the computer.

14 ATTORNEY VALENTE: Okay.

15 BY ATTORNEY YANG:

16 Q. Okay, I will put a copy of the CV into chat.
17 And please -- let's see. Please let me know when you
18 see it.

19 A. I see it, and I am downloading it right now.
20 Okay, I have it.

21 (Exhibit No. 1003, previously marked, was
22 referenced and indexed.)

23 BY ATTORNEY YANG:

24 Q. So this is a copy of Exhibit 1003 obtained
25 from the PTAB website.

1 Can you confirm that Exhibit 1003 accurately
2 reflects your professional experience in computer
3 software and hardware systems?

4 ATTORNEY VALENTE: Objection to form.

5 A. Well, this seems to be a version of my CV that
6 existed at that time.

7 BY ATTORNEY YANG:

8 Q. By "that time," you mean October 7 -- around
9 October 2024?

10 A. Around that time means when I updated it
11 around that time, so yes, approximately that time
12 period.

13 Q. And this CV is accurate as of approximately
14 October 2024.

15 Is that correct?

16 A. I believe so. Again, it's a CV. It has
17 highlights, it has high-level summaries. So yes, I
18 believe it's accurate. But it's simply a CV that seems
19 to have 15 pages. I don't think it captures everything
20 that I've done.

21 Q. Okay. What is Experantis LLC?

22 A. So as it says, Experantis LLC provides
23 consultation and services, so it's a consulting company.

24 Q. And your work for Experantis LLC is all
25 consulting for patent litigation.

1 Is that right?

2 A. I don't think so, no.

3 Q. Is it consulting for litigation?

4 A. There is some component of that, yes, but
5 there are other components as well.

6 Q. Besides consulting for litigation, what other
7 components are there?

8 A. Well, one think off the top of my head is
9 education. So Experantis has, for example, provided
10 education in certain areas.

11 Q. Could you give an example where Experantis LLC
12 has provided education?

13 A. So Experantis was selected by -- and this is
14 an example -- by the government, the Central Government
15 of India, to teach faculty, staff, as well as industry
16 about the best practices in digital forensics, including
17 mobile forensics.

18 So that's an example where Experantis was
19 selected and identified as a global leader in the space
20 and asked to perform or provide education or training
21 to, like I said, faculty, staff, and also industry
22 people.

23 Q. Did you do this work on behalf of Experantis
24 for India yourself?

25 A. I was involved, if that is your question.

1 Q. And what was your involvement?

2 A. I did most of the lectures, if I remember
3 correctly.

4 Q. And those lectures were in India.

5 Is that right?

6 A. Yes.

7 Q. Your consulting work for litigation, is that
8 all through Experantis LLC or do you also do that on
9 behalf of some other entity?

10 A. Are you asking right now?

11 Q. Yes.

12 A. I think it's all through Experantis.

13 Q. What percentage of your income comes from
14 consulting for patent litigation?

15 ATTORNEY VALENTE: Objection to form and
16 scope.

17 A. I really don't know. I don't break that out
18 for any purpose for patent litigation versus anything
19 else, so I really don't know.

20 BY ATTORNEY YANG:

21 Q. Okay. On average, how many litigation matters
22 do you typically provide expert opinions for per year?

23 A. So when you're saying provide expert opinions,
24 are you talking about, like, the number of declarations
25 or reports that I'm submitting in any particular year?

1 Is that your question?

2 Q. Yeah, sure. Let's ask that. On average, how
3 many declarations or reports do you typically submit in
4 a year?

5 A. I don't think that there's -- again, I really
6 don't know, and I don't think that there is any typical
7 number. I think it really depends on what's happening
8 that year.

9 Q. Would you expect a minimum of at least 10?

10 ATTORNEY VALENTE: Objection to form.

11 A. I don't think that there's any minimum. For
12 example, two years ago, I broke my knee so I -- so I
13 don't think that there's any minimum.

14 BY ATTORNEY YANG:

15 Q. To be clear, two years ago when you broke your
16 knee, is it your testimony that that year you did not
17 provide any expert declarations or reports?

18 ATTORNEY VALENTE: Objection to form and
19 scope.

20 A. I don't think I said that whatsoever.

21 BY ATTORNEY YANG:

22 Q. Then what's the relevance of that testimony to
23 my question of how many expert opinions you typically
24 provide in a year?

25 ATTORNEY VALENTE: Objection to form and

1 scope.

2 A. Well, if I broke my knee and I'm in surgery,
3 it's difficult for me to be providing opinions. And so
4 my point is that there's no -- that there's no minimum
5 as far as I'm aware.

6 BY ATTORNEY YANG:

7 Q. Okay. Are you aware of any maximum number of
8 opinions that you provide in a year?

9 ATTORNEY VALENTE: Objection to form and
10 scope.

11 A. So you seem to be asking about opinions. For
12 example, even in a single declaration, I may have many
13 opinions. So again, I really have not tallied anything
14 like that up for any declarations or cases.

15 BY ATTORNEY YANG:

16 Q. Okay. Well, let me ask about declarations and
17 reports.

18 Do you have a maximum number of declarations
19 and reports that you have submitted in a year?

20 A. I guess by definition, your question, there
21 would be some maximum number. If you just look at the
22 number of reports and declarations I've submitted, I
23 believe by definition, there may be a maximum, but I
24 have not tallied those up.

25 Q. Okay. You have provided declarations in IPRs

1 on behalf of petitioners.

2 Is that right?

3 A. And on behalf of patent owners, yes.

4 Q. What percentage of your declarations in IPRs
5 have been provided on behalf of petitioners?

6 A. I really don't know. I have not tallied that
7 up.

8 Q. If you were to do it, would you expect that
9 tally to be 50 percent for patent owner, 50 percent
10 petitioner, or would you expect it to be higher or
11 lower?

12 ATTORNEY VALENTE: Objection to form.

13 A. So I think with regards -- like, your question
14 is very specific with regards to IPRs. So I -- I do not
15 have that information. I have not tallied it, but I
16 have more generally with regards to both litigation
17 including PTAB proceedings. So for that, I have a rough
18 number, but I have not broken it up for IPRs
19 specifically.

20 BY ATTORNEY YANG:

21 Q. Okay. What's your rough number for all
22 litigation that you said you have?

23 A. I think the rough number is approximately
24 40 percent.

25 Q. 40 percent for whom?

1 A. 40 percent for plaintiffs or patent owners.

2 Q. And so then it would be 60 percent for
3 defendants or petitioners.

4 Is that right?

5 A. I believe that's correct math, yes.

6 Q. Do you recall when was the last time you
7 submitted a declaration in an IPR on behalf of a patent
8 owner?

9 A. I do not, not off the top of my head, no.

10 Q. In an IPR where you have submitted an expert
11 opinion on behalf of the petitioner, has the PTAB ever
12 found a claim not invalid where you provided an opinion
13 that the claim was invalid?

14 ATTORNEY VALENTE: Objection to form and
15 scope.

16 A. I don't know. I don't even believe I'm
17 apprised of what happens for the vast majority of cases.
18 Like, I work on declarations, I do depositions, and
19 that's usually the last I hear about a case.

20 BY ATTORNEY YANG:

21 Q. So is it fair to say that you don't know of
22 any examples of that?

23 ATTORNEY VALENTE: Objection to form and
24 scope.

25 A. I do not, no. Like I'm saying, I don't know

1 what happens after my involvement in a matter.

2 BY ATTORNEY YANG:

3 Q. Okay. Besides the Multifold IPRs, have you
4 ever submitted expert declarations in IPRs where Google
5 is the petitioner?

6 A. I believe so. I don't recall, but I believe
7 so.

8 Q. Okay. Do you own any Google stock?

9 A. Not directly as far as I'm aware. There may
10 be ETFs or mutual funds that do, but I don't believe I
11 own Google stock directly.

12 Q. And do you have any other monetary interest in
13 Google?

14 A. I have no monetary interest in Google, no.

15 Q. Okay. Besides the Multifold IPRs, have you
16 ever submitted expert declarations in IPRs where
17 Motorola is the petitioner?

18 A. I don't believe so. But again, I don't recall
19 off the top of my head.

20 Q. And do you have any monetary interest in
21 Motorola?

22 A. I think it's the same answer that I gave you
23 for Google. I don't own stock directly in the company.
24 I may have ownership in ETFs or mutual funds, but no, no
25 other interest.

1 Q. Okay, thank you.

2 In your CV, what is the Mobility Center of
3 Excellence?

4 A. Well, it's talking about -- the organization
5 is above it, and it's called IIDT, and that's -- so I
6 was working with that institute to help them form the
7 education and knowledge that people would need to
8 succeed in today's especially digital or
9 technology-focused world.

10 Q. I see.

11 Was this a managerial position or did you do
12 technical work?

13 A. Well, it's -- you can see the title. It says
14 dean, Mobility Center of Excellence, so it -- I don't
15 even -- so when you say "technical work," I'm not really
16 sure what you mean.

17 But clearly, as I explained to you, it's in
18 the field of technology and what kind of technologies I
19 believe students and practitioners should be learning to
20 be successful in today's increasingly technology-based
21 world.

22 Q. Well, the reason I ask is because "dean" is a
23 rather broad term. Like, when I was in college, some of
24 the deans did research work; some of the deans, they
25 only managed the college. So I'm trying to understand

1 what role you played there.

2 Was this managing the Mobility Center or were
3 you actually engaged in research?

4 A. Neither. It was more of an advisory role.

5 Q. I see.

6 And what is S3G Technology, LLC?

7 A. S3G, like it states, it provides consultation
8 and product services related to mobile and wireless
9 solutions that deliver critical services to semi-urban,
10 rural, and remote populations across the world.

11 Q. And what type of work do you do at S3G?

12 A. So for S3G, I am responsible for architecting
13 the technology, overseeing the development, engaging
14 with customers and potential customers, making -- so
15 essentially moving the technology and the products
16 forward.

17 Q. When you said "overseeing the development,"
18 what are you developing in?

19 A. Well, one of the technologies that S3G has
20 developed and continues to develop is a tool to empower
21 people in -- to really financially empower people
22 through technology -- specifically, apps -- that can
23 help them emerge from poverty and make a better life for
24 themselves and their families.

25 Q. So for my understanding purposes, are you

1 saying that it's a financial app?

2 A. No.

3 Q. Could you explain what the technology was
4 again? Because you said the word is an app to
5 financially help people.

6 A. I don't think I said financially help people,
7 I think I said financially empower people. And so the
8 technology, as an example, can be used -- so I'll give
9 you one concrete example.

10 For example, in developing countries, there
11 are fishermen that go out early in the morning to find
12 fish or prawns. And what typically happens is those
13 fishermen, they go out, they catch maybe several kilos
14 of prawns, then they sell it to a middleman. That
15 middleman sells it to another middleman, and then
16 ultimately, it gets to the market.

17 The fisherman gets very little money for the
18 fish or the prawns, whereas with this technology, people
19 in the village were able to develop an app that would
20 allow each of these fishermen, when they come back from
21 their little boats that they'd go out on every morning,
22 they could enter in I've caught this many kilos of this
23 type of fish, this many kilos of this type of prawns.
24 And then the local or even far-away hotels and
25 restaurants, they would also have the corresponding app

1 and they would be able to identify what they would want
2 to buy.

3 And then that way, the -- through technology,
4 we were able to, or the people in the village who used
5 the technology were able to eliminate the middleman and
6 the fishermen were able to significantly increase the
7 amount of payment they received for their work
8 specifically in going out and catching fish and prawns
9 and that helped to financially empower themselves and
10 their families and to really emerge from poverty and
11 make a better life for themselves and their families and
12 even for the villagers overall.

13 Q. I see.

14 I believe you said that people in the village
15 developed the app. What's your role in the development
16 process?

17 ATTORNEY VALENTE: Objection to form.

18 A. I think -- are you asking what is S3G's role
19 in the development process, or are you asking my
20 particular role apart from what I explained to you
21 earlier?

22 BY ATTORNEY YANG:

23 Q. Your particular role.

24 A. Well, I explained to you earlier that my
25 particular role is overseeing the development of the

1 technology, architecting the solution, working with
2 customers, potential customers. So that is my role.

3 Q. So for the example that you gave earlier, you
4 would be working for the people developing the app? I'm
5 sorry, working with the people developing the app?

6 A. Are you asking me again personally?

7 Q. Yes. I'm trying to understand what your role
8 is in the example that you gave.

9 A. And I explained to you that my role is in
10 developing the technology, architecting its design,
11 working with customers or potential customers.

12 Q. My confusion is "developing the technology" is
13 a really broad term.

14 Are you saying that you're writing the code
15 for the app yourself, or you're helping someone else
16 write the app?

17 ATTORNEY VALENTE: Objection to form.

18 A. I myself wrote significant parts of the
19 technology, yes, if that is your question.

20 BY ATTORNEY YANG:

21 Q. That was. That was very helpful, thank you.

22 Looking back at your CV, what's the Expert
23 Network of the World Economic Forum?

24 A. So the Expert Network is a network of experts
25 within the World Economic Forum that advises certain --

1 certain countries, certain companies that are members of
2 the World Economic Forum on specific issues that are
3 happening or that may come up.

4 Q. And what is your role as a member of the
5 Expert Network?

6 A. So I think the entire Expert Network is made
7 up of experts that have been identified by the World
8 Economic Forum. And, like I said, at meetings, we
9 discuss issues, we advise people, including Presidents
10 and Prime Ministers, on various issues, primarily
11 related to technology.

12 Q. And when you said "we," do you mean that you
13 personally advise Presidents and Prime Ministers on
14 these topics?

15 A. Yes. The World Economic Forum gathers
16 Presidents, Prime Ministers, industry leaders, and we
17 meet with them. We advise them, yes.

18 Q. Okay. And what is Shuv Gray LLC?

19 A. Shuv Gray is -- it doesn't really do much
20 anymore. It -- it -- a lot of -- yeah, it doesn't
21 really do much.

22 Q. So it says that -- in your CV, it says from
23 2007 to present. Is it fair to say at present, you're
24 not doing anything with Shuv Gray?

25 A. Well, no, I'm still, I believe, from a LLC

1 perspective, I'm still a member of the LLC. I'm saying
2 that the LLC I don't believe does that much right now.

3 Q. You said "does that much." Does it -- do you
4 mean -- does it do anything?

5 A. Well, it did similar things to S3G. It
6 developed technologies as well. What I'm trying to say
7 is right now, the -- my time has not been spent,
8 especially recently, on Shuv Gray and the technologies
9 that it was developing, so that's what I mean.

10 Q. And when was the last time you spent -- you
11 spent -- you did any work for Shuv Gray?

12 ATTORNEY VALENTE: Objection, form.

13 A. Are you asking about, like, technical work, or
14 what is your question?

15 BY ATTORNEY YANG:

16 Q. Sure, let's -- let me ask about technical
17 work. When was the last time you did any for Shuv Gray?

18 A. I would probably say many months ago.

19 Q. Was it within the last year?

20 A. Probably. I don't have a recollection, but
21 probably.

22 Q. Do you recall what that work was?

23 A. So even for Shuv Gray, it's researching and
24 developing new technologies that can help -- that can
25 help people. So I'm very focused on using modern

1 technology to solve critical problems in the world and
2 to really help people and financially empower them.

3 And so Shuv Gray essentially does research and
4 development in how technologies can be used to achieve
5 those purposes.

6 Q. And I believe you said earlier that there was
7 overlap between Shuv Gray and S3G. Is that right?
8 Overlap in terms of technologies.

9 ATTORNEY VALENTE: Objection to form.

10 A. I don't think I said that. I think I said it
11 does similar things. So I think the breakdown would be
12 that Shuv Gray oftentimes would perform the research to
13 kind of identify novel uses of technology or even novel
14 technologies to address the issues I talked about. And
15 S3G is more directed to actually moving forward with
16 working with people and customers and governments to
17 really move that forward.

18 BY ATTORNEY YANG:

19 Q. So is it fair to say that there's a relation
20 between Shuv Gray and S3G?

21 A. Are you asking from a legal perspective? I'm
22 not really understanding your question.

23 Q. You said that Shuv Gray performs the research
24 and then S3G moves it forward. When you said that, do
25 you mean that Shuv Gray performs the research and then

1 S3G moves forward the same research or different
2 research?

3 A. I said that S3G moves forward with the
4 implementation of it, so I don't believe I said what you
5 just summarized.

6 Q. Right. I'm trying to understand the -- what
7 are you implementing at S3G? Are you implementing the
8 research that you did at Shuv Gray, or are you
9 implementing something else?

10 A. S3G is moving forward with the implementation
11 based on the research that Shuv Gray did to identify
12 these problems, identify solutions, identify
13 technologies that can positively address the areas that
14 we are focused on.

15 Q. And besides you, are there any other people
16 involved with both Shuv Gray and S3G?

17 A. Yes. There are, for example, contractors that
18 help in performing the research, that help in performing
19 the source code development, the testing.

20 Q. When you said "research," does that research
21 include research in user interfaces?

22 A. Yes. Researching user interfaces is a big
23 part of it, yes.

24 Q. And can you give me an example of that
25 research in user interfaces?

1 A. Well, I can give you an example with regards
2 to the example I gave you about the fishermen in the
3 small villages.

4 We spent a lot of time looking at how to
5 really facilitate the user interface for those fishermen
6 and what would work for them.

7 Q. What was your role in researching the user
8 interface for the fishermen?

9 A. I think part of it was for some of them, I
10 believe I spoke with some of the potential users or
11 groups of users; and then for others, it was also
12 understanding what the feedback was from people and then
13 thinking through what kind of -- what kind of solution
14 would be potentially attractive and then trying those
15 out.

16 Q. Okay. Can we turn to your expert declaration?
17 I believe you have an unmarked copy, a paper copy.

18 A. I do.

19 Q. Or you can look at the electronic copy.
20 Either one is fine. And let me know when you're on
21 paragraph 16.

22 A. Okay, I'm there.

23 Q. In paragraph 16, you list materials you
24 reviewed in forming your opinions for your declaration.

25 Is that correct?

1 ATTORNEY VALENTE: Objection to form.

2 A. The first sentence of paragraph 16 does state
3 in forming my opinions expressed in this declaration, I
4 reviewed the following materials, yes.

5 BY ATTORNEY YANG:

6 Q. Were you familiar with Exhibit 1001, which is
7 the '135 patent, prior to this IPR?

8 A. I don't believe so, no.

9 Q. And you reviewed and are familiar with the
10 '135 patent now.

11 Is that right?

12 A. Now, as well as when I wrote the declaration,
13 yes.

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

16 BY ATTORNEY YANG:

17 Q. Okay. Do you have a copy of Exhibit 1001, the
18 '135 patent?

19 A. I do, yes.

20 Q. Okay. And could you open it and look at it?

21 A. Sure. I have it open.

22 Q. Okay, thank you.

23 Do you personally know any of the inventors of
24 the '135 patent?

25 A. I don't believe so, no.

1 Q. Okay. Could you turn to page 37.

2 A. Of the '135?

3 Q. That's right.

4 A. Page 37 of the markings on the bottom?

5 Q. Yeah, of the markings on the bottom, page 37.
6 It should be column 29 and 30.

7 A. Okay, I'm there.

8 Q. Could you take a look at Claim 1 for me?

9 A. Okay, I have it in front of me.

10 Q. So Claim 1 says: A method of displaying
11 information on a mobile multi-display device.

12 And then if you read on, the first step of
13 Claim 1 says: Placing the multi-display device in an
14 open state with a first display and a second display
15 facing in a same direction.

16 Do you see that?

17 A. Well, I think you eliminated a large part of
18 the preamble, but I do see the portions that you read.

19 Q. Okay. What is a display in the context of the
20 '135 patent?

21 ATTORNEY VALENTE: Objection to form.

22 A. I'm looking at column 4, line 43, and it
23 states in the specification, the term "display" refers
24 to a portion of one or more screens used to display the
25 output of a computer to a user.

1 BY ATTORNEY YANG:

2 Q. Is that the understanding of display that you
3 applied in your analysis of the '135 patent?

4 ATTORNEY VALENTE: Objection, form.

5 A. I'm not really understanding your question
6 that it's the understanding of the term. If -- clearly,
7 in my declaration, I do state things with regards to
8 what is explained in the '135 and what one of ordinary
9 skill would understand from the prior art references.

10 BY ATTORNEY YANG:

11 Q. Okay. I apologize. Let me rephrase that.

12 Based on what we just read in column 4, would
13 one of ordinary skill understand that a display means a
14 portion of one or more screens used to display the
15 output of a computer to a user?

16 ATTORNEY VALENTE: Objection to form.

17 THE WITNESS: Can you ask your question one
18 more time, please?

19 ATTORNEY YANG: Yeah, sure.

20 BY ATTORNEY YANG:

21 Q. Based on what we just read in column 4, would
22 one of ordinary skill understand a display as used in
23 the '135 patent to be a portion of one or more screens
24 used to display the output of a computer to a user?

25 ATTORNEY VALENTE: Objection to form.

1 A. So I believe one of ordinary skill would
2 understand it to encompass that, yes.

3 BY ATTORNEY YANG:

4 Q. Does your understanding of the term "display"
5 in the context of the '135 patent encompass that?

6 A. I'm not sure what you mean by my
7 understanding.

8 Q. Do you understand the term "display" to
9 encompass a portion of one or more screens used to
10 display the output of a computer to a user?

11 ATTORNEY VALENTE: Objection, form.

12 A. So the analysis that I've performed is from
13 the perspective of one of ordinary skill as defined in
14 my declaration so I'm not really sure what you are
15 asking with regards to me personally.

16 BY ATTORNEY YANG:

17 Q. I guess I'm asking did you apply the
18 understanding in column 4 with respect to the term
19 "display" in your analysis?

20 A. I applied in my analysis the perspective of
21 one of ordinary skill, as I explained.

22 Q. And I'm asking specifically about "display" as
23 it is written here in column 4.

24 Did you apply that in your analysis?

25 A. In my analysis, I looked at what is set forth

1 and what one of ordinary skill would understand from,
2 for example, the prior art references, and I've pointed
3 to that in my analysis.

4 Q. Okay. In the sentence that we just read, it
5 says: The term "display" refers to a portion of one or
6 more screens used to display the output of a computer to
7 a user.

8 What is a screen in the context of the '135
9 patent?

10 A. So I think if you look further up in column 4,
11 line 11 states: The term "screen," touchscreen or touch
12 screen, refers to a physical structure that includes one
13 or more hardware components that provide the device with
14 the ability to render a user interface and/or receive
15 user input.

16 Q. Do you agree with column 4 that the term
17 "screen" as used in the '135 patent refers to a physical
18 screen?

19 ATTORNEY VALENTE: Objection to form.

20 A. I'm not really understanding your question, do
21 I agree within the context of the patent. The analysis
22 that I performed is based on what is recited in the
23 claims, and then I also have in my declaration where I
24 was asked to assume certain things. And then I
25 performed the analysis that shows that one of ordinary

1 skill would understand the prior art to disclose and/or
2 suggest the claim limitations.

3 BY ATTORNEY YANG:

4 Q. I guess what I'm asking is based on column 4
5 within the context of the patent, does the word "screen"
6 refer to a physical structure?

7 Isn't that what column 4 says?

8 ATTORNEY VALENTE: Object to form.

9 A. Well, column 4 continues. It says -- refers
10 to a physical structure and then it continues on.

11 BY ATTORNEY YANG:

12 Q. Right. But wouldn't you agree that the
13 portion that continues on modifies the physical
14 structure? It doesn't say that it cannot be a physical
15 structure.

16 ATTORNEY VALENTE: Objection to form.

17 THE WITNESS: What did you say? What modifies
18 what?

19 BY ATTORNEY YANG:

20 Q. It says: The term "screen," touchscreen or
21 touch screen, refers to a physical structure that
22 includes one or more hardware components that provide
23 the device with the ability to render a user interface
24 and/or receive user input, period.

25 Do you see that?

1 A. I do.

2 Q. Wouldn't you agree that the sentence that I
3 just read says that the term "screen" refers to a
4 physical structure and not a nonphysical structure?

5 A. If your question is if it -- if it says
6 something else in the remainder of the '135 patent, I
7 have not memorized the entirety of the '135 patent.

8 Q. But off the top of your head, you can't think
9 of it saying anything else in the remainder of the '135
10 patent.

11 Is that right?

12 ATTORNEY VALENTE: Objection to form.

13 A. I think what I'm saying is that I have not
14 memorized the entirety of a 38-page patent. If there's
15 something that you want to point me to, I'm happy to
16 take a look at it.

17 BY ATTORNEY YANG:

18 Q. That wasn't my question.

19 My question was off the top of your head, you
20 can't think of anything. Regardless of how much you've
21 memorized, you can't think of anything.

22 Is that right?

23 ATTORNEY VALENTE: Objection to form.

24 A. Think of anything about what?

25 Q. About whether a screen can be a physical

1 structure or not.

2 A. But that's what I explained to you in my
3 declaration. I was asked to make certain assumptions as
4 well. So with regards to my declaration, I have shown
5 that one of ordinary skill, in reviewing the prior art,
6 would understand that the prior art discloses and/or
7 suggests the claim limitations.

8 Q. Except my question isn't about what the prior
9 art discloses. My question is about what the patent
10 teaches.

11 And I'm asking you, based on column 4, doesn't
12 the patent teach that a screen is a physical structure?

13 A. So do you want me to read column 4?

14 Q. If you need to read column 4, be my guest,
15 sure.

16 ATTORNEY VALENTE: Counsel, while
17 Dr. Chatterjee's reading that, we've been going a little
18 over an hour now. Just let us know if it's a good time
19 for a break soon.

20 ATTORNEY YANG: Okay. I have one or two
21 questions and then I think we can take a break.

22 ATTORNEY VALENTE: Okay.

23 THE WITNESS: I've very quickly skimmed
24 through column 4 like you asked.

25 BY ATTORNEY YANG:

1 Q. Okay. So based on column 4, does the word
2 "screen" refer to a physical structure?

3 A. So like I explained to you, column 4, line 11
4 states: The term "screen," touchscreen or touch screen,
5 refers to a physical structure that includes one or more
6 hardware components that provide the device with the
7 ability to render a user interface and/or receive user
8 input.

9 Q. Okay. In the context of the '135 patent, what
10 is the difference between a display and a screen?

11 ATTORNEY VALENTE: Objection to form.

12 A. Well, like I explained to you a few moments or
13 a few minutes earlier, column 4, line 43 states: The
14 term "display" refers to a portion of one or more
15 screens used to display the output of a computer to a
16 user.

17 BY ATTORNEY YANG:

18 Q. Right. I'm trying to understand the
19 difference between a display and a screen.

20 Do you agree that the terms "display" and
21 "screen" mean different things?

22 A. Can you point me to where in my declaration
23 I'm opining about this?

24 Q. I'm trying to understand how -- your
25 understanding of Claim 1, so I'm trying to understand.

1 Are you pointing -- are you saying that
2 "screen" and "display" are the same, or are you saying
3 that "screen" and "display" are different?

4 A. I don't recall having -- like, I don't -- I'm
5 not really understanding your question with regards to
6 my declaration and the opinions that I've set forth in
7 the declaration.

8 Q. I'm asking about your understanding of the
9 '135 patent and, in particular, Claim 1.

10 Do you understand -- when you're looking -- a
11 person of ordinary skill, looking at Claim 1, would they
12 understand "screen" and "display" to be different or
13 would they understand "screen" and "display" to be the
14 same?

15 ATTORNEY VALENTE: Objection to form.

16 A. That -- that's my point, that -- again, I'm
17 going from memory. It's a 100-page declaration,
18 100-plus-page declaration I've submitted. But I do
19 remember that I was asked to make certain assumptions,
20 and I've done that. So I don't know if you're asking me
21 to, like, remove those portions of my declaration. I'm
22 not really understanding your question.

23 BY ATTORNEY YANG:

24 Q. My question is how one of ordinary skill would
25 understand Claim 1 of the '135 patent.

1 Would one of ordinary skill understand
2 "screen" and "display" to mean the same thing or would
3 they understand it to mean different things?

4 A. But again, that's what I just explained to
5 you. I told you that I recall in my declaration I was
6 asked to make certain assumptions, and I performed
7 analyses with those assumptions as well as other
8 analyses, so I'm not really understanding your question.

9 Q. My question is how one of ordinary skill would
10 understand Claim 1.

11 ATTORNEY VALENTE: Objection to form.

12 A. And the analyses that I've done in my
13 declaration shows that -- for example, if you're looking
14 at page 27 of my declaration, the subheading states Yook
15 discloses and/or suggests Claim 1, 5 through 6, 9, 15,
16 and 20. So one of my analyses is that Yook discloses
17 and/or suggests Claim 1.

18 BY ATTORNEY YANG:

19 Q. And my question isn't about what Yook
20 discloses or suggests. My question is about how a
21 person of ordinary skill would understand Claim 1.

22 When the person of ordinary skill is looking
23 at Claim 1, would they think that "screen" and "display"
24 are the same thing or would they think "screen" and
25 "display" are different things?

1 A. But that's what I've tried to answer for you
2 multiple times now, that I was asked to make certain
3 assumptions in my declaration, which I've done under
4 those assumptions, as well as I have additional analyses
5 in my declaration as well.

6 ATTORNEY VALENTE: Counsel, I think it's time
7 for a break.

8 ATTORNEY YANG: When I finish this line of
9 questioning, certainly.

10 ATTORNEY VALENTE: How many more questions do
11 you have?

12 ATTORNEY YANG: When I'm done on this one
13 particular topic on "screen" versus "display."

14 BY ATTORNEY YANG:

15 Q. And so is it your testimony that a person of
16 ordinary skill trying to understand the difference
17 between a screen and display would have to take into
18 account your assumptions, the assumptions in your
19 declaration?

20 A. That's not what I said at all.

21 Q. So then how are the assumptions in your
22 declaration relevant to the understanding of a person of
23 ordinary skill of what Claim 1 means?

24 A. Because my declaration is providing an
25 analysis with regards to, for example, looking at

1 heading 9, the prior art discloses and/or suggests all
2 recited features of Claims 1, and continues on, lists a
3 number of other claims of the '135 patent.

4 So my declaration performed certain analyses,
5 and I'm trying to say that within my analyses, I was
6 asked to make certain assumptions. And I performed
7 analyses with those assumptions, and I also performed
8 analyses in other parts of my declaration as well.

9 Q. Okay, let me try to break it down.

10 Did you analyze what Claim 1 means to a person
11 of ordinary skill?

12 A. I analyzed that, for example, one of ordinary
13 skill, in reviewing the Yook reference, would understand
14 that Yook discloses and/or suggests Claim 1. That's an
15 example of the analyses and opinion -- one of the
16 opinions that are set forth in my declaration.

17 Q. Except my question isn't about what Yook
18 teaches. My question is about what Claim 1 means.

19 Did you analyze what Claim 1 means?

20 ATTORNEY VALENTE: Objection to form. Asked
21 and answered.

22 A. I don't really understand what you mean by --
23 I performed the analyses that are set forth in my
24 declaration. One of the analyses and one of the
25 opinions that I've set forth, for example, on page 27,

1 is that to one of ordinary skill, Yook discloses and/or
2 suggests, for example, Claim 1. That's an example of an
3 opinion and analyses that I've set forth in my report or
4 in my declaration.

5 BY ATTORNEY YANG:

6 Q. And I'm not asking about Yook. Can you answer
7 my question without using the word "Yook"?

8 ATTORNEY VALENTE: Objection to form.

9 THE WITNESS: Can you point me to my
10 declaration? Because I don't understand your question.

11 BY ATTORNEY YANG:

12 Q. My question isn't based on your declaration.
13 My question is based on how a person of ordinary skill
14 would understand Claim 1.

15 I'm asking you as a -- as more than a person
16 of ordinary skill, as an expert, looking at Claim 1, how
17 a person of ordinary skill would understand Claim 1. It
18 has nothing to do with what Yook teaches.

19 ATTORNEY VALENTE: Object to form, scope.
20 Asked and answered.

21 A. So again, the analyses and opinions that I've
22 set forth in my declaration are with regards to whether
23 certain prior art discloses and/or suggests, for
24 example, Claim 1, and that's what I've done.

25 I've done the analysis that, for example,

1 states that one of ordinary skill, in reviewing one or
2 more of these prior art references, would understand the
3 claim limitations to be disclosed and/or suggested, and
4 that's what I've set forth, so I'm -- that's why I keep
5 on asking you to point me to which part of my
6 declaration you're talking about because I'm not
7 understanding your question.

8 BY ATTORNEY YANG:

9 Q. Okay, let me rephrase it a different way.

10 Is it fair to state you did not analyze the
11 meaning of Claim 1 without referring to any prior art?

12 ATTORNEY VALENTE: Objection to form.

13 A. I don't understand what that means. Like,
14 obviously, I'm not referring to prior art to understand
15 the '135 patent so I'm not understanding your -- this
16 question either.

17 BY ATTORNEY YANG:

18 Q. So I'm trying to understand your understanding
19 of the '135 patent. You said you understood the '135
20 patent without referring to prior art.

21 Is that right?

22 A. I think I said that I don't understand this
23 latest clarification that you tried to provide to me.
24 That's what I don't understand.

25 The analysis that I performed is I looked at

1 whether certain prior art references discloses and/or
2 suggests, for example, Claim 1. And that's one of the
3 examples of the opinions and analyses that I've provided
4 in my declaration.

5 Q. Okay. Did you look at the meaning of Claim 1
6 of the '135 patent without looking at prior art?

7 ATTORNEY VALENTE: Objection to form.

8 A. I'm not sure I understand this question. Did
9 I understand the meaning of Claim 1 without looking at
10 prior art?

11 Q. Yes.

12 A. Well, obviously, Claim 1 is in the '135
13 patent. And what I've done is I've done the analysis
14 that shows that to one of ordinary skill, as defined in
15 my declaration, certain prior art discloses and/or
16 suggests, for example, Claim 1, and so I don't really
17 understand your question with regards to do I understand
18 Claim 1 in relation to or by looking at prior art.

19 Q. Let me ask it this way then.

20 In order to determine whether prior art
21 suggests Claim 1, don't you have to understand what
22 Claim 1 means?

23 ATTORNEY VALENTE: Objection to form.

24 A. And I've shown in my analysis that one of
25 ordinary skill would understand certain prior art to

1 disclose and/or suggest, for example, Claim 1.

2 BY ATTORNEY YANG:

3 Q. Except that's nonresponsive to my question.

4 My question is in order to do that, wouldn't
5 you have to know what Claim 1 means?

6 ATTORNEY VALENTE: Objection to form. Asked
7 and answered.

8 A. I'm not -- I'm not understanding your
9 question. I've done the analysis. I've shown in my
10 declaration here's why one of ordinary skill in
11 reviewing certain prior art references would understand
12 those certain prior art to disclose and/or suggest
13 Claim 1 or the limitations in Claim 1. And I've gone
14 through in my 100-plus-page declaration why one of
15 ordinary skill would have that understanding.

16 BY ATTORNEY YANG:

17 Q. And how can do you that without knowing what
18 Claim 1 means?

19 ATTORNEY VALENTE: Objection to form.

20 A. When did I say that I -- I just explained to
21 you that I performed analysis that showed one of
22 ordinary skill, what they would understand certain prior
23 art discloses and/or suggests and why that meets, for
24 example, Claim 1.

25 BY ATTORNEY YANG:

1 Q. And can you perform the analysis of why prior
2 art meets Claim 1 if you don't know what Claim 1 means?

3 ATTORNEY VALENTE: Objection to form.

4 A. Are you asking, like, without reading Claim 1?
5 I'm really confused by your line of questioning.

6 BY ATTORNEY YANG:

7 Q. My question is without knowing what Claim 1
8 means, can you perform the analysis of why prior art
9 teaches Claim 1 if you don't know what it means?

10 ATTORNEY VALENTE: Objection to form.

11 A. I don't really know what you mean, without
12 knowing what it means. I explained to you in my
13 declaration I have performed analyses and I've set forth
14 in what I believe is very clear English that certain
15 prior art, to one of ordinary skill, in reviewing
16 certain prior art, they would understand that prior art
17 to disclose and/or suggest certain things.

18 And I've explained why one of ordinary skill
19 would understand those certain prior art to disclose
20 and/or suggest each and every limitation of Claim 1 as
21 an example. I've gone through each and every
22 limitation. I have not missed any limitations, if that
23 is what you're saying.

24 BY ATTORNEY YANG:

25 Q. No. My question is completely different.

1 Does your analysis compare Claim 1 with the
2 prior art?

3 A. What do you mean, does it compare Claim 1 with
4 the prior art? I've explained to you that my analysis
5 shows that one of ordinary skill, in reviewing certain
6 prior art, would understand that the prior art discloses
7 and/or suggests certain things. And I've explained,
8 again in what I believe is clear English, that -- why
9 one of ordinary skill would understand that certain
10 prior art to disclose and/or suggest each and every
11 limitation of, for example, Claim 1.

12 Q. Well, I'm sorry, but it's not clear English to
13 me. That's why I'm asking these questions.

14 A. Can you point me to which part you're not
15 understanding? And I can try and explain it to you.

16 Q. Yes. The part I'm not understanding is how
17 you're -- how you're analyzing the prior art to show
18 that it meets the claim.

19 When you're doing that, how do you do that if
20 you -- without determining what the claims mean?

21 A. So I think you explained it's not clear to
22 you. If you point me to the paragraph, I can try to
23 read it, refamiliarize myself with it, and then try to
24 clarify to you.

25 Q. Well, I'm actually trying to understand the

1 process of your analysis. It's, like, during your
2 analysis, is the process that you read the prior art
3 first or is the process that you read the patent first?

4 A. I think I've read all of these references and
5 the '135 patent many, many times.

6 Q. I understand that.

7 But which one do you read first? Do you read
8 the patent first, or do you read the prior art first?

9 ATTORNEY VALENTE: Objection to form.

10 A. I think I would say I've read the '135 patent
11 first, I believe. I don't -- I believe so. That makes
12 sense to me. I -- again, like I explained, I don't
13 recall exactly what I did a year ago, but yes, I would
14 have read the '135 patent first. And, like I explained
15 to you, I've read all of these references many, many
16 times.

17 BY ATTORNEY YANG:

18 Q. Okay. And so when you read the '135 patent
19 first, do you read it word for word and -- or do you
20 just skim it?

21 A. Do I just skip it? Is that your question?

22 Q. Skim. I'm sorry. Do you skim it or do you
23 read it word for word?

24 A. I think I've read it word for word, and again,
25 like I've explained, many, many times.

1 Q. Okay. And when you read the '135 patent
2 first, you read the claims as well, do you not?

3 A. Again, I don't have a recollection of what I
4 did or did not do a year ago. But yes, I would believe
5 that the first time that I read the '135 patent, I would
6 have at a minimum read through and reviewed at a minimum
7 the -- Claim 1 and the -- some of the independent
8 claims.

9 Q. And when you read Claim 1 of the '135 patent,
10 are they just words to you, or do they have meaning?

11 ATTORNEY VALENTE: Objection to form.
12 Argumentative.

13 A. I think they're claims and so they have
14 meaning in that they are setting forth the claims of a
15 patent.

16 BY ATTORNEY YANG:

17 Q. You just testified they have meaning.
18 Correct?

19 A. Well, I think they're also words. I think
20 your question was whether they're words. They are words
21 as well.

22 Q. No, my question is are they only words or do
23 they have meaning?

24 A. And I explained to you that they're claims,
25 and my understanding is that the claims are different

1 from the specifications and they're claiming or setting
2 forth the claimed invention.

3 Q. And this is all before you read the prior art
4 and so would you agree with me that they have meaning
5 before you read the prior art?

6 A. The claims -- yes, like I said, the claims --
7 my understanding is that the claims set forth the
8 claimed invention, yes. They -- they do have meaning.

9 Q. So then my question was what is this meaning?
10 Like, what is the meaning of -- is the meaning in
11 Claim 1 of "display" and "structure," are they different
12 or are they the same?

13 ATTORNEY VALENTE: Objection to form.

14 A. So I read to you from different -- or from
15 different lines, I believe, of the same column, column
16 4, what the specification states. And I read those to
17 you, and so I believe the words are different. And I
18 can review it again.

19 ATTORNEY YANG: That's actually not necessary.
20 We can take a break now if you'd like.

21 (Recess taken.)

22 BY ATTORNEY YANG:

23 Q. Dr. Chatterjee, during the break, did you
24 speak with anyone?

25 A. I did.

1 Q. Was it about this deposition?

2 A. No.

3 Q. Okay. Could you pull up the '135 patent
4 again.

5 A. Okay, I have it.

6 Q. Okay. And could you turn back to page 37.

7 A. Okay, I'm there.

8 Q. And look at Claim 1.

9 A. Okay.

10 Q. Looking at Claim 1, the second step says:
11 Receiving by a processor a first input that represents
12 an instruction to reveal one of a first desktop or
13 application on the first display of the multi-display
14 device and selecting the first desktop or application to
15 display on the first display.

16 Do you see that?

17 A. I do.

18 Q. What is a application in the context of
19 Claim 1?

20 ATTORNEY VALENTE: Objection to form.

21 A. So if you look at, for example, paragraph 53
22 of my declaration, I'm saying, for example, as shown in
23 Figure 3, a user may activate or select a first user
24 function. And then in parentheses, "first ...
25 application."

1 So I'm saying that one of ordinary skill would
2 understand Yook's disclosure of a first user function to
3 be included in what one of ordinary skill would
4 understand the first application in Claim 1.

5 BY ATTORNEY YANG:

6 Q. Okay. So based on paragraph 53 of your
7 declaration, is it your testimony that a user function
8 is an application?

9 A. It's my testimony that the user function as
10 disclosed by Yook would be understood to be included
11 within what one of ordinary skill would understand to be
12 an application, or the first application in the
13 limitation that you read to me.

14 Q. And did you just review the '135 patent for
15 the word "application"?

16 A. I did look at the '135 patent, yes.

17 Q. Would you agree that the '135 patent does not
18 define what an application is?

19 A. I think it talks about single -- I think
20 there's some disclosure in paragraph 5 related to
21 multi-screen application and single-screen application.
22 There are -- there are two paragraphs in that column.

23 Q. Yeah, my question wasn't about what a
24 multi-screen application, a single-screen application is
25 in column 5. My question was about the word

1 "application," just "application."

2 And I was asking, would you agree that the
3 '135 patent doesn't define what an application is?

4 ATTORNEY VALENTE: Objection to form.

5 A. I don't remember off the top of my head if
6 there's something like that in the '135. But then I
7 pointed you to paragraph 53 of my declaration, which
8 states -- and there may be other parts as well of my
9 declaration that is relevant to this -- that states that
10 one of ordinary skill would understand Yook's first user
11 function to at least be included within what one of
12 ordinary skill would understand the first application in
13 the '135 to be.

14 BY ATTORNEY YANG:

15 Q. So then if the '135 patent doesn't define the
16 term "application," the meaning would be what one of
17 ordinary skill would understand.

18 Is that right?

19 ATTORNEY VALENTE: Objection to form.

20 A. Can you ask your question again? I believe
21 yes, it is based on what one of ordinary skill would
22 understand the term to be within the context of the '135
23 patent.

24 BY ATTORNEY YANG:

25 Q. Okay. I guess what I'm trying to understand

1 is are there any user functions that one of ordinary
2 skill would understand is not an application, or are all
3 user functions applications?

4 ATTORNEY VALENTE: Objection to form.

5 A. So are you talking about the user functions in
6 Yook or something in general?

7 BY ATTORNEY YANG:

8 Q. No, I'm just talking about the term "user
9 function."

10 Are all user functions applications, or are
11 there some user applications -- functions that are not
12 applications?

13 ATTORNEY VALENTE: Objection to form.

14 A. I -- the term "user function," I couldn't tell
15 you. But what I'm saying is as Yook describes and
16 teaches in the Yook reference, one of ordinary skill
17 would understand, for example, as set forth in
18 paragraph 53 of my declaration, that the -- that as used
19 in Yook, the first user function, one of ordinary skill
20 would understand it to be included within the claimed
21 first application.

22 BY ATTORNEY YANG:

23 Q. I guess the problem I'm having is the word
24 user -- the term "user function" isn't defined and the
25 term "application" isn't defined. So I'm trying to

1 figure out would a person of ordinary skill understand
2 the term "user function" to be synonymous with the term
3 "application"?

4 ATTORNEY VALENTE: Objection, form.

5 A. I think -- and I'm going from memory here. I
6 think the Yook reference provides certain examples as
7 well. If you look at, for example, page 34 of my
8 declaration, it's citing to other portions of Yook that
9 is stating that what is displayed is, for example, a
10 functional view area App.A as to the application program
11 related to the menu item A. So it's explaining very
12 clearly in Yook that these are applications and what is
13 displayed on the screen of Yook as well.

14 BY ATTORNEY YANG:

15 Q. When you just said these are applications, you
16 mean user functions are applications, or something else?

17 ATTORNEY VALENTE: Objection to form.

18 A. So if you look at paragraph 47 of my
19 declaration, I'm stating Yook discloses displaying
20 information including "a plurality of desktops and/or
21 applications each having at least one window" on mobile
22 terminal 100.

23 And then I continue on to cite: As shown in
24 Figure 3 below, when a first user function, an
25 application, and a second user function, another

1 application, are activated, screen 140 is divided into
2 two screen areas where a functional view area A.App for
3 the first user function is displayed on one area, and
4 then I continue on.

5 And then if you look further at the bottom of
6 page 34, it's also stating that it can store any of
7 application programs related to the present invention.

8 So there is a lot of disclosure that I'm
9 citing to from Yook that would lead one of ordinary
10 skill in reading the teachings of Yook to understand
11 that those would be included within what one of ordinary
12 skill understands to be the first -- the first desktop
13 or application.

14 BY ATTORNEY YANG:

15 Q. So I apologize. The trouble I'm having is
16 that you're talking about user functions and then
17 halfway through your answer, you stop -- you started --
18 you're saying those would be included within what one of
19 ordinary skill would understand, and so I'm trying to
20 understand what "those" are.

21 Are "those" user functions or are "those"
22 something else?

23 ATTORNEY VALENTE: Objection to form.

24 A. Those are the user functions as disclosed by
25 Yook. And as I explained, in addition to the portions

1 that I cited you to or pointed you to in paragraph 47,
2 even at the bottom of page 34, I'm also further
3 explaining why one of ordinary skill would understand
4 that those user functions as disclosed by Yook to be
5 applications within the '135 patent.

6 So, for example, if you look at paragraph 33
7 of Exhibit 1005, it's stating the storage unit 150 can
8 store any of application programs related to the present
9 invention, and then it continues on, controlling
10 execution of an activated application program.

11 So these are -- obviously, there's a lot of
12 citations in my actual declaration, but I'm simply
13 pointing you to some of them as examples of why one of
14 ordinary skill in reviewing Yook would understand those
15 cited user functions to be the -- to be included in what
16 the claimed first application is in the '135 patent.

17 BY ATTORNEY YANG:

18 Q. Okay. To make sure I understand this, your
19 opinion is that those cited user applications -- I'm
20 sorry, those cited user functions are applications.

21 Do you have an opinion whether all user
22 functions are applications?

23 ATTORNEY VALENTE: Objection to form. Scope.

24 A. The user functions that I cite to in my
25 declaration from the Yook prior art reference would be

1 understood to be included within the understanding of
2 application. For example, the first application in the
3 '135 patent.

4 BY ATTORNEY YANG:

5 Q. Right. But my question was about all user
6 functions, not those -- not just the user functions
7 cited.

8 Are all user functions applications?

9 ATTORNEY VALENTE: Objection to form. Scope.
10 Asked and answered.

11 A. Can you -- which document are you looking at
12 that's talking about user functions apart from Yook?

13 BY ATTORNEY YANG:

14 Q. I'm asking about the term "user functions"
15 generally, not just Yook's user functions.

16 I'm asking, are all user functions
17 applications?

18 ATTORNEY VALENTE: Same objections.

19 A. I don't understand the -- somebody might
20 use -- like, without seeing a document that you're
21 talking about, I don't understand how I can answer that
22 question.

23 BY ATTORNEY YANG:

24 Q. So is it fair to say that you can't answer
25 whether all user functions are applications?

1 ATTORNEY VALENTE: Objection to form and
2 scope.

3 A. I don't know what document. I'm telling you
4 that user functions, as disclosed and understood by one
5 of ordinary skill in reading the Yook reference, would
6 be included within the claimed first application.

7 As per your question with regards to that
8 claim limitation of Claim 1, I don't know how to answer
9 a question about how other people, other documents,
10 other references might use user function. I don't see
11 how I can answer that question without looking at the
12 other document that you're looking at.

13 BY ATTORNEY YANG:

14 Q. Okay. Does the term "user function" have a
15 meaning as understood by a person of ordinary skill?

16 ATTORNEY VALENTE: Objection, form and scope.

17 A. Well, again, I'm looking at the bottom of page
18 34 of my declaration, and it's citing to paragraph 45.
19 And it's clearly talking about -- it's stating when the
20 user selects a dual menu item AB in screen 401, the
21 mobile terminal 100 can activate application programs
22 related to the menu items A and B, and then it continues
23 on.

24 And so again, that's just one example within
25 the disclosure of Yook why one of ordinary skill, in

1 reading the Yook reference, would understand the user
2 functions of Yook to be included within the
3 understanding of the first application of that claim
4 limitation you pointed me to.

5 BY ATTORNEY YANG:

6 Q. Okay. Does Yook define what a user function
7 is?

8 A. Well, I think one of ordinary skill would
9 understand Yook's user functions to include the
10 application programs that he's talking about and that I
11 just read from. That was just one sentence of one
12 paragraph.

13 Q. That wasn't my question.

14 My question was does Yook define what a user
15 function is?

16 A. So through Yook's disclosure, one of ordinary
17 skill would understand that application programs are an
18 example of a user function and so that's why one of
19 ordinary skill, in reviewing the Yook reference, would
20 understand the claimed first application of Claim 1 to
21 be disclosed and/or suggested by the Yook reference, as
22 I explain in my declaration.

23 Q. Okay. Could you go back to Claim 1 of the
24 '135 patent.

25 A. Okay.

1 Q. Looking at the fifth step of Claim 1, it says:
2 Displaying by the processor a preconfigured enunciator
3 window having information therein.

4 Do you see that?

5 A. Yes, and then the limitation continues.

6 Q. Okay. What's as an enunciator window in the
7 context of the '135 patent?

8 ATTORNEY VALENTE: Objection to form.

9 A. I think in relation to Figure 7, the patent
10 provides an example. So, for example, in column 7, line
11 approximately 38, it's stating figure -- so in Figure 7
12 illustrating the enunciator window displaying an alarm
13 or message, so that's an example as set forth in the
14 '135 patent.

15 BY ATTORNEY YANG:

16 Q. Would you agree that the '135 patent provides
17 examples of enunciator windows but doesn't define what
18 enunciator window is?

19 ATTORNEY VALENTE: Objection to form.

20 A. I -- I'm -- I think I'm a little bit confused
21 by your question. If something is providing examples,
22 then at a minimum, the -- it would include those
23 examples.

24 BY ATTORNEY YANG:

25 Q. Okay. Could I direct you to column 3 of the

1 '135 patent.

2 A. Okay. Which line?

3 Q. Starting at line 14, it says: The present
4 disclosure can provide a number of advantages depending
5 on the particular aspect, embodiment, and/or
6 configuration. These are -- and other advantages will
7 be apparent from the disclosure.

8 Do you see that?

9 A. I do.

10 Q. And then immediately after that, it says: The
11 phrases "at least one," "one or more," and "and/or" are
12 open-ended expressions.

13 And then the rest of column 3 followed by
14 column 4 and then column 5 talks about various phrases,
15 and it ends in column 6.

16 Do you see that?

17 A. Yes.

18 Q. And would you agree with me that the word --
19 that the term "enunciator window" doesn't appear in
20 column -- isn't defined in columns 3, 4, 5, or 6?

21 A. Do you want me to read it, or do you want to
22 tell me it doesn't appear there?

23 Q. I'd like you to read it and then confirm for
24 me that it doesn't appear there.

25 A. Which columns did you ask me to read?

1 Q. 3, 4, 5, and 6.

2 A. Okay. So are you asking about the specific
3 term "enunciator window"? Because on line 2 of column 3
4 I see the word "enunciator."

5 Q. Yes, I'm asking about the term "enunciator
6 window," not "enunciator."

7 A. Did you include column 7 or only up through
8 column 6?

9 Q. Only up to line 29 of column 6.

10 A. So I did a quick search and the word "window"
11 does appear; the word "enunciator" does appear in
12 columns 3, 4, 5, and 6, but I don't see the two words
13 used, "enunciator window," in those columns ending at
14 line 29 of column 6.

15 Q. Okay. Because the term "enunciator window,"
16 those two words together, don't appear in columns 3
17 through 6, would you agree that a person of ordinary
18 skill would look to the examples of what an enunciator
19 window is in the specification to understand what that
20 term means?

21 ATTORNEY VALENTE: Objection to form.

22 A. Well, I think one of ordinary skill, in
23 reading the '135 patent, would look to the
24 specification, including the figures and the claims, to
25 understand.

1 BY ATTORNEY YANG:

2 Q. And to clarify, to understand is to understand
3 the meaning of "enunciator window."

4 Is that right?

5 A. As used in the '135 patent, yes.

6 Q. Okay. Could you turn to column 4 of the '135
7 patent. Specifically, line 3.

8 A. Okay, I'm there.

9 Q. Column 4, line 3 says: The term "desktop"
10 refers to a metaphor used to portray systems.

11 Do you see that?

12 A. I do.

13 Q. And then going back to Claim 1 of the '135
14 patent, is that the meaning of the word "desktop" in
15 Claim 1?

16 ATTORNEY VALENTE: Objection to form.

17 A. So again, I'm confused by your question
18 because you just read the first sentence in column 4
19 starting at line 3. There are additional sentences as
20 well that say a desktop is generally considered a
21 surface, and it continues on. So are you asking only
22 with that one sentence that you read?

23 BY ATTORNEY YANG:

24 Q. Let me rephrase that. I'm asking about
25 column 4, lines 3 through 10.

1 A. Okay, I've read column 4, lines 3 through 10.

2 Q. Okay. Is that the meaning of "desktop" in
3 Claim 1 of the '135 patent?

4 ATTORNEY VALENTE: Object to form.

5 A. So looking at Claim 1 of the '135 patent, it's
6 reciting desktop and/or applications or desktop or
7 application. And in my analysis, I've set forth where,
8 at a minimum, the application part of the desktop and/or
9 application is met. And I may have analysis with
10 regards to desktop as well, but the claim language is
11 desktops and/or applications.

12 BY ATTORNEY YANG:

13 Q. Right. The claim language is desktop or
14 application. I agree with that. But my question isn't
15 directed to the application portion, it's only directed
16 to the desktop portion.

17 My question is with respect to desktop, is the
18 meaning of desktop found in column 4, lines 3 through
19 10?

20 ATTORNEY VALENTE: Objection, form. Scope.

21 A. So are you saying if the claim language were
22 written to not have the "or"? Is that your question?

23 BY ATTORNEY YANG:

24 Q. No. My question is specifically on the word
25 "desktop." I'm trying to understand the meaning of the

1 word "desktop." I know there's an "or" there, and
2 there's also "application," but I'm not asking about --
3 but I'm asking only about the desktop portion, not the
4 application portion.

5 A. And so again, like I answered for you already,
6 my -- I'm going from memory here, but my declaration
7 clearly identifies, because the claim language, at least
8 of Claim 1, is desktop -- desktops and/or applications,
9 my understanding is that only one of those would be
10 needed.

11 And I explain in my declaration why one of
12 ordinary skill would understand, at a minimum, the
13 applications to be disclosed and/or suggested by, for
14 example, the Yook reference.

15 And, like I said, I haven't memorized the
16 entirety of my declaration. I may have analysis with
17 regards to the desktop portion of the claim language as
18 well. I don't remember. But my understanding is that
19 where it's saying "desktops and/or application," that
20 just one of those would be required to meet the claim.

21 Q. Yes, I understand that's your -- that's your
22 opinion, but I'm trying to understand the desktop
23 portion. I'm trying to understand what the word
24 "desktop" means in Claim 1.

25 ATTORNEY VALENTE: Objection to form. Scope.

1 A. So again, I think I'm still not understanding
2 the -- you seem to agree with me that the claim language
3 is desktops and/or application, at least in the
4 preamble. And then later on, the -- in the limitations
5 the claim language is desktop or application, and you
6 seem to agree with me on that. And so I think I'm not
7 understanding your question again.

8 BY ATTORNEY YANG:

9 Q. Well, I do agree with you on that. The issue
10 is I'm trying to understand what both sides of the "or"
11 mean. We've already discussed what applications are,
12 and I'd like to understand what desktops are, because in
13 order -- you'll -- I agree it's an "or" there so you're
14 only looking at one or the other. But, like, I have to
15 understand both sides of it.

16 So I've understood the application sides from
17 my previous questions, and now I'm trying to understand
18 the desktop side.

19 ATTORNEY VALENTE: Objection to form. Scope.

20 A. So when you said that you have to understand
21 both sides of --

22 BY ATTORNEY YANG:

23 Q. Well, I have to understand what your opinion
24 is in order to address it. Like, if your opinion is
25 unclear, it's hard for me to address it so I have to

1 understand what the claim language is.

2 ATTORNEY VALENTE: Objection to form. Scope.
3 Is there a question pending, counsel?

4 ATTORNEY YANG: Yes.

5 BY ATTORNEY YANG:

6 Q. My question is, is the definition of -- is the
7 meaning of "desktop" in Claim 1 based off -- defined in
8 column 4, lines 3 through 10?

9 ATTORNEY VALENTE: Objection to form and
10 scope.

11 A. So I think I -- again, I think I've answered
12 this question a couple of times for you already. My
13 understanding of reading the claims is that because
14 there's an "and/or" and then there's "or," in order to
15 meet the claim language, just one of the two would be
16 required.

17 And I'm going from memory here. I believe
18 I've very clearly identified why one of ordinary skill,
19 in reading the prior art, would understand the prior art
20 to disclose and/or suggest the claims.

21 And I don't recall whether I've addressed the
22 desktop part in my declaration. I'm going from memory
23 here. But I think I answered your question by pointing
24 you to the relevant portions, or at least some of the
25 relevant portions of my declaration that is talking

1 about the applications part of the "or."

2 BY ATTORNEY YANG:

3 Q. And my question is directed to the desktop
4 part. Do you have an opinion of what desktop means?

5 ATTORNEY VALENTE: Objection to form and
6 scope.

7 A. I think the opinions that I've set forth --
8 and again, I -- like I keep on telling you, I don't
9 recall whether I've addressed the desktop part, but I
10 know I've addressed the application part.

11 And my reading or in my understanding of the
12 "or" -- and I think you've confirmed this at least twice
13 for me already -- that you also agree that the "or" only
14 requires one of the two items on either side of the "or"
15 to be shown in the prior art.

16 And what I've explained to you is that I do
17 recall providing analysis with regards to the
18 application part. And I think I identified various
19 portions of my declaration that cites to different
20 portions of, for example, the Yook reference to show why
21 one of ordinary skill would understand the Yook
22 reference to disclose and/or suggest that claim
23 language.

24 So I don't remember whether I've addressed the
25 desktop portion. If I have, then you can point me to

1 it.

2 BY ATTORNEY YANG:

3 Q. But my question is your testimony -- your
4 opinion -- you only need an opinion on one of those in
5 order to show that Yook suggests Claim 1. The issue I
6 have is I have to address both because you only need
7 one, but I have to address both. So in order to address
8 both, I need to know what your opinion is of the desktop
9 portion.

10 Do you have one?

11 ATTORNEY VALENTE: Objection to form and
12 scope. Asked and answered.

13 A. I'm really not understanding what you mean by
14 that you need both, you have to address both. I don't
15 understand what that means.

16 BY ATTORNEY YANG:

17 Q. It means that -- it means that if you provided
18 an opinion of both application and desktop, I have to
19 address both application and desktop.

20 ATTORNEY VALENTE: Objection to form and
21 scope.

22 A. And what I've explained to you is that I have
23 not memorized everything in my declaration. But I do
24 have a clear recollection that I addressed the
25 applications part of the asked desktop or application.

1 I may have addressed the desktop part but I don't recall
2 off the top of my head right now.

3 BY ATTORNEY YANG:

4 Q. Okay, I think that's sufficient.

5 Can we turn now to Claim 3 of the '135 patent.
6 This would be at the top of column 30.

7 A. Okay, I'm there.

8 Q. The second step of Claim 3 says: Masking at
9 least one icon representing the device status,
10 connectivity status, or messaging status.

11 Do you see that?

12 A. Yes. The limitation continues, but I do see
13 the portion that you read.

14 Q. You also see that Claim 3 depends on Claim 1,
15 right?

16 A. Yes.

17 Q. Okay. What's the difference between masking
18 at least one icon in Claim 3 and displays information
19 selectively in Claim 1?

20 ATTORNEY VALENTE: Objection, form.

21 A. So with regards to, as I understand your
22 question, for the masking limitation of Claim 3, one of
23 ordinary skill would understand in reading the '135
24 patent that masking would include, at a minimum,
25 superimposing. And so what is pointed to in my

1 declaration for Claim 3, so if you look at, I think
2 Claim 3 analysis -- I think there's analysis for Claim 3
3 starting at page 81, but it really refers back to the
4 analysis for Claim 2.

5 And if you look at the images from the Bauer
6 reference that are shown at the top of page 77, it's
7 showing that -- and in addition to the figures in Bauer,
8 the specification explains that the preview of the text
9 message is superimposed on top of those icons, and
10 that's what I'm pointing to with regards to the masking.

11 BY ATTORNEY YANG:

12 Q. Let me ask a different question then.

13 You don't rely on Bauer for your opinions of
14 Claim 1.

15 Is that right?

16 ATTORNEY VALENTE: Objection to form.

17 A. Well, within this section, this section, you
18 can see the heading B on the top of page 72. It is
19 talking about Yook in view of Bauer.

20 BY ATTORNEY YANG:

21 Q. And the rest of the heading for section B
22 says: Suggests Claims 2 through 3, 7 through 8, 16 and
23 19, right?

24 A. Right. But then, like we've talked about,
25 Claims 2 and 3 and some of the others depend from 1 as

1 well.

2 Q. So is it fair to say you don't have a section
3 specifically for Claim 1 that relies on Bauer?

4 A. So that's what I'm saying. The analysis in
5 this section is with regards to Yook in view of Bauer
6 and so it would be understood within that section as
7 well.

8 Q. Well, that's the problem that I -- I don't
9 understand. You said it would be understood within that
10 section as well.

11 What do you mean by the word "it"?

12 A. Well, if you look at, for example, the section
13 starting on page 72, I'm providing analysis why one of
14 ordinary skill would have combined, would have had
15 motivation to combine the teachings of Bauer and Yook,
16 and -- and so then I continue on. And then I, based on
17 that analysis, then I go into these dependent claims.

18 Q. Well, do you agree that on page 72, the
19 section that we're looking at, B, says Yook in view of
20 Bauer discloses and/or suggests Claims 2 through 3, 7
21 through 8, and 19?

22 A. It does say that. And on top of that, I
23 believe at least 2 to -- 2 and 3, and I believe the
24 other ones -- well, 2 and 3 depend from Claim 1.

25 Q. But you don't address Claim 1 specifically in

1 this section, you only address Claims 2 and 3, right?
2 There's no section here that says Claim 1.

3 ATTORNEY VALENTE: Objection to form.

4 A. But in my analysis for these dependent claims,
5 I am talking about Claim 1 as well.

6 BY ATTORNEY YANG:

7 Q. And can you identify where in your analysis
8 you talk about Claim 1 in these dependent claims?

9 A. Well, there's numerous references. If you
10 look at --

11 Q. Let me rephrase that. With respect to Bauer.
12 Sorry.

13 A. Well --

14 ATTORNEY VALENTE: Objection to form.

15 A. Again, if you look at paragraph 79, it's
16 talking about limitation 1A and it's talking about
17 Bauer. So it's repeatedly -- if you look at 79, 80,
18 onwards, it is talking about independent Claim 1 from
19 which Claims 2 and 3 depend.

20 BY ATTORNEY YANG:

21 Q. Okay, let's break it down paragraph by
22 paragraph then. Looking at paragraph 9, you state:
23 Yook in view of Bauer discloses or -- and/or suggests
24 this limitation.

25 By "this limitation," you mean the limitation

1 of Claim 2. Correct?

2 A. This section is about Claim 2, which is a
3 dependent claim which depends from Claim 1.

4 Q. And then the next section, the sentence in
5 paragraph 79, you're asserting that Yook discloses the
6 limitations of Claim 1, right?

7 ATTORNEY VALENTE: Objection to form.

8 A. Well, I think it's talking about limitation
9 1A. So I'm talking about the independent claim from
10 which Claim 2 depends in this section, and it's
11 discussing both Yook and Bauer and why -- and what one
12 of ordinary skill would have understood from the
13 disclosures that I reference in this section.

14 BY ATTORNEY YANG:

15 Q. Okay. In paragraph 79, where do you discuss
16 where Bauer discuss -- suggests a limitation of Claim 1?

17 A. So, for example, if you look at the last
18 sentence of paragraph 80, this is on --

19 Q. I asked about 79. We'll get to 80. My
20 question was in paragraph 79, where do you discuss where
21 Bauer suggests a limitation of Claim 1?

22 ATTORNEY VALENTE: Objection to form. I'll
23 note for the record as well Dr. Chatterjee was not
24 allowed to finish his last answer.

25 THE WITNESS: So are you asking me to just

1 look at 79, even though there are other paragraphs in
2 this section?

3 BY ATTORNEY YANG:

4 Q. Yes, because I will ask this question
5 identically for each and every paragraph. I just want
6 to go over it paragraph by paragraph.

7 My question is in paragraph 79, where do you
8 discuss where Bauer suggests a limitation of Claim 1?

9 ATTORNEY VALENTE: Objection, form.

10 A. Well, so like I was explaining to you, there
11 is disclosure in paragraph 80, but I think you're asking
12 me not to talk about paragraph 80.

13 BY ATTORNEY YANG:

14 Q. I'm asking -- my question is limited to
15 paragraph 79. My question for paragraph 79 is where do
16 you discuss where Bauer suggests a limitation of Claim 1
17 in paragraph 79? Limited to 79.

18 ATTORNEY VALENTE: Objection to form.

19 A. So I think 79 is talking about the assumption
20 that I reference earlier on and is simply talking about
21 that with regards to section 9A.

22 BY ATTORNEY YANG:

23 Q. Okay. And then moving on to paragraph 80, do
24 you talk about the masking limitation of Claim 3 in
25 paragraph 80?

1 A. I do talk about it.

2 Q. And where do you talk about the masking
3 limitation of Claim 3 in paragraph 80?

4 A. Well, for example, the items which are masked
5 are, for example, the battery status, connectivity
6 status.

7 Q. Does the word "mask" appear in paragraph 80?

8 A. I think I'm -- what I'm explaining is what one
9 of ordinary skill would understand. And I think Claim 3
10 analysis starts later and then it refers back to this
11 discussion.

12 Q. Okay. How does paragraph 80 explain how Bauer
13 suggests the displays information selectively limitation
14 of Claim 1?

15 ATTORNEY VALENTE: Objection to form.

16 A. Well, for example, if you look at the first
17 sentence in paragraph 80, it's talking about dynamically
18 reflect the updated battery level and signal strength in
19 order to provide updated status information to the user.

20 BY ATTORNEY YANG:

21 Q. And that provides a citation to the previous
22 section for Claim 1, is that right, Section 9.8.16?

23 A. It's in this section of the declaration.

24 Q. It is.

25 But doesn't this citation mean that this

1 particular sentence is describing Yook's teaching with
2 respect to Claim 1?

3 A. I think it's talking about within the context
4 of this section.

5 Q. Yeah, I'm trying to understand for the first
6 sentence of paragraph 80, is that assertion for Yook or
7 is it for Bauer?

8 A. It's in this section, which is in Yook in view
9 of Bauer.

10 Q. And so I see that the second sentence of
11 paragraph 80 is addressing Bauer, because it says "in
12 view of Bauer." But the first sentence doesn't say
13 what -- that it's addressing Bauer, and you have a
14 citation to a section that addresses Yook.

15 Is that right?

16 ATTORNEY VALENTE: Objection, form.

17 A. I mean, clearly from looking at the references
18 and, in particular, looking at the figures, they're very
19 similar. And so what I'm talking about here in
20 paragraph 80 and in the other paragraphs in this section
21 are really in relation to this section B, which is Yook
22 in view of Bauer.

23 BY ATTORNEY YANG:

24 Q. Could you turn to paragraph 86.

25 A. Okay, I'm there.

1 Q. In paragraph 86, the second sentence after the
2 first clause says: The Yook/Bauer combination discloses
3 and/or suggests, and then the rest of that is a
4 limitation from Claim 3.

5 Is that right?

6 A. Yes, that seems to be a portion of Claim 3
7 from the '135.

8 Q. Okay. Do you discuss Claim 1 in this section
9 with -- section 2 with paragraphs 86 and 87?

10 A. I do, because I'm pointing back to Claim 2.
11 And that's what we were just looking at, and I explained
12 it to you.

13 Q. My question was for Claim 1. You just said it
14 was for Claim 2.

15 A. It was in the section for Claim 2, but I just
16 showed you a few moments ago where I'm discussing
17 Claim 1 as well.

18 ATTORNEY VALENTE: Counsel, we've been going
19 over an hour here. Can we take a break soon? We'd
20 appreciate that.

21 ATTORNEY YANG: Okay, I'm almost done with
22 this section 2.

23 BY ATTORNEY YANG:

24 Q. So let me go back to page 72 of your
25 declaration starting with paragraph 79.

1 A. Okay, I'm on page 72.

2 Q. Actually, I'd like to turn -- go a little
3 further, to paragraph 81.

4 A. Okay, I quickly read through paragraph 81.

5 Q. In paragraph 81, is this teaching of Bauer
6 being applied to Claim 2 or is it being applied to
7 Claim 1?

8 ATTORNEY VALENTE: Objection, form.

9 A. Like I explained to you, Claim 2 depends from
10 Claim 1, so it's addressing both Claims 1 and Claim 2
11 because it's a dependent claim.

12 BY ATTORNEY YANG:

13 Q. Then why didn't you have a separate section in
14 section B with a Claim 1 heading?

15 ATTORNEY VALENTE: Objection to form.

16 A. My report is already like 104 pages. I didn't
17 want to make a thousand-page report or declaration. I
18 think it's very clearly set forth in this section.
19 Because Claim 2 and Claim 3 are dependent claims, I've
20 discussed it within the context of this Yook in view of
21 Bauer section, the dependent claims, which includes the
22 independent claim.

23 BY ATTORNEY YANG:

24 Q. Except if you were to -- if you were trying to
25 address the independent claim by itself and there's no

1 section titled Claim 1, how do I know that you're trying
2 to -- you're addressing the independent claim by itself
3 rather than in view of the dependent claims?

4 ATTORNEY VALENTE: Objection to form.

5 A. I don't think I followed your question. I --
6 I think I just showed you in various paragraphs where
7 I'm talking about limitations from Claim 1, so --

8 BY ATTORNEY YANG:

9 Q. So my question -- let me rephrase my question.
10 My question is since you're talking about --
11 since you're talking about Claim 1, why wouldn't you
12 make a separate section for Claim 1 specifically?

13 ATTORNEY VALENTE: Objection to form. Also,
14 I'll note for the record that Dr. Chatterjee was cut off
15 in his last answer.

16 A. So I think I've -- I don't know how else to
17 answer your question. You can clearly see I'm
18 addressing Claim 1 limitations. And I'm doing that
19 because Claim 2 is a dependent claim, as an example.
20 And so I -- and I've explained to you that I've tried to
21 keep my declaration reasonably succinct, even though
22 it's over 100 pages long.

23 I'm obviously referring back to portions --
24 like I do in the analysis for Claim 3, I'm referring
25 back to paragraphs previous to that where I'm talking

1 about certain limitations and certain -- what one of
2 ordinary skill would understand from reviewing, for
3 example, Yook in view of Bauer.

4 I believe it's pretty clear what I've done and
5 what I've set forth as for my analysis.

6 BY ATTORNEY YANG:

7 Q. As I was reading it, it becomes totally
8 confusing because you don't have a section addressing
9 Claim -- specifically addressing Claim 1 for Yook and
10 Bauer, right?

11 ATTORNEY VALENTE: Objection to form.

12 A. I'm not sure how else to answer your question.
13 Like I pointed you to, there is analysis for Claim 1
14 limitations.

15 BY ATTORNEY YANG:

16 Q. My question is there's no section specifically
17 for Claim 1. It's in a section for Claim 2.

18 ATTORNEY VALENTE: Objection to form.

19 THE WITNESS: Is your question why did I not
20 repeat, like, pages and pages over and over again?

21 BY ATTORNEY YANG:

22 Q. No. My question is don't you agree that
23 there's no separate section for Claim 1 where you
24 address Yook in view of Bauer?

25 A. I mean, I believe the analysis is there. I'm

1 still not following what your confusion is, but I
2 believe the analysis is clearly there.

3 Q. My confusion is, like, suppose you had a
4 section titled Claim 7, and it addresses -- then you
5 have an analysis of Claim 9 there. Like, I wouldn't be
6 expected to find an analysis of Claim 9 in Claim 7.

7 And so for the same reason, there's no section
8 titled Claim 1 where I would expect to find an analysis
9 of Claim 1 for Yook in view of Bauer.

10 ATTORNEY VALENTE: Objection to form.

11 BY ATTORNEY YANG:

12 Q. You've put that analysis in a section for
13 Claim 2, right?

14 ATTORNEY VALENTE: Objection to form.

15 A. I think I disagree with what you stated
16 because like I -- I gave you an example for Claim 2. I
17 discuss a lot of things. It's very -- I believe it's
18 very confusing to cut off analyses in different
19 sections, and that's why I've put together analyses in a
20 clear, cogent, and reasonably succinct way to put forth
21 the analysis.

22 And then I'm referring back -- for example, I
23 pointed you to Claim 3 where I'm referring back to
24 previous analysis that I've done. And so I believe that
25 that makes the analysis easier to understand, clearer,

1 and more succinct.

2 BY ATTORNEY YANG:

3 Q. But you're telling me in order to find
4 analysis on Claim 1 for Yook in view of Bauer I have to
5 look to a section titled Claim 2, right?

6 ATTORNEY VALENTE: Objection to form.

7 A. I think the analysis is not set forth only in
8 section titles but in the actual analyses, the actual
9 paragraphs. And I think that's what I -- that may be
10 the confusion. The paragraphs set forth the analyses.

11 BY ATTORNEY YANG:

12 Q. That's right. But doesn't the section titles
13 help you to figure out which paragraph is -- are
14 analyzing what?

15 ATTORNEY VALENTE: Objection to form.

16 A. I think the plain language of the paragraphs
17 help somebody who's reading the declaration to
18 understand what is happening. I -- perhaps I could have
19 made it clearer, but I believe -- and it sounds like
20 you're in agreement with me that the paragraphs are
21 crystal clear. You seem to be saying that I should have
22 added additional section headers or section titles. And
23 may be, but I -- I think it seems like you and I are
24 both in agreement that the analysis and the paragraphs
25 of crystal clear.

1 BY ATTORNEY YANG:

2 Q. Well, the first part of my question was just
3 asking to confirm that there is no section titled
4 Claim 1 where you analyze Yook in view of Bauer.

5 ATTORNEY VALENTE: Objection to form. Asked
6 and answered.

7 A. I think there's no dispute between us that the
8 paragraphs set forth the analysis.

9 BY ATTORNEY YANG:

10 Q. My question wasn't about the paragraphs, it
11 was about the section header. I'm asking is there a
12 section header titled Claim 1 where you -- for Yook in
13 view of Bauer?

14 ATTORNEY VALENTE: Objection to form. Asked
15 and answered.

16 ATTORNEY YANG: I'd also like to state on the
17 record that the witness is shaking his head.

18 A. I'm shaking my head because I don't know how
19 else to answer this question. You're agreeing with me
20 that the paragraphs set forth the analysis very clearly.
21 And I've told you perhaps putting different section
22 titles may be -- maybe my section titles are unclear to
23 some people. I believe that they're very clear.

24 But it seems like both you and I are in
25 agreement that the paragraphs where the analysis

1 actually resides are crystal clear, so I'm -- I don't
2 know how else to explain this to you. You're conceding,
3 you're admitting that the analysis is in the paragraphs
4 and so I don't know what else --

5 Q. Well, first of all --

6 A. -- to say.

7 Q. -- I haven't conceded that. You're putting
8 words in my mouth. But let's go back to the section
9 header titled B.

10 In the section header titled B on page 79, it
11 says: Yook in view of Bauer discloses and/or suggests
12 Claims 2 through 3, 7 through 8, and 19.

13 Do you see that?

14 ATTORNEY VALENTE: Objection to form.
15 Counsel, I'd also request that you stop cutting off the
16 witness and let him finish his answers.

17 ATTORNEY YANG: I'll consider it.

18 ATTORNEY VALENTE: And after this answer,
19 we're going to take a break.

20 ATTORNEY YANG: We'll take a break when I
21 agree to take a break.

22 ATTORNEY VALENTE: That's not how this works.
23 We take a break when the witness would like to take a
24 break.

25 ATTORNEY YANG: Where are you located in?

1 ATTORNEY VALENTE: I'm in Washington, DC.

2 ATTORNEY YANG: Okay. I believe the court
3 reporter's in California and under the Rules of Evidence
4 in California, both parties have to agree to go off the
5 record.

6 ATTORNEY VALENTE: The witness is in DC.

7 ATTORNEY YANG: Well, I'm not agreeing to go
8 off the record until I finish my questions.

9 BY ATTORNEY YANG:

10 Q. Will you please answer my question with
11 respect to section heading B on page 79?

12 ATTORNEY VALENTE: Objection to form.

13 THE WITNESS: What was your question?

14 BY ATTORNEY YANG:

15 Q. Do you see Yook in view of Bauer discloses
16 and/or suggests Claims 2 through 3, 7 through 8, and 19
17 in the section heading titled B on page 79?

18 A. I do. And Claims 2 and 3 are dependent claims
19 that depend from Claim 1.

20 Q. But you agree with me that the number 1
21 doesn't appear in the section header.

22 A. Reading the Claims 2 and 3 as set forth in the
23 '135 patent, clearly it is a dependent claim that
24 depends from Claim 1.

25 Q. That wasn't my question.

1 My question was does the number 1 appear in
2 this section?

3 ATTORNEY VALENTE: Objection to form.

4 ATTORNEY YANG: And I don't mean 19. I mean
5 1.

6 ATTORNEY VALENTE: Objection to form.

7 A. Well, I mean, this -- the number 1 does not
8 appear other than 19. But claims -- when I'm
9 identifying the claims, they're talking about the '135
10 patent.

11 And if you look one line directly above that
12 section, it identifies the patent number for the '135
13 patent. And so clearly, the claims that are written
14 there would be understood -- or at least that was my
15 intent -- that those are the claims from the '135
16 patent. And so if you look at Claim 2 and Claim 3 from
17 the '135 patent, they are dependent claims that depend
18 from Claim 1.

19 BY ATTORNEY YANG:

20 Q. Okay. So if you're going to discuss Claim 1
21 in this section, why not change the number 2 to the
22 number 1? It's literally one character.

23 ATTORNEY VALENTE: Objection to form.

24 A. I -- again, we've talked about the paragraphs
25 have the number 1 in there. I've written declarations

1 for many years. People find them to be clear. I don't
2 know what else to say.

3 Maybe there are different ways of writing
4 declarations. Maybe I could have repeated things over
5 and over again to make a thousand-page declaration.
6 Again, my intent -- and I've done this for some time --
7 is to make my analysis easy to understand and not make
8 it overly long and so that's what I've done here, as
9 I've done in other declarations and expert reports.

10 BY ATTORNEY YANG:

11 Q. I've actually seen some quite long
12 declarations.

13 Is there a reason that you don't want to write
14 an overly long declaration?

15 ATTORNEY VALENTE: Objection to form.

16 THE WITNESS: You've seen long declarations
17 written by me?

18 BY ATTORNEY YANG:

19 Q. No, by other experts in IPRs. I've seen,
20 like, thousand-page declarations.

21 Is there a reason that you don't submit a
22 longer declaration with more section headers that
23 describe what those sections are?

24 ATTORNEY VALENTE: Objection to form.

25 Relevance.

1 THE WITNESS: I -- I don't know, like, what
2 experts you're talking about. Can you show me the
3 patents that were analyzed and how many grounds there
4 were? If you show me the declarations, I can take a
5 look at that and answer your question.

6 ATTORNEY YANG: Let me rephrase it.

7 BY ATTORNEY YANG:

8 Q. You said you didn't want this declaration to
9 be too long.

10 Why not?

11 ATTORNEY VALENTE: Object to form. Relevance.

12 A. Because the whole purpose of my declaration is
13 to set forth the analysis in an easy-to-understand,
14 succinct, clear way, which is what I've done. I don't
15 believe setting forth a 10,000-page declaration is easy
16 to understand. And what I've done is consistent with my
17 philosophy in performing analysis, is that you set forth
18 the analysis in a clear, easy-to-understand and succinct
19 way, not just adding hundreds and hundreds of pages for
20 no reason.

21 ATTORNEY VALENTE: Counsel, we have been going
22 an hour and a half. Just so the record's clear, are you
23 refusing to allow Dr. Chatterjee to take a break?

24 ATTORNEY YANG: No. Actually, we can take a
25 break now. How long would you like, Dr. Chatterjee?

1 THE WITNESS: It's lunchtime. Or is lunch
2 here?

3 ATTORNEY VALENTE: Let me see. Lunch is here.

4 THE WITNESS: Lunch is here. Maybe we can
5 take like a 30-minute lunch break.

6 ATTORNEY YANG: That's totally fine. Can we
7 come back at 12:45?

8 ATTORNEY VALENTE: Sounds good.

9 ATTORNEY YANG: Okay, excellent. Thank you so
10 much.

11 (Recess taken.)

12 BY ATTORNEY YANG:

13 Q. Welcome back, Dr. Chatterjee. During the
14 break, did you speak with anyone about this deposition?

15 A. No.

16 Q. Okay. Could we turn back to your declaration
17 starting on page 10.

18 A. Okay, I'm there.

19 Q. So correct me if I'm wrong, but I believe you
20 said earlier that you had personal knowledge of the
21 Nokia 9000.

22 Is that right?

23 A. Yes, the 9000 family, yes.

24 Q. Could you briefly describe what that personal
25 knowledge is.

1 A. I think I used it. I'm wondering if we
2 developed anything for it, but I think it was more
3 related to using it and -- yeah, using it and
4 interacting with the device and the applications on the
5 device.

6 Q. So by "use it," you mean you at one point
7 owned one?

8 A. I don't think I owned it. I think either a
9 colleague owned it or the company owned it.

10 Q. And when you said "the company," what company
11 are you talking about?

12 A. It was -- I think at that point it was HP.

13 Q. And when you said you may have developed
14 something for it, would that also have been at HP?

15 A. I don't remember. I don't remember whether we
16 developed anything for it, but I do remember using it,
17 interacting with it. But I don't remember for sure
18 whether we developed anything.

19 Q. Okay. In paragraph 26, you say that it had
20 8 megabytes of memory.

21 Do you see that?

22 A. Yes, I see 8 megabytes of memory.

23 Q. How did you know that?

24 A. I think it's from a document. I think it's
25 from Exhibit 1013.

1 Q. And where did you get Exhibit 1013?

2 A. I think the URL is set forth on the bottom of
3 Exhibit 1013.

4 Q. So you typed in the URL into a browser and
5 then downloaded Exhibit 1013?

6 Is that how you got it?

7 ATTORNEY VALENTE: Objection to form.

8 A. I don't recall how this specific exhibit was
9 created.

10 BY ATTORNEY YANG:

11 Q. So you don't recall if it was given to you or
12 you found it on your own.

13 Is that right?

14 ATTORNEY VALENTE: Objection.

15 A. So if you're talking about this specific
16 exhibit, I don't recall off the top of my head whether
17 I'm the one that created this exhibit or somebody else
18 did. But like I explained to you earlier, I did have
19 knowledge of this Nokia 9000 and the family. And so
20 this particular document, how it was created, how it was
21 made into a PDF, I don't recall off the top of my head.

22 BY ATTORNEY YANG:

23 Q. And your knowledge, that was from your time
24 working at HP?

25 A. So I think it was HP or a colleague that had

1 it. I don't recall off the top of my head. Like I
2 explained to you, I don't remember whether HP or my
3 colleague owned the device.

4 (Exhibit No. 1005, previously marked, was
5 referenced and indexed.)

6 BY ATTORNEY YANG:

7 Q. Okay. Do you have a copy of Exhibit 1005,
8 which is the Yook patent application?

9 A. Yes, I do.

10 Q. Could you please open that?

11 A. Okay.

12 Q. Looking at the title, you see that the title
13 says Method of Dividing Screen Areas and Mobile Terminal
14 Employing the Same?

15 Do you see that?

16 A. I see the title.

17 Q. The word "screen" in the title, is that
18 referring to a physical screen or is it referring to a
19 screen in the more -- in the abstract sense?

20 ATTORNEY VALENTE: Objection to form.

21 THE WITNESS: I'm not sure. What do you mean
22 by the abstract sense?

23 ATTORNEY YANG: Let me rephrase my question.

24 BY ATTORNEY YANG:

25 Q. If you recall from the '135 patent, it had --

1 it defined both a screen and a display.

2 A. I think we read from portions of the
3 specification that there -- there were portions of the
4 specification that I read to you or you asked me to
5 read.

6 Q. Right. So I am trying to understand. The
7 screen in Yook, is that screen a physical screen or is
8 that screen a display that refers to a portion of a
9 physical screen?

10 ATTORNEY VALENTE: Objection to form.

11 A. So are you asking whether Yook discloses
12 multiple physical screens?

13 Is that your question?

14 BY ATTORNEY YANG:

15 Q. No. My question is the word "screen" as it is
16 used in Yook, is that referring to a physical screen or
17 is that referring to portions of a physical screen?

18 ATTORNEY VALENTE: Objection to form.

19 A. So in Yook, as far as I remember -- and again,
20 I've not memorized everything in Yook -- Yook is
21 disclosing a single physical -- so if you look at, for
22 example, Figure 2, it shows touchscreen 140.

23 BY ATTORNEY YANG:

24 Q. Okay. Going back to page 1 of Yook,
25 underneath the title, it lists the inventors.

1 Do you personally know any of the inventors of
2 Yook?

3 A. I don't believe so.

4 Q. Okay. Could we look on page 2 and look at
5 Figure 1.

6 A. Okay, I'm there.

7 Q. And what is 100 in Figure 1?

8 A. It's mobile terminal 100.

9 Q. So is it true that 100 is the entire thing
10 that's shown in Figure 1?

11 A. It's the mobile terminal. But there are
12 components within it, obviously, and that -- those
13 components, or at least an illustration of the
14 components, are shown in Figure 2.

15 Q. Okay. And my next question is trying to
16 figure out what those components are.

17 Do you know what 121 is?

18 ATTORNEY VALENTE: Objection to form. Scope.

19 THE WITNESS: Are you looking at Figure 1 or
20 2?

21 BY ATTORNEY YANG:

22 Q. I'm looking at Figure 1. Under -- at the
23 bottom of -- I guess on the bottom right side of the
24 figure, there's 121 and 123, and I'm asking what 121 is.

25 A. So I'm reading from paragraph 28. About

1 halfway in the middle, it states: In particular, as
2 illustrated in Figure 1, the input unit 120 can include
3 a touchpad 121 near the display unit 141 on an upper
4 slide body and a plurality of key buttons 123 on a lower
5 slide body slidable under the upper slide body.

6 Q. Okay. And is keyboard 123 a screen?

7 A. I think you asked me about 121, correct?

8 Q. When you were reading about 121, you said 121
9 was a touchpad and then 123 is the keyboard, so I'm now
10 asking about 123.

11 A. I don't think I read "keyboard." I think this
12 portion of paragraph 28 that I read, it's saying and a
13 plurality of key buttons 123.

14 Q. Okay. Let me rephrase that then.

15 Is the plurality of buttons 123 a screen?

16 ATTORNEY VALENTE: Objection to scope.

17 A. Based on only reading that section of
18 paragraph 28, it's stating a plurality of key buttons
19 123. I've not memorized what else the Yook reference
20 says about 123, but I read from paragraph 28 to you.

21 BY ATTORNEY YANG:

22 Q. So how many physical screens are shown in
23 Figure 1?

24 ATTORNEY VALENTE: Objection to form.

25 A. So I think 140 is the touchscreen.

1 BY ATTORNEY YANG:

2 Q. Is touchscreen 140 in a landscape orientation
3 or is it in a portrait orientation?

4 ATTORNEY VALENTE: Objection to form.

5 A. The entirety of the touchscreen 140 seems to
6 be in a landscape orientation as shown in Figure 1.

7 BY ATTORNEY YANG:

8 Q. Okay. Can we turn to Figure 3 on page 4.

9 A. Okay, I'm there.

10 Q. So 301 shows a potential screen that's shown
11 on touchscreen 140.

12 Is that right?

13 ATTORNEY VALENTE: Objection to form.

14 A. If you read paragraph 38, it's stating that,
15 referring to Figure 3, when a first user function and a
16 second user function which are independent of each other
17 are activated at one of the same time and in sequence as
18 illustrated in screen 301, the control unit 160 can
19 control the display unit 141 to divide the screen into
20 two areas and cause a functional view area A.App for the
21 first user function to be displayed on one area and
22 cause a functional view area B.App for the second user
23 function to be displayed on the other area.

24 BY ATTORNEY YANG:

25 Q. So is it fair to say that A.App on the left

1 and B.App on the right are on the same physical screen
2 in Yook?

3 A. The screen area is divided into two areas.
4 And as I just read to you, the functional view area
5 A.App is on the left and the functional view area B.App
6 is on the right.

7 Q. I guess my question is looking at 301, that is
8 the one screen shown in Figure 1140, isn't it?

9 A. 301 is showing the screen divided into two
10 areas with the functional view of A.App on the left and
11 the functional view of B.App on the right.

12 Q. Okay. And is 301 displayed in the landscape
13 orientation or is it displayed in the portrait
14 orientation?

15 ATTORNEY VALENTE: Objection to form.

16 A. So are you talking about the individual screen
17 areas A.App and B.App?

18 BY ATTORNEY YANG:

19 Q. I'm talking about the individuals and the
20 whole thing.

21 A. Well, as I've mapped in my analysis, the
22 individual screen areas I believe would be portrait for
23 the individual two areas.

24 Q. And how can you tell that from this figure?

25 A. Well, as it's drawn -- and I think I have a

1 number of diagrams set forth in my report. As it's
2 drawn, if you look at the analysis set forth in my
3 declaration starting at, for example, paragraph 73, it
4 talks about -- it talks about Claim 15. And I have
5 diagrams that are annotated below paragraph 74, and I
6 discuss that very same concept.

7 Q. You just said "as it's drawn," so are you
8 assuming that Figure 3's drawn to scale?

9 A. Well, the express disclosure in Yook, for
10 example, in paragraph 55 talks about that the divided
11 screen areas can be formed in portrait mode.

12 Q. So are you relying on the way it's drawn in
13 Figure 3 or are you relaying on Yook's disclosure in
14 paragraph 55?

15 ATTORNEY VALENTE: Objection to form.

16 A. I'm relying on what one of ordinary skill
17 would understand from the disclosure of Yook.

18 BY ATTORNEY YANG:

19 Q. So is it your testimony that one of ordinary
20 skill could determine the orientation from Figure 3, or
21 would they have to also read the Yook specification?

22 ATTORNEY VALENTE: Objection to form.

23 A. Well, my analysis is based on the Yook
24 reference and what one of ordinary skill would
25 understand from the Yook reference. My analysis is not

1 based on looking at a diagram or a figure from Yook in a
2 vacuum away from its specification, and so I have -- as
3 you can see for the paragraph that I pointed you to, I
4 am citing to portions of the specification, the figures
5 as well.

6 BY ATTORNEY YANG:

7 Q. Okay. At element 301 of Figure 3, is there a
8 status bar at the top?

9 A. Where are you reading in the specification?

10 Q. I'm not reading the specification, I'm just
11 looking at Figure 3. And above A.App and above B.App
12 there is a bar above it.

13 Do you see that?

14 A. I do see that, and that is what I've mapped to
15 the enunciator window.

16 Q. Does Yook ever describe what that is?

17 A. I don't remember off the top of my head, but I
18 believe, as explained in the technology background in my
19 declaration, one of ordinary skill would have understood
20 what that is. And I cite to other materials why one of
21 ordinary skill would have been familiar with what those
22 are.

23 Q. So is it fair to say that your opinion is
24 based on the understanding of one of ordinary skill and
25 not based on any express disclosure in Yook?

1 ATTORNEY VALENTE: Objection to form.

2 A. Well, I think the diagrams are express
3 disclosures in Yook.

4 BY ATTORNEY YANG:

5 Q. Let me rephrase that.

6 Your opinion's based on the diagram and the
7 understanding of one of ordinary skill and not based on
8 any paragraph in the specification of Yook.

9 Is that right?

10 ATTORNEY VALENTE: Objection to form.

11 A. I don't agree with that. I believe that
12 within the context of Yook's disclosure, for example,
13 Yook talking about a mobile terminal, there's a lot of
14 other disclosures within Yook that a -- one of ordinary
15 skill would understand very clearly what that is on the
16 top of where you pointed me to above the A.App and the
17 B.App in 301. Based on it's a mobile terminal, based on
18 discussions about wireless network connectivity, things
19 like that, I believe one of ordinary skill would clearly
20 understand what that is.

21 BY ATTORNEY YANG:

22 Q. Specifically, which paragraph of Yook's
23 specification describes that bar?

24 A. For example, if you look at paragraph 53, it's
25 talking about the mobile terminal 100. It's talking

1 about battery power. Then if you look at paragraph 117
2 as an example, it's talking about the network. So
3 there's a lot of disclosure that would make one of
4 ordinary skill understand within the context of the
5 mobile terminal 100 what those are.

6 And again, I point to a number of materials in
7 my technology background section that further supports
8 that.

9 Q. Okay. Is the bar labeled with a number in
10 Figure 3?

11 A. For Figure 3, I don't see the bar individually
12 being labeled with a separate number.

13 Q. And do you agree that Figure 3 shows the bar
14 extending across the whole screen above both A.App and
15 B.App?

16 ATTORNEY VALENTE: Object to form.

17 A. The two areas, the bar as shown is extending
18 across the two areas where on the left, the A.App
19 functional view is displayed and on the right, the B.App
20 functional view is displayed.

21 BY ATTORNEY YANG:

22 Q. Looking at 302, what is A2.app?

23 A. So I'm reading from paragraph 39. It states:
24 Thereafter, when the user activates a second user
25 function, being the message composition function, the

1 control unit 160 controls the display unit 141 to divide
2 the screen into two areas to display a functional view
3 area, A1.App, i.e., resize message composition view area
4 for the first user function on one area and to display a
5 functional view area, A2.App, for the second user
6 function on the other area.

7 Q. Okay. What's the difference between A2.App as
8 shown in 302 and B.App as shown in 301?

9 A. So it seems like for 301, it's providing some
10 examples. And you'd asked me about these examples
11 earlier on in the morning today. For example, it's
12 talking about message composition function, and then
13 it's also talking about web connection for A2.App. So
14 these are other examples of -- other examples of
15 functional areas of apps, applications.

16 Q. Is it your testimony that A2.App and B.App are
17 both applications?

18 A. Well, these are the functional view areas that
19 are shown in the figure.

20 Q. Okay. In 303, what is Link A.App?

21 A. So if you look at paragraph 40, it's saying
22 toward the end, so I guess a little bit beyond halfway
23 in the middle, it's stating: To divide the screen into
24 two areas to display a functional view area A.App as to
25 the message composition function on one area and to

1 display a functional view area Link A.App as to the file
2 search function on the other area. Hence, the user can
3 compose a message using the functional view area A.App
4 displayed on one area and can find and attach a
5 necessary file using the functional view area Link A.App
6 displayed on the other area.

7 Q. So in example 303, is A.App and Link A.App the
8 same application?

9 A. Well, the portion that I read from in
10 paragraph 40, it's making clear that A.App is a message
11 composition function, and Link A.App is a file search
12 function.

13 Q. And so from that portion, would a person of
14 ordinary skill understand that they're different
15 functions?

16 ATTORNEY VALENTE: Objection to form.

17 A. I don't remember off the top of my head what
18 other portions of this specification of Yook may say
19 about these. But at a minimum, based on what I read to
20 you, it is describing -- the specification in paragraph
21 40 is describing A.App as a message composition function
22 and Link A.App as a file search function. So those are
23 two functions that it's expressly stating in at least
24 paragraph 40.

25 BY ATTORNEY YANG:

1 Q. Okay. Going back to Figure 3, looking at 304,
2 what is Sub A.App?

3 A. So looking at paragraph 41, it's saying when a
4 user function is activated first and then a subfunction
5 thereof is activated, the control unit 160 can control
6 the display unit 141 to divide the screen into two areas
7 and cause two functional view areas to be displayed on
8 the corresponding areas as illustrated in screen 304.

9 Q. Is a subfunction of a function part of that
10 function?

11 A. I don't believe I really considered that, and
12 I don't think I've pointed to this as part of my
13 opinions. If I'm mistaken, if I have, if you point me
14 to that in my declaration, I'm happy to take a look at
15 it.

16 Q. That won't be necessary, I was just trying to
17 figure out how Figure 3 worked. But if you say that you
18 don't recall your opinion, that's fine.

19 Going back to Figure 3 and looking at examples
20 301, 302, 303, and 304, when splitting the screen, does
21 Yook disclose how to determine where the splitter is
22 placed?

23 A. So before I answer that, I don't think I said
24 that I don't recall my opinion. I think I stated that I
25 don't remember if I've -- pointing to that portion of

1 the specification in my opinion. So I don't think I
2 said what you summarized that I said.

3 Q. Okay. I apologize about that. That's a
4 perfectly fine answer, and it's totally understandable.

5 So if you could now answer my pending
6 question.

7 ATTORNEY VALENTE: Object to form.

8 THE WITNESS: Can you remind me of your
9 question again, please?

10 ATTORNEY YANG: Sure.

11 BY ATTORNEY YANG:

12 Q. In Figure 3 looking at 301, 302, 303, and 304,
13 when splitting the screen, does Yook disclose how to
14 determine where the splitter is placed?

15 A. Well, for example, if we look at paragraph 55,
16 it's saying, referring to Figure 4E, the user of the
17 mobile terminal 100 can generate an input signal for
18 activating a listing function. The mobile terminal 100
19 can display a functional view area List A as to the
20 listing function on the display unit 141 and further
21 display a splitter icon for divided screen areas as
22 illustrated in screen 441. Thereafter, when the user
23 touches the splitter icon, the mobile terminal can
24 output a functional view area, items of List A, related
25 to detailed viewing as illustrated in screen 443.

1 Q. Right. But my question is looking at
2 Figure 3, example 301, does Yook tell us where the line
3 between A.App and B.App is placed?

4 A. I think I read from this earlier.
5 Paragraph 38 states: As illustrated in screen 301, the
6 control unit 160 can control the display unit 141 to
7 divide the screen into two areas, and then it continues
8 on.

9 Q. So is it your opinion that paragraph 38 tells
10 us where the line is placed?

11 A. Well, it's my opinion that what I read for you
12 from paragraph 38 sets forth that the screen 301 can be
13 divided into -- divide the screen into two areas, and
14 that's what's shown in 301.

15 Q. Does that tell you what the size of the two
16 areas is?

17 A. Well, it would -- it would say that the screen
18 is divided into two areas; and therefore, the two areas
19 are smaller than the entire area was. But I -- again, I
20 haven't memorized all of Yook. I'm just taking a look
21 at paragraph 38. It's talking about dividing the screen
22 into two areas.

23 Q. Okay, that's fair. If you need a moment to
24 refresh your recollection of Yook, feel free to read it.
25 I just want to confirm whether Yook tells you what the

1 size of A.App and B.App, those portions of the screen
2 are.

3 ATTORNEY VALENTE: Objection, form.

4 A. Are you asking whether it provides, like,
5 precise dimensions of the entirety of mobile terminal
6 100?

7 BY ATTORNEY YANG:

8 Q. No, whether it provides dimensions for
9 these -- the two screen areas after it's been split.

10 A. Well, it -- it's disclosing that it divides
11 the screen into two areas in paragraph 38 and then it
12 has figures, including Figure 301 that shows two areas
13 where A.App, the functional view, is displayed on the
14 left and B.App, the functional view, is displayed on the
15 right.

16 Q. And I'm asking do you know what the dimensions
17 are for those two screen areas?

18 Or does Yook tell you what the dimensions are
19 for those two screen areas?

20 ATTORNEY VALENTE: Objection to form.

21 A. So looking at Figure 3, which is what I think
22 you asked me to look at, Figure 3, 301, I don't see any
23 numbers on there, but I have read for you at least that
24 portion of the paragraph. And it's talking about
25 splitting the -- or dividing the screen into two areas.

1 I don't see any numbers or dimensions in inches or
2 centimeters as set forth in Figure 3, 301.

3 BY ATTORNEY YANG:

4 Q. And do you think Figure 3 is --
5 proportionate --(electronic interference - audio
6 distortion)

7 THE REPORTER: Please repeat the question for
8 me.

9 ATTORNEY YANG: I apologize about that. I'll
10 withdraw the question.

11 BY ATTORNEY YANG:

12 Q. Could you please turn and look at Figure 4A.

13 A. Okay, I'm there.

14 Q. Looking at Figure 4A, do you see element 403?

15 A. I see it.

16 Q. Is element 403 the same as element 301 in
17 Figure 3?

18 ATTORNEY VALENTE: Objection to form.

19 A. So 403 seems to be discussed in at least
20 paragraph 45. And there, it states: When the user
21 selects a dual menu item AB in screen 401, the mobile
22 terminal 100 can activate application programs related
23 to the menu items A and B, display a functional view
24 area App.A as to the application program related to the
25 menu item A on a divided screen area, and display a

1 functional view area App.B as to the application program
2 related to the menu item B on the other divided screen
3 area as illustrated in screen 403.

4 BY ATTORNEY YANG:

5 Q. Right. And I'm asking you, is screen 403 the
6 same as screen 301?

7 ATTORNEY VALENTE: Objection to form.

8 A. Well, I think 403 is trying to show the
9 process from 401 and what happens when you press one of
10 those dual menu items on the bottom as shown in 401.

11 BY ATTORNEY YANG:

12 Q. So after performing the process there, do you
13 get -- is the result what's shown in Figure 30 -- in 301
14 in Figure 3?

15 ATTORNEY VALENTE: Objection to form.

16 A. I'm not sure what you're asking. For example,
17 based on the disclosure of Yook, this is just showing
18 one example, that you can press the dual menu AB and it
19 will show up App.A and App.B on the left and right side
20 respectively. But based on the disclosure of Yook, one
21 of ordinary skill would understand that there are other
22 ways, for example, sequentially pressing the different
23 menu items to get to showing the functional view area of
24 App.A on the left and the functional view area of App.B
25 on the right.

1 BY ATTORNEY YANG:

2 Q. Okay, let me ask a different question.

3 Do you see anything different graphically
4 between 301 and 403?

5 Do you see anything different visually?

6 ATTORNEY VALENTE: Objection to form.

7 A. Well, everything to the left of 403 is not
8 there in 301.

9 BY ATTORNEY YANG:

10 Q. Right. But I'm only asking about element 301
11 and element 403. Is there anything different visually
12 between these two elements?

13 A. Well, one is rotated and one is not.

14 Q. I assume that's because Figure 4A itself is
15 rotated.

16 ATTORNEY VALENTE: Objection to form.

17 A. So I'm not understanding your question. You
18 asked me if there's any differences visually, and I
19 pointed out that there is a difference visually.

20 BY ATTORNEY YANG:

21 Q. Okay.

22 A. Multiple differences visually, but I don't --
23 I don't really understand. And then they are different
24 portions of the spec that talk about 403 and 301 that
25 explains it as well. So 301 and 403 are not in a

1 vacuum. There are specifications that talk about those,
2 and I think I read from large parts of that as well for
3 you.

4 Q. Okay. Can App.A in 403 also be the same App.A
5 in 301?

6 A. Well, that's a good point. It seems to
7 show -- coming back to your question about the visual
8 differences, 301 shows A.App and 403 shows App.A.

9 Q. And I guess my question is can those two apps
10 be -- can those two Apps.A be the same?

11 A. Again, can you point me to my opinion where
12 I'm comparing these two apps in my declaration? I
13 really don't understand these questions.

14 Q. These questions are to help me understand Yook
15 itself and how it works, not your opinions.

16 A. So Yook discloses a lot of things, and I'm
17 pointing to certain things within Yook. So you seem to
18 be saying these are outside of my opinions. You're
19 trying to ask me questions outside of my opinions?

20 Q. Oh, no. Your testimony is that you reviewed
21 Yook. So based on your review of Yook, I'm asking you
22 what you -- a person of ordinary skill would understand
23 of Yook.

24 ATTORNEY VALENTE: Objection to form.

25 A. Okay, so I'm -- I'm really confused. So would

1 you like me to read you the portions of the
2 specification again that I already read for you for --
3 in relation to element 403 and 301?

4 BY ATTORNEY YANG:

5 Q. I don't think that's necessary. I can ask a
6 different question.

7 Is what's displayed in element 403, is that --
8 can that be shown in display 140 in Figure 1? I'm
9 sorry, in screen 140 of Figure 1?

10 A. You asked me about 140 in Figure 1, and what
11 was the rest of your -- what was the other part?

12 Q. Element 403 in Figure 4A, I was asking if 403
13 can be shown on screen 140 in Figure 1.

14 A. So I think Figure 1 is showing two different
15 functional view areas, and so I think it is showing --
16 Figure 1 is showing two functional view areas. And I
17 think you asked me about 403, and that is showing two
18 functional view areas.

19 Q. Then looking at Figure 4B, on the top side,
20 which should have been the right side, do you see
21 element 415?

22 A. I do.

23 Q. And it also has an App.A there as well as an
24 App.C.

25 Do you see that?

1 A. I do.

2 Q. Can App.A there be the same at App.A in
3 element 403?

4 A. Sorry, are you asking if App.A is the same as
5 403? I -- again, I just -- I'm not understanding the
6 relationship from this to what I've cited to in my
7 declaration. I think Figure 4B is talking about a
8 process from the bottom, which is the left, to the top,
9 which is the right.

10 Q. Right. And I apologize. I'm trying to
11 understand the relationship between Figures 4A and 4B.
12 Because it's 4A and 4B, there has to be some
13 relationship between 4A and 4B. I'm trying to
14 understand if App.A in 403 can be the same as App.A in
15 415.

16 A. I'm reading from paragraph 14, and it's
17 stating Figures 4A to 4E illustrate splitting and
18 merging of screens according to an exemplary embodiment
19 of the present invention.

20 Q. And does that tell a person of ordinary skill
21 whether App.A in Figure 4A can be the same as App.B in
22 Figure 4B?

23 A. It's saying that Figures 4A to 4E illustrate
24 splitting and merging of screens.

25 Q. So look at all the embodiments shown in

1 Figures 3 and 4.

2 They all have the status bar at the top of the
3 screen. Is that right?

4 A. Well, in Figure 4, they seem to be on the left
5 of the page.

6 Q. Right. But you're supposed to look at
7 Figure 4 oriented to the left, right?

8 A. Oriented --

9 Q. The words in Figure 4 are oriented to the
10 left, they're not oriented to -- they're not oriented
11 top to bottom.

12 A. I'm not sure I understand what you mean by
13 oriented to the left.

14 Q. Let me rephrase that.

15 To get from the orientation of Figure 4 to the
16 orientation of Figure 3, you have to rotate 90 degrees,
17 right?

18 A. Figure 4A and 4B should be rotated clockwise
19 90 degrees.

20 Q. So when you're looking at the screens in
21 Figure 4, if they're to the left, then they're actually
22 on the top once you rotate them 90 degrees, right?

23 A. If you rotate Figures 4A and 4B 90 degrees
24 clockwise, then the battery icon and the connectivity
25 icon would be on top of the mobile terminal 100.

1 Q. And when you split the screen in Figure 3, the
2 split is with one area to the left and one area to the
3 right.

4 Is that right?

5 A. Well, I think, for example, 447 shows top and
6 bottom as well.

7 Q. Well, I was actually just asking about the
8 embodiments in Figure 3, not the embodiments in
9 figure -- I believe that was figure, let's see, 4E.

10 So for the embodiments of Figure 3, the split
11 is to the left and the right, right?

12 A. So if you're asking about 301, 302, 303, 304
13 as shown and as drawn in Figure 3 on page 4 of 31, then
14 the two areas appear to be left and right of each other.

15 Q. And the status bar is on top of both areas
16 after the split.

17 Is that right?

18 ATTORNEY VALENTE: Objection to form.

19 A. Again, you're looking only at Figure 3 with
20 301, 302, 303, 304, and only as illustrated in those
21 four pictures. The battery icon, the connectivity
22 icons, they are on the top of mobile terminal 100.

23 BY ATTORNEY YANG:

24 Q. Okay. Well then I guess let's look at the
25 embodiment Figure 4E, 447. You mentioned earlier that

1 in this embodiment, the split is top and bottom with the
2 first area on the top and the second area on the bottom.

3 Is that right?

4 A. As shown -- again, limited to Figure 4E as
5 shown and drawn in that figure where it's showing
6 element 447.

7 Q. Okay. Besides element 447 in Figure 4E, is
8 there any other embodiment that splits the screen top
9 and bottom in any of the figures?

10 A. Well, I think Figure 7B. And I think you
11 asked me to limit it to the figures, so I'm looking at
12 Figure 7B. As well, Figure 7C.

13 Q. Okay. In Figure 7B, can you identify what the
14 two screen areas are after the split?

15 A. I'm sorry, say that again.

16 Q. Looking at Figure 7B, can you identify what
17 the two areas are after the split? There should -- you
18 said there were two, top and bottom, so I'm trying to
19 figure out what those two are.

20 ATTORNEY VALENTE: Objection to form. Scope.

21 A. So I'm reading from paragraph 81. It's saying
22 here: The mobile terminal 100 can output an email
23 handling view area 73 related to the mail check function
24 on one divided screen area of the display unit 141 and
25 output a map viewing view area 76 related to the map

1 viewing function on the other divided screen area.

2 ATTORNEY VALENTE: Counsel, we've been going
3 for about an hour and 10 minutes, if we could take a
4 break shortly.

5 ATTORNEY YANG: Yeah, two questions left.

6 BY ATTORNEY YANG:

7 Q. So for Figure 7B, would it be fair to say that
8 the two screen areas are areas 73 and 76?

9 ATTORNEY VALENTE: Objection to form.

10 A. Well, as I read, it's saying the terminal,
11 mobile terminal 100 can output an email handling view
12 area 73 related to the mail check function on one
13 divided screen area of the display unit 141 and output a
14 map viewing view area 76 related to the map viewing
15 function on the other divided screen area.

16 BY ATTORNEY YANG:

17 Q. And is the status bar shown at the bottom of
18 area 73 on top of 76?

19 ATTORNEY VALENTE: Objection to form.

20 THE WITNESS: Ask your question again.

21 BY ATTORNEY YANG:

22 Q. Is a status bar shown at the bottom of area 73
23 on top of area 76?

24 ATTORNEY VALENTE: Objection to form.

25 A. So in this picture, Figure 7B, like the icons

1 battery and connectivity are shown toward the middle, if
2 that was your question.

3 BY ATTORNEY YANG:

4 Q. It's toward the middle of the screen, but
5 area -- screen area 73 is on top of it and screen area
6 76 is below it, right? I just want to confirm that that
7 is the status bar.

8 A. Well, I -- with regards to these, I don't
9 recall even citing to any of this stuff that you've been
10 ask me about, so I -- I would have to look at what the
11 disclosure is with regards to this.

12 But if you're asking in the picture whether
13 the number 73 is above the number 76 and the battery
14 icon and the connectivity icons are above 76, the number
15 76 and below the number 73, I think visually, it's
16 pretty clear just from a visual question. In terms of
17 the disclosure, I would need to read the disclosure with
18 regards to this figure.

19 ATTORNEY VALENTE: Counsel, that was two
20 questions. Three, actually. Shall we take a break?

21 ATTORNEY YANG: Well, I have one follow-up,
22 actually.

23 BY ATTORNEY YANG:

24 Q. The reason I'm asking this is because it seems
25 to me like part of the issue is that your opinion is

1 visually, someone could look at this and see what the
2 status bar is. So I was just asking visually looking at
3 this, would you identify that as the status bar?

4 ATTORNEY VALENTE: Objection to form and
5 scope.

6 A. Can you -- like, you seem to have summarized
7 what I said. Can you repeat what your summary was? It
8 did not sound accurate to what I said.

9 BY ATTORNEY YANG:

10 Q. I apologize. I was just asking visually,
11 would a person of ordinary skill looking at Figure 7B
12 identify the status bar there as a status bar? The bar
13 with the -- the bar with the 1:20 PM.

14 ATTORNEY VALENTE: Objection to form and
15 scope.

16 THE WITNESS: Again, I don't recall citing to
17 this or putting screenshots into my declaration. Can
18 you point me to where I cite to this?

19 ATTORNEY YANG: That's fine. I think we
20 should take a break until 2:10. Would that work?

21 ATTORNEY VALENTE: That's fine.

22 ATTORNEY YANG: Okay, sure. Thank you.

23 (Recess taken.)

24 BY ATTORNEY YANG:

25 Q. Dr. Chatterjee during the break, did you talk

1 to anyone about this deposition?

2 A. No.

3 Q. Okay. I'd like to go back to Figure 3 of
4 Yook. And let me know when you're there.

5 A. Okay, I'm there.

6 Q. Is it your opinion that a person of ordinary
7 skill would understand the bar at the top of the screen
8 to be a status bar?

9 A. I think I've mapped in my declaration the
10 claimed enunciator window to that.

11 Q. And my question is would a POSA looking at
12 Figure 3 identify the bar there as the status bar?

13 A. So I think I explained and answered this
14 question for you earlier, that based on the disclosure
15 of the Yook reference, including its discussion about
16 battery and network connectivity and other disclosures
17 that I read to you, I believe it's very clear that one
18 of ordinary skill within all the context of Yook would
19 understand that to be the claimed enunciator window as
20 set forth in the '135 patent.

21 Q. Looking at Figure 7B, for the same reasons,
22 wouldn't a POSA understand that the bar at the bottom of
23 area 73 is also a status bar? I mean, the icons are
24 identical.

25 ATTORNEY VALENTE: Objection to form and

1 scope.

2 A. So I think in paragraph 17 of Yook, it
3 explains Figures 7A to 7C illustrate screen
4 representations for a second example of user interaction
5 in an exemplary embodiment of the present invention.

6 BY ATTORNEY YANG:

7 Q. And I'm specifically asking about the bar with
8 the time at the bottom of area 73. If you can identify
9 the bar in Figure 3 as a status bar, can you also
10 identify the bar there in Figure 7B as a status bar?

11 ATTORNEY VALENTE: Objection to form and
12 scope.

13 A. Well again, like I've explained to you
14 earlier, I don't recall citing to figures -- the Figures
15 7A to C in my declaration. I may be wrong, but I don't
16 recall off the top of my head.

17 And as I just read to you, paragraph 17
18 expressly states that Figures 7A to 7C illustrate screen
19 representations for a second example of user
20 interaction. So it's talking about a different user
21 interaction.

22 BY ATTORNEY YANG:

23 Q. My question is one of consistency. A person
24 of ordinary skill would use the same criteria in every
25 figure to determine what a status bar is.

1 Isn't that right?

2 A. I just read to you that it's expressly stating
3 that Figures 7A to 7C illustrate screen representations
4 for a second example of user interaction. It's
5 expressly stating that this is a completely different
6 user interaction.

7 Q. And I'm asking how a user can identify a
8 status bar in Figure 3 and not identify a status bar in
9 Figure 7.

10 ATTORNEY VALENTE: Objection to form.

11 A. I'm not -- I don't understand your question.
12 It's saying that these are totally different examples of
13 user interactions. I've told you that as far as I
14 remember, I'm citing to the other screenshots and the
15 other figures of Yook, and I pointed you to various
16 exemplary disclosures in the specification of Yook and
17 why one of ordinary skill would have the conclusion that
18 I've set forth in my declaration.

19 So I -- again, I don't really understand your
20 question. These are two very different user
21 interactions as expressly set forth in Yook, at least in
22 paragraph 17.

23 BY ATTORNEY YANG:

24 Q. Do you believe Figure 7 does not show a status
25 bar?

1 ATTORNEY VALENTE: Objection to form and
2 scope.

3 A. I think -- like I've explained to you, I have
4 not memorized everything of Yook. There's a lot of
5 disclosure in Yook. And I have pointed to portions of
6 Yook and that first set of user interactions that Yook
7 talks about, and I've explained through numerous
8 citations in the specification the figures why one of
9 ordinary skill would have understood Yook to disclose or
10 suggest the claims, the challenged claims.

11 BY ATTORNEY YANG:

12 Q. Right. And I'm trying to figure out how a
13 person of ordinary skill can look at a figure and
14 identify what is and what is not a status bar.

15 So to me the bar in Figure 7B looks like the
16 bar in Figure 3. So are you telling me that one of them
17 is a status bar and the other one is not a status bar?

18 ATTORNEY VALENTE: Objection to form.

19 A. I'm telling you that the express disclosure in
20 Yook, which I've read to you twice already in paragraph
21 17, expressly states Figures 7A to 7C illustrate screen
22 representations for a second example of user
23 interaction. So it's saying it's a very different user
24 interaction.

25 And I've pointed you in my declaration to

1 other portions of Yook and the specifications and why
2 one of ordinary skill would have understood the prior
3 art to disclose and/or suggest the challenged claims.

4 BY ATTORNEY YANG:

5 Q. Based on the disclosure you just read, does
6 the disclosure in Yook say there is no status bar in
7 Figure 7B?

8 ATTORNEY VALENTE: Objection to form and
9 scope.

10 THE WITNESS: Are you talking about paragraph
11 17?

12 Q. Yes.

13 A. Paragraph 17 is a single-sentence paragraph
14 that states: Figures 7A to 7C illustrate screen
15 representations for a second example of user interaction
16 in an exemplary embodiment of the present invention.

17 Q. Okay. Have you relied on the embodiment in
18 Figure 7B in your declaration?

19 A. I don't recall off the top of my head.

20 Q. Would it surprise you to learn that the answer
21 was no?

22 A. I don't recall off the top of my head. If you
23 tell me I don't point to anything in figures for
24 Figure 7A to C, I think that's consistent with my
25 recollection that I've told you a number of times that,

1 I don't recall pointing to Figures 7A to C. But I could
2 have been wrong, but it seems like you're confirming
3 what I recalled.

4 Q. Okay. Yeah, that's very helpful. I guess I
5 can move on.

6 Were you familiar with Exhibit 1005, Yook,
7 prior to your work in this case?

8 A. Is your question about the Yook reference or
9 some of the teachings in Yook?

10 Q. About the Yook reference, not about the
11 teachings.

12 Did you know of the reference prior to this
13 IPR?

14 A. I don't think so, but I don't remember for
15 sure.

16 Q. And was Yook provided to you or did you find
17 it yourself in the prior art search that you did?

18 A. So I think we talked about this in the
19 morning. I don't recall. This was -- I think I
20 submitted my declaration in October, which means that I
21 was working on it before that, so it's over a year ago.
22 I don't recall off the top of my head.

23 (Exhibit No. 1007, previously marked, was
24 referenced and indexed.)

25 BY ATTORNEY YANG:

1 Q. Okay. Could you look at Exhibit 1007, the
2 Bauer reference?

3 A. Okay, I'm there.

4 Q. Were you familiar with Exhibit 1007, Bauer,
5 prior to this IPR?

6 A. So again, I understand your question to be the
7 same as the clarification that you gave me. It's not
8 about the teachings in Bauer but the actual Bauer
9 reference itself.

10 Q. That's right.

11 Were you familiar with the Bauer reference
12 itself prior to this IPR?

13 A. I don't believe so.

14 Q. And do you personally know the inventors of
15 Bauer?

16 A. I don't believe so.

17 Q. Could you turn to Figure 1 of Bauer on page 2.

18 A. Okay, I'm there.

19 Q. And element 101 of Bauer is the device.

20 Is that right?

21 A. Yes. I'm looking at column 4. It states the
22 mobile device 101.

23 Q. And how many physical screens does device 101
24 have?

25 ATTORNEY VALENTE: Objection to form.

1 A. So if you look at column 11, line 25 onwards,
2 it's stating: As depicted in one implementation in
3 Figure 4, the mobile device 401 includes a display
4 screen 404, and then in parentheses (and possibly other
5 output devices which are not shown,) and it continues
6 on.

7 BY ATTORNEY YANG:

8 Q. Okay. And how many applications are shown in
9 Figure 1 displayed on the screen?

10 A. The column 5, line 3 says: As shown in one
11 implementation, the display screen 104 includes two
12 areas: An application area 105 that consumes much of
13 the screen real estate, and a status bar 107.

14 Q. I guess my question is how many applications
15 can be displayed in application area 105?

16 ATTORNEY VALENTE: Objection to form.

17 A. Are you asking whether one of ordinary skill,
18 in reading the Bauer reference, would understand it to
19 be limited to just the email application that's shown?

20 BY ATTORNEY YANG:

21 Q. No. I'm asking what Bauer teaches, not what
22 one of ordinary skill would extrapolate from it.

23 ATTORNEY VALENTE: Objection to form.

24 A. Not sure I understood what you said. What
25 Bauer teaches, not what one of ordinary skill would

1 extrapolate from it?

2 BY ATTORNEY YANG:

3 Q. Yeah. I'm simply asking in Figure 1, how many
4 applications are shown?

5 A. So are you asking me limited to Figure 1 in a
6 vacuum without the specification?

7 Q. Yes.

8 A. I don't know. It's showing an email
9 application in Figure 1, but you've asked me to ignore
10 the specification in Figure 1 in a vacuum. It's showing
11 an email application.

12 Q. Okay. Could you turn to Figure 6. And let me
13 know when you're on Figure 6.

14 A. I'm there.

15 Q. Figure 6 shows another embodiment of Bauer.
16 Is that right?

17 A. Column 3, line 50 is stating Figure 6 is a
18 schematic representation of an exemplary mobile device
19 that can implement interactive indicators.

20 Q. And is 600 in Figure 6 the device?

21 A. Column 14, line 44 states: Referring now to
22 Figure 6, the exterior appearance of an exemplary device
23 600 that provides interactive indicators is illustrated.

24 Q. Looking at Figure 6, is there a status bar at
25 the top of screen 601?

1 A. I searched for status bar, and status bar
2 seems to be identified as 107.

3 Q. Wouldn't you agree that 107 is in Figure 1 and
4 not Figure 6?

5 A. So I'm taking a look at Figure 6. I don't see
6 anything labeled as 107. But in response to your
7 question, I did a search for status bar and it seems
8 like status bar is 107.

9 Q. So my question is, is there a status bar at
10 the top of the screen in Figure 6? Because 107 is in
11 Figure 1.

12 A. Well, it's also in Figure 2A and the other
13 Figure 2s as well.

14 Q. Yeah, that's fair, but I was asking
15 specifically about Figure 6.

16 Is there a status bar in Figure 6? Because
17 107 is not in Figure 6.

18 A. And so I think I answered for you that I don't
19 see any number 107. But there are a lot of numbers on
20 Figure 6 but I don't see a number 107 in Figure 6.

21 Q. So is there a status bar in Figure 6?

22 ATTORNEY VALENTE: Objection to scope.

23 A. Again, similar for your other questions with
24 regards to the Yook reference, I don't recall citing to
25 Figure 6. But again, I could be wrong. But based on I

1 did a search and I think I answered for you already that
2 I searched for status bar and it seems to say status bar
3 107.

4 BY ATTORNEY YANG:

5 Q. Okay. How many screens are in Figure 6?

6 ATTORNEY VALENTE: Objection, form.

7 A. So looking at column 17, line 20, Figure 7 is
8 a block diagram illustrating an internal architecture
9 700 of the device 600. The architecture includes a
10 central processing unit, CPU 701, where the computer
11 instructions that comprise an operating system or an
12 application are processed; a display interface 702 that
13 provides a communication interface and processing
14 functions for rendering video, graphics, images and
15 texts on the display 601; provides a set of built-in
16 controls such as buttons, texts and lists; and supports
17 diverse screen sizes; a keyboard interface 704 that
18 provides communication interfaces to the keyboard. And
19 it continues on.

20 BY ATTORNEY YANG:

21 Q. Okay. Let me direct you to column 14, line
22 51.

23 A. Okay, I read line 51.

24 Q. Line 51 says: The hardware environment of the
25 device 600 includes a display 601 for displaying text

1 images and video to a user.

2 Doesn't that say that the display is 601?

3 ATTORNEY VALENTE: Objection to form and
4 scope.

5 A. So if your question is did you read it
6 correctly, it does say on line 52 includes a display
7 601.

8 (Exhibit No. 1008, previously marked, was
9 referenced and indexed.)

10 BY ATTORNEY YANG:

11 Q. Okay. Could we look at Exhibit 1008, which is
12 the Lee patent?

13 A. Okay, I'm there.

14 Q. Okay. Were you familiar with the patent
15 itself, not the teachings of Exhibit 1008, Lee, prior to
16 your work in this IPR?

17 A. I don't believe so.

18 Q. And do you personally know the inventor, Lee?

19 A. I don't believe so.

20 Q. Okay. Could you turn to page 7, specifically,
21 Figure 6.

22 A. Okay, I'm there.

23 Q. And can you confirm for me that 100 is the
24 device?

25 A. So column 2, line 2 states: As shown in

1 Figure 1, a mobile terminal 100, and it continues on.

2 Q. And in Figure 6, Figure 6 shows that device
3 100 has two screens, 101 and 102.

4 Is that right?

5 A. You're looking at Figure 6, you said?

6 Q. Yes.

7 A. So I'm reading column 8, line 37. It says:
8 As shown in Figure 6A, the controller 180 may provide
9 the broadcasting application through the first
10 touchscreen 151A. The controller 180 may provide the
11 broadcasting application through the second touchscreen
12 151B.

13 Q. Okay. And these screens 151A and 151B, these
14 screens are in the landscape orientation.

15 Is that right?

16 A. I think the actual physical devices are in --
17 so if you look at 6A, the device is folded over and so
18 the -- it would say that in that picture, it is in --
19 the actual devices are in a landscape orientation.

20 Q. And what is the hatched line 10 in Figure 6?

21 A. Can you point me to where it discusses --

22 Q. The reason I asked this question, because when
23 I was reading Lee, it doesn't appear to actually discuss
24 what that is so I wanted to know what a person of
25 ordinary skill would understand hatched line 10 to be.

1 ATTORNEY VALENTE: Objection to form and
2 scope.

3 THE WITNESS: Can you point me to my
4 declaration where I'm talking about hatched line 10?

5 BY ATTORNEY YANG:

6 Q. Do you recall having any opinions on hatched
7 line 10?

8 A. I don't off the top of my head. But since
9 you're asking me about it, I assume that I must be
10 talking about it in my declaration.

11 Q. Well, you did talk about Figure 6 in your
12 declaration so I'm trying to understand what hatched
13 line 10 in Figure 6 is.

14 ATTORNEY VALENTE: Objection to form.

15 THE WITNESS: Can you show me where in my
16 declaration I talk about Figure 6 of Lee?

17 BY ATTORNEY YANG:

18 Q. Yeah. For example, on page 109, you have
19 excerpted there Figure 6A?

20 A. On page 109?

21 Q. No.

22 ATTORNEY VALENTE: Paragraph.

23 BY ATTORNEY YANG:

24 Q. Paragraph 109 on page 104 according to the
25 page numbering at the bottom. You also -- there, you

1 also cite to Figures 6A and 6B, which is what we were
2 discussing.

3 A. Okay. Well, it appears that the hatched line
4 is essentially showing whether the -- if you see my
5 discussion in paragraph 109, for instance, Lee teaches a
6 mobile device having two physical screens but the user
7 may choose to use one screen at a given time, as shown
8 in Figure 6A below, whereas you can see that in
9 Figure 6B, the hatched lines are across both of the
10 physical screens.

11 Q. I'm sorry, what is the hatched line 10 in
12 Figure 6?

13 A. What is the hatched line?

14 Q. Yeah. What is it?

15 A. So I think, like I explained to you, if you
16 read column 8 starting at line 37 onwards, it's saying
17 as shown in Figure 6A, the controller 180 may provide
18 the broadcasting application through the first
19 touchscreen 151A. The controller 180 may provide the
20 broadcasting application through the second touchscreen
21 151B. In such instances, a user may place the mobile
22 terminal on a surface when A is approximately 45 to
23 135 degrees, e.g., a hands-free display mode. Such a
24 mode provides convenience to the user, since the mobile
25 terminal may be placed on, e.g., a table and the user

1 can watch a broadcast without holding the mobile
2 terminal. As shown in 6B, the controller 180 may
3 provide the broadcasting application by using the first
4 and second touchscreens, 151A and 151B, as a single
5 screen.

6 Q. But what you just read doesn't say what the
7 hatched line 10 is.

8 A. Well, it's showing in 6A and 6B using a single
9 screen versus using both of the screens, and that's
10 where the hatched lines are. But again, for purposes of
11 my declaration, I'm pointing to Lee's disclosure of the
12 two physical screens for that part of my analysis in my
13 declaration.

14 Q. That's fair. But this disclosure includes the
15 hatched line 10, so I'm trying to understand what a
16 person of ordinary skill would understand from that
17 hatched line.

18 What is it? What is it?

19 ATTORNEY VALENTE: Objection to form and
20 scope.

21 A. So I think I just explained to you what it is.
22 But on top of that, I explained to you, and I think it's
23 very clear in my report and my declaration, that I'm
24 pointing to Lee for the disclosure of the multiple
25 physical screens. And I believe that's very clear. And

1 there are a number of motivations that one of ordinary
2 skill would have had to combine the teachings of Lee
3 into the references Yook and Bauer.

4 BY ATTORNEY YANG:

5 Q. You just said you explained to me what it is.
6 Can you repeat that explanation?

7 A. So do you see that the hatched lines are only
8 on the screen which is facing the user? So this -- it's
9 explaining that this is on a table or a desk. And then
10 on the bottom one, 6B, it's showing the hatched lines
11 across both of the physical screens.

12 Q. And what does it mean when it does that?

13 ATTORNEY VALENTE: Objection to form.

14 A. So as I read to you from column 8, line 37
15 onwards, it's saying that -- it's saying that in that
16 mode, such a mode provides convenience to the user,
17 since the mobile terminal may be placed on, e.g., a
18 table and the user can watch a broadcast without holding
19 the mobile terminal.

20 And then it continues on as shown in
21 Figure 6B, the controller 180 may provide the
22 broadcasting application by using the first and second
23 touchscreens, 151A and 151B, as a single screen.

24 So it's showing, as clearly shown in Figure 6B
25 and in relation to the specification that I read from,

1 that it's shown that in Figure 6A, it's using a single
2 screen, and that's where the hatched lines are for that
3 broadcast application. And here, the broadcast
4 application is using both of the physical screens as a
5 single screen.

6 BY ATTORNEY YANG:

7 Q. So just to make sure I understand, is it
8 saying that it's the same broadcast in 6A and 6B, but
9 the broadcast in 6A is on one screen and then the
10 broadcast in 6B is on both screens?

11 A. Well, I'm not sure what you mean by it's on
12 both screens. It's -- I read to you from column 8, line
13 48, I guess, and it's saying by using the first and
14 second touchscreens, 151A and 151B, as a single screen.

15 Q. So I guess I'm trying to understand. In 6A,
16 the broadcast is being shown on one screen, 151A. And
17 then in 6B, it's the same broadcast but it's shown on
18 151A and 151B with the top half on 151B and the bottom
19 half on 151A, and that's the purpose of the hatched
20 line.

21 Is that right?

22 ATTORNEY VALENTE: Objection to form.

23 A. Well, it's showing using -- 6B is showing
24 using the two physical screens as a single screen.

25 ATTORNEY YANG: Okay. Thank you. I have no

1 further questions.

2 ATTORNEY VALENTE: Take a short break?

3 ATTORNEY YANG: Okay.

4 (Recess taken.)

5 ATTORNEY VALENTE: Thank you, Dr. Chatterjee.
6 I don't have any questions for you today.

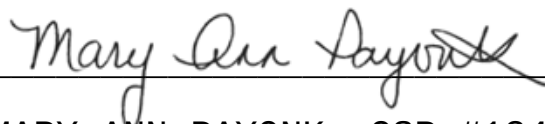
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8 (Deposition adjourned at 11:59 a.m.)
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- REPORTER'S CERTIFICATE -

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 9th 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

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1 I,

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5 That the foregoing is my deposition under
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7 That I have read same and have made the
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10 That my answers as indicated are true and
11 correct.

12 Executed at _____ this
13 _____ day of _____, 2025.

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