

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

APPLE, INC.,	)	
	)	
Petitioner,	)	
	)	
vs.	)	Case No. IPR2025-00172
	)	Patent No. 9,022,294
DH INTERNATIONAL, LTD.,	)	
	)	
Patent Owner.	)	

VIDEOCONFERENCE DEPOSITION OF SAFWAN ZAHEER
TAKEN ON BEHALF OF THE PETITIONER
NOVEMBER 21, 2025

VIDEOCONFERENCE DEPOSITION OF SAFWAN ZAHEER,
produced, sworn, and examined on the 21st day of
November 2025, between the hours of 9:00 o'clock in
the forenoon and 6:00 o'clock in the evening of that
date via Zoom videoconference, before KARA D. INCE, a
Certified Court Reporter within and for the State of
Missouri, in a certain cause now pending UNITED STATES
PATENT AND TRADEMARK OFFICE, BEFORE THE PATENT TRIAL
AND APPEAL BOARD, wherein APPLE, INC. is the
Petitioner and DH INTERNATIONAL, LTD., is the Patent
Owner.

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* * * * *

(The deposition commenced at 9:23 a.m.)

THE COURT REPORTER: We are on the record.
My name is Kara Ince. I am a Missouri Certified
Court Reporter, CCR License No. 1348. Today's date
is November 21, 2025. Will the witness please raise
their right hand.

SAFWAN ZAHEER,
of lawful age, being produced, sworn, and examined
on behalf of the Petitioner, deposes and says:

EXAMINATION

BY MR. PAUL HART:

Q. Good morning, Mr. Zaheer. I'll make some
quick introductions from our end. I'm Paul Hart
with Erise IP here on behalf of Petitioner Apple
today. With me today, also from Erise IP, is
Miguel Gutierrez. We don't really need to do these
formal introductions on an IPR record, but, Robert,
if you'd like to introduce your side, feel free to
do that now, or I can just get moving.

MR. ROBERT HART: You can just get moving.

MR. PAUL HART: Very good.

BY MR. PAUL HART:

Q. Mr. Zaheer, can you state your full name
on the record to kick us off.

1 A. Safwan Zaheer.

2 Q. And where are you located today,
3 Mr. Zaheer?

4 A. Philadelphia.
5 (Reporter clarification.)

6 A. Philadelphia -- Philadelphia.

7 BY MR. PAUL HART:

8 Q. Have you been deposed before, Mr. Zaheer?

9 A. No.

10 Q. Let me cover some quick and important
11 ground rules. The first -- first major ground rule,
12 it's my job to ask clear questions today. If you
13 don't understand a question I ask, any part of a
14 question I ask, please, let me know; so I can
15 rephrase or clarify my question.

16 A. Uh-huh.

17 Q. The second and probably most important
18 rule is that the court reporter can only capture one
19 of us speaking at a time. I will do my best not to
20 speak over you, and I just ask that you do your best
21 not to speak over me. If I do begin my next
22 question before you have finished your prior answer,
23 will you, please, let me know; so I can let you
24 finish your answer?

25 A. Very good.

1 Q. Very good.

2 In response to questions, attorneys for
3 Patent Owner DH may object to my questions, please,
4 allow them to enter their objects, finish their
5 objections, and so long as you have not been
6 instructed not to answer the question, I would ask
7 that you answer the question after they enter their
8 objections.

9 Is there any reason, medical or otherwise,
10 that you'd be incapable of answering my questions
11 fully and truthfully today?

12 A. No.

13 Q. What did you do to prepare for today's
14 deposition?

15 A. I reviewed my declaration, I went over the
16 two references, and also '294.

17 Q. Okay. Did you meet with anybody in
18 preparation for today's deposition?

19 A. Yes.

20 Q. And who -- who did you meet with?

21 A. My counsels.

22 Q. Okay. Who attended those preparation
23 meetings or meeting?

24 A. The -- the two counsels that are present
25 today.

1 Q. Got it.

2 Was anybody else present at any point
3 during your preparation for today's deposition?

4 A. No.

5 Q. Have you discussed your opinions related
6 to this matter with anybody, other than the
7 attorneys who are on the Zoom session today?

8 A. No.

9 Q. Approximately, how long did you spend
10 preparing for today's deposition?

11 A. A few hours.

12 Q. Okay. And when did that occur?

13 A. Two days, yesterday, and two days back.

14 Q. You have submitted a single declaration in
15 this proceeding; correct?

16 A. Yes.

17 Q. Okay. And I believe that's marked
18 Exhibit 2001.

19 (Deposition Exhibit No. 2001 was marked
20 for identification.)

21 BY MR. PAUL HART:

22 Q. You have a clean copy of that declaration
23 with you there today; is that right?

24 A. Yes, sir, yeah.

25 Q. What was your general process for

1 preparing that declaration, which has been marked
2 Exhibit 2001?

3 A. We consulted and discussed the declaration
4 in depth, and the final output that is out there
5 represents my opinion.

6 Q. Okay. And when you say "we," are -- is
7 that you and the attorneys representing DH?

8 A. Yes.

9 Q. In preparation for today's deposition,
10 have you reviewed any materials, other than the
11 materials you reviewed and discussed in your
12 declaration?

13 A. No, I've looked at the materials that are
14 part in the appendix and -- and my declaration and
15 the references.

16 Q. Okay.

17 A. That's it.

18 Q. Have you seen the decision from the PTAB
19 instituting this IPR proceeding?

20 A. I looked over it.

21 Q. Okay. And when did you look over that?

22 A. Yesterday.

23 Q. So that was a document that you would not
24 have looked at in preparing your declaration;
25 correct?

1 A. Yes.

2 Q. Okay. Can you think of any other
3 documents like the institution decision that you
4 would have looked at in preparation for today that
5 you did not look at when preparing your declaration?

6 A. I -- no, I don't think of any. I mean,
7 it's all the documents in the exhibit. I've looked
8 at them, but I studied the packet and the two
9 references in detail in coming up with my
10 declaration.

11 Q. Understood.

12 So we covered a little bit of this off the
13 record, but let me just make sure the record's
14 clear. We're going to be discussing today at least
15 your declaration, Exhibit 2001, and very likely the
16 '294 Patent, Exhibit 1001 --

17 (Deposition Exhibit No. 1001 was marked
18 for identification.)

19 BY MR. PAUL HART:

20 Q. -- the Gorsuch reference, Exhibit 1006,
21 and the Suga reference, Exhibit 1005.

22 (Deposition Exhibit Nos. 1005 and 1006
23 were marked for identification.)

24 BY MR. PAUL HART:

25 Q. I understand you have clean copies of

1 those documents there with you today; is that
2 correct?

3 A. That's right.

4 Q. Okay. Very good.

5 I will ask questions about those
6 documents, assuming that you will use your local
7 copies. If there's any reason for me to share a
8 document on the screen, if you would like to look at
9 one thing on the screen and another in your local
10 copy, please, let me know. I'm happy to accommodate
11 that.

12 A. Thank you.

13 Q. Other than the clean copies of those
14 documents, do you have any other materials with you
15 today?

16 A. No.

17 Q. Okay. No notes or markings on any
18 documents with you today?

19 A. No.

20 Q. Let's turn to your declaration to get us
21 started, Exhibit 2001.

22 Can you pull that up for me, and I'm going
23 to refer you to Appendix A of your declaration, the
24 very end.

25 Actually, it's the very last page of that

1 Exhibit 2001 in this proceeding. Just let me know
2 when you're there.

3 A. Okay. It's the -- is it the Appendix?

4 Q. It's the Appendix, which includes your CV,
5 and I'd like you to refer to the last page of your
6 CV, if you want.

7 A. Yes. I -- I don't have my CV in front of
8 me, but if you give me a second, I can pull that up
9 on -- and print it and -- and so -- see -- see the
10 last page.

11 Q. Okay. I -- I would just -- just in case
12 you need to refer to any of the information in
13 there. I can also drop this into --

14 A. Thank you, yeah.

15 Q. -- live channel here.

16 I think -- I think your CV was actually
17 submitted as a separate document, a second time with
18 the patent owner response; so I'm going to drop that
19 one in. It'll be a little --

20 A. Thank you.

21 Q. -- smaller and easier to deal with. Give
22 me one second.

23 (Deposition Exhibit No. 2004 was marked
24 for identification.)

25

1 BY MR. PAUL HART:

2 Q. Okay. I have dropped into the chat what
3 was marked Exhibit 2004, and submitted with the
4 patent owner response in this proceeding.

5 I believe this is the same CV that was
6 included as Appendix A with your original
7 declaration?

8 A. (Nods.)

9 Q. But I -- I don't know that any
10 distinctions are going to matter for my questions.

11 A. All right.

12 Q. But just let me know when you have that up
13 and you're ready to answer some questions about your
14 background.

15 A. Yes, sir. It's -- I have it up. Thank
16 you. And I'm ready to answer.

17 Q. Very good.

18 On the very last page of your CV, you list
19 your education. It looks like your first degree was
20 a bachelor's of science in electrical engineering
21 from Texas A&M; is that right?

22 A. That's right.

23 Q. Okay. What year did you obtain your
24 bachelor's degree?

25 A. December 1998.

1 Q. Okay. And, then, you also received a
2 master's of science in electrical engineering also
3 from Texas A&M; is that right?

4 A. That's right.

5 Q. Okay. And what year was that?

6 A. December 2000.

7 Q. And the third degree you have listed here
8 is a master of science in engineering in management
9 from MIT.

10 What year did you obtain that?

11 A. 2008.

12 Q. Did you go straight through your bachelor
13 program to your master's program at Texas A&M?

14 A. Yes.

15 Q. What was your first job after obtaining a
16 master's of science in electrical engineering?

17 A. I worked for Lucent Technologies and Bell
18 Labs in the wireless telecommunication division.

19 Q. And what were your general
20 responsibilities in that role?

21 A. My initial two years was studying wireless
22 networks, in particular, CDMA networks and --
23 (Reporter clarification.)

24 A. CDMA net- -- wireless networks and --
25 and -- and writing specifications for global

1 standards. Part of the role included, where
2 applicable, filing patents. And, then, post the
3 two years, I spent time as a product manager
4 building wireless products.

5 BY MR. PAUL HART:

6 Q. How many patents did you oversee while at
7 Bell Labs?

8 A. I don't recall. It's been a while. But I
9 filed a patent while at Lucent Technologies during
10 my time there, and it was granted.

11 Q. And when you say "I filed," you were named
12 inventor on that patent; is that right?

13 A. Correct, but it was a joint patent with
14 two other colleagues of mine.

15 Q. Do you recall approximately what year you
16 would have filed that joint inventor patent?

17 A. I don't recall the year.

18 Q. Do you recall what the subject matter was?

19 A. Yes. More -- more broadly, it was around
20 data packet switching and CDMA-based wireless
21 systems.

22 Q. How long were you at -- I'm sorry -- it
23 was Lucent Bell Labs; is that right?

24 A. Yeah.

25 Q. How long did you stay at Lucent?

1 A. So at Lucent, I started December 2000, and
2 left more or less somewhere of 2010, and in that
3 period, I also took a sabbatical to go to MIT for my
4 master's degree. And while I was at MIT, I was
5 still employed at Lucent, but at a -- at a fraction
6 of time -- at part-time.

7 Q. What was the -- the goal of your MIT
8 program? Were you looking to shift focus in your
9 career, or can you help me understand what
10 precipitated that move.

11 A. I wanted to compliment my technical
12 understanding with the knowledge of management to
13 lead technology management products at a global
14 scale.

15 Q. Where did you -- so you obtained your
16 master's in engineering management from MIT in 2008.
17 You were still employed with Lucent until
18 2010; is that right?

19 A. That is right.

20 Q. Okay. Where did you go after leaving
21 Lucent in 2010?

22 A. I went to AOL for a brief period of time
23 and followed by a strategy consulting firm, Peppers
24 & Rogers Group, which was later acquired after a
25 year or so, and then started to work at Barclays.

1 Q. In Wilmington?

2 A. In Wilmington, Delaware, yes.

3 Q. What was the nature of your role at
4 Barclays?

5 A. It was payments, mobile payments products.

6 Q. Okay. And as I scroll through -- I
7 promise I won't take all day asking about your
8 background, but I do want to get a sense for kind of
9 your path.

10 It looks like payments, mobile payments,
11 FinTech have been a focus of yours since that move
12 to Barclays.

13 Is that generally fair?

14 A. That's true.

15 Q. Okay. And would you say that around that
16 time of the move, the transition from Lucent to
17 Barclays, you did transition from a more engineering
18 role into a more kind of finance-product FinTech
19 role in your career?

20 A. More product -- less finance, more product
21 and ...

22 Q. Focused on the products for FinTech?

23 A. Correct.

24 Q. Makes sense.

25 And what are you currently doing for work?

1 A. I am consulting with a bank.

2 (Reporter clarification.)

3 THE COURT REPORTER: One more time.

4 "I am consulting" ...

5 A. With a client of mine that is a bank.

6 BY MR. PAUL HART:

7 Q. Bank. Got it.

8 A. Bank, B-A-N-K.

9 Q. And are you an independent consultant
10 currently?

11 A. Yes.

12 Q. How much of your time do you spend on
13 legal matters as a expert witness or consulting
14 witness?

15 A. None to limited.

16 Q. Okay.

17 A. As acquired.

18 (Reporter clarification.)

19 A. Only as needed in -- you know, via my
20 declarations and -- of expert witness work.

21 BY MR. PAUL HART:

22 Q. And how many times have you served as an
23 expert in a legal matter?

24 A. Twice.

25 Q. Including the current case?

1 A. Correct.

2 Q. What was the other case where you served
3 as an expert?

4 A. I don't recall exactly the name, but it
5 was around wireless RF communication and payments.
6 A combination of those.

7 Q. I mean, you served as an expert for DH in
8 different IPRs that Google filed; is that right?

9 A. That is right, yeah.

10 Q. And are you treating all the DH matters as
11 a single case? In your -- in your answer where you
12 said you have served as an expert twice, DH is one,
13 and then there was an unrelated case?

14 A. That's correct, sir, yeah. That was
15 outside of the DH International, yeah.

16 Q. Okay. Were you involved at all in the
17 lawsuit against Samsung when these patents were
18 owned by G Holdings?

19 A. No.

20 Q. All right. Can I have you scroll up in
21 your -- or turn the page in your declaration,
22 Exhibit 2001, to Paragraph 67.

23 A. Uh-huh, yes.

24 This is page 22?

25 Q. This is -- let's see here -- this is on --

1 page 27 is branded at the bottom. It is -- let me
2 see -- PDF page 41.

3 A. I'm there, sir.

4 Q. Okay. Here, you're talking about the Suga
5 and Gorsuch references. You state in the opening
6 sentence of Paragraph 67, Suga and Gorsuch are from
7 different fields of endeavor than the '294 Patent.

8 Do you see that?

9 A. I do.

10 Q. In the concluding sentence in this
11 paragraph, says, Therefore, the references are from
12 a different field than the '294 Patent.

13 Do you see that?

14 A. I do.

15 Q. What is the relevance of this opinion
16 captured in Paragraph 67?

17 A. I have my details throughout my
18 declaration, but in sum, '294 is about secure
19 communication, and Suga and Gorsuch about switching
20 communication parts.

21 Q. Okay. And how does that impact your
22 overall assessment of the invalidity case that Apple
23 filed, if you know?

24 A. Yes. So the details are present in my
25 declaration, but in sum, '294 Patent is about secure

1 communication, and Suga and Gorsuch are about
2 switching paths between a wireless LAN and a
3 cellular network.

4 (Reporter clarification.)

5 THE COURT REPORTER: I'm sorry, "a
6 wireless LAN and a" ...

7 THE WITNESS: Cellular network. I'm
8 sorry. Cellular network.

9 BY MR. PAUL HART:

10 Q. Can I have you turn a few pages earlier to
11 what starts with Paragraph 21 on branded page 6.

12 A. Okay, sir.

13 Q. Okay. This section is titled: Statement
14 of Legal Principals. In the introductory paragraph,
15 Paragraph 21 states, Patent owner's counsel has
16 advised me of the following legal principles.

17 Do you see that?

18 A. Yes.

19 Q. Now, you have a few sections here. First
20 on Claim Construction, one on Obviousness, and a
21 third on Dependent Claims. And, please, take all
22 the time you need to review this to answer this next
23 question, but I don't see a discussion of analogous
24 art -- the legal principle of analogous art in this
25 section.

1 Do you know if you advanced any opinions
2 related to the analogous art inquiry?

3 A. I'd have to -- I- -- I'd have to review
4 the content, but I don't -- I don't see an analogous
5 art element here.

6 Q. Okay. Do you know what the analogous art
7 inquiry is, generally?

8 A. I would like you to clarify that.

9 Q. I'm just trying to pin down what you
10 weighed in on and what you did not weigh in on; so
11 I -- I won't try to load you up with any new legal
12 principles, if you haven't already addressed them
13 today.

14 A. I believe I have a general understanding,
15 but I'm not a legal professional.

16 Q. Understood.

17 If we go back down to that discussion in
18 Paragraph 67 related to Suga and Gorsuch.

19 A. Yes, sir, I'm there.

20 Q. Your opening sentence, Suga and Gorsuch
21 are from different fields of endeavor than the '294
22 Patent --

23 A. Uh-huh.

24 Q. -- have you defined a field of endeavor
25 for the '294 Patent in this case?

1 A. Have I defined a field of endeavor ...
2 The details are in the declaration; however, as I
3 broadly stated earlier, the '294 Patent is directing
4 to accessing data security -- a security piece, and
5 both Suga and Gorsuch are directed towards selecting
6 data paths between a cellular network and a wireless
7 LAN to reduce data transmission types, volume, and
8 reduce cost.

9 Q. And I think consistent with that answer,
10 this second sentence in Paragraph 67 begins, The
11 '294 Patent is directed to accessing data securely.

12 Do you see that?

13 A. Yes.

14 Q. Is that the field of endeavor for the '294
15 Patent, or is the field of endeavor -- or have you
16 not defined the field of endeavor for the '294
17 Patent?

18 A. Could you clarify what is a "field of
19 endeavor"?

20 Q. I'm just using the language in your
21 declaration. So the opening sentence states, Suga
22 and Gorsuch are from different fields of endeavor
23 than the '294 Patent, and the next sentence begins,
24 The '294 Patent is directed to accessing data
25 securely.

1 I'm just trying to figure out if you're
2 comparing fields of endeavor or more accurately,
3 contrasting fields of endeavor.

4 What is the field of endeavor that you
5 have used to contrast for the '294 to contrast Suga
6 and Gorsuch?

7 A. Very broadly, the field of endeavor over
8 here is, as I stated in our patent, '294, it's about
9 security, and the embodiment in '294 -- at least one
10 embodiment is where you're using it for a payment
11 mechanism, versus Suga and Gorsuch are about
12 switching data net -- paths -- data paths for
13 commercial reasons or cost reasons.

14 Q. What information did you consider in
15 arriving at this characterization of the '294 Patent
16 as directed to accessing data securely?

17 A. It's the patent itself. Specifically, the
18 inactivation -- invariable activation command --
19 excuse me -- that triggers the state of the
20 switching, which you cannot change once it's
21 triggered, to make a -- you know, to -- to have data
22 flowing a certain path. And the requirement of
23 using a PIN as part of the -- as part of the
24 trigger -- either a PIN or biometrics as a means of
25 security and authentication.

1 Q. Okay. Let's set aside the PIN and the
2 fingerprint. Those, I think I understand how
3 they're related to security.

4 How is preventing the user from modifying
5 which data path is used -- how is that related to
6 data security?

7 A. Could you clarify that.

8 Q. You're -- I'm -- I do have real time here
9 to help me out here.

10 You -- your fir- -- the first part of your
11 answer referenced the "invariable activation
12 command."

13 A. Uh-huh.

14 Q. And you characterized that as "you cannot
15 change once it's triggered to -- to have data
16 flowing a certain path"?

17 A. Yeah.

18 Q. I understand the concept of the
19 invariability of that activation command to mean
20 that the user, once the command is issued, cannot
21 change which path the data flows through.

22 Is that generally right?

23 A. True.

24 Q. Is that related to security in some way,
25 that general concept of preventing the user from

1 modifying which data path is used?

2 A. It's related via the PIN so that -- so
3 entering the PIN is an indication of security, which
4 switches that path for a particular data to flow.

5 Q. Okay.

6 A. And once that is done, the path cannot be
7 changed.

8 Q. I see.

9 Can you pull up the '294 Patent for me,
10 which is Exhibit 1001 in this proceeding.

11 A. Yes.

12 Q. Let's start on the very first page here,
13 the title is toward the top left -- and I know
14 you're a patentee; so I'll try not to give you too
15 much basic information about patents -- but is the
16 concept of securing data reflected in the title of
17 the '294 Patent?

18 A. The title doesn't use the term,
19 "security."

20 Q. Okay. Does it convey the concept of
21 security in any way?

22 A. I believe there is an indication of
23 security via, quote/unquote, invariable activation
24 command.

25 (Reporter clarification.)

1 THE COURT REPORTER: I'm sorry, "via" ...
2 I didn't hear that word.

3 THE WITNESS: Invariable activation
4 command.

5 BY MR. PAUL HART:

6 Q. The abstract is also on that first page of
7 the '294 Patent. Can you take a quick refresher,
8 read through the abstract, and my question is -- is
9 the same as the title -- I'm sorry -- is the same as
10 my question about the title: Does the abstract say
11 anything about securing data, or does the abstract
12 reflect the concept of securing data?

13 A. Allow me to quickly refresh and read
14 through this. It'll take a minute.

15 (Witness is reviewing document.)

16 A. So as is in the title, the word,
17 "security" is not used, but it is inferred through
18 the invariability of the activation command.

19 BY MR. PAUL HART:

20 Q. Is there anything else, other than the
21 discussion of the invariability of the activation
22 command, in the abstract that suggest data security?

23 A. No.

24 Q. Can I have you scroll down past the
25 figures in the '294 Patent to Column 1.

1 A. Uh-huh.

2 Q. Column 1, starting around Line 14 or 15,
3 there's a short section titled: Field of the
4 Invention.

5 Do you see that?

6 A. Yes, I do.

7 Q. Does this discussion of the Field of the
8 Invention describe or suggest data security?

9 A. The term, "data security" is not
10 specifically mentioned in the patent; however, the
11 element of invariability, i.e., invariable
12 activation command, suggests that there is a trigger
13 that needs to be executed or done in order for
14 certain conditions to happen.

15 Q. Okay. Too many ways of being contacted
16 here. I, apparently, did not turn them all off this
17 morning.

18 Last question on this line of questions,
19 can I have you scroll down to Independent Claim 1 in
20 the '294 Patent, please.

21 A. Yes.

22 Okay.

23 Q. Okay. And we can go kind of piece by
24 piece on this, but I- -- I'd like to understand
25 where, in Claim 1, if anywhere, the concept of data

1 security pops up.

2 Can you review Claim 1, and then we'll
3 walk through on kind of a limitation-by-limitation
4 basis for any limitations you believe require or
5 suggest data security.

6 (Witness is reviewing document.)

7 A. Allow me to read the Claim 1, please.

8 Thank you.

9 BY MR. PAUL HART:

10 Q. Take your time.

11 A. So I've read through the claim. As is --
12 as I mentioned earlier, the term or the word,
13 "security" is not there in Claim 1, but the
14 invariability of activation command, i.e., the claim
15 elements of the switching element combined with
16 the -- combined with the invariable activation
17 command suggests the data security element because
18 once you -- once you select a path, you cannot
19 change it.

20 Q. Does Claim 1 require a PIN or fingerprint,
21 the two examples of secure authentication that you
22 referred to earlier?

23 A. It does not mention PIN; however, Lines --
24 Column 19, Lines -- let's say 2 through -- 2 through
25 7 indicate that -- that it's a user-triggered

1 control device configured to be operated by a user
2 via a button, a keypad, a tactile screen, and a
3 biometric parameter, and after being operated, issue
4 an invariable activation command, which said
5 invariable activation command being issued when said
6 control devices selected be triggered by the user.

7 Q. Is it your interpretation that that
8 limitation you just read into the record requires
9 some kind of security-focused entry from the user,
10 something like a PIN or a fingerprint that only the
11 user could provide?

12 A. Yes, biometric parameter. A biometric is
13 a very specific identity pertaining to an
14 individual, and as a POSITA, that is similar to a
15 PIN.

16 Q. Similar to a PIN, sure. So those are two
17 examples that would be captured by this limitation.

18 I'm asking: Does the limitation require
19 some form of security-focused entry from the user?

20 MR. ROBERT HART: Objection as to the
21 form.

22 BY MR. PAUL HART:

23 Q. So you read into the record that the
24 control -- the user-triggered control device could
25 be a button?

1 A. I -- I stated it could be a button as it
2 is -- a keypad, a tactile screen, and a biometric
3 parameter. And biometrics is a form of identity
4 that is only limited to an individual suggesting
5 security.

6 Q. Yeah. The -- this limitation, the claim
7 language uses the term, "and" to connect those
8 examples of a control device.

9 Is it your understanding that all of those
10 must be present, or are those alternatives such that
11 only one must be present to satisfy this limitation?

12 MR. ROBERT HART: Objection as to the
13 form.

14 A. The latter.

15 BY MR. PAUL HART:

16 Q. You can answer.

17 A. The latter.

18 Q. Okay. If we focus on button, does a
19 user-triggered control device, consistent with this
20 limitation in the form of a button, require the user
21 to do anything beyond pressing the button?

22 A. No.

23 Q. Okay. And if the user simply pressed a
24 button, does that capture this concept of secure
25 authentication that only the user and -- the one

1 true user could provide, or is that more generic
2 such that anybody could press that button?

3 A. No. It's the former. A button will be
4 pressed by a finger and a finger has biometrics in
5 it, which suggests it is secured trigger.

6 Q. Are you interpreting the recitation of
7 "Button" in this limitation to also include a
8 biometric parameter detector?

9 MR. ROBERT HART: Objection as to the
10 form.

11 THE WITNESS: What was that? I'm sorry.
12 Was there an objection?

13 MR. PAUL HART: There was an -- and
14 again --

15 MR. ROBERT HART: There was an
16 objection -- there was an objection.

17 And you can answer.

18 BY MR. PAUL HART:

19 Q. Yeah, there you go.

20 A. Okay. Could you, please, repeat your
21 question again, Mr. Paul Hart.

22 Q. Does the recited "Button" in this
23 limitation also include a requirement that the
24 button include a biometric parameter detector?

25 A. As I stated earlier, you -- you can only

1 press a button with a finger, which has biometrics,
2 and that suggests that the combination is a secured
3 transaction.

4 Q. Not all buttons are able to detect
5 biometric parameters; correct?

6 A. I believe that's possible.

7 Q. Okay. There are pure mechanoelectrical
8 buttons that have no ability to interpret your
9 biometric fingerprint; correct?

10 A. I believe so.

11 Q. Would a non-biometric button satisfy the
12 button element in this limitation of Claim 1?

13 A. I -- I mean, this -- the patents
14 suggests -- say it's a button where -- and it
15 doesn't -- it doesn't -- button is a one -- the
16 patent does not define what the button is, whether
17 it's with specific mechanisms of a PIN or a
18 biometric, but the claim specifically calls out
19 button, a keypad, a screen, a tactile screen, and a
20 biometric parameter detector.

21 (Reporter clarification.)

22 THE COURT REPORTER: "A biometric
23 parameter" ...

24 THE WITNESS: Detector.

25

1 BY MR. PAUL HART:

2 Q. I'm not -- I'm not sure I followed your
3 answer there; so I'm going to ask it again.

4 If we have a button on a device, assuming
5 everything else in this claim is satisfied, that has
6 no ability to interpret biometrics, it's just a
7 mechanoelectrical button on a cellular phone, does
8 that satisfy the button element in this limitation
9 at the top of Column 19 in Claim 1?

10 A. I believe so.

11 Q. Okay. Very good.

12 A. But I would like to add, it's pressing a
13 button, whether with biometrics or not is the act of
14 triggering, which is clear in the claim; so the
15 trigger needs to happen.

16 Q. The trigger -- understood.

17 The trigger needs to happen, and, really,
18 the point of my questioning that began this
19 discussion was to confirm that the triggering does
20 not necessarily need to convey some kind of
21 security-based user authenticase -- authentication.
22 It can just be a physical act that includes no
23 information about the user; correct?

24 A. That could be one way.

25 Q. Let's turn next to the Suga reference,

1 which has been marked Exhibit 1005 in this
2 proceeding.

3 A. Okay.

4 Q. What is the -- the -- at a high level,
5 what is the Suga disclosure about?

6 A. The patent is titled: Portable
7 Information Device and Line Switching Method. The
8 details of my understanding are in my declaration,
9 but at a high level, it's about switching data paths
10 between a wireless network and a cellular network
11 for certain via settings, for certain elements, such
12 as cost or sending a type of data, which is, you
13 know, size -- size and volume of data.

14 Q. Okay. So the -- there is a mobile
15 device -- a cell phone that is described in Suga;
16 correct?

17 A. Yes.

18 Q. Okay. And that cell phone can use either
19 a wireless LAN data connection or a cellular data
20 connection; is that right?

21 A. That's right.

22 Q. And just to make sure we're on the same
23 page, the cellular connection would be wireless
24 connection from the cell phone to a cellular-based
25 station for the first link in that connection; is

1 that fair?

2 A. Yes.

3 Q. Okay. And the wireless LAN would be
4 something akin to Wi-Fi where the cellular phone
5 connects to a Wi-Fi access point for that
6 connection.

7 Is that also right?

8 A. I believe the specifications say, Wireless
9 LAN Antenna.

10 Q. Okay. Antenna.

11 And, then, it looks like that antenna is
12 connected to a component called, "AP," which I
13 believe is an access point --

14 A. True.

15 Q. -- is that consistent with your
16 understanding?

17 A. (Nods.)

18 Q. Okay. You discuss the -- there are really
19 two features in Suga I want to cover with this line
20 of questions. The first is Suga's Settings screen,
21 and the second -- which is captured in Figure 5 --
22 and the second is Suga's Automatic switching process
23 captured in Figure 6.

24 Are you familiar with the "Setting" screen
25 in Figure 5, and the "Automatic switching process"

1 in Figure 6?

2 A. Yes, I'm looking.

3 Q. Okay.

4 (Reporter admonishment.)

5 A. Yes, I've looked at it.

6 BY MR. PAUL HART:

7 Q. Let's start with Figure 5. I want to walk
8 through the Settings menu depicted in Figure 5, and
9 I think the easiest place to go is marked page 16 in
10 Exhibit 1005, which is the English translation of
11 Suga's Figure 5.

12 Do you see that?

13 A. Yes.

14 Q. And maybe you speak Japanese, but I don't;
15 so I'm going to stick with the English translation
16 for today's purposes.

17 What is the purpose of this Setting screen
18 in Suga's described invention?

19 A. It's to set conditions where the -- where
20 the transmission or data path can -- can go or
21 can have -- or can pass.

22 Q. Okay. And so the phone is deciding
23 whether to use wireless LAN or cellular for a given
24 data transmission, and these settings help define
25 how that process works; is that accurate?

1 A. The -- I'm not sure if the phone's -- I
2 don't think it's just the phone deciding. It is the
3 settings that's configured that, then, triggers the
4 path to follow for -- for data to -- to pass or go
5 through.

6 Q. Are those settings made in the phone?

7 A. I believe so.

8 Q. Okay. And it's the phone that applies
9 those settings in order to choose either wireless
10 LAN or cellular for a data transmission; right?

11 A. That's my understanding.

12 Q. Okay. Let's walk through these settings
13 in this Figure 5 Setting screen.

14 The section -- or the image starts with a
15 section titled: During Transmission, and the first
16 setting there is a check box that states, Prioritize
17 Use of Wireless LAN.

18 Do you see that?

19 A. I do.

20 Q. How does checking that first Settings box
21 impact the operation of Suga's cellular phone?

22 A. As I understand, it -- if you -- that
23 setting is checked, the path is prioritized to go
24 through the wireless LAN network.

25 Q. And prioritizes wireless LAN over the

1 cellular alternative?

2 A. True.

3 Q. Very good.

4 Under that first check box, there's
5 another section titled: Conditions.

6 Do you see that?

7 A. Yes.

8 Q. The first check box states, When type of
9 content is XXXX, and the second states, When content
10 volume exceeds XXXX.

11 What do these Conditions settings do in
12 Suga system?

13 A. It prioritizes the transmission of data
14 based on these two conditions. No. 1, Type of
15 content; No. 2, Content volume exceeds a certain
16 threshold.

17 Q. Okay. And are these conditions related to
18 prioritizing the wireless LAN?

19 A. It appears so, in, like, I don't see any
20 other conditions.

21 Q. Sure.

22 So these -- these allow the user -- and
23 let me ask it this way: Am I correct that these
24 conditions allow the user to prioritize wireless LAN
25 only for certain types of content or for certain

1 volumes of content?

2 A. True.

3 Q. Okay. And if the user leaves both these
4 Conditions boxes unchecked, will the system
5 prioritize wireless LAN for all data transmissions?

6 A. With the condition that it depends on
7 whether the bottom two checkmarks are checked or
8 not. So No. 1 would be automatically switched to
9 phone lines if wireless LAN line cannot be used. So
10 it's my understanding if the first one is checked,
11 Prioritize Use of Wireless LAN, and the second --
12 well, the -- the one that says, Automatic switch to
13 phone lines is also checked, then they would be a
14 switching if the two conditions meet or not. So
15 the -- the condition -- the conditions follow the
16 settings in the phone as to where -- which path the
17 data gets transmitted.

18 Q. If neither Conditions boxes is checked,
19 will Suga's mobile phone attempt to use wireless LAN
20 for all data transmissions?

21 A. So if the only condition is checked, which
22 is Prioritize Use of Wireless LAN and the other full
23 conditions are not checked, then, yes, the data will
24 pass and only use wireless LAN.

25 Q. Okay. And you referenced this in your

1 earlier answer, but the fourth check box in
2 Figure 5, the Setting screen states, Automatically
3 switch to phone line if wireless LAN line cannot be
4 used.

5 Let's just isolate that one.

6 Can you help me understand, what does that
7 setting do when a user checks it?

8 A. It just switches the path from wireless
9 LAN, if it's not available, to a -- to a phone
10 line -- wireless phone line.

11 Q. So it'll -- if the system attempts
12 wireless LAN and cannot use it for some reason, it
13 will automatically attempt to send the data via
14 cellular; is that right?

15 A. (Nods.)

16 Q. Okay. Very good.

17 MR. PAUL HART: Why don't we take a quick
18 break if you guys are okay with that.

19 MR. ROBERT HART: Yeah, I'm okay.

20 MR. PAUL HART: Okay.

21 (A recess was taken from 10:17 a.m. to
22 10:33 a.m.)

23 BY MR. PAUL HART:

24 Q. All right. Welcome back, Mr. Zaheer. We
25 just discussed Figure 5 in the Suga reference, and

1 I'd like to turn next to Figure 6 in the Suga
2 reference. The English translation is on branded
3 page 17 of Exhibit 1005.

4 Before we get into the details here, can
5 you, just at a high level, explain what Figure 6
6 depicts.

7 A. Figure 6 is, basically, transmission of
8 paths based on certain conditions.

9 Q. Is this the process in Suga by which the
10 choice is made whether to make a data transmission
11 via wireless LAN or cellular?

12 A. That's right.

13 Ba- -- in the settings -- the conditions
14 set in the settings would, then, be used as is in
15 Figure 7, and also Figure 6 and Figure 7.

16 Q. Okay. Got it.

17 And Figure 6, I believe, is Transmission,
18 and Figure 7 is Reception; is that right?

19 A. That is right.

20 Q. Okay. If we focus on Transmission in
21 Figure 6, I believe you just referenced the
22 settings.

23 How are the Settings that we discussed in
24 Figure 5 related to this process described in
25 Figure 6?

1 A. So the settings are your setting
2 conditions, and the -- the Figure 6 is the
3 process -- it's a flow diagram of the process that
4 walks through the conditions.

5 Q. Okay. So it's -- Figure 6 is a process
6 that applies the settings that were made in
7 Figure 5?

8 A. True.

9 Q. Okay.

10 A. Yes.

11 Q. Let's just start at the top of this flow
12 chart in Figure 6. A1 is the first stop we make
13 here. A1 is labeled: Has use of wireless LAN line
14 been prioritized?

15 Do you see that?

16 A. Yes.

17 Q. Is that referring back to the Prioritize
18 wireless LAN setting that we discussed in Figure 5?

19 A. I believe so.

20 Q. Okay. And so if the user did elect to
21 prioritize wireless LAN in the Settings menu in
22 Figure 5, we will flow down the "Yes" path from A1;
23 is that right?

24 A. True.

25 Q. Okay. A3 is the next stop. That is

1 labeled: Has type or volume condition been
2 satisfied?

3 Do you see that?

4 A. I do.

5 Q. What is that a reference to?

6 A. Is it -- the "Condition" reference, as it
7 states in the setting, as the volume condition being
8 satisfied, and I believe the volume condition is the
9 second condition as part of the four conditions in
10 the setting.

11 Q. Okay.

12 A. If it's checked, then it's yes. If it's
13 not checked, then it's no.

14 Q. And as we talked about earlier, if neither
15 of those Conditions boxes are checked by the user in
16 Figure 5, that means that all data transmissions
17 will attempt to use wireless LAN; correct?

18 A. Yes.

19 Q. And in that case, we will flow from A3
20 along the "Yes" path to A4; correct?

21 A. No. If the -- if it's -- if the Volume
22 condition is not checked, then we will fall into A2,
23 I believe.

24 Could you, please, repeat.

25 Q. Sure. That's why I want to walk through

1 this just to make sure we're on the same page.

2 So if we go back to Figure 5, we have two
3 different types of Conditions that can be set. The
4 first is, It limits prioritizing wireless LAN to
5 certain types of content, and the second: Limits
6 prioritizing wireless LAN to certain volumes of
7 content?

8 A. True.

9 Q. And so if neither one of those is checked,
10 then the condition will always be satisfied, and we
11 will always prioritize LAN for a data transmission;
12 correct?

13 A. True.

14 Q. Which means we will flow through A4 out of
15 A3. A4 being, Use wireless LAN line.

16 Do you see that?

17 A. Uh-huh, yes.

18 Q. Okay. Have I interpreted the -- the
19 process correctly there?

20 A. I believe so, but the condi- -- there's
21 also the other two conditions; Condition No. 3,
22 which is Automatically switching to phone line, and
23 Condition No. 4, which is, Prohibiting reception of
24 data or phone lines. So we -- in order to look at
25 the conditions, we have to look into what settings

1 are set in the conditions.

2 So in your case, if neither of the type of
3 content Condition and the content Volume condition
4 is checked and the Automatically switch to phone
5 line is -- and the Prohibit reception of data phone
6 line is unchecked, then yes. Then the condition
7 will go from A to A4.

8 Q. Now, just to make sure we're on the same
9 page, I think the Automatic switching setting comes
10 up later in the Figure 6 flow chart at A7.

11 Do you see that A7 has, Automatic
12 switching been set?

13 A. That's right.

14 Q. Okay. And so I want to make sure we're
15 going temporally here from A1 here through to the
16 end.

17 Do you agree with me that the Automatic
18 switching setting is not checked at the A3 step that
19 we were discussing, and it comes in later in that
20 flow?

21 A. I do.

22 Q. Okay. And that very last setting,
23 Prohibit reception of data over phone lines, that is
24 a data reception setting, not a data transmission
25 setting; right?

1 A. (Nods.)

2 Q. Okay. So it won't be checked as part of
3 the Figure 6 flow. It may be checked as part of the
4 Figure 7 flow; right?

5 A. That's right.

6 Q. Okay. So we flow through A4, which is
7 labeled: Use wireless LAN line, into the next
8 question, which is A5. A5 states, Is communication
9 possible?

10 Do you see that?

11 A. Yes.

12 Q. What is happening at A5 in the Figure 6
13 flow?

14 A. I mean -- yeah, as it states, it would --
15 depending on the condition, is communication
16 possible or not? So if the Prioritized Use of
17 Wireless LAN is checked, the path flows "Yes," and
18 the type and the condition -- the two conditions,
19 content and volume, are not set, then it goes into
20 A4. If the two con- -- one of two conditions are
21 set, it goes to A2.

22 Q. And, then, at A5, where we're saying, Is
23 communication possible, what happens in that A5
24 step?

25 A. It's the communication in the wireless

1 LAN.

2 Q. Is it a -- is that where we're attempting
3 to use the wireless LAN for a data transmission?

4 A. Yes.

5 Q. Okay. And if the wireless LAN attempt is
6 successful, it looks like we flow through to the
7 right through A6, which is titled: Execute
8 Communication.

9 Do you see that?

10 A. Yes.

11 Q. And if the wireless LAN attempt is
12 unsuccessful, it looks like we flow down to A7.

13 Do I have that right?

14 A. Yes.

15 Q. Okay. Now, A7 is titled: Has Automatic
16 Switching Been Set?

17 What happens at this A7 part of the
18 process?

19 A. As I understand from the setting, if the
20 setting is checked, then it's a "Yes," and the
21 setting specifically is, Automatically switch to
22 phone line if wireless LAN cannot be used. If it is
23 unchecked, then the setting is a "No."

24 Q. I see. Okay.

25 So if we assume that that automatic

1 switching setting has been checked, once the system
2 determines that wireless LAN communications are not
3 possible, it'll automatically attempt a cellular
4 data transmission; correct?

5 A. True, if the condition is checked.

6 Q. I want to briefly discuss the relationship
7 between the Settings in Figure 5 and the connection
8 selection process in Figure 6.

9 Does Figure 6 assume that settings have
10 already been made from the Settings menu?

11 A. Yes, that's my understanding.

12 Q. And so is it correct to say that at some
13 point, the user will have to go through and make
14 their selections in that Figure 5 Settings menu, and
15 then later, when they attempt to make a data
16 transmission, the Figure 6 flow will apply those
17 previously made settings?

18 A. Yes.

19 Q. Okay. Is there any suggestion in Suga
20 that once the user asks the phone to make a data
21 transmission, that they have the opportunity to go
22 back and change settings, or does the Figure 6 flow
23 chart just kind of automatically apply the
24 previously made settings?

25 A. I'll -- I'll have to review the patent

1 again, but as a -- as a POSITA and as an expert
2 reading Suga, the flow will follow -- Figure 6 will
3 follow the settings. So the settings has to be made
4 on the phone --

5 Q. Uh-huh.

6 A. -- and that flow will operate as directed
7 in the settings.

8 Q. Okay. Is it fair to say that Suga at
9 least captures a scenario where the user first makes
10 their settings, and then later, asked to transmit
11 data causing this Figure 6 flow to apply the
12 settings?

13 A. Yes.

14 Q. Okay. Let me take you back to your
15 declaration, Exhibit 2001. And we're going to
16 switch gears a little bit here.

17 A. Yes, sir.

18 Q. Can I have you turn to Paragraph 56, which
19 is on branded page 20 of your declaration.

20 A. Yes.

21 Q. Okay.

22 A. I'm there.

23 Q. This paragraph is in your Claim
24 Construction section.

25 A. (Nods.)

1 Q. And is it specifically discussing the
2 claim language, Close proximity.

3 Do you see that?

4 A. Yes, I do.

5 Q. So in your discussion of the proper
6 construction of close proximity, you start out by
7 citing the '294 Patent -- Column 15, Lines 55 to
8 57 -- and you characterize that as, Close Proximity
9 means within a several-meter range or less.

10 Do you see that?

11 A. I do.

12 Q. Okay. And so in the patent itself, it
13 describes at least an embodiment where close
14 proximity is within a several meter range; right?

15 A. But as I state in my declaration, it's two
16 words, "close" and "proximity." And in the same
17 paragraph, I note, As a -- as a POSITA, a person is
18 physically close to the machines to view the
19 interface and operate the machine, which -- which in
20 my declaration, "close proximity" means to be 1
21 meter or less. So rough- -- rough- -- or, roughly,
22 3 feet or less.

23 Q. I think you knew where I was going with
24 my -- my next question. So let's -- let's break
25 that up to make sure I get a clean record here.

1 So you -- you first acknowledge that the
2 patent itself describes examples where close
3 proximity is several meters, but your conclusion is
4 that a POSITA would consider close proximity in
5 these claims to be 1 meter or less; is that right?

6 A. That's right.

7 Q. Okay. And the support for that, as I
8 understand from your prior answer, is that the types
9 of devices described in the '294 Patent that are in
10 close proximity to the user, are types of devices
11 you believe would be within 1 meter or less in
12 operation?

13 A. I do.

14 Q. Is that generally right?

15 A. Yes, uh-huh.

16 Q. Okay. And the reason that a POSITA would
17 conclude -- in your opinion, that a POSITA would
18 conclude that you have to be within 1 meter of these
19 types of devices to be in close proximity, is that
20 these are the types of devices that the user is
21 interacting with, either the screen or the
22 input/output? Is that also correct?

23 A. The -- the reason, as a POSITA, I
24 concluded it to be 1 meter or less is because that's
25 the point -- according to '294, there is an

1 activation queue, which is signal that -- sending a
2 message that it wants to receive data from the
3 device -- from the portable electronic device.
4 Outside of the 1 meter or less, the device maybe
5 can't catch other signals from other devices or from
6 other networks. So, as a POSITA, the device has to
7 be close -- close proximity, 1 meter or less.

8 Q. Okay. Now, again, the patent talks about
9 a large distance than 1 meter or less to be in close
10 proximity to these machines; correct?

11 A. True. The patent does mention, as I state
12 in my declaration -- it starts off with Several
13 meter range --

14 Q. Uh-huh.

15 A. -- but as -- but the patent also cites an
16 embodiment, which, specifically, calls about a -- a
17 public transportation system where the device -- or
18 the portable electronic device is akin to a payment
19 mechanism, like a smart payment mechanism -- smart
20 car, and -- and a data exchange device as a debit
21 machine being close together to interact within the
22 close proximity -- to interact, and then the other
23 data transfer happens. For instance, at a high
24 level, to pay for a fair, if you're -- if you're
25 using a public transportation system.

1 Q. Does the -- and I want to -- I want to
2 kind of break these up into buckets of -- of kind of
3 rationales that I- -- that I've heard from you.

4 If we focus just on the interference
5 issue, that you have to be close in order to make
6 sure you are detecting an activation queue from the
7 right machine, and not a different machine that may
8 also be nearby, does the patent itself talk about
9 that potential problem at all?

10 A. Let me understand.

11 Are you referring, specifically, to the
12 problem of the device getting interfered if it's not
13 in close proximity?

14 Q. Let me just go back and refer to your
15 specific testimony.

16 Earlier, you said, As a POSITA, I
17 concluded it to be 1 meter or less because that's
18 the point -- according to the '294, there is an
19 activation queue, which is sticking in a -- that
20 sending a message that it wants to receive from the
21 device -- from a portable electronic device.
22 Outside the 1 meter or less, the device maybe can't
23 catch other signals from other devices or from other
24 networks. So as a POSITA, the device has to be
25 close -- close proximity, 1 meter or less.

1 If we just focus on that, the possibility
2 of detecting a different signal than you are
3 intending to detect --

4 A. Yes.

5 Q. -- is that problem discussed in the '294
6 Patent at all; the possibility of receiving the
7 wrong activation queue from a different device,
8 rather than the one you want?

9 A. I don't recall seeing that in '294, but
10 it -- but it is implied. The patent is about secure
11 communication at a high level, and for the secure
12 communication to happen -- a couple of things need
13 to happen. A queue receiver needs to be detected by
14 the portable electronic device, a trigger, an
15 invariability activation command needs to happen.
16 The states of data needs to be switched, depending
17 on which state they are, and then the communication
18 path will follow, depending on the states.

19 Q. Yes. Does the '294 Patent say anything
20 about a few meters being potentially too far in
21 certain scenarios? Does it ever suggest that there
22 would be a need to limit close proximity to less
23 than a few meters?

24 A. The patent doesn't specifically mention
25 1 meter or less.

1 Q. Okay.

2 A. It's broadly covering the sphere of
3 communication.

4 Q. In Paragraph 56, before you conclude that
5 a POSITA would consider close proximity to be
6 1 meter or less, you state the following: In all
7 these examples, a person is physically close to the
8 machines to view the interface and operate the
9 machine.

10 Does that support your conclusion that
11 close proximity must be 1 meter or less?

12 A. Yes.

13 Q. That these are machines that you have to
14 view the interface and operate the machine?

15 A. Yes.

16 Q. Does the patent ever discuss a user
17 viewing the interface or operating the machine or
18 any of these first data exchange devices?

19 A. The patent discusses the activation queue,
20 which is a -- which is an indication that it wants
21 to receive expected data, it's in close proximity,
22 it does a trigger of the device, the states are
23 switched in the switching element, and then the
24 communication happens. As a POSITA, it- -- it's my
25 declaration -- it's my understanding that close

1 proximity implies 1 meter or less.

2 Q. The data transmission that you just eluded
3 to in response to having received an activation
4 queue, and then triggered a data transmission, that
5 is a wireless transmission of data from the mobile
6 device to the first data exchange device; correct?

7 A. True.

8 Q. Okay. Other than that wireless data
9 transmission to the first data exchange device, does
10 the patent -- the '294 Patent describe the user
11 interacting with that first data exchange device in
12 any other way?

13 A. No.

14 Q. Okay. All right. Let's change gears
15 again. Can I have you scroll down to -- or flip to
16 page 63 in your declaration, Exhibit 2001.

17 A. Yes.

18 Q. All right. So about halfway down the
19 page -- or a little less than halfway down the page,
20 you discuss Claim 14, and your analysis starts at
21 Paragraph 169.

22 Do you see that?

23 A. I do.

24 Q. Okay. So let's start with the claim
25 language. Claim 14 -- I'll just read it into the

1 record -- recites, A method, as defined in Claim 13,
2 wherein after the step of forwarding said third data
3 to the display screen, the method comprises the
4 following step: A waiting for an authorization
5 command to be inputted through a user-confirmation
6 input device provided on said cellular phone before
7 forwarding said first data to said first data
8 transceiver.

9 Do you see that?

10 A. (Nods.)

11 Q. Okay. So --

12 (Reporter clarification.)

13 A. Yes. Sorry.

14 BY MR. PAUL HART:

15 Q. So you -- in Paragraph 171, you have a
16 large block quote from petitioner's expert,
17 Dr. Buehrer, and this is his opinion related to
18 Claim 14.

19 Do you see that?

20 A. I do.

21 (Deposition Exhibit No. 1004 was marked
22 for identification.)

23 BY MR. PAUL HART:

24 Q. Okay. And this spans pages 63 and 64 in
25 your declaration, and it is specifically quoting

1 Paragraph 145 from Dr. Buehrer's declaration, which
2 is Exhibit 1004.

3 So in this large block quote, Dr. Buehrer
4 explains that it was Well-known in the art of email
5 communications to trigger a confirmation message
6 that forces the user to expressly confirm that they
7 do, in fact, want to send an email before that email
8 is sent. And he cites references; Exhibit 1010,
9 which is the Wilson reference, Exhibit 1013, the
10 Sorotzkin reference, and Exhibit 1014, the Meister
11 reference in support of this opinion.

12 You introduced this block quote by saying
13 that his opinion makes no sense.

14 Before I kind of dig into what you're
15 critique is, can you give me a high-level sense of,
16 you know, what it is about Dr. Buehrer's analysis
17 that makes no sense?

18 A. Yes, because it would be pointless to send
19 an email every time and enter a PIN for an email
20 before you're sending it. As Dr. Buehrer said, it's
21 a email confirmation method in Suga and Gorsuch
22 combined, and that's the distinction. '294, it's
23 about secure transmission. It's about invariable or
24 activation command that leads to authorization, not
25 confirmation. So the difference is confirmation in

1 an email versus authorization via a trigger command.

2 Q. I'm glad I asked. Okay.

3 So in your read of Dr. Buehrer's mapping
4 or analysis, he is focused solely on confirmation,
5 confirming that the user actually wants to send that
6 email?

7 A. True.

8 Q. And your opinion is that that is
9 fundamentally different from what is claimed
10 authentication?

11 A. (Nods.)

12 Q. What is required of an authenti- -- I'm
13 sorry -- an authorization command in Claim 14 that
14 is not captured by the confirmation process that
15 Dr. Buehrer has mapped out here?

16 A. Okay. A confirmation is simply you're
17 sending or not sending; send or not send. An
18 authorization specifically requires a security mode,
19 such as a -- entering a PIN or pressing a button or
20 using biometrics.

21 Q. I see.

22 So you're not disputing Dr. Buehrer's
23 general opinion that it was well-known to ask a user
24 to confirm before sending an email; is that right?

25 A. For an email, specifically? Yes.

1 Q. Okay. But you are disputing that this
2 well-known process of having the user simply confirm
3 that they do want to send, satisfies the claimed
4 authorization command?

5 A. It doesn't satisfy the authorization
6 command. It's just a method to send email. As I
7 stated earlier, if a user had to enter a PIN every
8 single time to send an email, that's -- that's going
9 to be -- not an email -- it's a -- it would be a --
10 as I respectfully stated, does not make sense. But
11 '294 is about authorization. Should be a PIN or a
12 biometric input, which is authorizing.

13 Q. And if it is a simple input -- so let's go
14 back to the button example where I'm just pushing a
15 button and that is causing something to happen -- if
16 the user has just asked to push a button and not
17 asked for a PIN, a fingerprint, a password, or
18 anything like that, it's your opinion that the
19 Claim 14 authorization command has not been
20 satisfied? Is that generally right?

21 A. True.

22 Q. Okay. How does the patent define
23 "authorization command"?

24 A. Authorization ... So the authorization is
25 via a PIN entry in a keypad or a biometric or a

1 button, as we've discussed, or a tactile screen.

2 Q. Okay.

3 A. So the condition of entering a security
4 mode, a PIN or a biometric, needs to happen for
5 states to switch in the switching element. And once
6 that happens, you cannot change the states, and the
7 communication happens, which is remark- -- which is
8 very different from sending an email.

9 Q. And in -- if we take ourselves outside of
10 the email context of petitioner's mapping of -- of
11 the prior art to Claim 14 and just focus on
12 authorization command, have you discussed in your
13 declaration the meaning of authorization command
14 with reference to the '294 Patent? Like, where
15 would I go to find out how you arrived at your
16 opinion that an authorization command in Claim 14
17 requires something beyond just confirmation?

18 A. Well, '2- -- '294, as I've stated earlier,
19 is about secured communication via an invariable
20 activation command that requires a trigger, either a
21 PIN or a biometrics mode, which suggests -- which,
22 then, changes the states, and the data transfer
23 happens. It's not about an email or just switching
24 paths, as is in a combination of Suga and Gorsuch.
25 The -- my views are in the entirety of my

1 declaration, and -- and -- and that's what I have to
2 answer this question.

3 Q. Okay. Do you -- can you point me to any
4 particular place in your declaration where you say:
5 Based on, you know, these teachings in the '294
6 Patent, I have concluded that an authorization
7 command is the specific thing or imposes these
8 specific requirements?

9 A. Just a matter of clarification, pointing
10 out that the authorization is via either a PIN or a
11 biometrics, is that -- did I answer your question?
12 Pointing to the parts of my declaration where I talk
13 about PIN and authorization, is that the -- the
14 request?

15 Q. Well, let's break it down to a more
16 fundamental level.

17 In your opinion, what is required to
18 satisfy Claim 14's authorization command?

19 A. In my opinion, at a high level, it is the
20 triggering that activates the invariable activation
21 command, which is -- which is either a PIN on a
22 keypad or a biometrics or a button.

23 Q. Okay. And if we come back to the button,
24 as we discussed earlier, if it's just a standard
25 button that cannot interpret a user's fingerprint,

1 that is just a generic input that has no user
2 information, it doesn't convey a password, it
3 doesn't convey a PIN, it doesn't convey a
4 biometrics. It's just a generic input; correct?

5 A. The button could be generic; however, the
6 purpose of the button is to switch the states in the
7 switching element, and the two cannot be decoupled.
8 It's an important part of the patent. So even
9 though the button might not have a PIN detector or a
10 biometrics detector, it is going to switch -- the
11 act of pressing the button will switch the data
12 states in order to have the path -- the data path
13 flow.

14 Q. Now, when we're talking Claim 14, which
15 expressly recites, "Authorization command" --

16 A. (Nods.)

17 Q. -- I really want to understand the scope
18 of what an authorization command is in Claim 14
19 because you're distinguishing one process -- a
20 confirmation process in petitioner's proposed
21 combination from an authorization command, and I
22 want to get at the heart of that distinction.

23 So what types of inputs are required to be
24 an authorization command in Claim 14?

25 A. And as I stated earlier, it's the

1 triggering of a button, a tactile screen, a PIN, and
2 a biometrics that switches the states in the
3 switching element. And once that is triggered, the
4 states remain until it's switched -- it is changed
5 at a subsequent triggering of a button, and then
6 that makes the data flow.

7 Q. And in the proposed combination, as
8 described by Dr. Buehrer, where the user is
9 providing that input as a confirmation that they do
10 want to send that email, why is that insufficient to
11 satisfy authorization command in Claim 14?

12 A. Because in an email, you just need a path.
13 The switching doesn't happen. The confirmation in
14 an email is about sending an email to a connected
15 path. In '294, it's the triggering happened --
16 happening, which switches the path -- the states in
17 the switching element to have a specific data
18 flow-through.

19 Q. So the user is defining the path the data
20 flows through in the '294?

21 A. No. The user does not define the path.
22 The user triggers confirmation, and then that
23 changes the state of the data in the switching
24 element determining which path the data will flow.

25 Q. In the proposed combination of Suga and

1 Gorsuch, when a user asked to transmit an email,
2 Suga's device is determining whether to send that
3 email data via wireless LAN or cellular; correct?

4 A. Via the setting, yes.

5 Q. And when the user hits send, why is that
6 not triggering that data communication in the same
7 way as the '294 Patent? I think we're missing each
8 other. I'm not quite following your distinction
9 here.

10 A. In an email, the email just requires a
11 connectivity, whether it's a wireless LAN or a
12 cellular network as set by the phone setting in Suga
13 and Gorsuch. '294 is different. '294 requires a
14 triggering -- a trigger action that activates the
15 invariable activation command, which switches the
16 state -- which switches the state, which, then -- so
17 switching of the state can -- is between an inactive
18 state versus an active state, which actually makes
19 the -- the communication secure, and that's how the
20 path is flowed -- that's how the data flows through
21 it.

22 Q. Isn't the state defined by the reception
23 or non-reception of an activation queue in the '294
24 Patent?

25 A. No, it's the triggering.

1 Q. The trigger. Okay. Let's take a look at
2 Claim 1 in the '294 Patent. This is Exhibit 1001.

3 A. Uh-huh.

4 Q. Where, in the claim, is that state
5 switched based on the user triggering?

6 A. It's Claim No. 1C and D and E and -- well,
7 let me break -- Claim No. -- Claim 1, B, C, D, and E
8 together. The -- it's -- talks about the
9 triggering, it talks about receiving a queue
10 receiver, and it talks about the switching of
11 states. Like, first transceiver, data transceiver,
12 and second data transceiver, which is in 1C and 1D.

13 Q. C and D don't talk about the state of the
14 switching element, do they?

15 A. They do. They talk about the -- as the
16 claim states, A first data transceiver operate
17 the -- operatively linked -- blah, blah, blah -- to
18 the first -- to the first data transceiver for
19 exchanging data between the device and the first.
20 So it's the first link versus Claim No. 1D,
21 specifically states a second data transceiver to
22 send data between the data exchange device or a
23 second communication link. So these are the two
24 different links; so they do talk about switching.

25 Q. Uh-huh. The first time we see "switching

1 element" pop up in this claim is F -- right?-- 1F
2 that begins, Data-Conveyance Switching Element? And
3 in that limitation, the claim recites, Said
4 switching element being assigned a first state upon
5 an activation queue having been received by said
6 queue receiver, and being assigned a second state
7 with no activation queue was received by said queue
8 receiver.

9 Do you see that?

10 A. (Nods.)

11 Q. Okay. Does the switching between a first
12 state and a second state depend on the user having
13 triggered the device, or is that an independent
14 process?

15 A. The switching is -- it does depend on the
16 user triggering -- that uses trigger action.

17 Q. Okay. And --

18 A. So --

19 Q. Go ahead. Please, finish.

20 A. As I stated earlier, the switching element
21 is not decoupled from the triggering action. The
22 states in the switching element change based on the
23 triggering.

24 Q. And where is that reflected in the claim?

25 A. It's -- it's the entirety of Claim 1, B,

1 C, D, E, the queue receiver, the switching of the
2 states, F, and the invariable activation command,
3 1G, and 1H is the switching element, it talks about
4 the second state, which is an inactive state.

5 Q. So if we go down to Limitation H -- and
6 sorry, I'm using the actual document here; so I
7 don't have my -- my letters labeled -- H begins,
8 Where- -- wherein, upon said control device being
9 selectively triggered by the user to issue said
10 invariable activation command.

11 Do you see that?

12 A. No, sir.

13 Are you referring to my declaration or are
14 you referring to the patent claim?

15 Q. The patent claim.

16 A. The patent claim. Okay.

17 So are you referring to Claim No. 1H,
18 Roman numeral 1.H.2, or 1.H.1?

19 Q. Well, all of those are generated for
20 purposes of clarity in this proceeding, and they're
21 not in the patent document itself. Let me -- I can
22 pull up your declaration to make sure we are on the
23 same page about claim limitation labeling.

24 A. Okay.

25 Q. All right. So -- yeah -- so 1HI, which I

1 believe you discussed starting at Para 99 in your
2 declaration that recites, Wherein, upon said control
3 device being selectively triggered by the user to
4 issue said invariable activation command. And,
5 then, there are two possibilities. One is captured
6 in what you have labeled: 1H1, and the second is
7 captured in 1H2.

8 Do you see that in your declaration?

9 The --

10 (Reporter clarification.)

11 A. Yes. Yes.

12 BY MR. PAUL HART:

13 Q. The first option begins, If said switching
14 element is in said first state, and the second
15 option begins, If said switching element is in said
16 second state.

17 So when the user triggers causing the
18 device to issue an invariable activation command,
19 the next step is dictated by the current state of
20 the switching element; correct?

21 A. True.

22 Q. Does that current state of the switching
23 element exist before the user has triggered the
24 device? When the user triggers the device, will the
25 switching element be either in a first state or a

1 second state?

2 A. It -- it can certainly be in either of
3 those -- either of the two states, but my
4 understanding is it's in the inactive state, which
5 is the second state.

6 Q. And how do you -- how did you arrive at
7 that understanding?

8 A. It's -- it's described in the patent in
9 certain -- in certain places. It -- do not -- I
10 cannot recall the exact line in the patent -- I'm
11 sorry -- the columns, but several areas in the
12 patent, the patentee discusses the second element as
13 being inactive, prior to the triggering happening,
14 before the state is switched.

15 So if -- as a POSITA, my understanding is
16 if the -- if the user wants to have a certain action
17 happen; triggers via button and a combination of
18 other elements, as we discussed earlier, depending
19 on that trigger, states will switch, depending on
20 that trigger, coming inactive to inactive.

21 Q. Okay. So the switching element changes
22 from inactive to active based on the user's trigger;
23 is that right? That's your understanding?

24 A. That is -- that is right, yes.

25 Q. Okay.

1 MR. PAUL HART: All right. Mr. Zaheer,
2 that is all I have for you today. Thank you very
3 much for your time. Your -- your counsel may have
4 some redirect; so I'll turn that over to him.

5 MR. ROBERT HART: Can we just have maybe a
6 10-minute break and let me go through my notes, and
7 I'll come back either with some questions or none.

8 MR. PAUL HART: That sounds great.
9 10 minutes.

10 (A recess was taken from 11:20 a.m. to
11 11:30 a.m.)

12 EXAMINATION

13 BY MR. ROBERT HART:

14 Q. All right. I just have a couple
15 questions.

16 Mr. Zaheer, does the Suga or Gorsuch
17 reference, describe, an invariable activation
18 command?

19 A. No.

20 Q. Okay. Does the '294 Patent teach that the
21 data is secure, or that the data path is secure
22 because of the invariable activation command?

23 MR. PAUL HART: Objection. Leading.

24 A. It's the latter.

25 MR. ROBERT HART: No more questions.

1 MR. PAUL HART: Nothing further from
2 petitioner. Thanks again for your time, Mr. Zaheer.

3 THE WITNESS: Thank you. Thank you
4 everyone. Thank you.

5 THE COURT REPORTER: Are we going to read
6 and sign today?

7 MR. ROBERT HART: I don't know. How
8 quickly can you turn around the transcript?

9 Yeah, we'll do a 30-day stipulation on the
10 record for the read and sign.

11 (The deposition concluded at 11:32 a.m.)
12
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CERTIFICATE OF REPORTER

I, Kara D. Ince, a Certified Court Reporter for the State of Missouri, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



Kara D. Ince
Missouri Supreme Court
Certified Court Reporter

ERRATA SHEET

Witness: Safwan Zaheer

APPLE, INC. v. DH INTERNATIONAL, LTD.

Date Taken: November 21, 2025

Page #_____ Line #_____

Should read:

Reason for change:

Page #_____ Line #_____

Should read:

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Page #_____ Line #_____

Should read:

Reason for change:

Witness Signature: _____

1 LEXITAS LEGAL

2 Date Taken: November 21, 2025

3 MR. ROBERT P. HART
4 ADDYHART, LLC
401 North Michigan Avenue, Suite 1200-1
Chicago, Illinois 60611
5 robert@addyhart.com
6 (312) 834-7701

7 IN RE: APPLE, INC. v. DH INTERNATIONAL, LTD.

8 Dear Mr. Hart:

9 Please find enclosed your copies of the deposition
10 of SAFWAN ZAHEER taken on NOVEMBER 21, 2025, in the
11 above-referenced case. Also enclosed is the original
12 signature page and errata sheets.

13
14 Please have the witness read your copy of the
15 transcript, indicate any changes and/or corrections
16 desired on the errata sheets, and sign the signature
17 page before a notary public.

18
19 Please return the errata sheets and notarized
20 signature page within 30 days to our office at 711 N
21 11th Street, St. Louis, MO 63101 for filing.

22 Sincerely,

23
24 Kara Ince
25

1 STATE OF)
2 COUNTY OF)

3 I, Safwan Zaheer, do hereby certify:

4 That I have read the foregoing deposition;
5 That I have made such changes in form and/or
6 substance to the within deposition as might
7 be necessary to render the same true and
8 correct;

9 That having made such changes thereon, I
10 hereby subscribe my name to the deposition.
11 I declare, under penalty of perjury, that
12 the foregoing is true and correct.

13 Executed this ____ day of _____,
14 20____, at _____.

15
16 _____
17 Notary Public

18 My commission expires: _____

19
20 _____
21 Safwan Zaheer

22
23
24
25

1	1348 4:5	56:16	5	A
1 26:25 27:2, 19,25 28:2,7, 13,20 32:12 33:9 38:14 39:8 50:20 51:5,11,18,24 52:4,7,9 53:17,22,25 54:25 55:6,11 56:1 66:2,7 67:25 1.H.1 68:18 1.H.2 68:18 10 71:9 10-minute 71:6 1001 9:16,17 25:10 66:2 1004 57:21 58:2 1005 9:21,22 34:1 36:10 41:3 1006 9:20,22 1010 58:8 1013 58:9 1014 58:10 10:17 40:21 10:33 40:22 11:20 71:10 11:30 71:11 11:32 72:11 13 57:1	14 27:2 56:20, 25 57:18 59:13 60:19 61:11,16 63:14,18,24 64:11 14's 62:18 145 58:1 15 27:2 50:7 16 36:9 169 56:21 17 41:3 171 57:15 19 28:24 33:9 1998 12:25 1C 66:6,12 1D 66:12,20 1F 67:1 1G 68:3 1H 68:3,17 1H2 69:7 1HI 68:25 69:6 2 2 28:24 38:15 2- 61:18 20 49:19 2000 13:6 15:1 2001 7:18,19 8:2 9:15 10:21 11:1 18:22 49:15	2004 11:23 12:3 2008 13:11 15:16 2010 15:2,18, 21 2025 4:6 21 4:6 20:11, 15 22 18:24 27 19:1 294 6:16 9:16 19:7,12,18,25 21:21,25 22:3,11,14, 16,23,24 23:5,8,9,15 25:9,17 26:7, 25 27:20 50:7 51:9,25 53:18 54:5,9,19 56:10 58:22 60:11 61:14, 18 62:5 64:15,20 65:7,13,23 66:2 71:20 3 3 44:21 50:22 30-day 72:9 4 4 44:23 41 19:2	5 35:21,25 36:7,8,11 37:13 40:2,25 41:24 42:7, 18,22 43:16 44:2 48:7,14 55 50:7 56 49:18 55:4 57 50:8 6 6 20:11 35:23 36:1 41:1,5,7, 15,17,21,25 42:2,5,12 45:10 46:3,12 48:8,9,16,22 49:2,11 63 56:16 57:24 64 57:24 67 18:22 19:6, 16 21:18 22:10 7 7 28:25 41:15, 18 46:4 9 99 69:1 9:23 4:2	A&m 12:21 13:3,13 a.m. 4:2 40:21,22 71:10,11 72:11 A1 42:12,13, 22 45:15 A2 43:22 46:21 A3 42:25 43:19 44:15 45:18 A4 43:20 44:14,15 45:7 46:6,20 A5 46:8,12,22, 23 A6 47:7 A7 45:10,11 47:12,15,17 ability 32:8 33:6 able 32:4 about 10:5 12:13 16:7 19:4,18,19,25 20:1 23:8,11 25:15 26:10, 11 33:23 34:5,9 43:14 52:8,16 53:8 54:10,20 56:18 58:16, 23 60:11 61:19,23 62:13 64:14

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