

APPLE, INC. vs MULLEN INDUSTRIES, LLC
David Williams, Vol. 1 on 07/26/2023

1	UNITED STATES PATENT AND TRADEMARK OFFICE	
2	BEFORE THE PATENT TRIAL AND APPEAL BOARD	
3		
4	APPLE, INC.,	)
5	Petitioner,	)
6	v.	) Case No. IPR2023-00090
7	MULLEN INDUSTRIES, LLC,	) US Patent No.
8	Respondent.	) 11,122,418 B2
9	APPLE, INC.,	)
10	Petitioner,	)
11	v.	) Case No. IPR2023-00115
12	MULLEN INDUSTRIES, LLC,	) US Patent No.
13	Respondent.	) 11,234,117
14	APPLE, INC.,	)
15	Petitioner,	)
16	v.	) Case No. IPR2023-00116
17	MULLEN INDUSTRIES, LLC,	) US Patent No.
18	Respondent.	) 11,234,117
19	APPLE, INC.,	)
20	Petitioner,	)
21	v.	) Case No. IPR2023-00091
22	MULLEN INDUSTRIES, LLC,	) US Patent No.
23	Respondent.	) 9,204,283
24		)
25		)

APPLE, INC. vs MULLEN INDUSTRIES, LLC
David Williams, Vol. 1 on 07/26/2023

Pages 2..5

Page 2 1 _____) 2 APPLE, INC.,) 3 Petitioner,) 4 v.) Case No. IPR2023-00096 5 MULLEN INDUSTRIES, LLC,) US Patent No. 6 Respondent.) 11,096,039 7 _____) 8 APPLE, INC.,) 9 Petitioner,) Case No. IPR2023-00097 10 v.) 11 MULLEN INDUSTRIES, LLC,) US Patent No. 12 Respondent.) 8,374,575 13 _____) 14 DEPOSITION OF DAVID WILLIAMS 15 TAKEN ON BEHALF OF RESPONDENT 16 JULY 26, 2023 17 18 VOLUME 1 19 20 Reported by Celena D. Davis, RPR, CCR, CSR 21 22 23 24 25	Page 4 1 *** 2 3 4 DEPOSITION OF DAVID WILLIAMS, produced, sworn and 5 examined on the 26th day of July, 2023, between the 6 hours of 8:00 of that day and 6:00 in the evening of 7 that day at Regus, 3636 S. Geyer Road, in the County of 8 St. Louis, State of Missouri, before CELENA D. DAVIS, a 9 Registered Professional Reporter and Certified Court 10 Reporter within and for the State of Missouri. 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 3 1 INDEX OF EXAMINERS 2 DEPOSITION OF DAVID WILLIAMS 3 Page: 4 Questions by Mr. Scheller 6 5 6 7 8 EXHIBITS 9 Williams Exhibit 1 9 10 (Appendix 6 of Williams Declaration) 11 Williams Exhibit 2 11 12 (Sheha reference) 13 Williams Exhibit 3 90 14 (Enzmann reference) 15 Williams Exhibit 4 117 16 (Williams Declaration) 17 Williams Exhibit 6 122 18 (Degnbol reference) 19 Williams Exhibit 7 150 20 (Appendix 1 of Williams Declaration) 21 22 (Exhibits 1, 2 and 6 are attached; Exhibit 5 was 23 skipped.) 24 25	Page 5 1 APPEARANCES 2 3 COUNSEL FOR THE PETITIONER: 4 KILPATRICK TOWNSEND & STOCKTON LLP 5 by Mr. Carl E. Sanders 6 and Ms. Vanessa Bell (via Zoom) 7 4208 Six Forks Road - Suite 1400 8 Raleigh, North Carolina 27609 9 (919) 420-1728 10 csanders@kilpatricktownsend.com 11 12 COUNSEL FOR THE RESPONDENT: 13 MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, PC 14 by Mr. Brad Scheller (via Zoom) 15 and Ms. Laura Petrasky (via Zoom) 16 919 Third Avenue 17 New York, New York 10022 18 (212) 935-3000 19 bmscheller@mintz.com 20 21 REGISTERED PROFESSIONAL REPORTER 22 CERTIFIED COURT REPORTER (MO) 23 CERTIFIED SHORTHAND REPORTER (IL) 24 CERTIFIED SHORTHAND REPORTER (TN) 25 CERTIFIED SHORTHAND REPORTER CA NO. 14464 Celena D. Davis HUSEBY Also Present: Tim Williams (via Zoom)

Page 14 1 position request is provided, so... 2 BY MR. SCHELLER: 3 Q. When you say "the Sheha system," 4 Mr. Williams, what are you referring to, specifically? 5 A. Well, it depends on the context, of course. 6 But, broadly, you can say that the litmus, for example, 7 Figure 3 of Sheha is a representation of Sheha's system. 8 Now that has all the different components, like the 9 wireless network. But, broadly, that is what the system 10 is about. 11 Q. Okay. Let's -- so in your declaration, 12 after the next sentence, you cite to lines 21 to 41, 13 column 5. 14 Do you see that? 15 A. I'm sorry. I'm getting a little -- I'm a 16 little slow in getting started this morning. Which 17 column? 18 Q. Lines 21 to 41, column 5. 19 A. Okay. 20 Q. Okay. Within that citation, I'd like to 21 direct your attention to an excerpt that we'll talk 22 about likely throughout the day. Starting at line 38 in 23 Sheha, it says: "In another embodiment, each device has 24 privacy settings that allow the device to prevent or 25 limit other calling devices from obtaining position	Page 16 1 So that, to me, seems like a general 2 condition that anyone logged into the ODAS may receive 3 that target device's position information if the 4 connection is a video or a voice connection; is that 5 correct? 6 MR. SANDERS: Objection to form. 7 A. Well, that's the -- not the only -- I guess 8 I'd call it a "qualifier." The "and/or only with the 9 device owner's permission" would articulate something 10 completely independent of whether there was a voice or 11 video connection going on. 12 BY MR. SCHELLER: 13 Q. Right. And then it says: "Other settings 14 may include allowing any remote device to request 15 position information for any specified amount of time," 16 meaning that the privacy setting implemented could be a 17 condition that anyone signed in to the ODAS could 18 receive the position information, but for that specific 19 amount of time set; is that right? 20 MR. SANDERS: Objection to form. 21 A. That's what that qualifier is about. But, 22 again, it's -- it would still require the privacy 23 settings of the mobile device to have -- to allow them 24 to get that. Just the mere fact that they're logged in 25 to the ODAS and there's a video call by itself may not
Page 15 1 information. These privacy settings can include 2 allowance of position information transfers only when a 3 voice or video connection is established and/or only 4 when" -- "with" -- excuse me, "and/or only with the 5 device owner's permission. Other settings may include 6 allowing any remote device to request position 7 information for any specified amount of time." 8 Do you see that? 9 A. Yes. 10 Q. Okay. So what this is describing is that 11 anyone who is signed in to the ODAS database may access 12 position information, for example, if a voice or video 13 connection is established; correct? 14 MR. SANDERS: Objection to form. 15 A. Well, that's part of it. The other part is 16 even if they're logged in to the ODAS system, they 17 still -- the mobile device still has to have the privacy 18 settings such that it will allow the location sharing to 19 be provided, if that's the way the embodiment is about 20 [sic] in terms of querying the privacy setting. 21 BY MR. SCHELLER: 22 Q. Okay. But this excerpt, for example, says: 23 "The privacy settings can include allowance of position 24 information transfers only when a voice or video 25 connection is established."	Page 17 1 be -- wouldn't necessarily be sufficient to get the 2 location. There would also have to be a privacy setting 3 saying, "Okay, this caller can receive the location 4 information." 5 BY MR. SCHELLER: 6 Q. Oh, okay. So let me see if I'm 7 understanding what you just said. Are you saying that 8 there's a privacy setting with respect to a specific 9 individual? 10 A. Sheha doesn't discuss that level of 11 privacy, I don't believe. I think it's more at the 12 group level. 13 Q. Okay. When you say group, Mr. Williams, 14 what are you referring to? The people who are logged 15 into the ODAS database? 16 A. There is -- there is a group capability 17 within Sheha that you can say, For the people in this 18 group, I will allow location information to be provided. 19 And a group can be a group of one or it can be a group 20 of many. 21 Q. Okay. Are they -- I think I know what 22 you're referring to, but are they talking about that 23 here? Or not "they." Is Sheha talking about that here 24 in the excerpt that I read, lines 38 to 45 in column 5? 25 A. The word "group" is not used in that

Page 114 1 (A discussion was held off the record.) 2 MR. SCHELLER: All right. Yeah, let's take 3 a quick five-minute break. 4 (A break was taken.) 5 BY MR. SCHELLER: 6 Q. Let's go to paragraph 29 of your 7 declaration. 8 MR. SANDERS: Is this Appendix 2 still? 9 MR. SCHELLER: Yes. 10 MR. SANDERS: Okay. 11 BY MR. SCHELLER: 12 Q. And this relates to assigning location 13 access rights limitation of claim 1. In that first 14 sentence, you say: "Sheha allows user to establish 15 which other users and devices may access their location 16 information." 17 Correct? 18 A. Correct. 19 Q. This is not on an individual basis; 20 correct? 21 MR. SANDERS: Objection to form. 22 A. If I understand your question, I think 23 that's accurate. The privacy settings, as well as the 24 group database settings, are not individual by 25 individual. Though as I mentioned, the group	Page 116 1 BY MR. SCHELLER: 2 Q. Okay. And those privacy settings indicate 3 under what conditions a target device with those privacy 4 settings will send out its own position information; 5 right? 6 MR. SANDERS: Objection to form. 7 A. I think that's accurate. 8 BY MR. SCHELLER: 9 Q. Next sentence: "Sheha describes" -- 10 actually, I'm sorry. I'm in paragraph 30 now, 11 Mr. Williams. 12 "Sheha describes that in the case of one 13 device calling another -- of one device calling another 14 device, the called device can request location 15 permission of the calling device." 16 Do you see that? 17 A. "The called device can request location 18 permission of the calling device," yes. 19 Q. What is the difference between location -- 20 actually, strike that. 21 I want to read the whole -- let's read the 22 whole sentence, actually. There's a reference to 23 location permission and location. I just want to know 24 what the difference is between those two terms that you 25 used.
Page 115 1 permutation, in my view, can have a group of one, which 2 would be equivalent to that. But, in general, what you 3 said is accurate. 4 BY MR. SCHELLER: 5 Q. Next sentence says: "Sheha" -- or 6 "Sheha" -- I'm skipping ahead, actually. Do you see 7 where I'm starting: "Sheha is agnostic" -- 8 A. Yeah. 9 Q. -- "as to whether it is a requesting device 10 or a target device that it can establish permission 11 rights - any device that can provide its location to the 12 ODAS can establish location access rights." 13 Do you see that? 14 A. Yes. 15 Q. When you refer to established permission 16 rights, are you referring to implementing privacy 17 settings? Is that what you mean by that? 18 MR. SANDERS: Objection. 19 A. That's one of the ways. 20 BY MR. SCHELLER: 21 Q. Okay. And the permission rights are stored 22 on the mobile device; is that right? 23 MR. SANDERS: Objection to form. 24 A. Privacy settings generally are stored on 25 the devices.	Page 117 1 A. Paragraph 30? Where are you at? 2 Q. Yeah. First sentence in paragraph 30. 3 A. Okay. Is there a question there? 4 Q. Yeah. The question is: What is the 5 difference between the term you used, location 6 permission, and the term you used, location? 7 A. Well, the location -- the permission has to 8 do with the -- you've called me. I'm asking if I could 9 get your location via the Sheha system, and you check 10 for permissions. And if that's allowed, then I can be 11 -- you -- I can be provided with the location. So it's 12 a sequence. 13 MR. SCHELLER: Let's go off the record. 14 (A break was taken.) 15 MR. SCHELLER: We are moving on to 16 IPR 2023-0096 [sic] regarding the '039 patent. And 17 we'll need a new exhibit. This is going to be 18 Exhibit 4, the Williams declaration. I'll pass it 19 through so you have it. 20 (Exhibit 4 was marked for identification.) 21 MR. SANDERS: I gave him a hardcopy of 22 Appendix 4. 23 BY MR. SCHELLER: 24 Q. Let's go back to paragraph 17 of your 25 declaration, which is in Appendix 4 of your declaration.