



Transcript of Justin Marston

Date: November 11, 2025

Case: X Corp. -v- Sterling Computers Corporation (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

X Corp. EX1050
X Corp. v. Sterling Computers Corp.
IPR2025-00299
Page 1 of 131

META-1043
Meta Platforms, Inc. v. Sterling Computs. Corp., IPR2025-00430

Transcript of Justin Marston
Conducted on November 11, 2025

1 (1 to 4)

1	3
1 UNITED STATES PATENT AND TRADEMARK OFFICE	1 A P P E A R A N C E S
2 -----	2 ON BEHALF OF THE PETITIONER:
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD	3
4 -----	4 ETHAN PLAIL, ESQUIRE
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12 Case No. IPR2025-00299	9 Padmanabhan & Dawson, PLLC
13 U.S. Patent No. 7,716,217	9 9800 Sheldard Parkway, Suite 120
14 -----	10 Minneapolis, MN 55441
15 ORAL, REALTIMED DEPOSITION OF	10 612.444.3601
16 JUSTIN MARSTON	11
17 NOVEMBER 11, 2025	12
18 -----	13
19	14
20	15
21	16
22	17
19 JOB NO.: 608103	18
20 PAGES: 1 - 303	19
21 REPORTED STENOGRAPHICALLY BY:	20
22 ANNETTE PELTIER, CSR, CRR	21
	22
2	4
1 ORAL AND REALTIMED DEPOSITION OF JUSTIN	1 Index
2 MARSTON, produced as a witness at the	2 Page
3 instance of the Petitioner, and duly sworn,	3 Appearances..... 3
4 was taken in the above-styled and numbered	4 Examination by Mr. Plail..... 7
5 cause on NOVEMBER 11, 2025, from 9:09 a.m. to	5 Adjournment..... 301
6 3:39 p.m., before Annette Peltier, CSR, Texas	6 Court Reporter's Certificate..... 302
7 Certified Realtime Reporter, in and for the	7 Exhibits
8 State of Texas, reported by machine	8 Number Description Page
9 shorthand, at the offices of Regus, 2021	9 Exhibit 1 Justin Marston Linked In 24
10 Guadalupe Street, Suite 260, Austin, TX	10 Exhibit 2 BlueSpace Investment
11 78705, pursuant to the PTAB Rules of Civil	10 Presentation
12 Procedure and the provisions stated on the	11 (Sterling_XIPR_003199).. 59
13 record or attached hereto.	12 Exhibit 3 Correspondence..... 158
14	13 Exhibit 4 Correspondence
15	13 (Sterling_XIPR0002055).. 165
16	14 Exhibit 5 Updated Ex2041..... 207
17	15 Exhibit 6 Updated (11/3/2025)
18	15 Ex2042..... 220
19	16 Exhibit 7 Bobby Inman Letter
20	17 (Sterling_XIPR_0002835). 275
21	18 PREVIOUSLY MARKED EXHIBITS
22	19 Exhibit
	19 1001 US Patent 7,716,217..... 74
	20 Exhibit
	21 1003 Provisional Application.. 170
	22

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Conducted on November 11, 2025

2 (5 to 8)

5				7			
1	Exhibit			1	JUSTIN MARSTON,		
2	1043	US Patent Application	139	2	Having been first duly sworn, testified upon		
3	Exhibit			3	his oath as follows:		
4	2003	Declaration of Justin	197	4	EXAMINATION		
5	Exhibit			5	BY MR. PLAIL:		
6	2004	BlueSpace Mail Search...	204	6	Q. All right. Good morning,		
7	Exhibit			7	Mr. Marston.		
8	2006	BlueSpace Mail Relevance	149	8	A. Hey.		
9	Exhibit			9	Q. Have you ever been deposed		
10	2008	BlueSpace Mail Relevance	290	10	before?		
11	Exhibit			11	A. No, not like this, no.		
12	2010	BlueSpace Mail Relevance	290	12	Q. When you say "not like this,"		
13	Exhibit			13	what do you mean?		
14	2014	Claim Chart for		14	A. I mean, I was in a tiny, small		
15	2030	BlueSpace Mail		15	claims thing with a video, you know, judge		
16	Exhibit	Documents (EX2004 and		16	whatever a consulting contract, but, like, it		
17	2032	EX2006).....	200	17	was -- you know, it was, you know, like, the		
18	Exhibit			18	whole -- the whole thing was about ten grand		
19	2041	Second Supplemental		19	paying to a consultant. So it was -- it was		
20	Exhibit	Declaration of Justin		20	very low pressure.		
21	2042	Marston.....	180	21	Q. Okay.		
22	Exhibit			22	A. I can say that.		
	2046	Redacted Email.....	243				
6				8			
1	Exhibit			1	Q. Well, hope to keep today low		
2	2047	TransMail Relevance	179	2	pressure, as well.		
3	Exhibit			3	A. Yeah.		
4	2048	Notes on Search Document...	187	4	Q. So, you know, I guess, just to go		
5	Exhibit			5	over the rules of the road, I'm going to ask		
6	2050	General Comments.....	194	6	questions, you provide answers. From time to		
7	Exhibit			7	time your counsel may object. Unless you're		
8	2054	BlueSpace Mail Search.....	189	8	specifically instructed by your counsel not		
9	Exhibit			9	to answer, you must still answer the		
10	2073	BlueSpace Mail Relevance...	285	10	question.		
11		*****		11	A. Okay.		
12				12	Q. Does that all make sense?		
13				13	A. Yeah.		
14				14	Q. If I ever ask a question that		
15				15	doesn't make sense, just let me know, and		
16				16	we -- and I will do my best to rephrase it,		
17				17	or we can break it down into parts.		
18				18	A. Okay.		
19				19	Q. Does that all make sense?		
20				20	A. Yeah.		
21				21	Q. All right. So what's your		
22				22	current address?		

9 1 A. 2800 Rio Mesa Drive, Austin, 2 Texas, 78732. 3 Q. And what did you -- 4 A. Sorry, you have to write that. 5 Yeah. 6 Q. I'm used to saying that so fast. 7 And what did you do to prepare 8 for today's deposition? 9 A. You know, spoke to attorney, 10 tried to refresh a little bit on the 11 documents. It's a long time ago, but tried 12 to have some context coming in so I would be 13 useful for answering questions. 14 Q. Okay. Did you speak with 15 Mr. Latifur Khan -- Khan? 16 A. I'm sorry. I didn't -- 17 Q. Latifur Khan. 18 A. I have no idea who that is, but 19 no. 20 Q. Okay. Did you review Mr. Khan's 21 declaration in preparation for today? 22 A. No. I don't know who he is, no.	11 1 Q. BlueSpace is a company you 2 founded, right? 3 A. Yes. 4 Q. And what kind of products did 5 BlueSpace make? 6 A. We made secure messaging products 7 at the start, and then over time, we moved to 8 doing cross-domain -- cross-domain solutions 9 for the government, for the intelligence 10 community. 11 Q. What do you mean by "cross-domain 12 solutions"? 13 A. "Cross-domain" means an 14 application that spans multiple virtual 15 networks that are running at different 16 classification levels. 17 Q. Okay. Just one other thing: I 18 notice you have some documents in front of 19 you. 20 A. Uh-huh. 21 Q. Are those your notes on the -- 22 on --
10 1 Q. Okay. Did you speak with 2 Mr. Paul Marston? 3 A. Well, he's my dad; so, yeah, I've 4 spoken to him, yeah. 5 Q. About today's deposition? 6 A. Only that I'm coming in to do it, 7 yeah. 8 Q. Did you review Mr. Paul Marston's 9 declaration? 10 A. I don't know if I've read that. 11 I don't think I've read it. 12 Q. Okay. Did you speak with anyone 13 else other than your counsel or Mr. Marston 14 about today's deposition? 15 A. No. 16 Q. Okay. Did you reach out to any 17 former BlueSpace employees while preparing 18 your declaration for today's deposition? 19 A. No. 20 Q. Okay. So I want to talk about 21 BlueSpace for a bit. 22 A. Okay.	12 1 A. Yes. These are all things that 2 you have, so these are the -- the -- my -- my 3 declarations in case I don't -- you know, I 4 can't remember something and I need to refer 5 to them, and then the timeline one that the 6 attorneys prepared based on conversations 7 with me and I've reviewed. 8 But I don't remember -- I mean, 9 this is 20 years ago, so I don't remember 10 every single date, every single action 11 that -- the written record of the documents 12 we have is, you know, far superior to the -- 13 whatever I remember at this point. But yes, 14 that's what these are, so... 15 Q. Okay. So just so we recap, you 16 have in front of you a copy of each of your 17 three declarations? 18 A. Yes. 19 Q. And then you said the timeline 20 document. 21 What is the exhibit number in the 22 corner of that?

13 1 A. 2014. 2 Q. Okay. Okay. So you said that 3 "cross-domain" means that the application 4 spans multiple virtual networks that are 5 running at different classification levels; 6 is that right? 7 A. Uh-huh. 8 Q. So that product stream doesn't 9 relate to the relevance systems -- 10 A. No. 11 Q. -- disclosed in the '217 patent? 12 A. Correct. 13 Q. Okay. And did BlueSpace ever 14 make a product that implemented the '217 15 patent? 16 A. No. We did -- we never -- we 17 pivoted. So after we had created it, we 18 moved more into cross-domain solutions. 19 Q. Okay. And when, about, did you 20 pivot? 21 A. It was probably a year after I 22 moved to U.S., so I would say -- I mean,	15 1 working on a way to create a unified inbox 2 that would span, you know, different -- these 3 different network domains on a trusted 4 operating system. 5 And then from there, we sort of 6 realized, well, that was one instance of that 7 type of application, and we built out a 8 middleware framework to build more of them. 9 Q. When you say you moved to create 10 "a middleware framework to build more of 11 them," are you referring to building the 12 TransMail system? What do you mean by 13 "middleware framework"? 14 A. A middleware framework is a 15 software platform designed for other people 16 to build applications on top of. 17 Q. Okay. 18 A. So we built -- and I think we 19 patented. I haven't -- I mean, I'm going 20 from memory -- a trusted service pass, which 21 was a way of exchanging very limited, very 22 narrowly, sort of, fenced messages between
14 1 it -- there wasn't a moment in time, right? 2 It was around 2007, I would say, that we 3 pivoted, something like that. 4 I moved to the U.S. in 2006 and 5 then, you know, we were -- we were working 6 with parts of the U.S. intelligence 7 community, and that was where -- through it, 8 we created TransMail, and we were marketing 9 TransMail as a secure messaging platform. 10 And then we -- then we moved to 11 wanting to allow that to run on different 12 classified networks at the same time. So 13 that was sort of the -- you know, we had 14 multiple instances of TransMail running on 15 different network domains, like, you know, 16 classified, secret, top secret, various 17 flavors of top secret, SCI. 18 And then the government wanted to 19 have a single inbox view of these separate 20 systems running at different classification 21 levels. 22 So then, you know, we started	16 1 different networks to orchestrate a single 2 user experience across these, you know, 3 logically separate network domains. 4 So it was still TransMail in 5 that -- I mean, and we actually got close to 6 [GOVERNMENT ENTITY] adopting TransMail as 7 their primary method for distributing 8 intelligence, but -- so, yeah, we were still 9 actively selling it. 10 But we -- you know, we also went 11 into this -- this, you know, cross-domain 12 space; and then in the end, you know, I had 13 left to form Hypori -- DroidCloud, then 14 Hypori, which was really a continued -- you 15 know, it was a continuous path in the sense 16 of that then took some of the same concepts 17 to mobile devices, so -- and that software is 18 used by over a hundred thousand people in the 19 Department of Defense today. 20 So it was really just narrowing, 21 I guess, on the biggest pain points for the 22 end users, the end customers.

17 1 Q. I see. 2 So when you say "create a unified 3 inbox" -- 4 A. Mm-hmm. 5 Q. -- would the unified inbox -- was 6 that managed through, for example, a 7 compliance model? 8 A. So when you say "compliance 9 model," do you mean the separate patent that 10 we have for compliance model, or do you 11 mean -- what do you mean by "compliance 12 model"? 13 Q. This patent refers to a 14 compliance model. 15 A. No, it wasn't -- it -- so it's -- 16 tell me when you're bored here. 17 So the compliance model was about 18 how messages were handled over their 19 lifecycle within a single network domain. 20 What the government does, because 21 they are very worried about foreign nation 22 state hackers, they run global non-internet	19 1 on their desks. 2 And what [GOVERNMENT ENTITY] had 3 worked on was a trusted hypervisor that 4 allowed them to run multiple virtual 5 computers on a single piece of hardware; but 6 that didn't help with the user experience. 7 They were all still separate. 8 So the place that BlueSpace ended 9 up was building this middleware platform that 10 allowed you to create a single application 11 and a single application view that spanned 12 those different logical networks without 13 causing, you know, big security gaps because 14 you had now connected them. 15 You could imagine it was an 16 incredibly locked-down firewall that was 17 orchestrating messages going between these 18 different networks to build a single user 19 experience, but each of the data still lived 20 within each of the respective virtual 21 networks. 22 So that is cross-domain
18 1 peered networks. 2 So the secret network, the top 3 secret network in the U.S. government, those 4 networks are walled gardens that do not route 5 out to the internet at all. 6 And the problem with, you know, 7 9/11 -- the 9/11 report inspired this whole 8 wave of cross-domain solutions and multilevel 9 security because all the information was 10 stovepiped and it made it difficult to make 11 connections between this one and this and 12 this because they're all on different 13 networks. 14 So essentially, what they were 15 looking -- they had seven, eight different 16 inboxes. They had one on unclassified, they 17 had one on secret, they had one on top 18 secret, they had one on Two Eyes UK, they had 19 one on Five Eyes, they had one on NATO, they 20 had one on ISAF; so they literally had, you 21 know, eight to ten sort of separate inboxes; 22 and historically, they had separate computers	20 1 solutions, multilevel security. 2 Q. I see. 3 You said you -- you said that 4 BlueSpace pivoted away from the relational -- 5 sorry, the relevance models in the '217 6 patent into this multi-domain security. Why 7 was that? 8 A. Money. 9 Q. Money. 10 And what do you mean by "money"? 11 A. Well, I mean, as an entrepreneur, 12 you look at what your customers are asking 13 you for, and then you go towards that. 14 And so, you know, the relevance 15 patent was just different to that big 16 post-9/11 problem, the -- you know, how do I 17 build applications that span multiple 18 security domains? 19 And, you know, there was a 20 particular moment where -- I mean, that was 21 the reason I left BlueSpace, ultimately, and 22 formed Hypori was because I was sat with

21 1 different senior executives with [GOVERNMENT 2 ENTITY], and they said: Hey, if you can 3 build me a mobile thin client, I'll give you 4 millions of dollars to go build one of those 5 because we really need it. 6 So that's the -- you know, 7 everybody does it. You know, you listen to 8 what customers tell you, and you take 9 prioritization decisions. 10 Q. I see. 11 So you -- when you say that as an 12 entrepreneur you look at what your customers 13 are asking -- so your customers were looking 14 for these multi-domain security solutions at 15 the time? 16 A. Correct. 17 Q. And they weren't really looking 18 for a relevance system at the time? 19 A. It wasn't their burning, number 20 one issue. You know, their number one thing 21 was, you know, terrorists blew up the Trade 22 Centers and it was because we didn't share	23 1 of BlueSpace, the existing investors, the cap 2 structure, everything else. Like, it's a new 3 product, requires different skilled 4 developers with different specialisms [sic], 5 you know, different revenue source, different 6 investors. 7 Like, it's a whole new thing; and 8 so I -- you know, I worked my way out and 9 essentially resigned from BlueSpace to -- to 10 go form -- it was originally called 11 DroidCloud, is the working name, which is 12 D-R-O-I-D-C-L-O-U-D, and then we renamed it 13 to Hypori, you know, a year or two later. 14 Q. And you left BlueSpace in around 15 2011; is that right? 16 A. No. It was -- well, I can't 17 remember, actually. Yeah, I guess that's -- 18 yeah, I'd have to look at the dates, but 19 probably around then, yeah, I think. Yeah, 20 I'd have to look at the dates to -- it's on 21 my LinkedIn. Whatever's on my LinkedIn is 22 sort of accurate for when I went to
22 1 information between organizations very well 2 and everything was stovepiped. So that -- 3 you know, there was a lot of money that was 4 getting spent moving in that space. 5 Q. And you said you left Hypori 6 because -- to focus on a thin client -- or 7 sorry, strike that. 8 You said you left BlueSpace and 9 moved to Hyperion [sic] going forward -- 10 A. Hypori, yes. 11 Q. Hypori, sorry. 12 A. Yeah. 13 Q. -- to focus on, again, this 14 multi-domain security solution, right? 15 A. I mean, so technically, it was to 16 focus on a mobile thin client solution, 17 which, as I say, is used by a over a hundred 18 thousand people today in the government. 19 So it was to -- it definitely 20 was -- it was a whole new company. It was a 21 whole new product, and I just kind of said 22 there's no point dragging all of the history	24 1 DroidCloud. 2 MR. PLAIL: So I guess we can 3 go ahead and mark this as Exhibit 1 then. 4 A. Mm-hmm. 5 (BY MR. PLAIL) 6 Q. It's just a copy of your 7 LinkedIn. 8 (Whereupon Exhibit Number 1 was 9 marked for identification.) 10 THE COURT REPORTER: Hold on a 11 second. So when you ask me to mark an 12 exhibit, please give me one second to 13 do so, please. Appreciate you. Okay. 14 A. So yes, that's right. 15 And DroidCloud and Hypori were 16 the same company; we just changed the name. 17 (BY MR. PLAIL) 18 Q. I see. 19 And after that, you worked at 20 Bamboo -- 21 A. Yeah. 22 Q. -- Tribe, and now Mithril

25 1 Defense? 2 A. Correct. 3 Q. And at all of these companies, 4 did you make a relevance system similar to 5 the '217 patent? 6 A. No. 7 Q. Why not? 8 A. I mean, you know, I built things 9 that were -- I mean, as an entrepreneur, you 10 respond to immediate problems in front of you 11 and people who are willing to spend money 12 immediately. 13 So, you know, those are the 14 things I built. That's the life I've lived. 15 Mithril Defense is all about 16 drones and stopping school shootings. It's 17 different -- you know, you -- you know, 18 that's -- that's -- you're a serial 19 entrepreneur. You look at new problems, and 20 you make new things, so... 21 Q. So let's look at your LinkedIn 22 real quick.	27 1 at the moment that I left. I'd given up the 2 CEO title. I'd been diluted significantly. 3 It just didn't make sense to 4 start a whole new project in a company where 5 I owned -- I can't remember the -- you know, 6 some of -- some -- I think, like, 10 percent 7 of the stock, so -- so that was why I left. 8 It was a -- it was a whole new thing, so -- 9 so they weren't happy about it. 10 But sometimes in life, you know, 11 you have to -- you have to close one chapter 12 and move to the next. 13 Q. And so you weren't particularly 14 involved with BlueSpace between 2011 and 15 2014? 16 A. No. I was very -- sort of look 17 at the timeline here, but yes -- no, I really 18 wasn't involved pretty much at all, you know, 19 no. 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]
26 1 A. Sure. 2 Q. So this is just a copy of your 3 LinkedIn. 4 A. Yeah. 5 Q. Does this look accurate to you? 6 A. Yes. 7 Q. Okay. So you said that you left 8 BlueSpace, I guess, in 2011. 9 A. Uh-huh. 10 Q. Did you leave on good terms with 11 BlueSpace? 12 A. They didn't want me to leave. So 13 I gave them a piece of Hypori, and they ended 14 up selling that for several million dollars, 15 but -- but, yeah, they didn't -- they didn't 16 really -- I don't think -- I -- I -- we 17 didn't have particularly expert investors, 18 and I could associate with them that -- they 19 felt like they had backed me and not a 20 specific product, and so it was difficult for 21 them to come to terms with me leaving, but, 22 you know, I didn't own very much of BlueSpace	28 1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]

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29 1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 MR. PADMANABHAN: Sorry. And 6 the objection is Rule 601, 602. 7 (BY MR. PLAIL) 8 Q. You mentioned that you gave a 9 stake -- I might have mispronounced it 10 again -- Hyperio [sic]? 11 A. Hypori. 12 Q. I'll get there eventually. 13 A. Yeah. 14 Q. You -- you mentioned that you 15 gave a stake of Hypori to BlueSpace as part 16 of your transition out? 17 A. (Nods head.) 18 Q. And that BlueSpace sold that 19 stake for several million dollars, you said? 20 A. Yes. 21 Q. Was that sale you're referring 22 to, is that the sale to Sterling?	31 1 invest -- the other investors in Hypori. 2 Q. I see. 3 And when about did the -- that 4 sale take place, the sale of Hypori stock? 5 A. Yeah, I don't remember that 6 offhand. I would have to... 7 Q. Would it have been before or 8 after BlueSpace was acquired by Sterling? 9 MR. PADMANABHAN: Objection, 10 601, 602. 11 But you can answer. 12 A. I don't know the answer to that. 13 I can't remember. I wasn't -- yeah, I don't 14 have any of my Hypori files with me. 15 (BY MR. PLAIL) 16 Q. BlueSpace made a product called 17 the XD Framework. Do you know what that is? 18 A. Yeah. I think that they called 19 it that after I left, but that was the 20 cross-domain platform, so the framework 21 platform. It was a web -- and X was 22 cross-domain. The X is sort of a -- so it
30 1 A. No. 2 Q. So there was a separate sale for 3 the Hypori stock? 4 A. Yeah. The Hypori stock was 5 purchased by other investors in the 6 company -- in Hypori. So the investors were 7 investing in preference stock. What 8 BlueSpace owned in Hypori was common stock. 9 So the rest of the investors 10 bought out BlueSpaces's common stock holding 11 in Hypori at a discount to the full 12 preference price, but, you know, they felt 13 like it was a good value and it was really -- 14 there was a guy, Michael Underwood, who was 15 the primary financial backer of BlueSpace at 16 this point, and he -- you know, he -- he was 17 looking to sort of liquidate all of the 18 position, and so he -- he kind of drove 19 BlueSpace's board deciding that they wanted 20 to sell it. 21 So we helped with the sale -- 22 essentially a secondary sale to the existing	32 1 was the cross-domain framework. That -- I 2 think that's what they named the product. 3 Q. Okay. So did that include 4 TransMail? 5 A. I don't believe so, but you'd 6 have to -- again, I think that happened after 7 I left. 8 Q. Okay. And so just so we're 9 clear, TransMail, what time period was that 10 active? 11 A. Well, it was still active, though 12 not as much as of a focus when I left, and I 13 don't know at what point they decided, look, 14 we're going to -- we're going to totally give 15 up on that and just focus on cross-domain 16 solutions. 17 I mean, I'm guessing it was 18 sometime between when I left and when they 19 sold the assets. 20 Q. And when did TransMail start? 21 A. Well, that was the first product 22 that we created. So, you know, the original

33 1 idea of TransMail was -- or the original 2 customer need was security. 3 Like, back in -- at the very 4 start, when I was, you know, fresh out of 5 university, a long time ago -- I'm guessing 6 this is, like, around 2001 -- the original 7 idea was, you know, e-mail's not very secure. 8 It gets forwarded through all these different 9 forwarding servers. There are customers who 10 want security. It needs better security, 11 right? 12 And then as we started talking to 13 those customers, it wasn't just about the 14 encryption and security of the data, it was 15 about how that data was managed; and so that 16 was where the compliance policy patent came 17 from, for saying, okay, if -- imagine in an 18 investment bank. 19 If an analyst sends an e-mail to 20 a investment banker, well, that's not 21 allowed, right, because of the -- because 22 they're supposed to have Chinese walls.	35 1 message but they can't see the analyst's 2 message because there's a Chinese wall. 3 Okay? 4 And it's not just the direct 5 sending, it's the whole lifecycle of that 6 message as an object. 7 And so, really, you know, to the 8 best of my knowledge, TransMail was the first 9 kind of object-oriented messaging platform, 10 and that was a key unique innovation that 11 we -- we kind of had. 12 And then you think about, well, 13 who are the people who care about that the 14 most? The banks kind of care about it, but 15 it turns out that the defense and the 16 intelligence community care about it a lot 17 more. 18 And that's why when I moved here, 19 you know, the natural "sock" was into the 20 intelligence community because they really 21 cared about who accessed that piece of 22 intelligence across its lifecycle and having
34 1 But if analyst sends an e-mail 2 to, you know, somebody in HR, and they 3 forward it to an investment banker -- at the 4 time, there wasn't any way to track that 5 because it was all just one giant text essay 6 in every e-mail, right? 7 And so the -- one of the 8 innovations that BlueSpace had was saying, 9 hey, if we keep each of these objects 10 separate and we just reference them, then 11 instead of having thousands of copies of the 12 same or, you know, tens -- hundreds of copies 13 of the same piece of text distributed across 14 different text fragments, we can resolve that 15 back to, you know, a single object, and then 16 we can start -- you know, then we can control 17 it better because there's only one copy of 18 it, right? 19 So we can say, even when the 20 analyst sends the message to HR and HR 21 forwards it to the investment banker, the 22 investment banker can see the HR person's	36 1 an audit trail of that. 2 So you know, we kind of -- that's 3 what kind of took us into that space, but the 4 core idea was objects that can be, you know, 5 tracked and managed across their lifecycle. 6 And the compliance patent was -- 7 was saying, okay, who can read it and how 8 long do I retain it for, when do I delete it 9 to get rid of my liability. 10 And then development's patent was 11 saying, okay, now that I have this single 12 object, I can think about who's accessed it, 13 what they've done with it. All of those 14 actions become an indicator for how useful 15 that content is, rather than just being who 16 can access it and whether I delete it or not. 17 You know, the feedback that we 18 were getting from lots of people in the -- in 19 the corporate world was, I get so much 20 e-mail, I don't have time to read it all, and 21 a lot of it isn't spam like Cuban cigars. A 22 lot of it is messages that are, you know,

37 1 internal cc'ing and stuff that's not 2 interesting to me, but people -- that person 3 who cc's the world every time they send an 4 e-mail, then all of that stuff ends up in the 5 inbox. 6 So that was the core, you know, 7 thought, was, hey, if we can come up with a 8 mechanism that -- that rewards good behavior, 9 means your e-mails are less likely to get -- 10 or your messages are less likely to get 11 delivered if you keep having bad "copy 12 everybody" behavior and we can start 13 determining how interesting each one of these 14 objects in the chain is to you based on all 15 the actions you're doing and people like you 16 are doing. Then -- then that would be really 17 helpful for that -- you know, that central 18 problem of -- of how do I make sense of 19 getting 200 e-mails a day, excluding the 20 Cuban cigars and the -- you know, whatever 21 other complete total spam. 22 Q. So --	39 1 Q. Yeah, the initial driver. 2 And so that is kind of what a lot 3 of your initial customers were interested in, 4 is solving that issue of lack of security? 5 A. Yes. 6 Q. Yeah. 7 And you can use the compliance 8 model and the relational model together to 9 alleviate that security concern by having a 10 single record of that e-mail? 11 A. Correct. 12 Q. Yeah. 13 And so then the -- the relevance 14 portion of this was really targeted at a -- 15 at a different issue altogether, which is a 16 large amount of e-mail? 17 A. Yes, it was how do I make sense 18 of the volume I'm getting. Yes. 19 Q. Okay. But that particular 20 relevance solution was never implemented in 21 the TransMail? 22 A. That's true.
38 1 A. -- you know. 2 Q. -- just to -- that's very 3 helpful. 4 And just to kind of break this 5 down into parts, then, you know, just -- you 6 said that TransMail started around 2001; is 7 that right? 8 A. Yeah. That was the first product 9 we built. 10 Q. Uh-huh. And when you're 11 referring to the, you know, compliance model 12 being used to control a single instance of 13 the mail object, you're referring to the 14 relational model? It's also sometimes called 15 the relational model -- 16 A. Yes. 17 Q. -- in the patent? 18 A. Yes, that's right. 19 Q. Okay. And you said that the lack 20 of security in traditional e-mail was one of 21 the major drivers to -- 22 A. That's the initial one.	40 1 Q. Yeah, and that was because as the 2 industry was moving towards these 3 multi-domain and higher security and -- and 4 that's where the money was? 5 MR. PADMANABHAN: Objection 6 611. 7 You can answer. 8 A. Yeah. I mean, I think that the 9 cross-domain thing -- I mean, each of these 10 steps was a step into a different product; so 11 there was the messaging thing and then, you 12 know, the how do I get to a single inbox, 13 really strong driver, drove, okay, now I need 14 a way to -- to create a single inbox that 15 spans all of those different virtual 16 networks. 17 That wasn't -- that was a 18 customer need inspiration hook, right? 19 (BY MR. PLAIL) 20 Q. Right. 21 A. And from that, you know, the 22 company then went on with the cross-domain

41 1 framework to build, you know, common 2 operating picture apps, chat apps, I mean all 3 kinds of different things that were based on 4 that architecture. 5 Now, ironically, in the end, 6 [GOVERNMENT ENTITY] copied it because they 7 felt like their problem was unique to defense 8 and so it didn't really need a commercial 9 solution. 10 But -- but it was a real problem, 11 and it -- it has -- it's reflected in some of 12 what the government does on its own systems 13 that [GOVERNMENT ENTITY] builds today. 14 And then a step from there to the 15 mobile thing was saying -- we were saying, 16 okay, how can we get those trusted apps onto 17 mobile devices and then, you know -- this 18 testimony isn't public, right? I probably 19 shouldn't say [GOVERNMENT ENTITY] so much if 20 it's going to be public, but -- 21 MR. PADMANABHAN: We can mark 22 it "attorneys' eyes only."	43 1 And that was what inspired us to 2 say, well, what if we could just build a 3 mobile thin client that was designed, you 4 know, to do that? 5 So, like, really, they are three 6 separate products. TransMail, the 7 cross-domain platform, they were both part of 8 BlueSpace. That was really -- you know, 9 one abridged the other, but one emerged as a 10 platform -- 11 THE COURT REPORTER: Hold on. 12 Slow down. 13 THE WITNESS: Sorry, okay. 14 (Reporter clarification.) 15 A. Okay. So there were three 16 different products. TransMail and the 17 cross-domain solution were both part of 18 BlueSpace. 19 The mobile thin client and Hypori 20 was a whole new company, and really, a whole 21 new idea; and, you know, each one of those -- 22 whenever you're an entrepreneur and you think
42 1 A. I can say "the government 2 customer." 3 MR. PLAIL: We'll have to -- we 4 can talk off the record about how to handle 5 it. 6 THE WITNESS: Okay. 7 MR. PLAIL: Yeah. But, I mean, 8 generally, if you can keep things public -- 9 (Talking over each other.) 10 A. Okay. Let's say "the government 11 customer." 12 (BY MR. PLAIL) 13 Q. Yeah. 14 A. You know, the government 15 customer, they kind of said, look, the 16 problem isn't getting cross-domain apps on 17 mobile devices, the problem is we can't get 18 any apps on mobile devices because they 19 are -- you know, they have data at rest; they 20 don't have good encryption; I don't want this 21 top secret stuff everywhere, you know, on 22 storage at rest.	44 1 of something else or you have an idea and you 2 start to pivot, you know, it's going to 3 reflect the journey that you went down, but 4 they were still separate logical ideas. 5 I think one of the questions that 6 you've been pushing on, so I can just answer 7 it, is, like, what -- if this was such a 8 great idea, why don't you go do it? 9 I mean, I think that's kind of, 10 like -- there's a long -- I mean, yeah, 11 that's the thread of the questions you're 12 asking. 13 Q. I think my -- my question, just 14 to -- just to go back to it, though -- 15 A. Sure. 16 Q. -- is you never implemented the 17 patent, right? 18 A. Correct, yeah. 19 Q. And the reason you didn't 20 implement the patent was because you pivoted 21 to the multi-security domain? 22 A. Yes, that's --

1 Q. Right? 2 A. Yep, yep. 3 Q. Okay. So, I mean, I think that's 4 really the -- with -- the main questions I 5 was asking -- 6 A. Okay. Sure. 7 Q. -- on that. 8 So -- and just to confirm, your 9 other companies didn't have a product like 10 TransMail going forward -- 11 A. No. 12 Q. -- or -- or a relevance system? 13 A. Correct. 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]
1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 Q. Okay. And we talked about the XD 7 Framework. It looks like BlueSpace also had 8 another product called the SmartXD framework? 9 A. I think it's probably the same 10 thing, but I don't know. I can't speak to 11 it. 12 Q. Okay. And TransMail, you said, 13 was discontinued sometime between 2011, when 14 you left the company, and 2014 at the sale? 15 MR. PADMANABHAN: Objection, 16 Rule 611 and 601, 602. 17 A. I don't know the answer to that. 18 I mean, I assume yes. I do not know the 19 answer to that. I was not involved. 20 (BY MR. PLAIL) 21 Q. Okay. You used to use TransMail 22 daily, right?

49 1 A. I mean, we used it for internal 2 communications. The greatest challenge that 3 we had in TransMail was that it wasn't 4 e-mail, and at the time, you know, separate 5 messaging systems – everybody was pushing 6 towards e-mail. 7 When you look at the product 8 portfolio and the patent portfolio, we tried 9 to create gateways from, you know, TransMail 10 to e-mail and then digest them coming back 11 in, and it was all about how you build that 12 gateway. 13 I think, interestingly, you know, 14 Facebook tried to do the same thing for a 15 period. They tried to allow you to send 16 messages out from their own Facebook 17 community into e-mail and then digest them 18 and bring them back, and you – everybody had 19 a Facebook e-mail address, and then they 20 killed it. 21 And so the problem is, like, you 22 have to be vested in the value of going to a	51 1 were doing it, the number one challenge was 2 that people just wanted it to all work around 3 e-mail. And it's very difficult – as 4 Facebook found, as LinkedIn found, as others 5 have found, it's very difficult to build a 6 bridge between some internal messaging system 7 that's substantially different and e-mail as 8 a common denominator. 9 Q. Okay. And so you used TransMail 10 for your internal communication? 11 A. Yeah, we did. We did use it. 12 You know, again, we couldn't use it for 13 everything because it didn't let us copy in 14 people who weren't on TransMail. 15 Q. I see. 16 A. We did have other customers who 17 used TransMail. We had a – we had a 18 company – we had several companies in the UK 19 that were using it for internal privileged 20 and sensitive communications, but, you 21 know – but yeah, I mean, it – that was the 22 primary problem, was everybody wanted to be
50 1 separate messaging system that isn't e-mail. 2 Now, the government does that for 3 intelligence distribution because 4 intelligence distribution is very important 5 to them. 6 Kids do it on Instagram because 7 they somehow have – you know, they – 8 there's value in the rest of that – social 9 network, there's value in sharing photos of 10 themselves and all the features of that 11 platform, and they have identity, they 12 project identity into that network, and so 13 they message through it, right? 14 In the corporate world, there was 15 Bloomberg that sort of had Bloomberg mail 16 that was separate, and it was kind of like a 17 VIP walled garden from everybody's Bloomberg 18 terminals and there was sort of this – maybe 19 over time, after I'd left the space, you 20 know, LinkedIn got more traction and then 21 started having LinkedIn mails. 22 But, like, at the time that we	52 1 able to talk to everybody else, and e-mail 2 was the standard. So... 3 Q. And so at some point, though, you 4 lost access to your BlueSpace e-mail. 5 A. Yeah. 6 Q. Was that when you transitioned 7 into a new company? 8 A. Yes. 9 Q. Okay. 10 A. It was around – I mean, I don't 11 know the exact time, but around that time. 12 It was – it was a transition because I 13 didn't want to leave instantly, and they 14 didn't want me to leave at all. 15 And so I tried to sort of – we 16 had this period where I – where myself and 17 my cofounder worked on DroidCloud part-time 18 and worked on BlueSpace part-time and then we 19 went over to fully working on – on, you 20 know, the new company alone; and again, I 21 don't think that – I don't think that – I 22 mean, they wanted – they wanted us to stay,

53 1 and so it felt like a one-sided divorce, 2 where one doesn't want you to leave and, you 3 know, one has decided that they want to go, 4 so... 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	55 1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 Q. All right. So going back to your 17 resumé for one second... 18 A. Sure. 19 Q. I just wanted to confirm, you -- 20 you don't have a background in computer 21 science, right? 22 A. Correct.
54 1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	56 1 Q. And you're not a computer 2 programmer? 3 A. I mean, I have done -- I did do 4 some computer programming when I was a kid. 5 So it's not -- I don't think it's on my 6 resumé, but, you know, I -- I actually did 7 the equivalent of my high school project in 8 the UK on chaos theory, and I published it in 9 a journal called Nature, which is quite 10 well-known. It's a -- it's probably -- it's 11 pretty much the most prestigious science 12 journal that there is, and -- and I was the 13 youngest person to have published in it in 14 the history of the journal, which was 125 15 years. 16 As part of that project, I did do 17 programming of a system to measure time 18 between events in a chaotic system, and 19 Nature did an international press release 20 about me. 21 I won the British Young Scientist 22 competition. I won one of the major prizes

57 1 of the European Young Scientist competition. 2 So, I mean, it's a long time ago, 3 but a long time ago I used to be quite smart, 4 you know. And so, yeah, I mean, I -- and I 5 also did -- and while I was in -- in the 6 equivalent of high school, in my A-levels, I 7 did a fifth of the First-Class Honor's degree 8 in statistics, and I was the young -- I got 9 approved -- I got, you know, confirmed as the 10 youngest ever Fellow at the Royal Statistical 11 Society in the UK based on the stats that I 12 did. 13 So, you know, there's a thin line 14 between computational mathematics and 15 statistics, and -- yeah, I mean, so I was 17. 16 I had a fifth of the First-Class Honors 17 degree in stats. I published in Nature. I 18 had a patent going on what I had developed at 19 British Nuclear Fuels in my year out, which 20 was to do with building feedback loops for 21 bioremediation. 22 So, you know, I always tell	59 1 A. No. I have a degree in 2 chemical -- I have a degree and a Master's 3 degree in chemistry. It's a -- it's a 4 unified course. 5 Q. So you didn't write the source 6 code for the BlueSpace products? 7 A. Correct. 8 Q. Okay. 9 A. I hired people to do that for me. 10 Q. Okay. 11 (Whereupon Exhibit Number 2 was 12 marked for identification.) 13 (BY MR. PLAIL) 14 Q. Do you recognize this document? 15 A. Honestly, not really, but I 16 probably did write it at some point 20 years 17 ago, yeah. 18 Q. Okay. 19 A. I don't recognize -- I don't 20 remember it. 21 Q. So you wrote this document? 22 A. Yeah. I'm sure I probably did.
58 1 people that I'm not as stupid as I look, but, 2 you know, I had done a lot of -- a lot of 3 math, and I had done, you know, coding to 4 build out both the system I built at British 5 Nuclear Fuels and the system I built at -- I 6 built for my high -- my high school physics 7 project, so... and then, obviously, my father 8 is a professor in the statistics department, 9 but, yeah. 10 Q. But you didn't build the code 11 used for TransMail? 12 A. That's correct. 13 Q. Yeah, or the software 14 implementations to implement the relevance 15 system? 16 A. Correct. 17 Q. Okay. And so while you have some 18 background in computer programming, you don't 19 have a degree in computer programming? 20 A. Correct. 21 Q. And you don't have a degree in 22 electrical engineering?	60 1 Q. And this was in December 2005, 2 right? 3 A. I don't know the date. 4 Q. Says it on the cover? 5 A. Then yes, probably, yeah. 6 Q. Okay. 7 A. Yes. 8 Q. Okay. And so this is an 9 investment presentation, right? 10 A. Uh-huh. 11 Q. And this -- you know, similar to 12 how we discussed before, this is focusing on 13 the multi-domain security solutions of 14 BlueMail, right? 15 A. No. 16 Q. What does this investment 17 presentation go over then? 18 A. Focuses on TransMail. I don't 19 think there's anything in cross-domain 20 solutions. 21 Q. So TransMail didn't implement the 22 cross-domain solutions at this time?

61 1 MR. PADMANABHAN: Objection, 2 misstates witness's testimony, Rule 611. 3 Objection, Rule 611. 4 A. Let me just look at it and see if 5 I can see anything in here that says that. 6 Yeah, so I don't see anything 7 here that's -- that's on the cross-domain 8 side; and then, again, I think -- I moved 9 here full-time in 2006, and it wasn't really 10 until after that. And I can't give you an 11 exact date/year, but, you know, it was after 12 I got here and I was permanently here and I 13 was doing a lot more meetings in the 14 intelligence community. 15 That was when, you know, frankly, 16 I started understanding how their IT 17 infrastructure worked. I mean, if you don't 18 work in defense and intelligence, you have no 19 idea how they manage to try and keep secrets 20 safe from foreign nation states. You know, 21 it's a uniquely difficult challenge. 22 So -- so, no, I think this entire	63 1 there's no control over who can see what. 2 So there's no -- there's no 3 control over access rights, there's no 4 control over how -- there's no control over 5 how long you keep it for, because it can get 6 copied into all these other mails and you 7 don't actually know whether you've deleted it 8 or not. 9 There's no ability to know who 10 did what with what because it's all just lost 11 in a morass of free text and data everywhere, 12 and then the process integration was there's 13 no way to -- to tie messages into projects, 14 into, you know, being related to specific 15 business processes. 16 Q. Okay. So when you say there's no 17 control over who can see what -- 18 A. Uh-huh. 19 Q. -- are you referring to basically 20 the idea that you need content to be 21 controlled based off, for example, someone's 22 job role within a company?
62 1 thing is about TransMail. 2 Q. Okay. Can you go to -- if you 3 look at the bottom right corner, those page 4 numbers -- or Bates numbers. 5 Can you go to the page ending in 6 3201? 7 A. Yeah, it's page -- yeah -- 8 problem -- yeah. 9 Q. Okay. So it appears that this 10 page is, as you said, identifying key 11 problems with e-mail, right? 12 A. Yeah. 13 Q. And one of the problems is the no 14 content control, right? 15 A. What do you -- yes, yeah, yeah. 16 It's written there. 17 Q. And what do you mean by "no 18 content control" there? 19 A. I mean, there's no -- there's no 20 lifecycle, is what I imagine I meant. I 21 mean, again, I wrote this 20 years ago, but 22 what I think I meant in this context is that	64 1 A. Correct. 2 Q. So you gave the example earlier 3 about how a banker may be able to see 4 different information than an analyst? 5 A. Correct. 6 Q. So it's important to kind of have 7 a system that maintains the messages such 8 that only the people who are supposed to see 9 things see things? 10 A. Allowed to see things, but yes. 11 Q. Okay. Okay. Can you go to the 12 page ending in 3209? 13 A. 3209. Yep. 14 Q. So it says here that you can 15 "compose TransMails through a web interface 16 just like webmail." 17 Do you see that? 18 A. Yeah. 19 Q. So TransMail was a webmail-like 20 product? 21 A. It was a browser interface, yeah. 22 Q. Okay. And so it used just a --

65 1 kind of a normal internet browser and then 2 you would log in, or was it a -- 3 A. Yeah, a normal internet browser. 4 Q. Okay. So at the time, there were 5 companies like AOL, right? 6 A. Uh-huh. 7 Q. And AOL used kind of a captive 8 web browser? 9 A. Yeah. They built their own. 10 Q. Yeah. So it -- basically a 11 walled garden that allows you to access their 12 webmail through this specialized browser; is 13 that right? 14 MR. PADMANABHAN: Objection 15 601, 602. 16 But you can answer if you know. 17 A. I'm not an expert in AOL. I know 18 that they had some concept of, you know, a 19 ring-fenced private garden. 20 I think that that kind of died 21 because so much data was coming online in the 22 broader internet that, like -- I mean, it's	67 1 plug-in to Microsoft Outlook at one point to 2 try and create views within Outlook because 3 that's what so many users were using. 4 But there was never a -- I mean, 5 the reason why people make browser 6 applications is so that you can access them 7 through browsers. 8 Q. Okay. Can you go to the next 9 page? 10 A. Sure. This is '10, right, 3210? 11 Q. Yes. 12 A. Okay. Yeah. 13 Q. And just to be clear, this is a 14 picture of the inbox of TransMail? 15 A. Correct. 16 Q. And it's here displayed inside a 17 browser like we discussed? 18 A. (Nods head.) 19 Q. And just to be clear, this is not 20 sorted by relevance? 21 A. That's true. This is -- well, I 22 can't see, actually, but let me have a look
66 1 really the reason why Google defeated Lycos, 2 is because, you know -- and Yahoo, was 3 because the idea of curating all of that 4 became impossible as the content grew; and 5 just staying within AOL-approved sites meant 6 you could only access 10 percent or less of 7 the data that was out there, so -- so I think 8 they gave up on it; but again, I'm -- I am 9 not an expert at AOL. There were other 10 people who would be. 11 (BY MR. PLAIL) 12 Q. But it was common at the time to 13 use internet browsers to access webmail? 14 A. Yes. 15 Q. Okay. Did you ever make a 16 plug-in or an interface for a internet 17 browser to make it compatible with TransMail? 18 A. You know, I mean, you accessed 19 TransMail through a web browser. 20 Q. Okay. 21 A. So there wasn't a need to try 22 and -- I mean, we made -- we played with a	68 1 closely. It's probably sorted by date. Yes, 2 I would imagine it's going to be sorted by 3 date. 4 Q. Actually, if you look in the 5 "received" column, you can see there's a 6 little, sort of, icon above it? 7 A. Uh-huh. 8 Q. So this is sorted by date? 9 A. Yeah. I mean, it's -- yes, I 10 would imagine it showed -- yes. 11 Q. Okay. And let's go to the next 12 page, 3211. 13 A. Yeah. 14 Q. I believe you mentioned this -- 15 well, actually, if we go to 3212 -- maybe 16 circle back after. I believe you just 17 mentioned this: "Compatible with Outlook and 18 Exchange, Microsoft Partner"? 19 A. Yes. 20 Q. So was that the plug-in you were 21 referring to a few minutes ago? 22 A. Well, it's two different things.

69 1 One was trying to make a plug-in to Outlook 2 so that TransMails would be viewed within 3 Outlook, so that was one thing. 4 And then Exchange was Microsoft's 5 mail server on the back end, so that was 6 trying to take a TransMail and effectively, 7 you know, print it out into a continuous text 8 stream that would be compatible with SMTP, 9 and then when an e-mail comes back in, to -- 10 to then digest it back into its object 11 components. 12 That's actually what Facebook 13 tried to implement in their messaging gateway 14 years later when they built one, and it's 15 also what Google tries to do with Threads, to 16 try and stack threads based on a -- on a 17 chain instead of just -- I have to find every 18 inbox -- every e-mail in my inbox that's, you 19 know, related, so... 20 But they're two different things, 21 the integration with Outlook and the 22 integration with Exchange, two different	71 1 dominant; and now Google has been, you know, 2 penetrating into the Outlook Exchange market, 3 but that took a 4 hundred-billion-dollar-company, you know, a 5 decade to make a significant impact on. 6 So Microsoft had a whole 7 ecosystem around that within Exchange of, you 8 know, compliance tools and archiving tools. 9 And so one thing was, how do I 10 talk to everybody else when everybody else is 11 using e-mail? And then the second problem 12 was, you know, Outlook -- Microsoft just 13 built -- by being the leader in the space, 14 they became a platform that others built on 15 top of and around. 16 Q. So that ecosystem of tools is 17 basically what you're referring to as the 18 ability of Outlook and Exchange to interact 19 with third-party software? 20 A. Yeah. They -- they started 21 allowing, you know, third-party systems and 22 developers to build value around their core
70 1 things. 2 Q. Okay. So focusing on the -- on 3 the plug-in, then -- 4 A. Uh-huh. 5 Q. -- and so the plug-in was used to 6 make TransMail compatible with -- 7 A. Accessible from, really. I mean, 8 it wasn't -- the plug-in was used to -- so 9 that I could click a button within Outlook 10 and I could see all my TransMail messages, 11 you know, as a -- as a view within Outlook. 12 I didn't have to go off to a web browser 13 separately to view it. I could view it from 14 within an Outlook screen. 15 Q. Okay. And you mentioned earlier 16 that you created this plug-in because 17 Microsoft had such a large market share, 18 basically? 19 A. I mean, both e-mail and Outlook; 20 but yes, Microsoft at the time -- again, I 21 don't know how much you care about this, but 22 like, Outlook and Exchange was incredibly	72 1 platform, you know. It became a platform 2 play. 3 Q. And so as a developer at that 4 time, you were incentivized to look for ways 5 to integrate your system with the dominant 6 e-mail system of the time, right? 7 A. Yes. 8 Q. And were others in the space also 9 creating these third-party add-ons? 10 A. Oh, yeah, tons of them, yeah. 11 Q. And you also mentioned, if we go 12 back to Page 11, "Notes and Domino - IBM 13 partnership"? 14 A. Yeah. 15 Q. What is that? 16 A. Domino is now dead, but Domino 17 and Notes was IBM's, you know, Lotus e-mail 18 platform. So they built -- they built an 19 internal collaboration system in Lotus Notes; 20 and then when e-mail became so critical to 21 everybody, they tried to also build -- you 22 know, they also built their own integration

73 1 with e-mail in Lotus Notes. 2 So really, Notes and Domino was a 3 competitor to Microsoft Outlook and Exchange, 4 but I think IBM's killed it now, like, 5 probably killed it a decade ago. 6 Q. So they were another major 7 competitor? 8 A. I mean, they had -- they 9 always -- I mean, Microsoft just killed them. 10 They -- they had a small number of Enterprise 11 clients that were on it, and it was very 12 difficult for them to get off it; but in the 13 end, everybody got off it and moved to 14 Microsoft. 15 Q. I see. 16 And so just going back in time to 17 2001, 2002 -- 18 A. Uh-huh. 19 Q. -- Microsoft is predominant, and 20 you're looking to create an e-mail 21 application? 22 A. Uh-huh.	75 1 A. I have no reason to believe it. 2 Yeah, I mean -- 3 Q. Okay. You have no reason to 4 believe that date's wrong? 5 A. Yeah. I mean, I believe that the 6 date is most likely correct. 7 Q. Okay. 8 A. I don't have any reason to 9 believe it would be false. 10 Q. Okay. Okay. Sorry, sometimes 11 things in the text chat look different 12 than... 13 A. Yeah. 14 Q. So we discussed a bit about your 15 relationship with BlueSpace? 16 A. Uh-huh. 17 Q. I wanted to talk about your 18 relationship with Sterling. 19 Do you have any current 20 relationship with Sterling? 21 A. No, other than I'm acting as an 22 expert witness on something that they own;
74 1 Q. You would look to, for example, 2 the major e-mail platforms like Microsoft 3 and -- and do your best to integrate with 4 those platforms, right? 5 A. Correct. 6 Q. All right. So we talked a bit 7 about your -- you can put that to the side. 8 MR. PADMANABHAN: We've been 9 going about an hour. Do you want to take 10 a... 11 MR. PLAIL: Sure. 12 (Break taken from 10:11 a.m. to 13 10:14 a.m.) 14 (Whereupon Exhibit Number 1001 15 was shown.) 16 (BY MR. PLAIL) 17 Q. All right. So just one more 18 question on that presentation. It says 19 "December 2005" on the cover. 20 A. Uh-huh. 21 Q. You have no reason to believe 22 that date's wrong?	76 1 but other than that, no. 2 Q. Okay. When you say you're 3 "acting as an expert witness," are you 4 referring to your testimony in this case? 5 A. There was a good answer to that. 6 I mean, they are -- yes, this is the only 7 thing that I'm involved with with Sterling is 8 them wanting my context on -- on the patent, 9 so that's the only thing I'm working on with 10 them. 11 Q. Okay. And are you being 12 compensated for your time here today? 13 A. I have a -- there's an hourly 14 rate contract for -- for my time. That's it. 15 Q. Okay. And how much are you being 16 paid for -- how much are you being paid by 17 the hour? 18 A. \$500 an hour. 19 Q. Okay. And were you also 20 compensated to prepare your declarations in 21 this case? 22 A. I think I can answer that. Yeah,

77 1 I mean, I -- yes, whenever I've had the -- 2 there would be no other reason for me to do 3 it; so, you know, yes. 4 Q. Okay. And at the same rate, \$500 5 an hour? 6 A. Yes. 7 Q. Okay. And you have no other 8 contracts with Sterling? 9 A. No. 10 Q. And you're not a party to any of 11 their agreements with BlueSpace as part of 12 their acquisition? 13 A. No. 14 Q. Okay. And you weren't involved 15 in their acquisition? 16 A. No. 17 Q. Okay. Okay. I'm going to hand 18 you a copy of the patent. 19 So this is a copy of the '217 20 patent, correct? 21 A. Yes. 22 Q. Okay. If we look at the -- I	79 1 people sending messages to each other. 2 Q. Okay. And one of the goals is to 3 organize e-mail so that the most relevant 4 e-mail appears basically at the top of 5 someone's inbox, right? 6 A. Yeah. I mean, that -- that or 7 just having sorts, so when they scroll down 8 it will put them in different folders or some 9 way to -- some way to give the user a 10 pre-read of how relevant this message is to 11 them. 12 Q. Can you go to Figure 2? 13 A. Yeah. 14 Q. This is a flowchart of the e-mail 15 system of the patent, right? 16 A. Figure -- yeah. I mean, it's -- 17 it's the -- it's the elements that make it 18 up, yeah. 19 Q. Okay. And each of these boxes is 20 a module of the system, right? 21 A. Yeah. I mean, that's -- it's a 22 chart, yes.
78 1 guess the second page here, the abstract -- 2 A. Uh-huh. 3 Q. -- it says, "in an electronic 4 mail system," and then it goes on to describe 5 some parts of a -- managing electronic 6 content. 7 Do you see that? 8 A. Yeah. 9 Q. Okay. So this patent was focused 10 on applications within an electronic mail 11 system; is that right? 12 MR. PADMANABHAN: Objection, 13 I'll just say 601, 602. 14 But you can -- you can answer 15 if you know. 16 A. Yes, it relates to electronic 17 messaging content. 18 (BY MR. PLAIL) 19 Q. All right. And it's focused on a 20 mail system, right? 21 A. Yeah. I mean, it's mail 22 messaging -- I mean, something that involves	80 1 Q. And you see this box here named 2 "relevance analysis engine"? 3 A. Yeah. 4 Q. Is that the part of the system 5 that calculates the relevance value for each 6 piece of the e-mail on the system? 7 A. Yeah. I mean, this is a -- a 8 very broad, high-level view, but yes. 9 Q. Okay. And the relevance analysis 10 engine uses two metrics, the relevance 11 Determination 256 and the Importance 12 Determination 258, right? 13 A. Yeah. I mean, those are -- it 14 uses many things, but those are two 15 high-level concepts in it, yeah. 16 Q. What is the difference between a 17 relevance and importance determination? 18 A. Relevance determination is how 19 relevant a piece of content is to me, and 20 importance determination is how important 21 a -- an entity is to me, which could be, you 22 know, a job code, could be a user, could be

81 1 a -- you know, so importance is about 2 entities, relevance is about content. 3 Q. So the system would calculate a 4 different score for the importance and the 5 relevance and combine them in the relevance 6 analysis engine; is that right? 7 A. Well, I mean, the -- this is kind 8 of a multivariant statistical model in which 9 actions with content help determine the 10 relevance of that content and other content 11 and the importance of actors and other 12 entities involved in whatever that piece of 13 content in the -- the user's looking at. So 14 they relate to each other. 15 I think there's another picture 16 of that in the patent, but they -- you know, 17 they all point -- you know, they're part of a 18 unified mathematical model. 19 Q. Can you go to column 6, line 65? 20 A. Do you have a page number? 21 Q. Page 28. 22 A. Okay. So say that again.	83 1 statistical model that's implemented in 2 software, you know; so yeah, I mean, it -- it 3 is software, yeah. 4 Q. And so that software would 5 include all of the algorithms to determine 6 the relevance for each piece of content? 7 A. Yeah. 8 Q. Okay. And your -- would -- 9 basically you could port that software to any 10 general purpose computer and have it run? 11 A. Yeah, providing it has sufficient 12 power to run it. Yes. 13 Q. What do you mean by having 14 "sufficient power"? 15 A. Well, I mean, you couldn't run a 16 very large mathematical model on, you know, 17 a version 1 Nokia phone. So I mean, it has 18 to have the necessary CPU power, memory, 19 other things to be able to run and manage a 20 model, and so that's -- that's what I mean. 21 Q. But any general purpose computer, 22 providing it has enough power --
82 1 Page 28, and then what column? 2 Q. Column 6, line 65 on -- 3 A. Yeah, still referring to 4 Figure 2, that -- that one there, yeah. 5 Q. Yeah. 6 It says there that [as read]: 7 "The electronic mail system 250 or any 8 combination of the modules shown therein may 9 run on any type of computer system." 10 Do you see that? 11 A. Yeah. 12 Q. What do you mean by that, "it may 13 run on any type of computer system"? 14 A. I mean, obviously this was 15 written by the patent attorney; but it just 16 means -- I mean, I -- I -- it could be a 17 server, it could be a desktop computer, it 18 could be a -- you know, some type of -- any 19 computing device. 20 Q. And is that because the 21 inventions here are software code? 22 A. Well, yeah. I mean, it -- it's a	84 1 A. Yes. 2 Q. -- could run software? 3 A. Yeah. 4 Q. Okay. And the software would be 5 programming that general purpose computer to 6 implement the algorithms in the patent? 7 A. Correct. 8 Q. Okay. If you'd go to the next 9 page. 10 A. Yeah. It's actually Page 30? 11 Q. 29. 12 A. Okay. Yeah, I'm on that. 13 Q. If you look at lines 7 through 12 14 of column 7... 15 MR. PADMANABHAN: Are you on 16 the "as contained" sentence? 17 MR. PLAIL: Yes, "as contains 18 [sic]." 19 (BY MR. PLAIL) 20 Q. Says [as read]: "As contained on 21 such a compute -- computer-readable medium, 22 the functionality of the electronic mail

85 1 system 250 or any combination of the modules 2 shown therein may be partially [sic] or 3 wholly carried out in response to one or more 4 processors executing software instructions 5 stored on the computer-readable medium." 6 Do you see that? 7 A. Yeah. 8 Q. What do you mean there by 9 "partially"? 10 MR. PADMANABHAN: You mean 11 "partly"? 12 MR. PLAIL: Yeah, sorry, 13 "partly." 14 A. I think it probably just means it 15 can split it across multiple computers if 16 you're clustering it. 17 But, yeah, I mean, it means you 18 could split it across multiple computers. 19 You could do part of the model on one 20 computer and part on another. 21 (BY MR. PLAIL) 22 Q. But each of those computers would	87 1 Would a person of ordinary skill 2 in the art be able to implement these models 3 with just what was available prior to your 4 patent? 5 A. I mean, if they were -- if they 6 were, you know, skilled in the art, yes. I 7 mean, if you picked somebody who stood 8 outside Home Depot looking to do kitchen 9 remodels, no; but if you picked somebody, you 10 know, who is -- who is skilled in the art of 11 building complicated computational models 12 based on a mathematical formula, then yes. 13 Q. Can you go to figure 8? 14 A. Yep. 15 Q. This is a picture of the 16 TransMail system, right? 17 A. It's a picture of the user 18 experience, yes. 19 Q. And this is an example of the 20 TransMail user experience being run in an 21 internet browser, right? 22 A. Yes.
86 1 be a general purpose computer? 2 A. Correct, yes. 3 Q. Okay. And so as we go through 4 the patent -- 5 A. Uh-huh. 6 Q. -- you agree there's a -- there's 7 a number of algorithms and statistical 8 formulas that explain the relevance model? 9 A. Yes. 10 Q. And in order to implement the 11 inventions in this patent, a POSA would need 12 to look to those algorithms in order to build 13 the necessary software code, correct? 14 A. Yes. 15 Q. Okay. And if you went to Best 16 Buy and purchased a computer, it would not be 17 able to run the relevance models in this 18 patent without that programming? 19 A. Yeah, I mean, that -- yes. 20 Q. And you would agree that these 21 models are beyond the level of -- strike 22 that.	88 1 Q. And if you look at the top, you 2 can see it's the Microsoft internet Explorer 3 browser? 4 A. Yes. 5 Q. All right. And your idea in this 6 patent was to integrate the relevance system 7 into this TransMail system, right? 8 A. Yes. 9 Q. So the relevance system described 10 in the patent would also work within the 11 browser experience TransMail, right? 12 A. Yes. 13 Q. Okay. What were some of the 14 advantages of using a webmail-based system 15 instead of a client-based system? 16 A. You don't have to install an 17 application on your computer to use it. 18 Q. And you also don't have to 19 maintain a separate client application? 20 A. Correct. 21 Q. And you don't have to worry about 22 update issues, as well, right?

89 1 A. Yeah. I mean, it -- yes. 2 Q. Yeah. 3 So you were motivated at the time 4 to use a web application? 5 A. Yes. 6 Q. And generally, was the industry 7 moving towards web applications at the time? 8 A. Yes. 9 Q. So it was common to use browsers 10 to access webmail? 11 A. Yes. 12 Q. Yeah, okay. 13 Can you go to column 16 that's on 14 Page 33, lines 40 through 57? 15 A. Okay. Page 33... 16 Page 33, and then what was there? 17 Q. It would be column 16 -- 18 A. Yeah. 19 Q. -- starting at line 40. 20 A. Yeah, okay. Turning to the 21 processes shown in Figure 7. 22 Q. So this is describing the	91 1 which Exchange is one of many, but one of the 2 biggest servers with that. 3 Q. And so when you say that the 4 Microsoft plug-in was "embedding a web view 5 inside of the Microsoft Outlook client" -- 6 A. Uh-huh. 7 Q. -- so basically you were 8 combining a small browser within the e-mail 9 client of Outlook in order to access 10 TransMail? 11 A. Well, I mean, they already had an 12 embedded browser, and we were leveraging it 13 to show a view of TransMail without forcing 14 them to go to Internet Explorer every time 15 they wanted to see it. 16 Q. I see. 17 So at this time Outlook already 18 included an embedded browser? 19 A. Right. 20 Q. And that embedded browser allowed 21 you to access other internet sites, right? 22 A. Yeah. I mean, when you get an
90 1 Microsoft -- 2 A. Gateway, the Exchange gateway. 3 Q. Okay. And so that's the same 4 gateway we were discussing earlier? 5 A. Yes. 6 Q. So you used this as a way to make 7 TransMail accessible from a Microsoft Outlook 8 experience? 9 A. No. 10 So what -- what the Microsoft 11 Outlook plug-in was doing was essentially 12 embedding a web view inside the Microsoft 13 Outlook client. What this is doing is 14 allowing me to send a TransMail to an e-mail 15 user, get a response via e-mail, digest it, 16 and put it back into that same relational 17 architecture that I have inside the TransMail 18 platform. 19 Q. I see. 20 A. So this is about external e-mail 21 integration and Exchange interoperability 22 with SMTP and interoperability with e-mail,	92 1 e-mail that's got a whole bunch of embedded 2 HTML stuff in it, it's the browser -- it's 3 the browser that is rendering that. 4 So, you know, it's a fundamental 5 part of being able to view e-mails. The 6 difference here is being able to see, you 7 know, and interact with that whole 8 application experience without it being tied 9 into, you know, a single e-mail preview pane. 10 Q. I see. 11 So having the embedded internet 12 browser is a fundamental part of interacting 13 with HTML e-mail? 14 A. Correct. 15 Q. And HTML e-mail is a fairly 16 common type of e-mail? 17 A. Correct. 18 Q. And it was fairly common back in 19 2004, as well? 20 A. Yes. 21 Q. Okay. Can you go to column 24, 22 line 30?

93 1 A. All right. 2 [As read]: "Each search hit 3 highlights the content that caused the items 4 to appear in the search results." 5 That one? 6 Q. If you keep reading down... 7 A. [As read]: "With, for example, 8 the following display schema: The subject of 9 the submessage; a magnifying glass containing 10 a question mark; the relevance of the 11 submessage; the body text showing the 12 instances of the search term; the people 13 involved, senders and recipients; a set of 14 property icons similar to those described 15 above," and et cetera, et cetera. 16 So it's just describing the user 17 experience. 18 Q. But this is a search 19 functionality within the user experience, 20 correct? 21 A. Yeah, it's – damn, this thing's 22 small. Yeah, it's about – it's about	95 1 A. Okay. Well, the sentence starts 2 at 24, so... 3 Q. Yeah. 4 A. [As read]: "By using a 5 relational architecture for regular 6 electronic mail, an electronic mail system in 7 accordance with one or more embodiments 8 allows for the searching of regular 9 electronic mail with a similar relevance 10 system to that of a search engine used for an 11 electronic mail system operating on 12 electronic mail objects as described above." 13 Yeah. 14 Q. So there you're discussing using 15 a relevance system similar to that of a 16 search engine. 17 Do you see that? 18 A. Yeah. 19 Q. So there you're referring to 20 using the actions of users similar to how 21 Google tracked it at the time, right? 22 A. Well, Google – I did not believe
94 1 searching in the interface. 2 So it's just saying you can see 3 the relevance score as one of the attributes 4 of a message in search results. 5 Q. Okay. And what is a search 6 score? 7 A. Well, it's a relevance score 8 within search results. 9 So I see that this e-mail came 10 from Bobby, and as part of the information 11 about the – the e-mail from Bobby, it tells 12 me the relevance score that was previously 13 calculated for it. 14 Q. So every piece of content has a 15 relevance score? 16 A. Uh-huh. 17 Q. And then the search is just 18 changing which content is viewable and giving 19 you that same relevance score? 20 A. Yes. 21 Q. Okay. Can you go to column 16, 22 lines 25 -- line 25? I guess it's 27.	96 1 Google did that to – you know, no. 2 Q. Okay. So what are you referring 3 to "using a relevance system similar to a 4 search engine"? 5 A. It just means, you know, 6 something that says that some results are 7 more relevant than others. It's a – you 8 know, the way Google did it, in my 9 understanding, is – is completely different 10 for websites than the way that, you know, we 11 were doing it in the messaging system. 12 Q. And so, at the time, though, a 13 search engine is just a way to identify 14 relevant content among a large amount of 15 content? 16 A. No, it was a way to say, okay, I 17 want to find all the e-mails from Bobby. It 18 was a way to create a custom view based on 19 filter criteria. 20 Q. And that's what you're referring 21 to as the search engine? 22 A. Yeah. That – that's how a

97 1 search engine works, yeah. 2 Q. Sorry, I'm not exactly asking how 3 searching works. 4 Here you refer to similar 5 relevance... to that of a search engine. 6 A. Yeah. I mean, a search engine -- 7 in my understanding -- you know, I put in I 8 want websites about cute kitties and I see 9 lots of websites about cute kitties where it 10 does a downselect of the internet to show me 11 content that's about cute kitties. 12 Q. And what you were trying to do 13 is -- in the e-mail context was downselect to 14 create a subsection of the most relevant 15 e-mails that relate to your keyword search? 16 A. Relevant isn't a -- isn't a 17 helpful term there. You know, searching 18 obviously existed in e-mail systems from the 19 year "dot," but it was only ever searching 20 based on who's the message from, who's it to, 21 what's the date range. 22 Now, in this description it still	99 1 based off of the search attribute? 2 A. Correct. 3 Q. And in the context of the e-mail 4 system, you were attempting to downselect 5 based off the search in the same way? 6 A. So you can -- you could search 7 based on attributes, and you could see all 8 the messages that are from Bobby within 9 certain dates. 10 Q. Uh-huh. 11 A. The -- the different piece here 12 is that in a -- in a traditional e-mail 13 system, that was a straight filter and that 14 was it. It was just a filter for everything 15 that -- that, you know, reflected those 16 attributes, whereas here we have this 17 additional concept of a relevance score which 18 could either just be displayed or could be 19 set as a -- you know, an attribute. It has 20 to be this much relevant or more, or I want 21 to sort them by relevance values. 22 But when I do a search in a
98 1 allows you to search by who it's from, who 2 it's to, you know, what the date range is. 3 And when you see that list, if 4 that's your search criteria, you're going to 5 see, you know, relevance scores of each of 6 those mails in the list; but you could also 7 include relevance scores as a search criteria 8 and you could say, show me the, you know, top 9 10 percent e-mails that are -- or top percent 10 of messages that are judged to be the most 11 relevant around this particular criteria I'm 12 looking for, or you could say sort the search 13 engine results by relevance. 14 Q. Okay. 15 A. But I think the way you used 16 relevance is confusing, because you said 17 they're relevant to a search criteria. It's 18 not really that -- you know, when you do a 19 search, you're just doing a downselect based 20 on attributes. 21 Q. I see. 22 So a search engine downselects	100 1 traditional e-mail system, what I'm doing is 2 a filter based on specific attributes. It's 3 not -- it's not a -- it's not a -- the user 4 might think of it as a -- these are messages 5 that are relevant to the conversation I've 6 had with Bobby, but what they're getting is 7 just all the messages that fulfill that 8 criteria, sorted by date. 9 Q. So it's a downselect? 10 A. Yeah, it's a downselect, is the 11 traditional way it works; And so we're saying 12 the same thing here. 13 Like, you can do a downselect 14 view, and one of the -- just like importance, 15 there's a thing in e-mail, right, where you 16 can say it's low importance, regular 17 importance, high importance. 18 Outlook has had that for a long 19 time, but those are just characteristics that 20 I, as a user, click from a drop-down box when 21 I send it. 22 It's not some -- it's not based

101 1 on any statistical model, mathematical model, 2 that's a straight attribute, but I -- you 3 know, that -- that's how Microsoft Outlook 4 works; it allows you to set that. 5 So this is just a different 6 attribute that is computer-derived from a 7 statistical model. Does that make sense? 8 Q. Yeah, that makes sense. 9 I mean, I think what I'm 10 struggling with is if we look at the line in 11 the patent, it says "with a similar relevance 12 system to that of a search engine." 13 A. Sure. I mean, the general 14 concept of systems that try and determine 15 relevance was not -- I mean, there were -- 16 that was a major difference between Google 17 and Yahoo, right, was that Yahoo just listed 18 everything and Google attempted to do some 19 prioritization based on an algorithm. 20 Q. That's what you were trying to 21 do, right? You were trying to do some 22 prioritization based off of the algorithm?	103 1 A. Yeah, I mean -- 2 Q. So -- and you would use those 3 relevance values to search -- sort the 4 e-mail, for example? 5 A. That was one of the uses of it in 6 the system, yes. 7 Q. So just like a search engine is 8 used to identify the best results on the web, 9 your system was used to sort for the best 10 results in e-mail? 11 MR. PADMANABHAN: Objection, 12 Rule 611. 13 But you can answer. 14 A. That was one of the uses of it. 15 There isn't really a context of an inbox 16 in -- in Google web pages. 17 (BY MR. PLAIL) 18 Q. Uh-huh. 19 A. So there isn't like, you know, I 20 just come to Google, I see a search box, and 21 I look... what I'm looking for. 22 There wasn't really a browsing
102 1 A. Yes, we were. In mail, we were 2 trying to do some scoring for relevance of 3 content based on an algorithm. That's true. 4 Q. All right. And so you mentioned 5 that the difference -- sorry, you mentioned 6 how Google would prioritize things based on 7 an algorithm, and that's similar to how you 8 were trying to prioritize things based off of 9 algorithms in here? 10 MR. PADMANABHAN: Objection, 11 Rule 611. 12 You can answer. 13 THE COURT REPORTER: I'm sorry, 14 say it again. 15 MR. PADMANABHAN: Objection, 16 Rule 611. 17 A. They were trying to prioritize 18 how to show web page results. 19 Yeah. I mean, we were also 20 trying to ascribe relevance values. 21 (BY MR. PLAIL) 22 Q. Yeah.	104 1 experience like there is in, say, a Facebook 2 wall or a -- you know, some other system; but 3 yes, they are both. 4 I mean, there are -- there are 5 other algorithms out there, there are other 6 systems. 7 I mean, Amazon tries to do it in 8 shopping. I mean, there's systems that try 9 and, you know, come up with some way to -- 10 to, you know, prioritize content that isn't 11 purely based on a chronological date. 12 Q. Uh-huh. And all of these systems 13 are trying to solve a similar problem, which 14 is when you have a large amount of content, 15 it can be difficult to identify the most 16 relevant portions of that content? 17 A. That's correct. 18 Q. Did you look to any of these 19 systems as you were creating the algorithms 20 in this patent? 21 A. No. It's a different system, so 22 I mean, it's -- the datasets are different.

105 1 I mean, obviously I was aware that Google 2 existed, as was the rest of everybody else 3 with a computer; but like, you know, their 4 challenge, their algorithms, their model was 5 very different to the problem in an e-mail 6 system, so... 7 Q. And so the difference between 8 Google and what you were designing was that 9 you were focusing on an e-mail system? 10 MR. PADMANABHAN: Objection -- 11 objection, Rule 611. 12 A. I mean, it's true we were focused 13 on the messaging or e-mail system. They were 14 focusing on web search in their own product. 15 The two systems are very different, but, you 16 know -- yeah, I mean, I'm -- I'm not 17 particularly an expert in how Google operates 18 today or how it does Google search, but like, 19 they're -- I see them as two different 20 problem sets. 21 (BY MR. PLAIL) 22 Q. Okay. So can you go to column	107 1 Q. Okay. If you go to column 47 -- 2 MR. PADMANABHAN: Column 47? 3 MR. PLAIL: Yes. 4 A. Yeah. 5 (BY MR. PLAIL) 6 Q. Lines 7 through 10. 7 A. 7 through 10. All right. 8 Q. Says [as read]: "In another 9 aspect, the electronic mail system may be 10 integrated with traditional e-mail systems." 11 A. Yes. 12 Q. Do you see that? 13 So the relational mail system was 14 not a requirement of the system? 15 A. It was not a requirement. It 16 worked better if you had it. 17 The problem in a traditional mail 18 system was the inability to see -- to resolve 19 content objects, you know, across all of the 20 lifecycle of their interactions; but you 21 could still, for example, see that I always 22 tend to read e-mails from Bobby. I don't
106 1 15, lines 51 -- 2 A. Okay. 3 Q. -- through 55? 4 A. [As read]: As described above, 5 an electronic mail system in accordance with 6 one or more embodiments may have a relational 7 mail architecture in which each piece of 8 content written by a user is managed as a 9 single instance object during its lifecycle 10 [sic] in the mail system." 11 That one? 12 Q. Yes. 13 A. Okay. 14 Q. So that's referring to the 15 relational -- 16 A. Yep. 17 Q. -- model that we were discussing 18 earlier? 19 A. Correct, yeah. 20 Q. So the relevance system can be 21 used within that relational model? 22 A. Correct.	108 1 tend to read e-mails from Claire. 2 So you could still get some level 3 of model just from that first order 4 interaction, but you wouldn't know how much 5 my e-mail to Bobby gets forwarded to 6 everybody else because you're not going to 7 see that anymore. It's lost in the -- in the 8 morass of text essays of the e-mails. 9 Q. I see. 10 Can you go to column 43, 30 11 through 37? 12 A. Okay. Do you want to read it? 13 Go ahead. 14 Q. It says [as read]: "In regard to 15 how such similarity or identification of the 16 cognate group is determined, one or more of 17 the following approaches may be used: Role- 18 or group-based, collaborative filtering, 19 fingerprinting, cluster models, search-based 20 methods, frequency analysis, and importance 21 value correlation. 22 "Each of these different

109 1 approaches, which may be used singularly 2 [sic] or in any combination, will now be 3 described." 4 A. Uh-huh. 5 MR. PADMANABHAN: "Singly." 6 THE WITNESS: Yeah, "singly," 7 but yes. 8 (BY MR. PLAIL) 9 Q. So this is talking about 10 combining different types of logic systems, 11 basically? 12 MR. PADMANABHAN: Objection, 13 Rule 611. 14 A. Yeah. I mean, it's different 15 ways to try and determine people who are like 16 me. 17 (BY MR. PLAIL) 18 Q. And they could be combined? 19 A. Yeah. 20 Q. Okay. And so it was common to 21 combine, for example, frequency analysis and 22 fingerprinting?	111 1 A. I can't remember. I mean, 2 fingerprinting is more stuff that -- people 3 that look like other people, based on their 4 actions. 5 I can't remember specifically 6 what I meant by "collaborative filtering." 7 I'd have to go and read the whole thing again 8 to see if I referenced it somewhere. 9 Q. So when you say that these can be 10 combined in any combination -- 11 A. Uh-huh. 12 Q. -- how does a person of skill 13 know which can be combined and which can't be 14 combined? 15 A. Well, I mean, you could combine 16 any of them or you could only use one of 17 them, depending on how you want to implement 18 it. 19 Q. And how are they combined? 20 A. I don't know. You'd have to 21 decide how much -- how much statistical 22 weighting to give to each one of those, based
110 1 MR. PADMANABHAN: Objection, 2 Rule 611. 3 You can answer if you know. 4 A. I don't know what "common" means. 5 I mean, when you say "common," you mean other 6 people did it? 7 (BY MR. PLAIL) 8 Q. Yes. 9 A. I don't know if anybody else was 10 doing it. I mean, Google wasn't doing it, as 11 far as I know; so no. 12 Q. But others were combining 13 different types of similarity analyses in the 14 prior art? 15 MR. PADMANABHAN: Objection, 16 Rule 611. 17 A. I don't know. I don't know the 18 answer to that. I haven't studied the prior 19 art enough to know. 20 (BY MR. PLAIL) 21 Q. What do you mean there by 22 "collaborative filtering"?	112 1 on, you know, your -- the feedback you're 2 getting from how the users are interacting 3 versus how you projected the relevant scores 4 to be. 5 If you find out that this thing 6 is a very good indicator of how the users are 7 going to react, then you would increase the 8 statistical weight for that type of -- for 9 that -- one of those things. 10 If you find that this other one 11 that you thought was a good idea turns out 12 doesn't have a strong correlation in 13 predicting how human -- how people will 14 interact with that content, then you would 15 decrease its weight. 16 Q. I see. 17 So one way to combine these would 18 be to have different weights associated with 19 each analytical approach and then adjust 20 those weights according to how successful 21 that approach is? 22 A. Yes, correct. I mean, it's a

113 1 feedback loop. 2 Q. Can you go to claim 1, which is 3 on Page 49? 4 A. Yeah. 5 Q. So if we look at line 30, you see 6 there's a computer-readable storage medium 7 storing computer programming modules; and 8 then if we look in the rest of the claim, we 9 can see there's a number of modules, a 10 monitoring module, a first relevance 11 measurement module, a second relevance 12 measurement module, and then finally at the 13 end, a relevance analysis module. 14 Do you see those? 15 A. Yes. 16 Q. Yeah. So let's start with the 17 monitoring module. 18 The monitoring module tracks 19 actions by users, right? 20 A. Yes. 21 Q. And the monitoring module is 22 implemented using code?	115 1 so... 2 Q. I meant off-the-shelf, the 3 operating system on. 4 A. It depends on the computer 5 operating system and what it's auditing. 6 So you know, it depends on -- 7 yeah, it depends on the operating system, 8 whether it's trying to record every action or 9 what it's doing. 10 Q. So generally, you would say, 11 then, the monitoring module is not an 12 off-the-shelf functionality of a computer? 13 A. I mean, it -- the idea of 14 auditing user actions in a computer system 15 was well-known at this time. 16 Q. But was it a functionality of an 17 off-the-shelf computer? 18 A. I mean, the computer itself isn't 19 doing anything. It's the software that runs 20 on it; and then it depends on the operating 21 system, whether the operating system is 22 tracking every single user interaction or if
114 1 A. Yes. 2 Q. Okay. And so you would need to 3 look at the code of how a system is 4 implemented in order to determine whether it 5 was using a monitoring module, correct? 6 A. Yes. 7 Q. Okay. Was using a monitoring 8 module well-known by 2004? 9 A. I mean, in the context of 10 generally auditing -- you know, looking at 11 what users are doing in a computer system, 12 yes. 13 Q. And is that the context that's -- 14 you're discussing here? 15 A. Yes. 16 Q. Was it possible for a 17 off-the-shelf computer to perform the steps 18 of the monitoring module, or did it have to 19 be programmed to do that? 20 A. Had to be -- I mean, it had to be 21 programmed to do it. A computer can't do 22 anything without -- without software running,	116 1 the operating system doesn't care and it's 2 just running the applications and it's not 3 attempting to create this incredibly detailed 4 audit log. 5 So trusted operating systems are 6 more likely going, like Solaris or Unix or 7 something which is -- you know, a more 8 sophisticated and, you know, trust-oriented 9 operating system would probably be doing 10 that, and the end user operating system may 11 not be bothered with the overhead of doing 12 it. 13 Q. So generally, then, you would 14 need to program the computer to perform these 15 steps above your ordinary operating system? 16 A. Yeah, generally -- 17 MR. PADMANABHAN: Objection, 18 611. 19 But go ahead, you can answer. 20 A. Yeah, generally the -- each 21 application is responsible for its own action 22 auditing. That's typically how software

117 1 works. 2 (BY MR. PLAIL) 3 Q. Okay. So if we look at the first 4 relevance measurement module, it says that 5 [as read]: "The first relevance measurement 6 module is coupled to the monitoring module 7 and is configured to determine the first 8 measure of relevance." 9 Do you see that? 10 A. Yes. 11 Q. Okay. How does it determine 12 first relevance -- sorry, how does it 13 determine a first measure of relevance? 14 MR. PADMANABHAN: Are you 15 saying beyond what's in the claim, or are you 16 referring to the claim itself? 17 MR. PLAIL: The claim says, 18 "determine a first measure of relevance." 19 MR. PADMANABHAN: But it goes 20 on, right? I mean, that same element goes on 21 to say -- I mean, I'm asking if you're saying 22 beyond what the claim is or are you saying	119 1 described in the patent. So, I mean, if I 2 forward it, it means it's more relevant. If 3 I reply to it, it means it's more relevant. 4 If I -- so all of those actions are fed into 5 a mathematical model, and then the 6 mathematical model then adjusts the value 7 that it scores for that piece of content for 8 relevance, and it adjusts the important 9 scores for all entities involved in that 10 piece of content. 11 Q. Okay. So a person of skill 12 looking at just this sentence would not -- 13 would need to look to the algorithms in the 14 specification to understand how to implement 15 the first relevance measurement module? 16 A. Correct. 17 Q. And the first relevance 18 measurement module was implemented in code? 19 A. Yes. I mean, that -- the method 20 of implementation has to be a computer 21 algorithm. 22 Q. And in order to determine whether
118 1 you have him read the rest of the claim? 2 (BY MR. PLAIL) 3 Q. Sure. 4 You can read the rest of the 5 claim -- for the first relevance measurement. 6 A. Yeah. 7 [As read]: "First relevance 8 measurement module coupled to the monitoring 9 module and configured to determine a first 10 measure of relevance of the piece of 11 electronic content based, at least in part, 12 on one or more actions of the user on the 13 piece of electronic content." 14 Okay. So what was your question 15 again? 16 Q. How does it determine the first 17 measure of relevance? 18 A. Does it based on what the actions 19 of the users are on the content. 20 Q. And how does it take the actions 21 and convert that into a measure of relevance? 22 A. Using the algorithms that are	120 1 a system was using a first relevance 2 measurement module, you would need to look at 3 the code of that system? 4 A. Yes. 5 Q. Was the functionality of the 6 first relevance measurement module well-known 7 by 2004? 8 A. No. 9 Q. And so you wouldn't say that this 10 is a conventional or necessary part of a 11 computer system? 12 A. No, I would not. 13 Q. And a computer would need to be 14 specifically programmed to implement this 15 first relevance measurement module? 16 A. Yes. 17 Q. And a general purpose computer 18 without that programming could not perform 19 the steps of the first relevance measurement 20 module? 21 A. Yes. Yes, that's correct. It 22 couldn't do it. So however you want to --

121 1 yeah. 2 Q. All right. Let's look at the 3 second relevance measurement module. 4 A. Uh-huh. 5 Q. So this one's lengthy, but it's 6 broken into two parts. 7 A. Uh-huh. 8 Q. First, there's [as read]: 9 "Identify at least one other of the plurality 10 of users that is a recipient of the piece of 11 electronic content and that is cognate to the 12 user." 13 A. Uh-huh. Cognate, yeah. 14 Q. The second is [as read]: 15 "Determine a second measure of relevance of 16 the piece of electronic content as based, at 17 least in part, on one or more measures 18 derived from the group consisting of --" 19 And then it lists four things. 20 Do you see that? 21 A. Yeah. 22 Q. So how does the second relevance	123 1 in this earlier one in the figure, and it 2 kind of shows, you know, relevance 3 importance. It shows, you know, global 4 importance. It shows importance to a 5 particular subset of users. Then you 6 implement it in a -- in a giant, you know, 7 data model. I mean, that's the -- that's how 8 you would do it. 9 Q. All right. So a person of skill 10 reading just this sentence, [as read], 11 "identify at least one other of the plurality 12 of users that is a recipient of a piece of 13 electronic content and that is a cognate 14 user," would not be able to implement that 15 idea within the second relevance measurement 16 module without looking at the algorithms in 17 the patent? 18 A. They could attempt to make an 19 implementation. If they read the rest of the 20 patent, they would make a better one. I 21 mean, they could read that sentence and say, 22 I'm going to imagine something and build it.
122 1 measurement module identify a cognate user? 2 A. A cognate user. 3 So this is users that 4 historically have acted in similar ways to 5 myself. It's used -- and, you know, that's 6 the most important one. It's going to 7 typically reflect similar roles. It's going 8 to reflect similar interesting content. It's 9 going to reflect similar, just, you know, 10 people I am -- I behave similarly to. 11 Q. I see. 12 And so how would a person of 13 skill in the art implement the second 14 relevance measurement module so that it would 15 be able to identify another cognate user? 16 A. Well, you know, you take the 17 mathematical formulas and you build out a 18 model, a multivariate computer model, in 19 which every piece of content is ascribed a 20 relevance score and every user is ascribed an 21 importance score. 22 So you take the picture which is	124 1 If they read through the rest of the patent, 2 they would have more context and -- and 3 specific, kind of, building blocks to do it. 4 Q. But specifically to build the 5 invention here, they would need to look to 6 the algorithms in the specification, right? 7 A. I mean, again, they could -- they 8 could attempt to come up with different ones, 9 but the ones that are in here would be very 10 helpful for somebody skilled in the art to 11 get there faster. 12 Q. And the second relevance 13 measurement module is implemented in code? 14 A. Yes. 15 Q. And you would need to program a 16 computer in order to perform the steps of the 17 second relevant -- 18 A. Yes. 19 Q. And a general purpose computer 20 would not be able to perform the steps of the 21 second relevance measurement module out of 22 the box?

125 1 A. No. 2 Q. [As read]: "The second relevance 3 measurement module also determines a second 4 measure of relevance of the piece of 5 electronic content as based, at least in 6 part, on one or more measures derived from 7 the group consisting of --" and then there's 8 four things listed there. 9 Do you see that? 10 A. Uh-huh. Yeah. 11 MR. PADMANABHAN: Are you 12 reading the claim? 13 MR. PLAIL: Yes. 14 THE WITNESS: Yeah. 15 (BY MR. PLAIL) 16 Q. How does the -- sorry. A person 17 of skill in the art would need to look to the 18 algorithms in the patent to understand how to 19 determine the second measure of relevance 20 here, right? 21 MR. PADMANABHAN: Wait, sorry, 22 I -- I just want to understand your question	127 1 A. I mean, I think they would need 2 to look at the rest of the patent for context 3 of what these terms mean; otherwise, they're 4 not going to know, you know, the -- "global 5 importance" is a defined term. "Local 6 importance" is a defined term. 7 Without knowing what the terms 8 mean, it would be difficult to implement a 9 system that -- you know, that does that. 10 Q. Okay. Looking at the relevance 11 analysis module -- 12 A. Yeah. 13 Q. -- it says [as read]: "That the 14 relevance analysis module is configured to 15 determine the relevance score of a piece of 16 electronic content sent from the sender to 17 the user, the relevance score being 18 determined based, at least in part, on the 19 first determined measure of relevance and the 20 second determined measure of relevance." 21 Do you see that? 22 A. Yeah.
126 1 because now I -- I track how you're doing 2 this. 3 Are you asking if they read 4 that whole element, would -- determine all 5 the way through the four things -- 6 MR. PLAIL: No, no. I'm going 7 to say that that's a speaking objection. 8 MR. PADMANABHAN: Okay. I just 9 -- I'm not understanding your question, so 10 objection, vague. 11 MR. PLAIL: Yeah. 12 MR. PADMANABHAN: It's vague, 13 objection, form. 14 A. Help me understand the question 15 again. 16 (BY MR. PLAIL) 17 Q. A person of ordinary skill, in 18 order to implement the second relevance 19 measurement module, would need to look to the 20 algorithms in the patent in order to figure 21 out how to determine a second measure of 22 relevance as described here in the claim?	128 1 Q. So a person of ordinary skill in 2 the art, in order to implement the relevance 3 analysis module as described here in the 4 claim, would need to look to the algorithms 5 in the specification, correct? 6 A. Yeah. I'm trying to struggle 7 to -- I'm thinking how to answer this. 8 I mean, it would be a lot easier 9 if they read the rest of the patent. If they 10 didn't read the rest of the patent, they 11 could still try and take a swing at it. 12 But this is one piece of a large 13 description of a complex mathematical model. 14 So if I only had that, could I attempt to go 15 implement something? I could. 16 Would I be better off doing it if 17 I'd read the rest of the patent? I'll be 18 better off if I read the rest of the patent. 19 So I don't know if I'm answering 20 your question or not. If not, feel free to 21 reanswer -- reask it; but, you know, there is 22 -- there is information here about how to do

129 1 it, you know, or what it is. 2 And then there's a lot more 3 information throughout the patent of how 4 it -- of what those terms mean and how they 5 work and how they interact with each other. 6 Sorry. 7 Q. So you wouldn't say implementing 8 it -- sorry. 9 So you wouldn't say, then, that 10 implementing the relevance analysis module 11 would be conventional and easy for a person 12 of ordinary skill in the art without reading 13 the algorithms in the patent? 14 A. I don't think it would be easy 15 either way, but I think somebody who's 16 skilled in the art -- you know, somebody 17 who's very skilled in the art could attempt 18 to make an implementation based on purely the 19 claim. They would have a better picture of 20 the -- of how to implement it if they read 21 the rest of the patent and the math. 22 Q. The relevance analysis module is	131 1 the user a value describing the determined 2 relevance score? 3 A. Yes. 4 Q. So a off-the-shelf computer would 5 need to be programmed to implement the 6 content present -- presentation module, 7 correct? 8 A. Yes. 9 Q. And it would be incapable of 10 performing the steps of the content 11 presentation module without that special 12 programming? 13 A. Yes. 14 Q. Okay. I am going to direct you 15 to column 33. 16 A. Yeah. 17 Q. Looking at the sentence starting 18 at line 58, it's talking about how to 19 identify other users -- 20 A. Uh-huh. 21 Q. -- who are in a cognate group. 22 Do you see that?
130 1 implemented in code? 2 A. Yes. 3 Q. And an off-the-shelf computer 4 would not be able to implement the relevance 5 analysis module without being specially 6 programmed to do that? 7 A. It would not. 8 Q. All right. Looking at -- looking 9 at claim 2, there is a content presentation 10 module listed there. 11 A. Yeah. 12 Q. What is the content presentation 13 module? 14 A. It's the thing that makes the -- 15 you know, that makes the user experience 16 pixels on the screen, the display and the 17 graphical display of the -- of the user 18 experience. 19 Q. And specifically for claim 2, [as 20 read]: "It presents the piece of electronic 21 content to the user in accordance with the 22 determined relevance score and to present to	132 1 A. Yes. 2 [As read]: "Now turning to a 3 description regarding computing cognate 4 importance in accordance with one or more 5 embodiments an electronic mail system may 6 store for each user a set of N other users 7 considered to be most similar to the user 8 concerned. That is the user's cognate 9 group." 10 Q. And so the system can determine 11 that a user is cognate to a particular person 12 or it can determine that the user's cognate 13 to an entire group of people? 14 A. Correct. 15 Q. And why is it important to have 16 the system be able to identify a cognate 17 group? 18 A. Because if I'm trying to predict 19 how relevant a piece of content is to you, if 20 you tend to behave like these ten other 21 people, then the behavior that they've had, 22 if they've already seen that piece of

133 1 content, is going to be a good indicator of 2 how relevant it is to you. 3 Q. And it's valuable to do that over 4 a group so you don't end up with one outlier, 5 right? 6 A. Yeah. I mean, it's -- you know, 7 there's a lot of these things. It's a -- 8 it's a computer algorithm with a feedback 9 loop, so it essentially learns what's the 10 most useful indicators to predict your 11 behavior, based on correlating its 12 projections with your actual behavior over 13 time. 14 Q. Right. 15 So if you just determined if 16 someone was cognate to one other particular 17 person in the system, there would be a high 18 chance of diverging relevance because you're 19 not going to be identical to that person, 20 right? 21 MR. PADMANABHAN: Objection, 22 Rule 611.	135 1 A. No. I mean, this is a -- I mean, 2 it -- it -- it's a -- a normalized database 3 view that include -- that is -- yeah, you 4 know, that includes the compliance policy as 5 one piece of it. I mean, it's -- I'm just 6 reading it now. 7 Yeah. I think this is mostly 8 about the compliance policy stuff, yeah. 9 Q. Do you see there's a box there 10 labeled "job code"? 11 A. Uh-huh, yeah. 12 Q. What's a job code? 13 A. Job code is a -- that's 14 essentially like a project code or a process 15 code that you could associate a message with. 16 So this is related to purchasing. This is 17 related to product requirements. So it's 18 a -- effectively a metadata field that lets 19 you describe context on the application, on 20 that message. 21 Q. All right. So, for example, a 22 company could, instead of -- strike that.
134 1 A. I mean, broader samples is 2 better. 3 (BY MR. PLAIL) 4 Q. Uh-huh. 5 A. So the more people that you have 6 that you're similar to, the -- you know, the 7 better prediction you would expect the model 8 to have. 9 Now, if you had an identical twin 10 and you literally behaved identically to your 11 twin, then your twin would be the best 12 cognate group to compare you to. 13 Q. Right. But that would be an 14 outlier situation? 15 A. That's true, that would be an 16 outlier. 17 Q. Yeah. 18 Can you look at figure 5 of the 19 patent? 20 A. Figure 5. Okay. Okay. Yep. 21 Q. This is the compliance policy, 22 right?	136 1 For example, a company could 2 assign a job code for all e-mails relating to 3 purchasing? 4 A. Yes. 5 Q. Right? 6 And then instead of each 7 individual having to receive that e-mail, 8 they would just be able to access it by 9 being given access to that job code? 10 A. I mean, traditionally in 11 messaging systems, you know, there is a -- 12 who it's from, and there's a set of 13 destinations; but if you considered that you 14 turn a job code into a distribution list, 15 then yes; if you said anything that is tagged 16 with this job code should be -- I mean, you 17 could say it should be viewable in search 18 results by this body of people. You could 19 say it should be delivered to that body of 20 people, and those would both be 21 metadata-based mail routing rules and viewing 22 rules, yeah.

137 1 Q. All right. And so you could use 2 the job code as that kind of distribution 3 list? 4 A. You could use -- yeah, that would 5 be one way of doing it, yeah, which it's 6 really just an attribute. It's a custom 7 attribute. 8 Q. Okay. Can you look down here at 9 the bottom of this? It says, "readership 10 rules"? 11 A. Yeah. 12 Q. What are those? 13 A. So this is, you know, should I be 14 allowed to read this message or not? So 15 communication is, can I talk to you? 16 Readership is, if I send a 17 message to Devan and he sends it to you, 18 should you be able to read it? 19 Q. I see. 20 So we discussed earlier the 21 example of the banker and the analyst. 22 Remember that?	139 1 prior art that as a company we had already 2 created. 3 Q. Okay. 4 A. I don't think any of the claims 5 of the patent are particularly dependent on 6 this picture, but... 7 MR. PADMANABHAN: Are you 8 switching to another topic? 9 MR. PLAIL: Not quite. 10 MR. PADMANABHAN: Okay. 11 (BY MR. PLAIL) 12 Q. This has already been marked as 13 Exhibit 1043. 14 (Whereupon Exhibit Number 1043 15 was shown.) 16 A. Okay. 17 (BY MR. PLAIL) 18 Q. So this is an earlier patent 19 application? 20 A. Yeah. 21 Q. When you're referring to the 22 "compliance patent," is this the patent
138 1 A. Uh-huh. 2 Q. So in this example, it may be 3 desirable for an analyst to be able to read 4 everything associated with a specific job 5 code? 6 A. Yes. 7 Q. All right. And you wouldn't want 8 the banker to necessarily have access to that 9 same database? 10 A. Correct. 11 Q. And, likewise, you would want to 12 make sure that the analyst had access to 13 everything they needed? 14 A. Yes, you know, subject to 15 whatever your policy is you're trying to 16 implement, yes. 17 Q. Okay. 18 A. I mean, the patent doesn't really 19 talk much about this. I think this is a -- 20 there's a separate patent for the compliance 21 policies. I think this is just referencing 22 it from the context of, you know, referencing	140 1 application you're referring to? 2 A. No. 3 Q. Okay. Do you know which patent 4 you're referring to when you refer to the 5 "compliance patent"? 6 A. It's the one for compliance 7 policies. 8 I don't have the number offhand. 9 Devan will know the number, but I don't 10 remember the number at this time. It's a 11 different patent. 12 Q. If we could go back real quick 13 to -- 14 A. The patent? 15 Q. -- the patent, yeah, the -- the 16 '217. 17 A. Yeah. 18 Q. Go back to column 43, lines 32 19 through 37 again. 20 A. 32 through 37. 21 Q. So -- 22 A. Yeah. Do you want to read it?

141 1 Q. I think we've already read this 2 part into the record, but I guess my question 3 is: This is describing how to identify 4 similarities in cognate groups and how to 5 determine cognate groups, right? 6 A. Uh-huh, okay. 7 Q. So it describes a number of 8 different methods to do that, right? 9 A. Yes, yeah. I remember looking at 10 this, yeah. 11 Q. And one of the ways to determine 12 a cognate group is through collaborative 13 filtering, right? 14 A. Uh-huh. 15 Q. Okay. And then another is 16 through role- or group-based filtering, 17 right? 18 A. Uh-huh. Well, it's -- yeah, it's 19 not -- role- or group-based methods. It 20 doesn't -- 21 Q. Yeah. 22 A. Filtering's separately, yes.	143 1 45 through 50, it describes using various 2 clusters to identify cognate groups, 3 including people who work in particular 4 departments? 5 A. Uh-huh. 6 Q. So one example of a cluster here 7 could be people who work in the same 8 department? 9 A. Okay. I guess, give me a minute 10 to read this whole -- this whole paragraph. 11 Q. Okay. 12 A. Yeah, so I think these are -- 13 these are cluster sets of people who behave 14 in similar ways; and you know, role would be 15 one indication of a cluster that behaves 16 similarly, but there are other -- could be 17 other cluster models, like people who read 18 long mails versus people who don't, people 19 who forward mails versus people who don't. 20 Q. So one cluster would be people 21 who have the same particular job? 22 A. Yes, yeah, that would be...
142 1 Q. And what does "role- or 2 group-based" mean? 3 A. Means that, you know, people in 4 HR tend to be interested in messages about 5 salaries, for example. So based on the role, 6 if this is a message about salaries, 7 it's likely more relevant to people in HR 8 than it is to, you know, people in logistics. 9 Q. Uh-huh. You see there's "cluster 10 modeling" there, right? 11 A. Uh-huh. 12 Q. What is "cluster modeling"? 13 A. You have to ask my father that. 14 He kind of helped -- dealt with the math more 15 than I did in this. So you -- I think that's 16 the -- I think that's a statistical term. 17 Q. Okay. If you look over on the 18 column to the right there, 37 through 62, 19 it's -- it is describing subparts of 20 clustering model -- 21 A. Sure. Read that, then. Yeah. 22 Q. Specifically, if you look around	144 1 Q. And another cluster it mentions 2 here is "job code." 3 Do you see that? 4 A. Yeah. I'm sure it's in there 5 somewhere. It's a very long sentence. 6 Q. And if we go back to our example 7 of the banker and the analyst, for example, 8 two analysts might be in a cluster because 9 they share the same job, right? 10 A. Uh-huh. 11 Q. Or they may be in a cluster 12 because they've been assigned the same job 13 code and they're working on the same project, 14 right? 15 A. Yes. 16 Q. And so we would expect those two 17 analysts who are working on the same job code 18 to have similar relevance on the same piece 19 of content? 20 A. If it pertains to that job code, 21 yes. 22 Q. Right. Okay.

145 1 And the system here, while it 2 primarily describes e-mail, it can be used to 3 manage other kinds of documents, as well, 4 right? 5 A. Yeah. I mean, you know, the 6 context of the patent is messaging systems 7 and, you know, really, content sent between 8 users. I mean, that could relate to e-mails; 9 it could relate to messages that are not 10 e-mails but are still sent between users; it 11 could relate to -- I mean, really, if 12 somebody, you know -- if somebody posts 13 something to a group of users in Facebook, 14 that is still a post to an audience, and the 15 audience interacts with it. 16 So all of those would be examples 17 of content that is authored by one user and 18 sent to another set of users who then 19 interact with it. 20 Q. So in the banker and analyst 21 example -- 22 A. Uh-huh.	147 1 and recognizes it's the same document, and 2 then, you know, essentially it pins that 3 document as being accessed by those new 4 people. 5 Q. Can you go to column 5, 29 6 through 44? 7 A. Okay. Sure. Do you want me to 8 read it? 9 So from column 5, "in one or more 10 embodiments." 11 Q. Yeah, I -- I don't need to force 12 you to read the whole thing, but this is 13 discussing the compliance model, correct? 14 A. Okay. I'll probably have to read 15 the whole thing. 16 Q. No, I don't mean to make you read 17 it out loud. 18 A. Okay. Yes, this is all about the 19 compliance model. 20 Q. Okay. So it's discussing using 21 the compliance model as part of a search 22 operation, right?
146 1 Q. -- so the analyst might look at 2 documents outside of e-mail -- 3 A. Sure. 4 Q. -- as part -- right? 5 And those documents would still 6 be managed within the system? 7 A. Depends how they're doing that. 8 I mean, obviously, if they're launching 9 Microsoft Word attachments and then going off 10 into Microsoft Word, our application would no 11 longer be able to track that because it had 12 gone into a third-party application. 13 So we're only able to track the 14 things we have visibility to based on what 15 permissions the operating system grants us. 16 Q. So as long as the document moves 17 within the confines of the system? 18 A. Yes; if it's an attachment and 19 people are forwarding the same attachment 20 around, the system does resolve that to a 21 single -- you know, even if they reattached 22 the same document, it computes a hash value	148 1 A. Yes. This is more about access 2 rights and not about relevance. 3 Q. Right, but a -- in this example, 4 an analyst may have the right to search all 5 content related to what that analyst is 6 working on, correct? 7 A. Yes. 8 Q. Okay. And so that would be 9 determined through a job code, for example? 10 A. Yes. 11 Q. Yeah. 12 A. That's one way of determining it, 13 yeah. I mean, there's a whole separate 14 patent that describes this, but yes. 15 Q. Okay. Okay. 16 MR. PLAIL: I'm going to switch 17 onto other topic if you want to -- 18 MR. PADMANABHAN: Take a short 19 break. 20 MR. PLAIL: Yeah. 21 (Break taken from 11:30 a.m. to 22 11:35 a.m.)

149 1 MR. PLAIL: This has already 2 been marked as Exhibit 2006. 3 (Whereupon Exhibit Number 2006 4 was shown.) 5 (BY MR. PLAIL) 6 Q. Do you recognize this document? 7 A. Yeah. I wrote this one; and the 8 font's bigger, which makes life easy. 9 (BY MR. PLAIL) 10 Q. Can you turn to Page 52? 11 A. Yep. 12 Q. Can you see the section entitled 13 "brain dump"? 14 A. Yes, yeah. 15 Q. So this is going over some of the 16 algorithms disclosed in this document at a 17 high level, right? 18 A. Uh-huh. 19 Q. Yeah, but this is not the 20 complete work product -- sorry, strike that. 21 This is not the complete set of 22 algorithms that eventually made it into the	151 1 A. I -- I don't know the answer to 2 that. You could ask him. I mean, I think 3 this was an interim model on the past of what 4 became the final patent, so it was just -- 5 basically, this was an internal document, and 6 it just sort of said, this is the initial 7 thoughts on the mathematical algorithm and 8 its implementation, but you know, it's going 9 to need a lot more thought to get to a final 10 product. 11 And so, yeah, I mean, that's sort 12 of the -- you start with something and then 13 you kind of refine it and add to it as you 14 figure out more of what you're -- of how the 15 innovation should work. 16 Q. Okay. Can you go back to 17 Page 51? 18 A. 51. 19 MR. PADMANABHAN: 50 what? 20 MR. PLAIL: 51. 21 A. Yeah. Okay. 22 (BY MR. PLAIL)
150 1 patent, correct? 2 A. Yes. This was in the creation 3 process of the -- you know, of the idea. 4 Q. All right. So if you go -- keep 5 scrolling through to Page 53... 6 A. Yeah. 7 Q. You'll see there's an "initial 8 maths" section. 9 A. Uh-huh. 10 Q. It notes there [as read]: "That 11 this" is "initial maths" that "has been 12 drafted with a mathematician, but is in need 13 of significant changes." 14 A. Yes. 15 Q. "It is included here for 16 completion in the current draft." 17 A. Yeah. 18 Q. The mathematician you're 19 referring to here, is that Paul Marston? 20 A. Yes, I think that's -- yes. 21 Q. Okay. And what significant 22 changes was the math in need of?	152 1 Q. It says here "relevance in 2 blogs"? 3 A. Uh-huh. 4 Q. What is -- what is this section 5 referring to? 6 A. Yeah, I mean, this is saying that 7 there were different content delivery 8 mechanisms that this could be applied to. So 9 you know, blogs -- this is more people 10 publishing things, you know, as -- so this is 11 more of a "send it out broadly" as opposed to 12 a -- a message. 13 So I think this is sort of a 14 throwaway. You know, we could apply the same 15 thing to blogs, say -- I don't think that we 16 ever -- we ever really pursued that in 17 detail, but you know, it's, again, recording 18 user interactions as a mechanism for scoring 19 relevant scores for content that are 20 individualized to the users. 21 Q. So this is using the 22 relevance-based models from the mail

153 1 environment in more of a web-based 2 application? 3 A. It's a different type of -- blogs 4 are more like when you're publishing 5 something, right? So it's not whether it's 6 delivered through an app -- through a thick 7 application or a web application; doesn't 8 make any difference. 9 It's more, you know, in a blog; 10 you're, like, publishing a piece of content 11 and then seeing how people interact with it. 12 I mean, in some ways, you know, 13 if I publish a message to Facebook, I can 14 publish it to everybody in the universe, I 15 can publish it to a subset of people, which 16 really is a lot like a message because I'm 17 sending it to this circle of my friends. 18 And even if I publish it to the 19 universe, the platform may still decide to 20 limit its distribution based on some 21 algorithm. 22 So, you know, I think there's a	155 1 of the claims of the patent claim blogs. 2 So, you know, I think this was 3 just part of the creation process. 4 (BY MR. PLAIL) 5 Q. But just to focus on this one 6 section, you say it's "highly analogous." So 7 you're saying that the -- kind of reading 8 these corporate blogs and determining the 9 relevance of corporate blogs could be highly 10 analogous to the mail-based environment that 11 we've been discussing previously? 12 A. So if you know all of -- if you 13 know all of the users in a corporate blog 14 environment and you know who -- which people 15 are allowed to read each blog based on some 16 access rate overview, then you have the same 17 richness of user data of who's interacted 18 with each of them and how and you have a 19 distribution set of data about who's 20 permitted to access each of those. 21 You know, it would be possible to 22 construct a similar model that is, you know,
154 1 fuzzy line between publishing stuff with 2 audiences and sending messages to people. In 3 both cases, I'm writing a piece of content 4 and I'm making it available to a set of end 5 users. 6 Q. It says here at the bottom [as 7 read]: "For brevity, relevance in blogs is 8 not described in full, as it is" a -- "as it 9 is highly analogous to that in mail 10 environments." 11 A. Yeah. I mean, I don't know if -- 12 I think that the -- I mean, I think this is 13 like a throwaway section in a white paper 14 that was never included in a patent. 15 You know, the idea of tracking 16 all of the things that the user is doing in 17 reading content, say, in a corporate blog 18 environment, it could be similar; it could be 19 integrated into the same -- you know, if I've 20 got a set of blogs and I've got a set of mail 21 messages, I could use the same algorithms to 22 analyze both; but I mean, I don't think any	156 1 based on the authors, based on the content 2 it's about, any meta tags that it's tagged 3 with; you could build a relevance model on 4 the back of that. I think that's what this 5 is saying. 6 Q. Can you go to Page 53 again, real 7 quick? 8 MR. PADMANABHAN: 53? 9 MR. PLAIL: Yes. 10 A. Okay. 11 (BY MR. PLAIL) 12 Q. Says here, [as read]: "We... 13 need to build" the idea -- "we need to build 14 in the idea of a federated weightings model." 15 What does that mean? 16 MR. PADMANABHAN: "We also need 17 to build in the"... 18 A. Okay. Let me read this 19 paragraph. 20 Okay. I know what this means. 21 This means that, you know, we want to be able 22 to learn from -- let's say that 20 companies

157 1 implement this. 2 We don't want the -- we don't 3 want to have to start from scratch with 4 company 21. We want to be able to take the 5 weightings, the -- you know, the -- I mean, 6 this is really kind of before much AI stuff 7 was around, but now, you know, weightings and 8 statistical models are known to be incredibly 9 important. 10 So it's the -- how much 11 importance should -- or how much weighting 12 should I give to, you know, this type of 13 action or -- or event versus this other type 14 of action or event. So all it turns out, 15 that if they forwarded the message, then 16 that's a really good indicator of relevance; 17 whereas, if they, you know, delete it, that's 18 not a good indicator of relevance. 19 So you know, we'd want to collect 20 the data that -- like sanitized user data. 21 We don't need to know the users' names, but 22 we want to collect the weighting values for	159 1 F-E-R-N-Y-H-O-U-G-H, I think. 2 (BY MR. PLAIL) 3 Q. So this appears to be a letter to 4 you and Jon? 5 A. Uh-huh. 6 Q. Correct? 7 Who wrote this? 8 A. I don't -- I'm not confident in 9 the answer to that. I would guess it's my 10 father, but that would be a guess; or, I 11 guess it would be Paul Marston. 12 Q. And it appears that one of the 13 issues this document is discussing is the 14 scalability of the system; is that fair? 15 A. Uh-huh. 16 Q. And was scalability a major 17 issue -- 18 A. Yes. 19 Q. -- early on? 20 What was the problem with 21 scalability? 22 A. There's a massive amount of
158 1 each of these different types of actions from 2 all of our customers and federate that back 3 into a unified model because it increases the 4 sample size, you know, that we're -- that 5 we're learning from for the out-of-the-box 6 weight and new implementations. 7 (BY MR. PLAIL) 8 Q. I see. 9 (Whereupon Exhibit Number 3 was 10 marked for identification.) 11 (BY MR. PLAIL) 12 Q. Do you recognize this document? 13 A. No. 14 Q. Do you see at the top where it 15 says, "Hi Jon and Justin"? 16 A. Yeah. 17 Q. Would that refer -- who is Jon? 18 A. That's Jon Fernyhough. He was a 19 developer. He worked for me. 20 THE COURT REPORTER: Jon who? 21 THE WITNESS: Jon -- yeah, yeah, 22 Fernyhough. I think it was	160 1 computer stuff to figure out. I mean, 2 it's -- these are enormous, enormous 3 multivariant models. Today those models 4 are -- I mean, that is the basis of a lot of 5 social platforms, and they have -- Facebook 6 has quite a few servers to work on this 7 problem. 8 Q. So this document is suggesting 9 four different ways to deal with the 10 scalability problem -- 11 A. Yeah. 12 Q. -- is that right? 13 Did you end up implementing any 14 of these four different ways to address the 15 scalability problem? 16 A. We never implemented the detail 17 of the -- the algorithm in code. So this was 18 a discussion of different ways to calculate 19 their cognate relevance and how often you 20 calculate it. 21 Clearly, if you calculate all -- 22 if you recalculate every single attribute

161 1 every time anybody touches any piece of 2 content, you would have an infinitely 3 difficult math problem. I mean, it would -- 4 it's very hard to keep up. 5 So the question from a 6 mathematical implementation is different than 7 from -- you know, I mean, you could implement 8 something; and as long as there's only ten 9 users and you've got a suitable server, it 10 will still function. 11 But as the number of users grows, 12 the -- you know, the number of compute stuff 13 you have to do grows; so what's -- how do you 14 decide the most efficient way to develop, you 15 know, the frequency of calculating the math? 16 I think that's what this is about. 17 Q. Okay. And how did you address 18 the scalability problem in the patent? 19 A. Well, the patent -- the patent is 20 describing the mathematics of how the system 21 works. And we can assume, you know, a 22 incredibly powerful computer doing it; but	163 1 And then, you know, each of these is then 2 coming up with ways to -- to compute it less 3 frequently and still have an approximation to 4 the -- the most accurate possible value, and 5 it's a trade-off between compute cost and 6 accuracy. 7 Q. Okay. So Jon was helping you 8 solve the scalability problem? 9 A. I mean, Jon Fernyhough was a 10 general software developer who was part of my 11 employee -- he was one of my employees. 12 He -- his maths wasn't particularly strong. 13 He was more of a general developer. 14 Ultimately, to fully refine and 15 develop this, you know, we -- we look at who 16 a Facebook or somebody would hire today, you 17 know, on this area. They're called data 18 scientists, and they have incredibly strong 19 statistical backgrounds. 20 So, you know, so when you look 21 through the comments he wrote, he was just 22 way out of his depth in thinking about how to
162 1 obviously, you know, to come to a 2 cost-effective implementation, you need to 3 think about, you know, what is sensible, 4 given the value of the system and not wanting 5 to tie up the whole of the Amazon Web 6 Services in trying to compute it. 7 So, you know, I think this was 8 discussing implementation-level detail of one 9 variant of the innovation as described in the 10 patent, you know, to try and make that 11 compute load be less. 12 Q. And one way to do that was to 13 change the algorithms slightly so that 14 they're more efficient, right? 15 A. I mean, yes, it's the -- it's the 16 rate at which you recalculate specific 17 values. That's what they're talking about. 18 Q. Uh-huh. 19 A. So do you do it periodically on a 20 review basis? Do you do it every time? I 21 mean, the first one would be the most compute 22 intensive. You have to do it every time.	164 1 reduce this -- this actual code and make it 2 function at scale, but -- but he was the -- 3 you know, he was the resource we had, so... 4 Q. But this letter is specifically 5 to Jon and you, right? 6 A. Yeah. My dad sent it to both of 7 us. I mean, Jon was trying to review it and 8 see if he could add value. I don't think he 9 had -- I mean, he didn't really add any value 10 or make -- make any suggestions that made it 11 into changes in the patent. 12 He was just trying to think about 13 what would it take to implement the -- the 14 math and the innovations described in the 15 patent in real life, and you know, what would 16 be the challenges in -- in how much computers 17 -- you know, what would you need in computer 18 systems to do it. 19 Q. So at this time, though, Jon was 20 helping you work on the scalability issue? 21 A. He was trying to advise on what 22 it would take and ways to make the thing

165 1 perform better on, you know, less expensive 2 computer hardware. 3 MR. PLAIL: I'm going to mark 4 this as 4. 5 (Whereupon Exhibit Number 4 was 6 marked for identification.) 7 (BY MR. PLAIL) 8 Q. Do you recognize this document? 9 A. No. 10 Q. This is another letter to you and 11 Jon. Does that appear to be correct? 12 A. Yes, that appears to be right. 13 Q. And this is from October of 2005? 14 A. That is the date that's marked on 15 it, yes. 16 Q. Who wrote this document? 17 A. Well, it says Paul, so I'm going 18 to guess Paul Marston. 19 Q. Okay. And so what -- what is 20 this document about? 21 A. Okay. Well, let me read it for a 22 second.	167 1 Do you see that? 2 A. Uh-huh. 3 Q. So Paul Marston is indicating 4 that he's added a section about calculating 5 or -- sorry. 6 Paul Marston is indicating that 7 he has added a section about identification 8 of cognate users, and one way of doing that 9 is correlating the local importance? 10 A. Correct. 11 Q. And that would be one way to 12 address the scalability issue, is to 13 correlate the local importance between users? 14 A. Yes, that's what he's suggesting. 15 Q. Yeah. 16 And so this would be a change to 17 the algorithms in order to focus them on 18 correlating the users, right? 19 A. I mean, yeah, it would be a 20 change in the weightings of which ones -- of 21 which values you -- you know, you give more 22 weight, more -- you know, I don't want to use
166 1 Yeah, so I think this is my 2 father creating a clean version of the 3 document with some of the tracked changes 4 resolved, and he is -- you know, he's 5 continuing to think about the computational 6 cost and where it makes sense to spend that 7 computational cost and where it doesn't. 8 Now, again, if you're, you know, 9 building a system today, the cost of compute 10 is dramatically less than it was in 2005, and 11 the whole software system's designed to allow 12 massively complex distributed compute models. 13 They didn't really exist back in 2005. 14 So the idealized implementation 15 of the math would be to recalculate 16 everything always in real-time and, you know, 17 that might be more feasible today than it was 18 back in 2005 because computers got cheaper. 19 Q. This document mentions [as read]: 20 "I have also inserted a section suggesting 21 identification of cognate users by 22 correlating local importances."	168 1 "importance." 2 Really, just -- let's just say 3 "weight to." So, you know, I mean, it's -- 4 again, going through the creation process and 5 saying, hey, we could -- in one 6 implementation we could simplify some of the 7 math -- you know, the compute required by 8 correlating local importance as an 9 approximation to a perfect value. 10 Q. And at this time, Jon was still 11 working with you and Paul Marston on the 12 white paper document, right? 13 MR. PADMANABHAN: I'm sorry, 14 what was the last word you said? 15 MR. PLAIL: White paper 16 document. 17 A. I mean, Jon was reviewing it. 18 Jon's main job was creating the code of 19 TransMail. I mean, that's what he was hired 20 to do. He was writing the back-end code that 21 powered the regular TransMail system, so this 22 was really a side task for him to try and

169 1 give, you know, opinions and suggestions on 2 how the system could be implemented with 3 computational efficiency; but his, you 4 know – so, I mean, he – he really didn't do 5 a lot on this. He just gave some thoughts 6 and feedback, but his – his maths and 7 statistics were not strong enough to – you 8 know, he was not a computational – he wasn't 9 a mathematical – he wasn't really, like, a 10 math, computational software developer. He 11 was a general back-end write Java-type 12 developer. 13 You know, the people who work 14 these groups in – the people who work as 15 data scientists, again, they have to have 16 much deeper mathematical foundations than Jon 17 ever had, so... 18 (BY MR. PLAIL) 19 Q. But Jon was working with you on 20 this project at the time? 21 A. Jon was attempting to provide 22 feedback to me on the patent that I was	171 1 A. Okay. Yeah. 2 Q. I'm going to ask you to turn to 3 Page 83. 4 A. (Complying.) Okay. 5 Q. This is the Section 11, titled 6 "Software Implementation." 7 Do you see that? 8 A. No. Is that on the page? 9 Q. On the very top in the black box. 10 A. Oh, yeah, yeah, yeah. Right, 11 right. 12 Q. And so this is talking about the 13 implementation in a phased approach of the 14 mathematical models into code; is that 15 correct? 16 A. Yes. 17 Q. Okay. Is this something that Jon 18 was helping you with? 19 A. No. We never got that far. 20 Q. And who helped put together the 21 software implementation? 22 A. I don't think that we ourselves
170 1 writing. 2 Q. Can we go back to 2006? 3 A. Okay. This is the white paper, 4 this one? 5 Q. Uh-huh, yes. 6 A. This guy? Okay. Yeah. 7 Q. I'm going to ask you to kind of 8 keep that open, and I'm going to give you a 9 second document to look at in parallel. 10 A. Sure. 11 Q. So you said Jon was working on 12 the software implementation, right? 13 A. Jon was working on the software 14 implementation of the TransMail platform. 15 (BY MR. PLAIL) 16 Q. This has already been marked as 17 Exhibit 1003. 18 (Whereupon Exhibit Number 1003 19 was shown.) 20 (BY MR. PLAIL) 21 Q. This is the provisional patent 22 application that led to the '217 patent.	172 1 reduced this to software. I think that we 2 had it in the mathematical model, but I don't 3 think we ever got to, ourselves, attempting a 4 software code that went to implementation. 5 Q. What about this software 6 implementation here? 7 A. This mathematical model? 8 Q. The name of the section, 9 "Software Implementation"? 10 A. Well, this is describing – yes. 11 I mean, this is describing the math 12 incremental implementation in software as the 13 model gets more complex by adding in more 14 terms – sorry – by adding more in – in 15 more functions and terms. 16 So it's – you start with it 17 simple, and then you add in more complexity, 18 you know, collectively. 19 There's a definition of "communal 20 filtering" here, too, if you want it. 21 Q. If you'd look at Page 86 -- 22 A. Okay.

173 1 Q. -- it's discussing "computational 2 issues." 3 Do you see that? 4 A. Yes. 5 Q. It says that [as read]: "It 6 should be apparent that the BlueSpace 7 TransMail relevance system involves a highly 8 complex nexus of interrelationships." 9 A. Uh-huh. 10 Q. Is this the scalability problem 11 you were talking about before? 12 A. Yes. 13 Q. And so this was still a 14 computational issue at this time? 15 A. Yes. 16 Q. Okay. So since we have both 17 open, if we go to 2006 -- 18 A. Uh-huh. 19 Q. -- if you go to Page 57 -- 20 A. Yeah. 21 Q. -- I want you to kind of look 22 through 51, just kind of scroll through 51,	175 1 through those pages. Keep going. It goes 2 for quite some time, right? 3 A. Yeah. 4 Q. And so the algorithmic math 5 section in 1003 is different than the 6 algorithmic math section in 2006, right? 7 A. Yes. 8 Q. All right. And there's been 9 significant changes to that section? 10 A. There have been changes. 11 Q. Uh-huh. All right. I'm going to 12 ask you to go back to 1043. 13 A. 1000 and... 14 Q. 43, this document. 15 A. Okay. Yeah, okay. 16 Q. Do you see that this application 17 lists inventors as yourself and Andrew Hatch? 18 A. Yes. 19 Q. Who is Andrew Hatch? 20 A. He was my cofounder at BlueSpace. 21 Q. And how long was he at BlueSpace? 22 A. I can't recall. He was there for
174 1 which -- I'm sorry, 52 through 57. You'll 2 see that's the math section of 2006; is that 3 right? 4 MR. PADMANABHAN: 57, for me, 5 is the conclusion. 6 MR. PLAIL: Yeah, yeah. 7 THE WITNESS: Yeah. He has the 8 previous pages. 9 A. Yeah, okay, yeah. 10 (BY MR. PLAIL) 11 Q. Now, if we go back to -- you'll 12 notice it just goes directly to the 13 conclusion, right? 14 A. After that, yes. 15 Q. Yes. 16 And so there's no software 17 implementation section? 18 A. Not in this document, no. 19 Q. Now, if we scroll back to Page 59 20 of 1003... 21 A. (Complying.) Yep. 22 Q. You can kind of scroll forward	176 1 several years. 2 Q. All right. And when, roughly, 3 did Mr. Hatch leave? 4 A. I can't remember. 5 Q. Okay. 6 A. Probably -- I mean, it was around 7 the time that I moved to the U.S.; so you 8 know, sometime in -- sometime between 2005 9 and 2008; but I mean, I'm sure it's on his 10 LinkedIn or somewhere. 11 Q. And what was Mr. Hatch's role? 12 A. He was CTO. He was, you know, 13 initially a CTO and then became a software 14 developer in the company. 15 Q. Chief technology officer? 16 A. When we started he was the chief 17 technology officer. 18 Q. And he worked on a number of 19 BlueSpace projects, correct? 20 A. Yes. 21 Q. And did he have any involvement 22 with the relevance system described in this

177 1 patent? 2 A. No. 3 Q. He did not work on that software 4 at all? 5 A. No, not at all. 6 Q. But he did work on the relational 7 model? 8 A. Yes. 9 Q. Yeah. 10 And this patent application is 11 describing the relational model? 12 A. Yes. 13 Q. Who's Tony Morton-Jones? 14 A. Tony Morton-Jones is a -- was a 15 colleague of my father in the statistics 16 department at the University of Central 17 Lancashire. 18 Q. And Mr. Jones commented on at 19 least one draft of the algorithm section of 20 the -- 21 A. Yeah, I believe he gave some very 22 high-level thoughts to my father as, you	179 1 A. You should ask him that question, 2 but I believe he did share something at some 3 point in time. 4 Q. Do you know if Mr. Jones was 5 under any NDA obligations? 6 A. I don't know the answer to 7 that -- I mean, implicitly. I'm sure my 8 father would have said this is confidential, 9 but I -- you'd have to ask him that. 10 Q. Okay. This has already been 11 marked as 2047. 12 (Whereupon Exhibit Number 2047 13 was shown.) 14 (BY MR. PLAIL) 15 Q. Do you recognize this document? 16 A. Not really. I mean, it's another 17 one of many documents that look similar. 18 Q. This is Mr. Jones's comments on 19 the relevance formula? 20 A. Okay. 21 Q. I believe in your declaration you 22 indicate that the redlined portions are
178 1 know, we were looking around to get feedback 2 on the innovation. 3 Q. Okay. And was Mr. Jones ever 4 employed by BlueSpace? 5 A. No. 6 Q. Was Mr. Jones involved in any 7 other way with BlueSpace? 8 A. No. 9 Q. Do you personally know Mr. Jones? 10 A. No. I mean, I might have met him 11 once, maybe, but I'm not sure, but I -- I do 12 not know him. 13 Q. So as it relates to this project, 14 did you direct -- did you interact directly 15 with Mr. Jones? 16 A. No, I don't believe so. 17 Q. So those communications would 18 have gone through Paul Marston? 19 A. My father, yeah. 20 Q. Did your father send a copy of 21 the initial white paper document to 22 Mr. Jones?	180 1 Mr. Jones's additions; is that right? 2 A. I don't recall that right now. 3 Q. You don't recall whether these 4 are Mr. Jones's? 5 A. Okay. Which -- I guess I'll need 6 to refer to my declaration. 7 Q. Sure. 8 A. Which declaration was it? 9 Q. It would be in 2030. 10 A. 20... 2003 or -- 11 Q. Yes. 20 -- 2030. 12 A. Okay. Okay. Which page? 13 (Whereupon Exhibit Number 2030 14 was shown.) 15 (BY MR. PLAIL) 16 Q. It would be in paragraph 58, 17 which starts on Page 21. 18 A. Okay. 19 Q. So the redlines in this document 20 are additions by Mr. Jones? 21 A. Yes, that's what, I guess, I 22 believe from reading my declaration, yes.

181 1 Q. The redlines in this document are 2 additions from Mr. Jones? 3 A. Yes. 4 Q. Okay. 5 A. Yeah. 6 Q. If you look at the bottom of 7 Page 2 and the top of Page 3 -- 8 A. Uh-huh. 9 Q. -- do you see that bar on the 10 side? 11 A. This one? 12 Q. This line -- this line here? 13 A. Yes. Yeah, yeah, yeah. Yeah. 14 Q. Do you understand that that 15 indicates that content has been changed 16 there? 17 A. Yes, it indicates that it was 18 changed. 19 Q. All right. So do you see that 20 Mr. Jones has crossed out a formula at the 21 bottom of Page 2 and added a new formula at 22 the top of Page 3?	183 1 A. (Complying.) 2 Q. Do you see there he's added three 3 additional formulas? 4 A. Yeah. I mean, I don't -- I guess 5 as I read this, I couldn't say with 6 confidence whether or not every letter that's 7 been typed here is coming from him. You'd 8 have to ask my father that. 9 I mean, it's true that he has 10 commented on this document. This language 11 sounds more like stuff that my father's 12 written. 13 So you would have to, at -- you 14 know, I don't know if there's a way to 15 forensically tell which bits were written by 16 who. It seems unlikely to me that all of 17 this text was written by him, you know, at 18 his -- by him solely, to be honest, but I 19 think you'd have to ask my father that 20 because that's -- this is one of his 21 documents. 22 Q. Sitting here today, though, you
182 1 A. Yeah. I mean, Word does that. I 2 don't know if he explicitly crossed it out or 3 changed one letter in it or added a bracket. 4 Like, you change anything, it 5 will strike the whole thing and redo the 6 entire thing; so I don't know, I mean, but I 7 see that one is struck and the other one is 8 not struck. 9 Q. Okay. But also you can see both 10 of them, right? 11 A. I see both of them, yeah. 12 Q. You see the variables -- strike 13 that. 14 The formulas are different 15 between the two? 16 A. I do see that. 17 Q. All right. Do you also see 18 further down the page he's added another 19 formula? 20 A. Yes. 21 Q. All right. If you go to 22 Page 4...	184 1 don't know one way or the other? 2 A. I don't know one way or the 3 other, yeah. 4 Q. But there are three formulas that 5 have been added to this document by someone? 6 A. Yes, there are three new 7 formulas, yeah, yeah. 8 Q. Okay. 9 A. I mean, it also shows this ABC 10 thing. Again, I'm pretty sure that -- 11 that -- I'm pretty confident 12 Tony Morton-Jones did not create that picture 13 or label those, so... 14 Q. So you mentioned a minute ago 15 that this was one of your father's documents. 16 A. I believe so. I don't think I 17 found this one, but either way this is 18 certainly a document that my father authored 19 because it -- you know, all of the detailed 20 math stuff is stuff that he worked on. 21 Q. If you go to the metadata, it 22 lists Mr. Jones as the author of this.

185 1 A. Where am I looking at metadata? 2 Q. That would be on the last page, 3 Page 7. 4 A. Yeah, means he was the last one 5 to save it. 6 Yeah, I mean, certainly he did 7 not write everything in this document, so... 8 Q. But Mr. Jones is the author of 9 this document, according to the metadata? 10 A. According to the metadata, that's 11 what this description says. 12 Q. And he's also the last person who 13 saved it, according to the metadata? 14 A. According to the metadata, yeah, 15 he's the last person who saved it. I mean, 16 yeah. 17 Q. Thank you. 18 A. Yeah. 19 Q. Who is Rick Turner? 20 A. Rick Turner was hired briefly as 21 a -- as the CTO of the company when it was 22 still based in the UK before it was moved to	187 1 what happened when. 2 So we had a team in Moldova that 3 had developed the first version of TransMail. 4 He then hired developers in Belgium and 5 people that he had worked with at Exscientia 6 in the U.S., in Belgium, and then somewhere 7 else, I think, and attempted to re-implement 8 TransMail from the ground up, and that 9 lasted -- that lasted maybe some -- you know, 10 a small number of years, but we ultimately 11 fired Rick Turner and all of that team 12 transitioned out and we rehired a new team in 13 the U.S. 14 So that's -- that was his role. 15 Q. And so he was focused on 16 developing TransMail? 17 A. Yeah. I mean, he was focused on 18 trying to re-implement it, but yes, his -- he 19 was part of the engineering organization. 20 MR. PLAIL: This has been marked 21 earlier as 2048. 22 (Whereupon Exhibit Number 2048
186 1 the U.S. 2 Q. Was he hired to replace Andrew 3 Hatch? 4 A. Yeah. Andrew still worked for 5 the company, but he was brought in to try and 6 be a, you know, more senior technology 7 employee. 8 Q. Again, chief technology officer? 9 A. That was his title, I believe. 10 Q. What was his role in the company? 11 A. Well, chief technology officer. 12 I mean, that was his job title. His role, 13 you know, he was -- around the period when I 14 got married and went on honeymoon, the rest 15 of the executive team were looking to bring 16 in sort of a more experienced, strong resumé, 17 technical leader. He had been a senior 18 manager at Exscientia, and his -- what he 19 actually ended up doing was hiring a bunch of 20 people that he had worked with previously and 21 then attempting to re-implement everything. 22 And let me see if I can remember	188 1 was shown.) 2 (BY MR. PLAIL) 3 Q. If you go to Page 5 of this 4 document, do you see that the author is 5 listed as Rick Turner? 6 A. Yes. 7 Q. If you go to the front of the 8 document, do you see, for example, this 9 document refers to Weighing [sic] "Importance 10 and Relevance"? 11 A. Yes. 12 MR. PADMANABHAN: "Weighting 13 importance and relevance." 14 (BY MR. PLAIL) 15 Q. So you'd agree this document 16 generally relates to the relevance system? 17 A. Yes. 18 Q. And Rick Turner wrote this 19 document? 20 A. I can't say for 100 percent 21 certainty, but I would -- I would guess yes, 22 he wrote this.

189 1 Q. So Rick Turner was working on the 2 relevance system at the time? 3 A. He provided commentary on the 4 white paper that we had drafted, and this 5 was -- I believe this is probably his 6 commentary, yes. 7 Q. Do you see at the top, it says, 8 [as read]: "I have not had time to read the 9 new stuff from the maths guy"? 10 A. Yes. 11 Q. Who's he referring to there? 12 A. I think he's referring to my 13 father. 14 Q. What is the "new stuff" that he's 15 referring to? 16 A. I don't know. 17 MR. PLAIL: This has already been 18 marked as 2054. 19 (Whereupon Exhibit Number 2054 20 was shown.) 21 (BY MR. PLAIL) 22 Q. Can you go to the last page of	191 1 A. Uh-huh. 2 Q. These appear to be inline 3 comments; is that fair? 4 A. Yeah. And yes, they're comments, 5 the stuff in red written in the body of the 6 document. 7 Q. Yeah. Do you know who left these 8 comments? 9 A. No, but let me read them. 10 So I don't know who wrote this. 11 Yeah, I'm going to leave it as I don't know. 12 It would be conjecture. I don't think it's 13 my father. 14 Q. So you don't think your father 15 wrote this? 16 A. I doubt he wrote the red pieces. 17 I think that's been written by somebody else. 18 Q. And you didn't write the red 19 pieces? 20 A. No, I didn't write them. 21 Q. If you look at the top one, it 22 says: "There is actually a problem here" --
190 1 this document? 2 A. Yep. 3 Q. It says the file name of this 4 document is "BlueSpace Mail Search for James 5 B." 6 A. Yeah. 7 Q. Who's James B? 8 A. No idea. Yeah, no, I have no 9 idea who that is. 10 Q. In this document, you see the 11 custodian is Paul Marston? 12 A. Uh-huh. 13 Q. This was one of the documents 14 that Mr. Paul Marston found? 15 A. Okay. 16 Q. I'm asking. 17 A. I don't know the answer to that. 18 Q. Okay. If you'd go to Page 41... 19 A. (Complying.) Yep. 20 Q. Do you see there's some 21 redline -- well, there are some red -- there 22 is some red text in here?	192 1 A. Uh-huh. 2 Q. -- "if there are no TransMails 3 received." 4 Do you see that? 5 A. Uh-huh. 6 Q. So it's indicating that there's a 7 problem with the math used in the document 8 when no TransMails have been received; is 9 that right? 10 A. That's what it's saying, yes. 11 Q. Because in that case, you'd 12 simply be subtracting alpha I-K over 1? 13 A. Yeah, but that's not the formula, 14 but yes, yeah. 15 Q. Yeah. 16 A. The thing that's written, yes. 17 Q. Yeah. 18 And so why would that be a 19 problem? 20 A. I don't know. You should ask my 21 father. 22 Q. Who's Tim Couper?

193 1 A. Tim Couper was a consultant who 2 we used in an advisory capacity at BlueSpace. 3 Q. What did he consult on? 4 A. He consulted on, you know, all of 5 the TransMail system. He had a background in 6 software and consulted on, you know, 7 different aspects of the software. 8 Q. I'm going to direct you back to 9 2006. 10 A. Okay. Yeah, got it. 11 Q. Page 52. 12 A. Yeah. 13 Q. So it describes a paper there. I 14 don't think the third -- the third is a 15 hyperlink, and then it says we "need an 16 expert in this area"? 17 A. Yes. 18 Q. Was Tim Couper the expert in that 19 area? 20 A. No. 21 Q. Who was the expert? 22 A. I don't think we ever found one.	195 1 Q. If you'd go to the last page, you 2 see it lists the author as Tim Couper? 3 A. Okay. 4 Q. And then, "last saved by 5 Marston." Do you see it? 6 A. Yeah. 7 Q. And then the file name is Tim's 8 [sic] Comments. 9 Do you see that? 10 A. Yeah, yes. 11 Q. So does this document contain 12 comments from Tim Couper on the white paper 13 document? 14 A. I would believe so. Let me read 15 some of the content and I'll try and figure 16 out who was writing what. 17 So my -- and this is -- this is 18 my conjecture. My conjecture would be the 19 black text is written by Tim and the blue 20 text was written by my father. 21 Q. Okay. And so the blue text was 22 not written by you?
194 1 Q. Okay. 2 A. I mean, this was a brain dump, 3 saying that, you know, we need an expert in 4 this area, but I don't think we ever -- we 5 never talked to anybody who -- who was an 6 expert in relevance models or in other 7 systems. Yeah, I don't think we ever did. 8 Q. So you said that Tim Couper 9 consulted on different aspects of the 10 software. Did he consult on the relevance 11 system? 12 A. I don't recall. I mean, I can't 13 recall from -- I can't recall. If he did, it 14 was incredibly minor. He was a generalist. 15 Again, he wasn't really sort of a specialist 16 in mathematics and computational software, 17 so... 18 MR. PLAIL: This has already been 19 marked as 2050. 20 (Whereupon Exhibit Number 2050 21 was shown.) 22 (BY MR. PLAIL)	196 1 A. No, no, I didn't write that. 2 Q. Okay. And this document relates 3 to the relevance system, correct? 4 A. Yes. Yes, I think he had made 5 comments here, and then the responses are my 6 father's, I think. 7 Q. So at this time, Tim Couper was 8 working on the relevance system? 9 A. Tim Couper provided commentary on 10 the relevance system. He was not working on 11 it. I mean, he provided very limited 12 commentary on the document. 13 Q. Why did Jon Fernyhough leave the 14 company? 15 A. When we moved the company from 16 the U.S. -- from the UK to the U.S., we 17 decided in the end it didn't make sense to 18 take really any of the people. I mean, the 19 cost of relocating was high, so we didn't -- 20 we didn't take any of the UK team. It was 21 really a U.S. restart. 22 Q. Okay. And when did you let the

197 1 UK team go? 2 A. I can't recall the date, but it 3 would have been around about a period of, you 4 know, between 2005 and 2007. 5 MR. PLAIL: I'm about to switch 6 topics. Should we take a break? 7 MR. PADMANABHAN: Yeah. 8 (Break taken from 12:36 p.m. to 9 1:06 p.m.) 10 (BY MR. PLAIL) 11 Q. This has been already marked as 12 Exhibit 2003. It's a copy of your earlier 13 declaration. 14 A. Okay. Yeah. 15 (Whereupon Exhibit Number 2003 16 was shown.) 17 (BY MR. PLAIL) 18 Q. I'd like to direct you to 19 paragraph 16 of this. It's on Page 7. 20 A. Yep. 21 Q. You say in paragraph 16 that "In 22 the 2004 to 2005 timeframe, a person of	199 1 software developer. 2 They need to have -- they need to 3 be -- they need to have knowledge in this 4 specific space of implementing these types of 5 complex algorithms and math in a large scale 6 system. 7 Q. Okay. And what is "having a 8 background in the technology of the patent"? 9 A. I think the background of the -- 10 the -- the background relating to the 11 technology of the patent is -- I mean, I 12 think this is a legal term, but my 13 expectation would be somebody who generally 14 understands the context of the problem you're 15 trying to solve and has read the patent. So 16 it's somebody who's read the patent and is a 17 data scientist and has built models that are 18 computational-type models, would be able to 19 implement this. I think that's true. 20 Q. Okay. So a person of ordinary 21 skill in the art would be -- would have read 22 the patent and have experience in the --
198 1 ordinary skill in the art" would understand 2 that -- and it goes on from there, right? 3 And you give an example of "a 4 person of ordinary skill in the art (e.g., 5 who would have knowledge of implementing the 6 model in software in addition to having a 7 background in the technology of the patent.)" 8 Do you see that? 9 A. Yeah. 10 Q. And so when you're referring to 11 "a person of ordinary skill in the art," are 12 you referring to that definition? 13 A. Yes. 14 Q. What do you mean by "the person 15 would have knowledge implementing the model 16 in software"? 17 A. I mean that they would have 18 experience of -- you know, they would have 19 knowledge of how to implement these types 20 of -- of models, so this would have to be 21 somebody who's a data scientist or somebody 22 who is, you know, not just a generalist	200 1 implementing the models in software? 2 A. I think -- you know, ordinary 3 skill in the art for me is somebody who 4 spends their days doing, you know, 5 computational software development. 6 So this is a data scientist, 7 somebody who is skilled in this type of area, 8 as to the specific on the definition -- yeah, 9 I mean, they'd have to -- they'd have to have 10 knowledge of implementing these types of 11 models in software and have the context of 12 having read the patent to be able to do it. 13 I mean, otherwise, they wouldn't 14 understand what "monitoring module" means. 15 They'd have to have read the patent to know 16 what the hell any of those things meant. So 17 that's what I think it means. 18 Q. Okay. This has already been 19 marked as Exhibit 2014. 20 (Whereupon Exhibit Number 2014 21 was shown.) 22 (BY MR. PLAIL)

201 1 Q. Do you recognize this document? 2 A. Yes. 3 Q. Did you prepare this document? 4 A. Yes, I prepared this with 5 assistance from -- from counsel, but I -- 6 yes. 7 Q. You did not cite this document in 8 your declarations. 9 A. Okay. 10 Q. Is there a reason for that? 11 A. No, not that I'm -- you know, I 12 don't have a specific reason for why I 13 didn't. 14 Q. Are there any other documents 15 that you reviewed and prepared that were 16 not -- or relied on or considered that were 17 not part -- or cited in your declarations? 18 A. I think everything that we have 19 read will have been included in the files 20 that were passed -- I read, but I'm not 21 100 percent confident in it but I believe 22 that's true. I mean, really it just came	203 1 definition of a POSA, sorry, a person of 2 ordinary skill in the art, that we just 3 discussed in paragraph 16 of your 4 declaration? 5 A. Yeah, I think I'm using those 6 terms interchangeably, yeah. 7 Q. So this would be a person who has 8 the context of the patents and who has 9 experience, such as a data scientist? 10 A. Yes, that's what you would need 11 to implement it, yes. 12 Q. And in this chart, you cite to 13 primarily two documents, 2004 and 2006; is 14 that right? 15 A. Yes. 16 Q. And both of those documents were 17 in your possession, custody, and control? 18 A. Oh, so probably. I think they 19 came from my -- I think they came from a -- a 20 backup I had on my -- on a old hard drive, so 21 yes. 22 Q. So I already handed you 2006, but
202 1 down to, you know, the timeline of when 2 different aspects of the innovation happened; 3 and that's what started this troll back 4 through, you know, e-mails and messages and 5 documents from, you know, before the patent, 6 so... 7 Q. Okay. Can you turn to Page 2 of 8 this? And I apologize for the printing. 9 A. Yeah. Okay. 10 Q. You say at the bottom of this 11 that [as read]: "A skilled artisan would 12 understand that these algorithms are 13 implemented using software" -- e.g., 14 "'computer program modules' stored on..." 15 Goes on from there. 16 What do you mean by a "skilled 17 artisan"? 18 A. Means somebody who's skilled at 19 doing -- I mean, a data scientist, somebody 20 whose skill set is building complex complete 21 and mathematical models and code. 22 Q. So are you using the same	204 1 I'll hand you 2004 just for completeness. 2 A. Yeah, I think these are all 3 versions in the creative process, but yes. 4 Q. Yes, both of these documents are 5 BlueSpace mail -- or are entitled "BlueSpace 6 Mail Search"? 7 A. Uh-huh. 8 Q. So these are your files? 9 A. I believe so. I mean, certainly 10 I wrote this, you know. 11 Q. Okay. 12 A. Apart from the math part, which 13 my father wrote. 14 (Whereupon Exhibit Number 2004 15 was shown.) 16 (BY MR. PLAIL) 17 Q. If you look at the last page -- 18 A. Uh-huh. 19 Q. -- of the document I just handed 20 you, 2004 -- 21 A. Yeah. 22 Q. -- it says, "Custodian Justin

205 1 Marston"? 2 A. Yeah. 3 Q. Okay. So this is one of your 4 custodial documents? 5 A. Yes, I guess so. 6 Q. Okay. If you'd turn back to 7 2006... 8 A. Okay. 9 Q. Go to the last page. 10 A. Yeah. 11 Q. It says, "custodian Justin 12 Marston"? 13 A. Yeah. 14 Q. So this is one of your custodial 15 documents? 16 A. Yes. 17 Q. So we can turn back to 2014. 18 A. Yeah. 19 Q. So the documents in here, or the 20 documents referenced in this chart, 2006 and 21 2004, are your custodial documents, correct? 22 A. What's the definition of a	207 1 which ones came from which of those two 2 folders, but I believe that these two came 3 from my laptop. I could check it, if I 4 looked at that laptop and looked through that 5 very old folder; but those are the only two 6 sources of these working documents where -- 7 stuff he provided that he had kept and stuff 8 I had found that was stuck on a hard drive 9 that I had. 10 Q. Okay. I'm going to hand you a 11 document that's already been marked as 2041. 12 (Whereupon Exhibit Number 2041 13 was shown.) 14 A. Yeah. 15 (BY MR. PLAIL) 16 Q. And then I'm also going to mark 17 this as Exhibit 5. 18 (Whereupon Exhibit Number 5 was 19 marked for identification.) 20 (BY MR. PLAIL) 21 Q. So first, on 2041, do you 22 recognize this document? Sorry, the one
206 1 "custodial document"? 2 Q. Basically that you have 3 maintained that document and that you're 4 attesting that you maintained that document. 5 A. Oh, okay, then, yes. 6 Q. Okay. I guess, to put it another 7 way, these documents were in your records. 8 A. Yeah. I mean, I had a file, I 9 had a folder on -- in an old embedded 10 archive, and it stayed on my computer that 11 whole time; so, yes. 12 Q. Okay. And we have discussed 13 other files that Paul Marston has located? 14 A. Uh-huh. 15 Q. But neither of these files were 16 located by Paul Marston? 17 A. As far as I'm aware, that's true. 18 I mean, there's a whole set of files that he 19 found, and there was a set of files that I 20 found from very old backups. 21 From memory, you know, I don't -- 22 I wouldn't be able to tell you precisely	208 1 that's labeled "2041" in the bottom right 2 corner. 3 MR. PADMANABHAN: Yeah, this 4 one. 5 A. Well, okay. This one's updated 6 here to 2041, and this one's 2041. Okay. 7 All right. 8 (BY MR. PLAIL) 9 Q. I meant the original 2041, yes. 10 A. Go ahead, this one, yeah, okay. 11 Q. Do you recognize that document? 12 A. Honestly, I don't particularly 13 recognize it, but it looks like a file list 14 of all the files in a folder that I provided. 15 Q. Okay. So you cite to this 16 document in your declaration on numerous 17 occasions? 18 A. Okay. I don't recall, but yes, 19 this -- this looks like a bunch of files that 20 came from my -- from my computer. 21 Q. Okay. I'll represent to you that 22 what I've marked as Exhibit 5 is an updated

209 1 version of 2041 that was provided by counsel. 2 A. This one? 3 Q. Yes. 4 A. Okay. 5 Q. Understand? 6 A. Okay. So this is an updated 7 version of the same folder, basically; but 8 yeah, okay, go ahead. What's the -- what do 9 you -- 10 Q. Have you reviewed this updated 11 version of 2041 before? 12 A. I can't say that I have. Yeah, I 13 don't think I have. 14 Q. You said that these are -- sorry, 15 you said that this is a log of files from 16 your folders; is that right? 17 A. I believe that's accurate. 18 Q. Okay. 19 A. Yeah. I mean, all -- yes, all of 20 these files are files that I recommend -- I 21 recollect the file names on, so... 22 Q. Okay.	211 1 Q. Okay. All right. So I'm going 2 to have you turn to November 9th, which is on 3 page -- I don't know. 4 A. Something or other. 5 Q. Something or other, yeah. 6 A. Yeah, I see that, "EPA 7 presentation." 8 Q. Yes. 9 A. Yep, okay. 10 Q. So if we look at the files on the 11 9th, 10th, 14th, and 15th -- 12 A. Uh-huh. 13 Q. -- these all relate to investor 14 presentations or conferences; is that right? 15 A. Sales presentations; so, you 16 know, "EPA presentation" was a presentation, 17 sales presentation, to the Environmental 18 Protection Agency, you know, Citigroup to 19 Citigroup -- Verizon likely was a 20 presentation to Verizon. Verizon was a 21 partner, a go-to-market partner in DC who had 22 a relationship with the USDA.
210 1 A. Yes. 2 Q. And so these are from your 3 records? 4 A. Yes, from 20 years ago, correct. 5 Q. And not all of these files relate 6 to the invention, right? 7 A. Correct. 8 Q. They relate generally to activity 9 relating to BlueSpace? 10 A. Yes. 11 Q. Are there any documents in this 12 list that are not your custodial files? 13 A. I don't believe so. I mean, I -- 14 if there were three that slipped in here 15 somehow, I wouldn't notice the difference; 16 but, like, all of the files that I'm looking 17 at right now, they look like things that I 18 would have on my -- in that folder. 19 Q. Okay. All right. So this log is 20 organized by what appears to be a last 21 modified date, correct? 22 A. Yes.	212 1 Q. Okay. And so none of these 2 relate to the inventions? 3 A. No. 4 Q. Can you turn to the next page? 5 A. Sure. 6 Q. All right. If you could look at 7 the documents on this page -- and this is 8 from November 21st -- 9 A. Yeah. 10 Q. -- through December 1st? 11 A. Uh-huh. 12 Q. These documents appear to relate, 13 again, to sales presentations, sales 14 forecasts, and compliance documents and 15 meeting minutes. 16 Does that seem right? 17 A. Yeah, that's generally the 18 content, yeah, yeah. 19 Q. And so these documents don't 20 relate to the claimed invention, correct? 21 A. No, I don't think any of these 22 ones do.

213 1 Q. Okay. We can go to Page 7, which 2 is December 1st through December 11th. 3 A. Uh-huh. 4 Q. These documents appear to relate 5 to, again, sales presentations, competitive 6 analysis, website updates, and something 7 called the fBi2 questionnaire. 8 Do you see that? 9 A. Yes. 10 Q. Is that accurate? 11 A. Yes. 12 Q. So these documents do not relate 13 to the claimed invention? 14 A. Yes, they do not. 15 Q. Let's go to the next page. 16 A. (Complying.) 17 Q. Now we're looking at the page 18 having to do with December 11th through 19 January 12th. 20 A. Uh-huh. 21 Q. These files appear to relate to 22 compliance reporting, financial planning, and	215 1 8th of -- it could be the other way around, 2 isn't it? Yeah, the 8th of November, 3 "BlueSpace mail relevance," that one likely 4 does. 5 Q. Uh-huh. 6 A. I don't see any others that I 7 think do. 8 Q. Okay. Going back to the first 9 page... 10 A. Uh-huh. 11 Q. If you look at the "author" and 12 "last saved by" column... 13 A. Yeah. 14 Q. Who is Debra Milner? 15 A. Debra Milner was a project 16 manager working for BlueSpace. 17 Q. And what projects was she working 18 on? 19 A. She kind of did -- effectively, 20 like a scrum master; so she was overseeing 21 the developer team building TransMail. 22 Q. Did she work on the relevance?
214 1 research relating to government 2 recordkeeping. 3 Does that seem accurate? 4 A. Yes. 5 Q. And so these files do not relate 6 to the claimed invention, correct? 7 A. Correct. 8 Q. Can you look at Page 1? 9 A. Yeah. 10 Q. Do any files on Page 1 relate to 11 the claimed invention? 12 A. I don't believe so, no. 13 Q. Looking at Page 2, do any of the 14 files on Page 2 relate to the claimed 15 invention? 16 A. No. 17 Q. Page 3, same question. 18 A. No, I don't believe so. 19 Q. Okay. Page 4, same question. 20 A. No. 21 Q. Page 5, same question. 22 A. So I think that the one on the	216 1 A. No. 2 Q. There is an author listed as 3 "dcs3ash." 4 A. Yeah. 5 Q. Do you know who -- 6 A. I think that's -- yes, I think 7 that's going to be Duncan Ash. 8 Q. Who is Duncan Ash? 9 A. He was a sales engineer who 10 worked for BlueSpace. 11 Q. Did he work on the relevance 12 models? 13 A. No. 14 Q. Who is Maki? 15 A. Maki was Maki Hatt Joseph. He 16 was a sales rep working for BlueSpace. 17 Q. Who is James Burk? 18 A. He was an attorney here in -- 19 well, he probably was in Austin, and I think 20 his -- he was in -- here in the U.S.; I can't 21 remember which city. So he helped introduce 22 me to some investors and his brother here in

217 1 the U.S. 2 Q. Who is Jason Fitzpatrick? 3 A. Jason Fitzpatrick was the head of 4 professional services for -- for BlueSpace. 5 Q. And what was his role in the 6 company? 7 A. Helping with implementations and 8 planning deployments. 9 Q. Go to the next page. 10 A. Okay. 11 Q. Who is Stephen Davies? 12 A. Stephen Davies was a sales rep 13 working for BlueSpace. 14 Q. Okay. And Cassy Weiler? 15 A. Cassy was -- she kind of did 16 documentation. So she was in America, and 17 she did -- she did requirements and 18 documentation. 19 Q. Do you know where in America? 20 A. Not with a high level of 21 confidence, no. I think Colorado, but I 22 wouldn't bear -- wouldn't swear to it.	219 1 briefly as the CEO. 2 Q. Andreea? 3 A. Where is that name on -- 4 Q. Last page. 5 A. You missed Rudi Vankeirsbilck, 6 whatever his name is. 7 Q. Oh, thank you. 8 A. He -- 9 Q. Thank you. 10 A. So he was -- he was a software 11 developer out of Belgium -- was it Belgium? 12 I think it was Belgium, yeah. 13 And then Ted West was an investor 14 from the U.S. 15 And then where is Andreea at? 16 Which -- 17 Q. Last page. 18 A. Oh, yeah, okay. I think she was 19 from Romania. We had a Romanian development 20 team at this point, but I can't be sure of 21 that but I think -- I think she was from 22 central Europe.
218 1 Q. Who is Isaac Gadsden? 2 A. Isaac Gadsden was a business 3 development, general guy in DC who was 4 doing -- trying to do market development for 5 us. He was a consultant. 6 Q. Okay. And who's Jackie Williams? 7 A. Jackie Williams was the finance 8 controller in the UK. 9 Q. And J Cleary? 10 A. Don't know who he was. I'm going 11 to guess he was a -- he was related to Jeff 12 Newell, which was the investment capital firm 13 that invested in the company. 14 Q. And Chris Davis? 15 A. Chris Davis, I can't remember 16 either. I think probably also related to 17 Jeff Newell in the New York office. 18 Q. And Michael Kaider? 19 A. I don't remember who he was. 20 Q. Graham Sewell? 21 A. Graham Sewell was an investor 22 from the UK and sort of acted as the CFO and	220 1 Q. This document has already been 2 marked as 2042. 3 (Whereupon Exhibit Number 2042 4 was shown.) 5 (BY MR. PLAIL) 6 Q. Do you recognize this document? 7 A. Not from memory. This looks like 8 e-mail traffic, but yes. What's your 9 question? 10 Q. Oh, one second. I'm going to 11 hand you this, which is going to be 12 Exhibit 6. 13 (Whereupon Exhibit Number 6 was 14 marked for identification.) 15 (BY MR. PLAIL) 16 Q. I will represent to you that this 17 is an updated version of exhibit -- this is 18 an updated version of Exhibit 2042, which was 19 provided by counsel. 20 It says across the top this is a 21 "Log of privileged communications with 22 BlueSpace counsel regarding BlueSpace work

221 1 from June 28th, 2005, through January 13th, 2 2006." 3 Do you see that? 4 A. I do. 5 So I think a difference here is 6 that I think that this -- a lot of this 7 content may have come from the law firm's 8 logs, from the Fenwick & West logs; whereas, 9 I think the other ones came from my files. 10 It's about the same stuff, But I 11 think -- I know that they had -- all my 12 e-mail was gone, but I know they had some 13 content. 14 So my -- I believe it may be -- 15 it may be from them, but I'm not sure. 16 Q. And just so we confirm, by "the 17 law firm," you mean Fenwick & West? 18 A. Correct. 19 Q. And so these documents here are 20 communications with Fenwick & West? 21 A. Yes, I believe so. 22 Q. So these documents don't	223 1 Q. Okay. I'm going to ask you to 2 pull out your declaration, 2030. 3 A. One second. All right. This is 4 2030. Yeah. 5 Q. So if you look at paragraph 19... 6 A. (Complying.) Yeah. 7 Q. You say here that, "My work as 8 CEO of BlueSpace during the summer 2005 is 9 corroborated by documents, including e-mails 10 exchanged with counsel for BlueSpace." 11 A. Uh-huh. 12 Q. Do you see that? 13 A. Right. 14 Q. What do you mean that these 15 e-mail exchanges "corroborate" your activity 16 in the summer of 2005? 17 A. They show that I was working at 18 BlueSpace. 19 Q. And what do you mean by the 20 "summer of 2005" there? 21 A. The broad period from the end of 22 spring to the beginning of fall.
222 1 necessarily relate to the claimed invention, 2 correct? 3 A. Again, not -- not all of them. 4 Some of them may -- do, if we went through 5 the list, but yes. 6 Q. They relate to activities for 7 BlueSpace generally? 8 A. They relate to other parts of the 9 intellectual property portfolio. So, yeah, 10 we filed the patent on context. 11 I don't know what the TransMail 12 one is in terms of content. A lot of this is 13 just back-and-forth about -- 14 Q. So just to -- some -- high-level 15 questions first. 16 A. Yeah. I guess it's comments 17 with -- comments with Fenwick & West, who are 18 our patent attorneys. 19 Q. Did you review these e-mails 20 while you were preparing your declaration? 21 A. Not any significant data. I know 22 that they were recovered.	224 1 Q. So if you go one page back... 2 A. Uh-huh. 3 Q. This is within the section 4 June 7th to August 21. 5 A. Okay. Those dates, yeah. 6 Q. Okay. 7 A. That would be included in "the 8 summer." 9 Q. So when you are referring to the 10 "summer of 2005" there, you're referring to 11 June 7 through August 21? 12 A. Yeah. I mean, I was working 13 continuously as CEO of BlueSpace during the 14 whole of the summer of 2005. 15 Q. When you said that these e-mails 16 corroborate that you were working at 17 BlueSpace -- 18 A. Uh-huh. 19 Q. -- they don't corroborate what 20 you were working on? 21 A. No. They corroborate the fact 22 that I was continuing to work at BlueSpace as

225 1 the CEO. 2 Q. Okay. Can you go to your other 3 declaration, 2003? 4 A. Yep. 5 Q. Can you look at paragraph 8? 6 A. (Complying.) Yeah. 7 Q. It says there [as read]: "To the 8 best of my recollection, I did not send the 9 Initial Document or any other documents 10 attached to this declaration to our patent 11 prosecution attorneys or any other lawyers." 12 A. Uh-huh. 13 Q. "I did send versions of the 14 document --" 15 MR. PADMANABHAN: Later 16 version. 17 (BY MR. PLAIL) 18 Q. "-- later versions of the 19 document that were later filed as a 20 provisional patent application to our patent 21 prosecution attorneys." 22 Do you see that?	227 1 A. Yeah, to the best of my 2 recollection, that's accurate. 3 Q. Okay. So you would have not had 4 any communication with Brian Hoffman relating 5 to the provisional patent application prior 6 to January 11th? 7 A. I mean, I may have talked about 8 it in a phone call. We filed, you know, at 9 least eight patents, I think, through Fenwick 10 & West. So I may have -- you know, we had 11 calls about other patents; so I may have 12 said, hey, I'm working on another one, but 13 there's no point sharing something that's 14 half finished and paying whatever attorneys 15 charge you per hour to have them look at a 16 document that's not finished. So, you know, 17 I was waiting to get to a full draft before I 18 sent the data, but I might have -- I might 19 have mentioned to him ahead of that that I 20 was working on it. I don't recall. 21 Q. So you would not have sent the 22 draft provisional patent application to Brian
226 1 A. Sure, yeah. 2 Q. Now, if you go back to 2030... 3 A. Yeah. 4 Q. In paragraph 54... 5 A. Yeah. 6 Q. You say there that [as read]: On 7 June 11th, 2006, I sent -- 8 MR. PADMANABHAN: January. 9 (BY MR. PLAIL) 10 Q. Sorry. 11 [As read]: "January 11th, 2006, 12 I sent a draft of the provisional patent 13 application to my patent prosecution 14 attorney, Brian Hoffman at Fenwick." 15 A. Correct. 16 Q. So if we look at those two 17 statements together -- 18 A. Uh-huh. 19 Q. -- to the best of your 20 recollection, you did not send the 21 provisional application to counsel before 22 January 11th, 2006; is that right?	228 1 Hoffman at Fenwick prior to January 11, 2006? 2 A. To the best of my recollection, 3 no. 4 Q. So if we go back to what has been 5 marked as Exhibit 6... 6 A. Yep. 7 Q. Again, this appears to be 8 organized by date; is that correct? 9 A. Yep. 10 Q. And so if we go through, we would 11 not expect to see any communications relating 12 to this patent application in here before 13 January 11th? 14 A. To the best of my recollection, 15 that should be true. 16 Q. Okay. So let's just go through 17 them. 18 The first section here lists 19 "context patent." 20 A. Uh-huh. 21 Q. What is the BlueSpace context 22 patent?

229 1 A. It was a patent for being able to 2 ascribe mails to context. It's not relevant 3 really to the -- to this relevance patent, 4 but it was a different patent. 5 Q. Okay. So it's not relevant to 6 the claimed inventions? 7 A. No. 8 Q. Okay. What is the TransMail 9 patent? 10 A. Which line are you looking at? 11 Q. That would be the fourth line, or 12 the name of the e-mail is "TransMail." What 13 is that e-mail? 14 A. No idea. 15 Q. It says in the right corner that 16 it is [as read]: Correspondence with [sic] 17 counsel providing legal advice regarding a 18 patent portfolio. 19 A. Okay. 20 Q. Is that a communication relating 21 to the overall patent portfolio for 22 BlueSpace?	231 1 Q. There appear to be some 2 attachments linked in there, but... 3 A. Helpfully named. 4 Q. If you go to Page 3... 5 A. Yep. 6 Q. The top one is a e-mail entitled 7 "Confirmation of Filing Instructions." 8 A. Yes. 9 Q. The description says it is [as 10 read]: "Correspondence from counsel 11 providing legal advice regarding patent 12 application on Secure Messaging System." 13 A. Uh-huh. 14 Q. What is the secure messaging 15 system? 16 A. I mean, the secure messaging 17 system is just TransMail. It is -- you know, 18 that is the -- that is the product. Yeah, I 19 mean, I can't recall from -- offhand what's 20 in the contents of the e-mail, you know. 21 Q. But you reviewed this e-mail in 22 preparing your declaration?
230 1 A. I don't know. I'd have to see 2 it. I mean, I wrote it 20 years -- just over 3 20 years ago. I don't know. 4 Q. All right. But you reviewed this 5 e-mail in preparing your declaration? 6 A. I mean, I -- I have scanned 7 through them, but I don't recall, you know. 8 So there's a lot of information when you 9 crawl back this far. There's a heck of a lot 10 to review, so... 11 Q. But sitting here today, you don't 12 know whether -- what that e-mail's 13 concerning? 14 A. I can't recall what that's 15 concerning right now. 16 Q. Do you recall if the claimed 17 invention was discussed in that e-mail? 18 A. No, I can't recall either way. 19 Q. And you'll see that the 20 TransMail-related communication carries on 21 for some time? 22 A. Uh-huh.	232 1 A. I mean, I reviewed a ton of stuff 2 in preparing my declarations, but I can't 3 recall all of it right now. 4 Q. And of that stuff you reviewed, 5 this e-mail was one of them? 6 A. I believe I had access to all of 7 the e-mails in preparing my declaration, and 8 I remember going through some. I can't speak 9 specifically to which ones I read in detail 10 and which ones I didn't. 11 Q. Does this e-mail relate to the 12 claimed invention? 13 A. I doubt it. I'd have to go back 14 and look at it to be confident. 15 Q. Okay. The next is "Tamper-Proof 16 Electronic Messaging." 17 A. Uh-huh. 18 Q. What is tamper-proof electronic 19 messaging? 20 MR. PADMANABHAN: On the next 21 row. 22 A. Oh, just on the next row. I was

233 1 just going to check it out. 2 Okay. Yeah, so this was to do – 3 it doesn't relate to the invention, but this 4 was to do with creating hash values from 5 e-mails to make sure that the hash values are 6 stored separately so that if somebody changed 7 the content of the mail in the database, it 8 wouldn't match to the hash value. 9 (BY MR. PLAIL) 10 Q. Does that relate to the claimed 11 invention? 12 A. No. 13 Q. Did you review this e-mail while 14 preparing your declaration? 15 A. Yeah, to the best of my 16 knowledge. Yeah. I mean, yes – well, if – 17 I had access to all of this during the 18 preparation. 19 Q. And did this e-mail relate to the 20 claimed invention? 21 A. No. 22 Q. If you go down to Page 4, the	235 1 Q. -- it says [as read]: 2 "Correspondence to counsel on behalf of J. 3 Marston to facilitate the" rendering [sic] 4 "of legal advice regarding filings in 5 connection with filings in connection with 6 pending patent applications." 7 A. Yes. 8 Q. Does that e-mail relate to the 9 claimed invention? 10 A. I can't recall from memory. I'd 11 have to go back to that specific e-mail, 12 so... 13 Q. So sitting here today, you don't 14 know whether that e-mail relates to the 15 patent application? 16 A. I can't recall from the – 17 what – I mean, it relates to – to patent 18 applications. Whether it relates to this 19 specific one, I'd have to go relook at the 20 e-mail to remind myself. 21 Q. Okay. I believe the next page 22 covers applications we've already discussed,
234 1 second -- on Page 4? 2 A. Uh-huh. 3 Q. It's discussing the [as read]: 4 "Patent application on Enforcing Compliance 5 Policies in a Messaging System." 6 You see that? 7 A. Yeah. The third row, right? 8 Q. Yeah, third row. 9 A. Uh-huh. 10 Q. What is the "patent application 11 on enforcing compliance policies in messaging 12 systems"? 13 A. Yeah, this is the rules engine 14 applied to message objects during a 15 lifecycle. It doesn't relate to the current 16 invention. 17 Q. Okay. And you reviewed this 18 e-mail while preparing your declaration? 19 A. Yes. I had access to all of this 20 during my -- preparing my declarations. 21 Q. If you look at the next line -- 22 A. Uh-huh.	236 1 or inventions we've already discussed; is 2 that true? 3 A. Yeah. 4 Q. Same with Page 6? 5 A. Yeah, yes. 6 Q. Same with Page 7? 7 A. Yeah. That's all tamper-proof 8 stuff. 9 Q. On Page 8 -- 10 A. Uh-huh. 11 Q. -- there are five entries that 12 relate to advice regarding pending 13 provisional patent applications and deadlines 14 for the same. 15 Do you see that? 16 A. Uh-huh. 17 Q. Do any of these e-mails relate to 18 the claimed invention? 19 A. To the best of my knowledge, no. 20 I mean, I can't recall every one of these 21 from memory, but... 22 Q. But you reviewed these in

237 1 preparing the declarations? 2 A. Yes, I had access to all of them 3 in preparation for my statements. 4 Q. On Page 9 -- 5 A. Uh-huh. 6 Q. -- same question with respect to 7 the first entry. 8 A. Yeah. No, I don't believe it had 9 anything to do with this -- this patent 10 application. I'd have to review it to be 11 100 percent sure, but I don't believe it did. 12 Q. Okay. Looking at the next entry, 13 it says the [as read]: "Patent application 14 on e-mail structuring." 15 What is the patent application on 16 e-mail structuring? 17 A. I think that was the SMPP 18 gateway; so that was, you know, taking 19 messages and -- that were sent out through 20 e-mail and then bringing them back in again. 21 Q. Okay. So that does not relate to 22 the claimed invention?	239 1 A. Yeah. I mean, I -- that would be 2 my -- that looks like a name to me, so -- I 3 can't recall from memory, but yeah, it has 4 Toby Gosnall-Fenwick.doc. So that would tell 5 me that's probably what it was. 6 Q. The last entry on there, does 7 that relate to the claimed invention? 8 A. No. 9 Q. Going to Page 11 -- 10 A. Uh-huh. 11 Q. -- do any of these entries relate 12 to the claimed invention? 13 A. First two, no. Third one, no. 14 Fourth one, no. No. 15 Q. Okay. I have a couple of quick 16 questions -- [as read]: "Enforcing 17 compliance policies in messaging systems," 18 what does that refer to? 19 A. That's the compliance policy 20 patent. 21 Q. Okay. And [as read]: 22 "Generating relational structures for
238 1 A. No. 2 Q. If you look at Page 10, you'll 3 see there's a number of correspondence on 4 behalf of you and Stuart Hatch? 5 A. Andrew, yes. 6 Q. Sorry, sorry, Andrew Hatch. 7 A. It's a lawyer. This is his full 8 -- second name there, but yeah. 9 Q. Relating to various pending 10 patent applications. 11 Do any of these relate to the 12 claimed invention? 13 A. No. 14 Q. Okay. Do you see that the 15 subject line of these e-mails is "Toby 16 Gosnall"? 17 A. Yeah. 18 Q. What does that refer to? 19 A. I think that's probably a name of 20 a paralegal that worked for Brian, would be 21 my guess. 22 Q. In the subject line?	240 1 nonrelational messages," what's that refer 2 to? 3 A. That's the gateway patent. 4 Q. On Page 12 do any of these 5 messages relate to the claimed invention? 6 A. No. 7 Q. On Page 13 do any of these 8 messages relate to the claimed invention? 9 A. No. 10 Q. There's this entry here, fourth 11 one, which the subject line is "Due 12 diligence." 13 A. Uh-huh. 14 Q. Says corresponding -- [as read]: 15 "Correspondence to counsel seeking legal 16 advice regarding due diligence." 17 A. Uh-huh. 18 Q. Does that refer to or relate to 19 the claimed invention? 20 A. No. 21 Q. If we look at Page 14, do any of 22 these messages relate to the claimed

241 1 invention? 2 A. No. 3 Q. If we go to Page 15, do any of 4 these messages relate to the claimed 5 invention? 6 A. No. 7 Q. If we go to Page 16, do any of 8 these messages relate to the claimed 9 invention? 10 A. No. 11 Q. If we go to Page 17... 12 A. Uh-huh. No. 13 Q. Okay. So just to confirm, none 14 of these -- 15 A. No, none of them relate to the 16 claimed invention. 17 Q. Okay. Go to Page 18. 18 A. So line Number 2 does, line 19 Number 3 does, line Number 4, and line 20 Number 5 does. 21 Q. Okay. But line Number 1 does 22 not --	243 1 timeline claim chart? 2 A. Yes. 3 Q. Did you review any other 4 documents in preparing your declaration? 5 A. I don't believe so. 6 Q. This has already been marked as 7 2046. 8 (Whereupon Exhibit Number 2046 9 was shown.) 10 A. Uh-huh. Yes, I remember this 11 one. 12 (BY MR. PLAIL) 13 Q. So this is an e-mail from 14 January 11th, 2006, -- sorry, the e-mail at 15 the bottom of the chain is from January 11th, 16 2006; is that correct? 17 A. Yes. 18 Q. If you go to the other side, you 19 can look at the signature line. 20 A. Uh-huh. 21 Q. It says at this time that you 22 were COO.
242 1 A. Correct. 2 Q. -- relate to the claimed 3 invention? 4 A. No. That was an introduction to 5 an employment lawyer. 6 Q. Okay. 7 A. So no. 8 Q. So do you agree that of the 9 entries in this log, only the last four 10 relate to the claimed invention? 11 A. Yes. 12 Q. When preparing your declaration, 13 you reviewed the documents in Exhibit 2042 14 and 2041, correct? 15 A. Which ones were those, again? 16 Q. The two logs we just went over. 17 A. Oh, yes. 18 Q. And you reviewed the documents 19 cited in your declaration? 20 A. Yes. I scanned through them. 21 Q. And you reviewed 2014, which 22 we've already discussed, which is the	244 1 Were you operating as COO at this 2 time in 2006? 3 A. And I can't remember my specific 4 title. I mean, there was a -- there was a 5 period where I handed over the CEO-ship to a 6 series of guys in the UK; and then I realized 7 they weren't going to be successful, so then 8 I started moving to -- the company to the 9 U.S., so I think I was CEO, then I was EVP or 10 something or other, and then, you know, I 11 was -- you know, I may have had a title of 12 COO for a while, and my next transition was 13 complete and the company was funded in the 14 U.S., then I went back to being CEO. 15 So I don't know. They liked 16 to -- you know, they wanted to feel like they 17 got the company to the U.S., so -- I think 18 Graham Sewell might have been CEO at this 19 time. 20 So the three people who were CEO 21 apart from me would have been, I think, Simon 22 Catlin, then John Clark, then Graham Sewell,

245 1 and then I took over the CEO-ship again. 2 Q. Okay. Starting at this first 3 e-mail, the subject line is "New patent." 4 Do you see that? 5 A. Yeah. 6 Q. So this patent is transmitting 7 the patent application for the provisional 8 application here? 9 A. Yeah. This is the relevance 10 patent, having Brian file the patent. 11 Apparently it -- the provisional. 12 Q. And do you see the next e-mail in 13 the chain is a response from Brian Hoffman on 14 January 13th, 2006? 15 A. Yes. 16 Q. Do you see that he's changed the 17 subject line, so it's no longer "new 18 patents." 19 "New patent-inventorship?" 20 A. I think they both have the same 21 subject, don't they? 22 Q. Well, it's here --	247 1 the -- regarding who it was. I -- yeah. 2 I know what you're going to ask 3 next, why the date's the wrong way around. 4 But, yes, I responded to him, 5 saying that -- that Jon -- have to remember 6 what it says. Jon "helped out a bit" but 7 didn't really do anything significant in the 8 patent. 9 Q. So here you were answering 10 Brian's question? 11 MR. PADMANABHAN: Objection, 12 403 -- 401 to 403. 13 Go ahead. 14 A. I believe so. 15 I mean, I can't recall seeing the 16 unsanitized version of this e-mail. I'd have 17 to probably look at it to make sure that was 18 the case. 19 (BY MR. PLAIL) 20 Q. So you would need to look at the 21 unredacted version of this e-mail to 22 determine whether you were answering a
246 1 A. Oh, I see, okay. 2 Yes, I think he was probably 3 validating in this e-mail that who the 4 identities of the creators were for the -- 5 to -- the creators of the patent to be filed 6 for the patent. 7 Q. So he's asking the question about 8 inventorship? 9 A. I think that's what he was doing, 10 yes. 11 So I sent the patent, and then I 12 think he replied to confirm identities of 13 inventors and then I replied. 14 Q. And within the context of that 15 communication, you responded on January 12th? 16 A. Yes. That's what it says, yeah. 17 I mean, remember here that -- let me think 18 about this, then. 19 This came from Fenwick, didn't 20 it, this document? It has to have come -- 21 because I didn't have any e-mail. So yeah, I 22 mean, yeah, I responded to him regarding	248 1 question from -- 2 (Talking over each other.) 3 A. I mean, I certainly am answering 4 the question -- what I -- you know, whether 5 both -- in terms -- I mean, he -- I'm sure 6 that he asked who were the authors and I made 7 a comment on who the author should be for the 8 patent. 9 Yeah. So, I mean, I'm sure I was 10 replying to a question he asked about that. 11 Q. So Mr. Hoffman asked who the 12 inventors were on the patent? 13 A. I believe so. 14 Q. And you responded? 15 A. Yeah. I mean, I -- that's my 16 response about who the inventors were. 17 Q. Did Mr. Hoffman ask any other 18 questions? 19 A. I don't recall because I don't 20 know that I've seen the unredacted version of 21 this e-mail. 22 Q. You don't recall if you have seen

249 1 the unredacted version? 2 A. I haven't seen the unredacted 3 version. I've only seen the redacted 4 version. I think that the key -- you know, 5 the key comment that was being highlighted to 6 me was this sentence that I wrote on 7 January 12, 2006. 8 Q. If you look at your log -- or the 9 log, this e-mail is listed on the log. 10 A. This is -- this one? 11 Q. Yes. It's on the last page. 12 A. Okay. Yep. 13 Q. And so you testified earlier that 14 you had access to all of the e-mails listed 15 on this log. 16 A. I have -- I've had access. I 17 don't remember seeing a version -- well, I 18 don't recall -- I don't think I've seen a 19 version that wasn't unredacted, but I have 20 had -- I've had access to this. I remember 21 reviewing this together, so... so in that 22 sense, yes, I've had access to the e-mail;	251 1 A. Okay. 2 Q. Let's go back to Page 18 of 2042. 3 A. Uh-huh. 4 Q. And so this e-mail is -- is the 5 second entry, the fourth entry, and the fifth 6 entry, right? 7 A. How do I tell that from this 8 list? I mean, this one and this one I see, 9 and then... 10 MR. PADMANABHAN: He's talking 11 about the top entry now. 12 A. Okay. So "new patent 13 inventorship," "new patent inventorship," 14 "new patent." 15 MR. PADMANABHAN: "New patent" 16 is right there. 17 A. Oh, I see, yeah, yeah, yeah. Got 18 it. The second, fourth, and the fifth, yeah. 19 Got it. 20 (BY MR. PLAIL) 21 Q. Okay. So you agree that the 22 second entry, the fourth entry, and the fifth
250 1 but it's been redacted. 2 Q. So at no point during preparing 3 your declaration did you have access to the 4 unredacted version of this declaration -- or 5 sorry, of this e-mail? 6 A. This e-mail? 7 I don't believe I did, but I 8 can't recall for certain, you know. I've had 9 a lot going on, but I don't think I've seen 10 it. I can't remember seeing the unredacted 11 version. 12 I remember this sentence, but 13 yes, I don't -- I don't have the rest of the 14 context on it. 15 MR. PLAIL: I think we should 16 go off the record quickly. 17 MR. PADMANABHAN: Okay. 18 (Break taken from 2:06 p.m. to 19 2:28 p.m.) 20 (BY MR. PLAIL) 21 Q. All right. Turning back to 22 Exhibit 2046, I just want to confirm...	252 1 entry are Exhibit 2046? 2 A. Yes. 3 Q. Okay. And the third entry, 4 "BlueSpace Mail Relevance," "131105." 5 What is that document? 6 A. Yeah. I think that's the -- 7 that's the provisional document that I sent 8 to Brian. 9 Q. Okay. And so that document 10 describes the claimed inventions? 11 A. Yes. 12 Q. And does it include the same 13 material as 2006? 14 A. Well, this one is "BlueSpace Mail 15 Relevance, 11 -- 131105." So whichever one 16 has the exhibit number that corresponds to 17 that, then yes, that would have been the 18 attachment. 19 Q. Sorry, you're referring to the -- 20 the date there, 131105? 21 A. So this one -- you're saying is 22 this one the same as some other -- same as

253 1 another exhibit, or are you saying this 2 whole -- 3 Q. You're referring to the file name 4 there, "131105"? 5 A. I was referring to that and 6 saying I think that you guys are going 7 have -- that would be one of the exhibits, I 8 assume; but what was your question? 9 Q. So I have not received this file. 10 So my question is: What is in this file? 11 A. I don't recall offhand. 12 Q. But you're saying it relates to 13 the claimed invention? 14 MR. PADMANABHAN: Well, I mean, 15 I think he's basing it on the -- 16 A. Well, it says "BlueSpace Mail 17 Relevance JM 131105." So that's -- 18 MR. PADMANABHAN: That's a 19 description for it. 20 A. Yeah, yeah. So this is a -- a 21 job -- I imagine this is going to be the 22 draft provisional patent for the BlueSpace	255 1 sent him -- and this was typically always 2 true, the document, he -- he would never 3 really have any comments on the provisional 4 patents, and then he would author the -- you 5 know, the patent attorney writes the utility, 6 for all intents and purposes. 7 So he would have written the 8 claims based on the provisional. 9 Q. But you reviewed this document in 10 preparing the declaration? 11 A. This one? 12 Q. Yes. 13 A. Yes. It's going to be the 14 submitted document that was finally -- it's 15 the same one -- it will be the same one that 16 you guys have as the provisional. 17 Q. So you're saying there was no 18 differences between this file, "BlueSpace 19 Mail Relevance JM 131105.doc," and the 20 provisional that was submitted to the patent 21 office? 22 A. I would expect that to be true.
254 1 mail relevance patent. 2 (BY MR. PLAIL) 3 Q. Okay. And you're saying that 4 each and every claim element was described in 5 the draft provisional attached to this 6 e-mail? 7 A. Well, the claims wouldn't have 8 been described in the provisional. The 9 claims were -- well, okay. So I think this 10 is the provisional, not the utility, and so I 11 don't think the claims would have been 12 created until the utility, right? 13 Q. So you're saying that the 14 invention that is claimed in the '217 patent 15 was fully described in the BlueSpace mail 16 relevance file? 17 A. I believe that is the case. 18 Q. What is your basis for saying 19 that? 20 A. By the time I sent it to Brian, I 21 will have had -- I will have completed the 22 drafting process. So the document that I	256 1 I can't say for 100 percent sure without 2 comparing both documents, but I believe that 3 would be the case. 4 Q. So I don't have access to this 5 file. 6 A. Okay. 7 Q. So you testified that this is 8 evidence that you provided this provisional 9 application to your patent agent on this 10 date? 11 A. Yes. 12 Q. How do I know that's true? How 13 do I know that this file contains everything 14 in the claim? 15 MR. PADMANABHAN: He just told 16 you. 17 A. Yeah. I mean, I haven't -- I 18 haven't been -- I haven't made decisions 19 about what is released to you and what isn't, 20 so I can't answer that other than to say this 21 is the -- you know, this is a log showing the 22 time that I sent the e-mail, and this will be

257 1 either the final or very close to the final 2 copy of the provisional patent. 3 Again, I'd have to go with a 4 tooth comb and reread both documents to 5 compare them line by line, side by side, but 6 I – you know, there wouldn't have been any 7 material changes from this document to the 8 final one that was signed, that -- that was 9 filed. 10 (BY MR. PLAIL) 11 Q. You mentioned that your attorney 12 rarely gave comments -- 13 A. Uh-huh. 14 Q. -- on the provisional 15 applications. 16 A. That's true. 17 By this point -- I mean, early on 18 he did, but I'd written a lot of patents by 19 this point. So, you know, broadly, he just 20 kind of accepted it and then started drafting 21 the utility based on it. 22 Q. So you would not expect any legal	259 1 words that are in the covered oath that goes 2 with it, but that would be the attachment. 3 Q. But it would have differences 4 from the provisional? 5 MR. PADMANABHAN: Objection, 6 misstates -- oh, objection, Rule 611. 7 A. I don't know the answer. 8 I doubt there were any 9 differences. I can't be sure without 10 comparing the documents. 11 (BY MR. PLAIL) 12 Q. So sitting here today, you are 13 not sure what the third entry on this log 14 says without reviewing it? 15 MR. PADMANABHAN: Objection, 16 Rule 611. 17 A. I mean, you're asking me if it's 18 precisely the same in every term in a 40-page 19 document. Am I confident that this -- this 20 file contains the invention? Yes, I'm 21 confident it contains the invention. 22 (BY MR. PLAIL)
258 1 advice to be contained within this 2 provisional patent? 3 A. Well, everything -- I mean, my 4 understanding is everything that's from 5 counsel is subject to client-attorney 6 privilege; but beyond that, I don't have an 7 opinion. 8 Q. So what does the relevance 9 document say? 10 A. This one? 11 Q. Yes. 12 A. It says, you know, the stuff 13 in -- this document, yeah, here is a 14 mathematical -- here's the basis of the 15 relevance formula for TransMail, and here's 16 the mathematics formulas that goes with it, 17 so -- yeah. 18 Q. Is that all it says? 19 A. Yeah. It's the same document, so 20 yeah, it's going to be -- that's what it's 21 going to say. I don't know what's in the -- 22 I can't recall the exact term, you know,	260 1 Q. All right. And that's based off 2 your review and analysis in preparing your 3 declaration? 4 A. Yes. This is the same -- it's 5 the same file, so yes. 6 Q. So you relied on this when you 7 made your testimony? 8 A. Yeah, I relied on this e-mail 9 log. I mean, there's no -- it came straight 10 from the attorney, so... 11 Q. All right. 12 A. I believe that it's accurate, 13 and -- you know, and they have the -- all of 14 the e-mails that I no longer have, so... 15 Q. And you relied on the underlying 16 file? You reviewed this underlying file, as 17 well? 18 A. I believe I did. I reviewed a 19 lot of files, but yes, I believe all of -- I 20 mean, I believe I reviewed it. 21 Q. And your review of that file 22 informed your testimony in your declaration?

261 1 A. Everything I read informed the 2 testimony in my declaration. 3 Q. So that's a "yes"? 4 A. Yes. 5 Q. Going back to 2046 -- 6 A. Yep. 7 Q. So that's the other three 8 documents that we previously -- sorry, the 9 entry two, entry four, and entry five on this 10 Page 18. 11 And -- 12 A. Yes. 13 Q. -- just to confirm, we previously 14 went through and confirmed that these are the 15 only four entries on this list that relate to 16 the claimed invention? 17 A. Yes. 18 Q. And when you sent this e-mail on 19 Wednesday, January 11th, 2006 -- 20 A. Uh-huh. 21 Q. -- was it that e-mail that 22 attached the file "BlueSpace Mail Relevance	263 1 me, is -- it doesn't relate to the main thing 2 I'm doing, spending my time doing, so I do 3 not recall every detail of every interaction 4 and conversation I've had with -- you know, 5 with counsel, looking at every one of these 6 documents. I don't recall all of it. 7 But I believe that I've seen the 8 unredacted version. I think the main -- I 9 mean, the main purpose in providing it was 10 just to reflect the fact that at the time I 11 didn't think that Jon Fernyhough had been a 12 significant contributor or in any way an 13 author to the -- to the patent. I think 14 that's why it was provided. 15 But like I say, I have reviewed, 16 you know, a large amount of forensic 17 documents in the process of preparing for 18 these -- all of these statements, so it's 19 hard for me to recall all of them from 20 memory. 21 Q. Okay. So just to recap... 22 A. Uh-huh.
262 1 JM 131105"? 2 A. I believe, yes. 3 Q. What are you saying here in this 4 e-mail? 5 A. I don't recall. 6 Q. During the break, your counsel 7 informed me that you have reviewed an 8 unredacted version of this file. 9 Does that refresh your 10 recollection? 11 A. No. I still don't recall, but 12 it's possible I have. 13 Q. Okay. What -- so you, sitting 14 here today, do not know what is under this 15 redaction? 16 A. Off the top of my head, I cannot 17 recall what's in it. 18 Q. And you, however, reviewed this 19 file in preparing your declaration? 20 A. Yeah. I mean, that was 21 several -- I mean, I have a lot of work I'm 22 doing; so I don't remember. I mean, this, to	264 1 Q. You do not know what's under this 2 first redaction here? 3 A. I do not remember it at this 4 time. 5 Q. The second e-mail, do you 6 remember what's under those redactions? 7 A. I do not remember it at this 8 time, from memory. 9 Q. And the third e-mail, do you 10 remember what's under that redaction? 11 A. I do not remember it at this 12 time, from memory. 13 Q. But you relied on the parts under 14 those redactions for when you were drafting 15 your declaration? 16 A. I must have done it because when 17 I wrote it, you know, I saw it. I mean, 18 again, I think that the -- the critical piece 19 of it was just confirmation. I mean, I 20 remember this sentence well, that -- about 21 Jon Fernyhough not being an author; but as to 22 the rest of it, you know, I can't remember

265 1 what else -- what's there right now. I don't 2 think any of it was very exotic, but there's 3 no point in me guessing, so... 4 Q. Well, for the first e-mail, 5 what's your best recollection for what's 6 under the redaction? 7 A. I don't remember. 8 Q. No -- 9 A. I have no recollection at this 10 time. 11 Q. The second e-mail? 12 A. Same answer. 13 Q. Third e-mail? 14 A. Same answer. 15 There's no point in me guessing 16 under oath. I mean, I cannot remember 17 offhand from memory of the hundreds of 18 documents that I've looked at in the process 19 of this trial or this, you know, 20 interaction -- I can't remember the details 21 of all of them. 22 Like, I remember the time I did	267 1 A. Yes. 2 Q. So you agree that you've relied 3 on this e-mail in forming the opinions in 4 your declaration? 5 A. Yes. 6 Q. And the only recollection you 7 have here, sitting -- sitting here today is 8 the one unredacted sentence from the e-mail? 9 A. Yes. It was the only piece that 10 was relevant. 11 Q. If you go back to 2046 -- 12 A. Uh-huh. 13 Q. -- do you recall whether the -- I 14 think we've already discussed -- sorry, what 15 do you mean by "relevant" there? 16 A. Well, none of it -- I mean, this 17 was the key sentence about whether Jon 18 Fernyhough would have been -- you know, 19 should be -- have considered to have been an 20 author or a creator of the patent; and so 21 that was the only sentence that we really -- 22 you know, that really focused on, was the
266 1 it. I obviously looked at it, but I can't 2 remember now. 3 Q. Do you recall anything else about 4 this document? 5 A. No. I mean, honestly, I think 6 this is a dance around a redaction. I just 7 don't -- but, you know, it's not my decision 8 how these e-mails get redacted when they're 9 released, so... 10 Q. Okay. So can we go to 2031? I'm 11 sorry, 2030. 12 A. That was one of the -- one of the 13 statements, right? 14 Q. One of your declarations. 15 A. Okay. Yeah. 16 Q. If you go to Page 12, paragraph 17 32... 18 A. Yeah. Yeah, Jon Fernyhough -- 19 yes. 20 Q. Do you see where you cite 2046, 21 the e-mail we were just discussing in this 22 paragraph, at the bottom?	268 1 fact that even at the time, you know, I was 2 confident that he wasn't an author and he 3 never provided, you know, content that would 4 be -- make him be considered to be one of the 5 creators of the -- of the IP in the patent. 6 So... 7 Q. And how can you determine that 8 that was the only relevant portion when the 9 rest is redacted? 10 A. I made a judgment call at that 11 time -- I mean, that we were looking at 12 whether Jon Fernyhough was considered -- 13 should be considered -- was being considered 14 a -- one of the creators of the patent; and 15 this was a clear indication of the record at 16 the time, that he wasn't. 17 Q. Sorry, a judgment call when you 18 made the redaction or a judgment call back in 19 January 12th, 2006? 20 A. Judgment call when I saw the 21 e-mail. I mean, the focus was on this one 22 sentence.

269 1 Q. So earlier you testified that you 2 didn't make the decision on what was or was 3 not redacted. 4 A. That's true. 5 Q. Okay. So -- 6 MR. PADMANABHAN: But you're 7 asking him about relevance. I just don't him 8 to go this way off -- 9 (Talking over each other.) 10 MR. PLAIL: I'm going to have 11 to -- speaking objection. 12 MR. PADMANABHAN: Okay. 13 Restate your -- restate your -- objection, 14 Rule 611. 15 (BY MR. PLAIL) 16 Q. Earlier you testified that you 17 didn't make a decision on what was not 18 redacted -- what was or was not redacted, 19 correct? 20 A. That is true, I did not make 21 decisions on what to redact. 22 Q. And earlier you testified that	271 1 on and what you don't. 2 My opinions on the -- of what -- 3 you know, what is relevant and isn't relevant 4 to waive -- you know, I'm not the 5 decisionmaker, and that decisionmaking is the 6 owner of the documents and the attorneys. 7 So you -- you know, I -- I 8 don't -- if I'd had the unredacted copy in 9 front of me right now, I would probably say, 10 yeah, that sounds like stuff I would have 11 written and it's completely benign; but I 12 don't have it in front of me at this moment. 13 So... 14 Q. So there's no way to confirm here 15 that what's under here is completely benign 16 since we don't have the unredacted version? 17 A. Not at this time. 18 MR. PADMANABHAN: Objection, 19 misstates -- objection, Rule 611. 20 (BY MR. PLAIL) 21 Q. So just to confirm, you said that 22 what is under this redaction is likely
270 1 this response here was an answer to a 2 question from Brian, right? 3 A. Yes, given the -- yes. I believe 4 that's true. 5 Q. And so you were here responding 6 to a question from counsel? 7 A. Yes. 8 Q. Earlier you said that you thought 9 this was "dancing around a redaction." 10 A. Uh-huh. 11 Q. What do you mean by that? 12 A. Well, it's not my decision what 13 gets redacted and what doesn't. I don't 14 think that any of the stuff under this 15 redaction, you know, in its unredacted form 16 would be in any way exciting. 17 But -- but it's not my decision 18 which -- you know, which pieces are redacted 19 and which aren't. 20 So you know, I -- I think there's 21 been a lot of concern around waiving client 22 privilege and what you waive client privilege	272 1 benign. 2 Does that mean it's likely just 3 transmittal of a document or not related 4 to -- not an attorney-client question or 5 communication? 6 MR. PADMANABHAN: Objection, 7 Rule 601, 602. 8 A. Can you restate the question? 9 (BY MR. PLAIL) 10 Q. You said that what is under this 11 redaction is likely benign. Does that mean 12 it's unlikely to be an attorney-client 13 question? 14 MR. PADMANABHAN: Objection, 15 Rule 601, 602, and 611. 16 A. I think it -- I mean, it's just 17 correspondence between me and an attorney 18 covered under client-attorney privilege. 19 I think the only reason that this 20 piece was released was because it relates to 21 authorship of the patent. The rest of the 22 patent is covered -- the rest of the e-mail

273 1 chain is covered by client-attorney 2 privilege; but, you know -- you know, I 3 can't -- like, I'm not the decisionmaker for 4 how these e-mails are redacted. 5 (BY MR. PLAIL) 6 Q. Okay. Can we turn back to the 7 updated 2041? And if you'd turn to the page 8 covering December [sic] 11th through 9 November 15th. 10 A. What does it -- 2041 look like 11 again? 12 MR. PADMANABHAN: Exhibit 5, 13 this one. 14 THE WITNESS: This one? 15 MR. PADMANABHAN: Yeah, yeah. 16 A. Okay. Which one? 17 (BY MR. PLAIL) 18 Q. The ones -- the page that covers 19 December -- October 11th through 20 November 15th. 21 A. Yeah. 22 Q. So just to confirm, we went	275 1 and other multi-security -- 2 A. It was more focused on TransMail 3 at the time, but yes. 4 Q. And you reference a letter to 5 Admiral Inman here in 2041. 6 Do you see that? 7 A. This is on -- in Section 10? 8 Q. Yes. 9 MR. PADMANABHAN: It's right 10 here. 11 A. Oh, okay. Yeah, right at the 12 end. Yeah, okay. 13 (BY MR. PLAIL) 14 Q. Okay. I'm going to show you that 15 letter. 16 A. Uh-huh. 17 (Whereupon Exhibit Number 7 was 18 marked for identification.) 19 (BY MR. PLAIL) 20 Q. All right. So this is a -- 21 appears to be a letter from you to Mr. Inman 22 on August 2nd, 2005.
274 1 through this whole document -- 2 A. Uh-huh. 3 Q. -- and of the documents 4 identified here, only this one listed as 5 "BlueSpace Mail Relevance JM," only that one 6 relates to the claimed invention; is that 7 correct? 8 A. Yes. 9 Q. Okay. All right. Can you go to 10 your declaration, 2030? 11 A. Yeah. 12 Q. Can you go to paragraph 10? 13 A. Yep. 14 Q. Here you mention working on an 15 investment round with an Admiral Inman in 16 April of 2005. 17 Do you see that? 18 A. Yep. 19 Q. And this investment round was not 20 dependent on the claimed invention, right? 21 A. Correct. 22 Q. And this related to the TransMail	276 1 Does that look right? 2 A. Yes. 3 Q. In this letter, you are 4 discussing some due diligence or, I guess, 5 the due diligence requirements from Grenifor 6 [sic]? 7 A. Gefinor. 8 Q. Gefinor; is that right? 9 A. Gefinor, yeah. 10 Q. But you are discussing the due 11 diligence requirements from Gefinor? 12 A. Yeah, discussing their -- their 13 investment. 14 Q. All right. And so this was early 15 stages with Gefinor? 16 A. Well, they had already -- let me 17 just check here. 18 I mean, I didn't think it was the 19 early stage. I think there had already been 20 a set of conversations. He had introduced me 21 to Prescott Winter, who -- who was the chief 22 information officer at a government -- an

277 1 intelligence agency. 2 So we'd already had a whole 3 bunch -- we'd had a bunch of meetings by this 4 point, but yes, go ahead. 5 Q. But at this point, Gefinor had 6 not yet invested? 7 A. That's true. 8 Q. Okay. And when did they 9 eventually invest? 10 A. I can't recall the exact date, 11 but it will be in some of the documents on 12 my -- 13 Q. If you go back over to paragraph 14 10 of your declaration, you see there the 15 investment eventually closed around 16 July 2006. 17 Does that sound right? 18 A. Yeah, it sounds right, yeah. 19 Q. Okay. If you look at paragraph 20 11... 21 A. Uh-huh. 22 Q. You mention that during this time	279 1 A. Yeah. 2 Q. And you were in the process of 3 restructuring the BlueSpace corporate 4 entities? 5 A. Yeah. 6 Q. And that involved rolling up 7 various BlueSpace legal entities and creating 8 new U.S. legal entities? 9 A. Yeah, yes, that's true. 10 Q. Okay. So why did you move 11 offices to the U.S.? 12 A. That was the best place to build 13 technology companies. 14 Q. And why cut headcount? 15 A. We looked at moving some of them. 16 We took it to be -- a business decision. 17 Q. And the business decision was 18 based off the cost of relocating them? 19 A. Relocating people and, you know, 20 it was difficult and just felt like, you 21 know, we could acquire new talent in the U.S. 22 to continue the development. I think the --
278 1 frame, and then you say from June 2005 to 2 December 2005? 3 A. Yep. 4 Q. Is that the time frame you're 5 referring to? 6 A. Well, I'm just saying general 7 time frame. I'm not saying that the time 8 frame -- I'm saying that the time frame 9 included the period June 25 -- 2005 to 10 December 2005, so I'm talking about the 11 general time frame and that third month being 12 a subset of that time frame. 13 Q. What is the scope of the general 14 time frame, 2005 as a whole? 15 A. Yeah. I would -- you know, yes. 16 Let's say -- let's say that I -- I'm talking 17 about 2005 through to the first half of 2006. 18 Q. And you mentioned that you shut 19 down your UK office -- 20 A. Yep. 21 Q. -- let go of the vast majority of 22 the European headcount?	280 1 you know, the team in Europe retired, so it 2 just -- it was a business decision. 3 Q. And why restructure the BlueSpace 4 legal entities? 5 A. We had an overly complicated 6 legal structure that was designed by the rest 7 of the team. So they wanted to be a 8 Bermudan-type company and then a licensing 9 arrangement to the UK and the other entities 10 so that they could ultimately declare 11 corporate tax in Bermuda, where the tax rate 12 was low. 13 But like, I mean, the company 14 never made a profit; so it was irrelevant. 15 It was just a, you know, cost overhead that 16 some of the folks on the team thought was a 17 good idea. 18 Q. And so none of these activities 19 related to the claimed invention? 20 A. True, they didn't relate to the 21 claimed invention, and they were taking my 22 time, clearly; but they didn't relate to the

281 1 claimed invention. 2 Q. So if we look at the next 3 section, it says "Work during June 7, 2005, 4 to August 21, 2005." 5 Do you see that? 6 A. Uh-huh. 7 Q. You mention a number of 8 activities during this time period. 9 A. Yeah. 10 Q. If you go to paragraph 18... 11 A. Uh-huh. Yep. 12 Q. You say [as read]: "I was 13 working on a number of other tasks for 14 BlueSpace." 15 A. Yeah. 16 Q. Are those "other tasks" the tasks 17 we had just discussed above? 18 A. You know, I mean, I was doing 19 sales; I was doing -- you know, organizing 20 restructuring; I was closing the investment 21 rounds; you know, doing the investor 22 relations. So, you know -- and product	283 1 Q. And the addition of Section 10 on 2 software implementation? 3 A. Yep. 4 Q. And the addition to Section 11, 5 conclusion -- 6 A. Yep. 7 Q. -- right? 8 What was the added and revised in 9 Section 9, the mathematics? 10 A. I don't recall at this time; but 11 you know, I think this is the process of my 12 father continuing to -- to develop the 13 mathematics; and, you know, there was a lot 14 of statistics, and it was a long process 15 that -- that it took to make it. 16 So I think he just was continuing 17 to refine the -- the formulae that were in 18 it. 19 Q. In paragraph 17 you say [as 20 read]: "I anticipate it would have taken 20 21 hours to make the revisions"? 22 A. Yeah.
282 1 management. So I was doing a whole bunch of 2 different tasks that are involved in being 3 the CEO of a technology company. 4 Q. Okay. If you look at paragraph 5 15, say, between June 7th and August 16th, 6 you added 16 pages to the draft patent 7 application; and you're referring to the 8 difference between Exhibit 2006 and 2007. 9 Do you see that? 10 A. Yeah. 11 Q. Okay. And you list a number of 12 changes made to the document. 13 Do you see that? 14 A. Yep. 15 Q. Okay. If you go on to the next 16 page... 17 A. Uh-huh. 18 Q. One of the changes you list is 19 additions and revisions to Section 9 on the 20 mathematics. 21 Do you see that? 22 A. Yep.	284 1 Q. Okay. And that's your time or 2 your and Paul Marston's time? 3 A. That's my time on my -- 4 Q. Or you and Paul Marston's time? 5 A. I think -- I think that would be 6 both of our time. I think that's what I 7 meant when I wrote that. 8 Q. Okay. And so just to -- well, I 9 guess, going to the next section, 23, 10 paragraph 23, this is related to work done 11 during August 21 to September 21. 12 A. Okay. Yes. 13 Q. If you go to paragraph 20 -- 14 sorry, if you go to paragraph 23, you discuss 15 some -- some changes made to the draft patent 16 application; is that right? 17 A. Yes. 18 Q. Yeah. 19 About how many hours did it take 20 to make the changes to Exhibit 2032? 21 A. I don't know that I recall at 22 this time.

285 1 Q. Rough estimate. 2 A. Yeah, I'd have to compare the 3 two. I don't have -- I don't have an 4 estimate at this time. 5 Q. I'm going to hand you 6 Exhibit 2032. 7 A. Thanks. 8 (Whereupon Exhibit Number 2032 9 was shown.) 10 A. Thanks. 11 And then comparing this to? 12 Which one am I comparing this to? 13 (BY MR. PLAIL) 14 Q. It looks like 2073. 15 A. Okay. 16 (Whereupon Exhibit Number 2073 17 was shown.) 18 A. Thanks. 19 Yeah, I think the main defenses 20 are going to be in the math. So let me look 21 at this. 22 Yes. I think you should ask that	287 1 those two pages; so if I was estimating, I 2 would say -- I would say three -- you know, 3 something like three hours for the -- 4 Q. Okay. 5 A. -- you know, diagram and the 6 definitions; and then there must be some 7 other changes in it, as well, I would think. 8 So because this is still -- this still -- 9 yeah, this -- there's some -- there's some 10 other changes through here, as well, because 11 it's going by -- another page. 12 Q. Okay. So in terms of a total 13 estimate of how long it took to create 14 2032 -- 15 A. Yeah, let's say -- and, I mean, 16 the thing in all of this is that, like, I 17 could see the text that I wrote and the 18 diagram that I wrote, and I don't think it 19 took me more than, say, three hours to do 20 that. 21 But for the mathematics section, 22 you would have to -- that's my father,
286 1 question to my father because if you look at 2 the two documents, they're pretty much 3 identical up to the beginning of the 4 mathematical algorithm framework section on 5 Page 55, Page 55 in both documents; and from 6 there, that's where -- you know, so there's 7 essentially three additional pages in this, 8 versus the original, and all of that were in 9 the mathematics section, which is the section 10 he primarily worked on. 11 Q. And if you look at 2032, it looks 12 like a section called "definitions" was added 13 to the mathematics section. 14 A. Which page is that? 15 Q. 55 of '32, 55 of Exhibit 2032. 16 A. So -- oh, yeah, okay. Yeah, so 17 that's the point at which they diverge, yes. 18 Q. Okay. 19 A. Yeah, so that's been added. 20 Q. And then the figure on the next 21 page was added? 22 A. Okay. So I probably created	288 1 because you could have two formulae that are 2 the same length; but it could have taken a 3 lot of time to get from one to the other. So 4 I would -- I would ask him that question. 5 Q. And at this point the 6 mathematical formulas were still being 7 developed? 8 A. Yeah. I -- based on a 9 combination or a comparison of the two, but 10 yes, I believe that's true, yes. 11 Q. And so you say to the best of 12 your recollection, you spent about three 13 hours on that? 14 A. On those two pages, correct. 15 Q. Can we go to paragraph 26? 16 A. Of this one again? 17 Q. Yes. 18 A. Yep. 19 Q. So this is work done between 20 September 21 and October 2 through 7. 21 A. Okay. 22 Q. You say that you prepared another

289 1 version of E-X -- or sorry, another version 2 of the provisional application. 3 Do you see that? 4 A. Yeah. 5 Q. And so not to belabor the point, 6 but if you go through, you discuss -- in 7 paragraph 26, you discuss one; paragraph 27, 8 28, 29, 30, you discuss various edits to the 9 draft. 10 A. Uh-huh. 11 Q. Kind of sums up in paragraph 34. 12 And in there you say, in total, 17 additional 13 pages of material were added. 14 [As read]: "I anticipate that 15 would take approximately another 55 hours to 16 prepare the additional material during the 17 time frame of August 17th through 18 October 6th." 19 A. Uh-huh. 20 Q. So this is the amount of time 21 that you and Paul Marston spent in preparing 22 the provisional application between	291 1 was shown.) 2 A. Okay. Yeah. 3 (BY MR. PLAIL) 4 Q. So where do you think the 5 majority of the changes were between these 6 two, in the mathematical formula section or 7 elsewhere? 8 A. Okay. So that one's on 59, this 9 one's on 55. 10 So yeah, I mean, it's -- this 11 one's got the additional picture and 12 definition ahead of that, I think, yeah; so 13 it's got algorithm definition -- algorithm 14 overview. I think that's a new section. 15 So I think my father worked on 16 Section 9 in the new document, including the 17 statistical terms for each of the different 18 things that I defined; and then I worked on 19 that diagram. 20 And then from there, you know, 21 there's another -- so the majority of the 22 changes were in the mathematical section.
290 1 August 17th and October 6th? 2 A. Yeah. I mean, we added -- how 3 many pages is that? You know, 17 pages, 4 right? 5 Q. Uh-huh. 6 And those 17 pages, were they 7 mostly related to the mathematical models? 8 A. I'd have to compare the two 9 again, to -- to see. 10 Q. Okay. 11 A. But yes, the math -- you know, 12 really the -- the concept was developed 13 first, all of the screenshots were developed, 14 and then -- you know, then we got into the 15 math; but sure, show them to me if you like, 16 yeah. 17 Q. This is 2008. 18 (Whereupon Exhibit Number 2008 19 was shown.) 20 (BY MR. PLAIL) 21 Q. And then I'll give you 2010. 22 (Whereupon Exhibit Number 2010	292 1 Q. Okay. 2 A. Yes. 3 Q. Okay. If you go to the next 4 section, this is discussing work between 5 October 7th and November 8th. 6 A. Yeah, 39, yeah. 7 Q. Yeah. You discuss preparing an 8 additional -- Exhibit 2034 and then 9 Exhibit 2035. 10 A. Uh-huh. 11 Q. And it goes on; and then at the 12 end of this section, kind of sums up again in 13 paragraph 47 -- it says, [as read]: "I 14 anticipate that it would take approximately 15 30 hours to prepare the document filed as 16 Exhibit 2013." 17 A. Uh-huh. 18 Q. So just to confirm, this would be 19 an additional 30 hours between the period of 20 October 7th through November 8th? 21 A. Yes. 22 Q. Okay. And that leaves us at

293 1 2000 -- Exhibit 2013. 2 A. Uh-huh. 3 Q. So moving on to November 13th 4 through January 11th, this section -- 5 MR. PADMANABHAN: On the next 6 page. 7 A. Yeah. 8 (BY MR. PLAIL) 9 Q. -- does not reflect any specific 10 work on the provisional application at this 11 time; is that right? 12 A. Yeah. There was a -- there was a 13 period where it was very focused on the 14 investment close and the holidays. 15 Q. Okay. And so during this time, 16 you did not specifically work on the 17 provisional application? 18 A. No, I don't believe so. 19 Q. You have a section here called 20 "Other documents" from September 2nd, 2004, 21 through June 7th, 2005? 22 A. At which paragraph number is	295 1 And you say, [as read]: "Paul 2 Marston is providing feedback to me regarding 3 the draft." 4 Do you see that? 5 A. Yeah. 6 Q. So this is a summary of 7 Mr. Marston -- I'm sorry, Mr. Paul Marston's 8 feedback on the relevance models at that 9 time, May 17th, 2005? 10 A. Okay. 11 Q. Do you agree? 12 A. Yeah. 13 Q. All right. And so this was 14 exchanged as part of both of you working 15 together on creating the relevance models, 16 correct? 17 A. Yeah. 18 Q. Have you ever reviewed any source 19 code or code from Twitter? 20 A. No. 21 Q. Or any products by X Corp.? 22 A. Not -- well, have I reviewed it?
294 1 this? Oh, yeah, got it. 2 Q. 57. 3 A. Yeah, uh-huh. 4 Q. I believe we've already discussed 5 paragraph 58; but that refers to Mr. Jones's 6 comments on the algorithms, correct? 7 A. Jones... what was his first 8 name? 9 Q. Tony Morton-Jones. 10 A. Oh, Jones, okay. Yeah, yeah. 11 Q. If you'd go to paragraph 63... 12 MR. PADMANABHAN: 63? 13 MR. PLAIL: Uh-huh. 14 A. Okay. 15 (BY MR. PLAIL) 16 Q. This relates to a document 17 entitled "Some Thoughts on the TransMail 18 Relevance/Importance Algorithm"? 19 A. Okay. 20 Q. You say, [as read]: "This 21 relates to our work on the provisional patent 22 application."	296 1 Have I -- have I ever touched Twitter up to 2 now or in the time of the patent? 3 Q. Source code. 4 A. Source code. 5 Q. Yeah. 6 A. No. 7 Q. Have you ever reviewed code for 8 Facebook? 9 A. No. 10 Q. Or Instagram? 11 A. No. 12 Q. All right. All right. 13 MR. PLAIL: We should take a 14 break. 15 THE WITNESS: Okay. 16 (Break taken from 3:24 p.m. to 17 3:29 p.m.) 18 (BY MR. PLAIL) 19 Q. Just one more quick line of 20 questioning, and then -- 21 A. Sure. 22 Q. -- I'll get you out of here.

Transcript of Justin Marston
Conducted on November 11, 2025

75 (297 to 300)

297 1 All right. I just want to 2 summarize what we talked about most recently, 3 the -- 4 A. Okay. So back to this one? 5 Q. Back to 2030, yeah -- 6 A. Okay. Okay. 7 Q. -- looking at work done between 8 June 7th and August 21. 9 MR. PADMANABHAN: What page are 10 you on? Page 5, okay. 11 MR. PLAIL: Yeah. 12 A. Yeah. 13 (BY MR. PLAIL) 14 Q. Approximately 20 hours of work -- 15 you and Paul Marston put in approximately 20 16 hours of work between June 7th and August 21 17 on the provisional application. 18 A. Which paragraph number is that? 19 Q. 17. 20 A. Yes, it's a guess, but yes. 21 Q. For August 21 through 22 September 21 on Page 8 --	299 1 application? 2 A. Yes. 3 Q. Looking at the time period of 4 October 7th through November 8th through 5 13th -- 6 A. Uh-huh. 7 Q. -- if you look at paragraph 47, 8 you and Paul Marston spent about 30 hours 9 between October 7th and November 13th on the 10 provisional application? 11 A. Uh-huh, yes. 12 Q. And for the time period between 13 November 13th and January 11 through 13, you 14 testified that you did not spend any 15 particular hours on -- 16 A. Yes. 17 Q. -- the provisional application? 18 A. Correct. 19 Q. Okay. And does that include Paul 20 Marston? 21 A. Ask him. 22 Q. I mean, I'm just going based off
298 1 A. Yeah. 2 Q. -- you estimated that you spent 3 three hours of work on a provisional 4 application between -- 5 A. Yes, me myself. 6 MR. PADMANABHAN: Yeah, but 7 objection, Rule 611. 8 Go ahead. 9 (BY MR. PLAIL) 10 Q. And you were not sure how much 11 Paul Marston had. 12 A. That's correct. 13 Q. Okay. If we go to September 21st 14 through October 7th -- 15 A. Yeah. 16 Q. -- on 10 -- 17 A. Uh-huh. 18 Q. -- if you look at paragraph 34 -- 19 A. Yes. 20 Q. -- you and Paul Marston spent 21 approximately 55 hours between September 21st 22 and October 7th on the provisional	300 1 your declaration. 2 You don't reference any 3 particular work done in that time period or 4 any drafts created in that time period? 5 A. Yeah, that was likely true. 6 I mean, he would have a better 7 recollection of how he spent his time than I 8 would have as to how he spent his time, but 9 yes, I don't think I did, so... 10 Q. But based off of what you know 11 here today, Paul Marston also did not spend 12 any time on the provisional application 13 between November 13th and January 13th, 2006? 14 A. I believe that. You should ask 15 him, though, yeah. 16 Q. Okay. All right. 17 MR. PLAIL: I think that's all 18 my questions. I pass the witness. 19 MR. PADMANABHAN: Do you want 20 to step out for just a second? 21 THE WITNESS: Yeah. Are we 22 done?

Transcript of Justin Marston
Conducted on November 11, 2025

76 (301 to 304)

301 1 (Break taken from 3:33 p.m. to 2 3:38 p.m.) 3 MR. PADMANABHAN: Yeah, I just 4 want to say I have no questions for the 5 witness, and we'll read and sign. 6 THE COURT REPORTER: You need a 7 copy of the deposition, correct? 8 MR. PADMANABHAN: Yes, I do; 9 and can you get us a rough? 10 THE COURT REPORTER: Yes. The 11 final has been ordered expedited. Do you 12 want that? 13 MR. PADMANABHAN: We don't need 14 the final expedited. They do, we don't. 15 MR. PLAIL: We do. 16 * * * * * 17 MR. PLAIL: For whenever the 18 word "[GOVERNMENT ENTITY]" is used, if we can 19 just replace that. 20 MR. PADMANABHAN: With 21 "[GOVERNMENT ENTITY]." 22 (Deposition concluded.)	303 1 attorney to any of the parties to this 2 action, and that I am in no way interested, 3 financially or otherwise, in the outcome of 4 this matter. 5 IN WITNESS WHEREOF, I have hereunto set 6 my hand this 14th day of November, 2025. 7 8  9 Annette Peltier, Texas CSR 3253 10 Expiration Date: 10/31/27 11 Firm Registration No. 686 12 451 Hungerford Drive 13 Suite 400 14 Rockville, MD 20850 15 Phone: 888.433.3767 16 Fax: 888.503.3767 17 18 19 20 21 22
302 1 Certificate of Shorthand Reporter 2 3 I, Annette Peltier, CSR, Texas 4 Certified Realtime Reporter in and for the 5 State of Texas do hereby certify: 6 That Justin Marston, the witness whose 7 deposition is herein before set forth, was 8 duly sworn before the commencement of such 9 deposition and that such deposition was taken 10 before me and is a true record of the 11 testimony given by such witness. 12 I further certify that the adverse 13 party, Sterling Computers Corporation, was 14 represented by counsel at the deposition. 15 I further certify that the deposition 16 of Justin Marston occurred at the offices of 17 Regus Business Center, Austin, Texas, on 18 November 11, 2025, commencing at 9:09 a.m. 19 to 3:39 p.m. 20 I further certify that I am not related 21 to any of the parties to this action by blood 22 or marriage, I am not employed by or an	

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Transcript of Justin Marston
Conducted on November 11, 2025

77

A			
a-levels	148:2, 155:19,	66:18, 147:3	activities
57:6	156:2, 161:16,	accessible	222:6, 280:18,
abandoned	162:3, 162:17,	70:7, 90:7	281:8
54:21	163:22, 164:12,	accordance	activity
abc	165:20, 166:5,	95:7, 106:5,	210:8, 223:15
184:9	167:4, 167:7,	130:21, 132:4	actors
ability	171:12, 172:5,	according	81:11
63:9, 71:18	173:11, 197:3,	112:20, 185:9,	actual
able	197:5, 221:10,	185:10, 185:13,	133:12, 164:1
52:1, 64:3,	222:13, 227:7,	185:14	actually
83:19, 86:17,	227:11, 246:7,	accuracy	16:5, 23:17,
87:2, 92:5,	246:18, 248:10,	163:6	56:6, 63:7,
92:6, 122:15,	248:16, 251:11,	accurate	67:22, 68:4,
123:14, 124:20,	256:19, 264:20,	23:22, 26:5,	68:15, 69:12,
130:4, 132:16,	266:3, 267:17,	163:4, 209:17,	84:10, 186:19,
136:8, 137:18,	269:7, 278:10,	213:10, 214:3,	191:22
138:3, 146:11,	278:17, 284:19,	227:2, 260:12	add
146:13, 156:21,	288:12, 297:2,	acquire	151:13, 164:8,
157:4, 199:18,	299:8	279:21	164:9, 172:17
200:12, 206:22,	above	acquired	add-ons
229:1	68:6, 93:15,	31:8	72:9
about	95:12, 106:4,	acquisition	added
7:18, 10:5,	116:15, 281:17	77:12, 77:15	167:4, 167:7,
10:14, 10:20,	above-styled	across	181:21, 182:3,
13:19, 17:17,	2:4	16:2, 34:13,	182:18, 183:2,
17:21, 25:15,	abridged	35:22, 36:5,	184:5, 282:6,
27:9, 31:3,	43:9	85:15, 85:18,	283:8, 286:12,
33:13, 33:15,	abstract	107:19, 220:20	286:19, 286:21,
35:12, 35:13,	78:1	acted	289:13, 290:2
35:14, 35:16,	accepted	122:4, 218:22	adding
35:21, 36:12,	257:20	acting	172:13, 172:14
42:4, 45:16,	access	75:21, 76:3	addition
48:6, 49:11,	36:16, 52:4,	action	198:6, 283:1,
56:20, 62:1,	63:3, 65:11,	12:10, 115:8,	283:4
64:3, 70:21,	66:6, 66:13,	116:21, 157:13,	additional
74:7, 74:9,	67:6, 89:10,	157:14, 302:21,	99:17, 183:3,
75:14, 75:17,	91:9, 91:21,	303:2	286:7, 289:12,
81:1, 81:2,	136:8, 136:9,	actions	289:16, 291:11,
88:21, 90:20,	138:8, 138:12,	36:14, 37:15,	292:8, 292:19
93:22, 94:11,	148:1, 155:16,	81:9, 95:20,	additions
97:8, 97:9,	155:20, 232:6,	111:4, 113:19,	180:1, 180:20,
97:11, 109:9,	233:17, 234:19,	115:14, 118:12,	181:2, 282:19
128:22, 131:18,	237:2, 249:14,	118:18, 118:20,	address
135:8, 138:19,	249:16, 249:20,	119:4, 158:1	8:22, 49:19,
142:4, 142:6,	249:22, 250:3,	active	160:14, 161:17,
147:18, 148:1,	256:4	32:10, 32:11	167:12
	accessed	actively	adjournment
	35:21, 36:12,	16:9	4:5

adjust 112:19 adjusts 119:6, 119:8 admiral 274:15, 275:5 adopting 16:6 advantages 88:14 adverse 302:12 advice 229:17, 231:11, 235:4, 236:12, 240:16, 258:1 advise 164:21 advisory 193:2 after 13:17, 13:21, 24:19, 31:8, 31:19, 32:6, 50:19, 61:10, 61:11, 68:16, 174:14 afterwards 53:22 again 22:13, 29:10, 32:6, 47:11, 51:12, 52:20, 61:8, 62:21, 66:8, 70:20, 81:22, 102:14, 111:7, 118:15, 124:7, 126:15, 140:19, 152:17, 156:6, 166:8, 168:4, 169:15, 184:10, 186:8, 194:15, 212:13, 213:5, 222:3, 228:7, 237:20, 242:15, 245:1, 257:3, 264:18, 273:11, 288:16,	290:9, 292:12 agency 211:18, 277:1 agent 256:9 ago 9:11, 12:9, 33:5, 57:2, 57:3, 59:17, 62:21, 68:21, 73:5, 184:14, 210:4, 230:3 agree 86:6, 86:20, 188:15, 242:8, 251:21, 267:2, 295:11 agreements 77:11 ahead 24:3, 108:13, 116:19, 208:10, 209:8, 227:19, 247:13, 277:4, 291:12, 298:8 ai 157:6 algorithm 101:19, 101:22, 102:3, 102:7, 119:21, 133:8, 151:7, 153:21, 160:17, 177:19, 286:4, 291:13, 294:18 algorithmic 175:4, 175:6 algorithms 83:5, 84:6, 86:7, 86:12, 102:9, 104:5, 104:19, 105:4, 118:22, 119:13, 123:16, 124:6, 125:18, 126:20, 128:4, 129:13, 149:16, 149:22, 154:21, 162:13,	167:17, 199:5, 202:12, 294:6 alleviate 39:9 allow 14:11, 49:15, 166:11 allowed 19:4, 19:10, 33:21, 64:10, 91:20, 137:14, 155:15 allowing 71:21, 90:14 allows 65:11, 95:8, 98:1, 101:4 alone 52:20 alpha 192:12 already 91:11, 91:17, 132:22, 139:1, 139:12, 141:1, 149:1, 170:16, 179:10, 189:17, 194:18, 197:11, 200:18, 203:22, 207:11, 220:1, 235:22, 236:1, 242:22, 243:6, 267:14, 276:16, 276:19, 277:2, 294:4 also 16:10, 38:14, 48:7, 55:9, 57:5, 69:15, 72:8, 72:11, 72:21, 72:22, 76:19, 88:10, 88:18, 98:6, 102:19, 125:3, 156:16, 166:20, 182:9, 182:17, 184:9, 185:12, 207:16, 218:16,	300:11 altogether 39:15 always 57:22, 73:9, 107:21, 166:16, 255:1 amazon 104:7, 162:5 america 217:16, 217:19 among 96:14 amount 39:16, 96:14, 104:14, 159:22, 263:16, 289:20 analogous 154:9, 155:6, 155:10 analyses 110:13 analysis 80:2, 80:9, 81:6, 108:20, 109:21, 113:13, 127:11, 127:14, 128:3, 129:10, 129:22, 130:5, 213:6, 260:2 analyst 33:19, 34:1, 34:20, 64:4, 137:21, 138:3, 138:12, 144:7, 145:20, 146:1, 148:4, 148:5 analyst's 35:1 analysts 144:8, 144:17 analytical 112:19 analyze 154:22 andreea 219:2, 219:15 andrew 175:17, 175:19,
---	---	--	--

Transcript of Justin Marston
Conducted on November 11, 2025

79

186:2, 186:4, 238:5, 238:6 annette 1:29, 2:6, 302:3, 303:9 another 48:8, 73:6, 81:15, 85:20, 107:8, 122:15, 139:8, 141:15, 144:1, 145:18, 165:10, 179:16, 182:18, 206:6, 227:12, 253:1, 287:11, 288:22, 289:1, 289:15, 291:21 answer 8:9, 28:9, 31:11, 31:12, 40:7, 44:6, 45:20, 47:3, 48:17, 48:19, 53:14, 54:17, 55:15, 65:16, 76:5, 76:22, 78:14, 102:12, 103:13, 110:3, 110:18, 116:19, 128:7, 151:1, 159:9, 179:6, 190:17, 256:20, 259:7, 265:12, 265:14, 270:1 answering 9:13, 128:19, 247:9, 247:22, 248:3 answers 8:6, 53:6 anticipate 283:20, 289:14, 292:14 any 10:16, 31:14, 34:4, 42:18, 46:10, 53:19, 75:8, 75:19,	77:10, 82:7, 82:9, 82:13, 82:18, 83:9, 83:21, 85:1, 101:1, 104:18, 109:2, 111:10, 111:16, 139:4, 153:8, 154:22, 156:2, 160:13, 161:1, 164:9, 164:10, 176:21, 178:6, 179:5, 196:18, 196:20, 200:16, 201:14, 210:11, 212:21, 214:10, 214:13, 215:6, 222:21, 225:9, 225:11, 227:4, 228:11, 236:17, 238:11, 239:11, 240:4, 240:7, 240:21, 241:3, 241:7, 243:3, 246:21, 248:17, 255:3, 257:6, 257:22, 259:8, 263:12, 265:2, 270:14, 270:16, 293:9, 295:18, 295:21, 299:14, 300:2, 300:4, 300:12, 302:21, 303:1 anybody 46:7, 54:19, 110:9, 161:1, 194:5 anymore 108:7 anyone 10:12 anything 60:19, 61:5, 61:6, 114:22, 115:19, 136:15, 182:4, 237:9, 247:7, 266:3 aol 65:5, 65:7,	65:17, 66:9 aol-approved 66:5 apart 204:12, 244:21 apologize 202:8 app 153:6 apparent 173:6 apparently 245:11 appeal 1:4 appear 93:4, 165:11, 191:2, 212:12, 213:4, 213:21, 231:1 appearances 4:3 appears 62:9, 79:4, 159:3, 159:12, 165:12, 210:20, 228:7, 275:21 application 4:31, 5:2, 11:14, 13:3, 15:7, 19:10, 19:11, 73:21, 88:17, 88:19, 89:4, 92:8, 116:21, 135:19, 139:19, 140:1, 146:10, 146:12, 153:2, 153:7, 170:22, 175:16, 177:10, 225:20, 226:13, 226:21, 227:5, 227:22, 228:12, 231:12, 234:4, 234:10, 235:15, 237:10, 237:13, 237:15, 245:7, 245:8, 256:9, 282:7,	284:16, 289:2, 289:22, 293:10, 293:17, 294:22, 297:17, 298:4, 299:1, 299:10, 299:17, 300:12 applications 15:16, 20:17, 67:6, 78:10, 89:7, 116:2, 235:6, 235:18, 235:22, 236:13, 238:10, 257:15 applied 152:8, 234:14 apply 152:14 appreciate 24:13 approach 112:19, 112:21, 171:13 approaches 108:17, 109:1 approved 57:9 approximately 289:15, 292:14, 297:14, 297:15, 298:21 approximation 163:3, 168:9 apps 41:2, 41:16, 42:16, 42:18 april 274:16 architecture 41:4, 90:17, 95:5, 106:7 archive 206:10 archiving 71:8 area 163:17, 193:16, 193:19, 194:4, 200:7
---	---	--	---

aren't 54:1, 270:19 around 14:2, 23:14, 23:19, 33:6, 38:6, 51:2, 52:10, 52:11, 71:7, 71:15, 71:22, 98:11, 142:22, 146:20, 157:7, 176:6, 178:1, 186:13, 197:3, 215:1, 247:3, 266:6, 270:9, 270:21, 277:15 arrangement 280:9 art 87:2, 87:6, 87:10, 110:14, 110:19, 122:13, 124:10, 125:17, 128:2, 129:12, 129:16, 129:17, 139:1, 198:1, 198:4, 198:11, 199:21, 200:3, 203:2 artisan 202:11, 202:17 ascribe 46:14, 102:20, 229:2 ascribed 122:19, 122:20 ash 216:7, 216:8 asked 248:6, 248:10, 248:11 asking 20:12, 21:13, 44:12, 45:5, 55:12, 97:2, 117:21, 126:3, 190:16, 246:7, 259:17, 269:7	aspect 107:9 aspects 193:7, 194:9, 202:2 assets 29:4, 32:19 assign 136:2 assigned 144:12 assistance 201:5 associate 26:18, 135:15 associated 112:18, 138:4 assume 48:18, 161:21, 253:8 attached 2:13, 225:10, 254:5, 261:22 attachment 146:18, 146:19, 252:18, 259:2 attachments 146:9, 231:2 attempt 123:18, 124:8, 128:14, 129:17 attempted 101:18, 187:7 attempting 99:4, 116:3, 169:21, 172:3, 186:21 attesting 206:4 attorney 9:9, 82:15, 216:18, 226:14, 255:5, 257:11, 260:10, 272:17, 303:1 attorney-client 272:4, 272:12 attorneys 12:6, 41:22,	222:18, 225:11, 225:21, 227:14, 271:6 attribute 99:1, 99:19, 101:2, 101:6, 137:6, 137:7, 160:22 attributes 94:3, 98:20, 99:7, 99:16, 100:2 audience 145:14, 145:15 audiences 154:2 audit 36:1, 116:4 auditing 114:10, 115:5, 115:14, 116:22 august 224:4, 224:11, 275:22, 281:4, 282:5, 284:11, 289:17, 290:1, 297:8, 297:16, 297:21 austin 2:10, 9:1, 216:19, 302:17 author 184:22, 185:8, 188:4, 195:2, 215:11, 216:2, 248:7, 255:4, 263:13, 264:21, 267:20, 268:2 authored 145:17, 184:18 authors 156:1, 248:6 authorship 272:21 available 87:3, 154:4 aware 105:1, 206:17	away 20:4 B back 33:3, 34:15, 44:14, 45:15, 49:10, 49:18, 53:5, 55:16, 68:16, 69:5, 69:9, 69:10, 72:12, 73:16, 90:16, 92:18, 140:12, 140:18, 144:6, 151:16, 156:4, 158:2, 166:13, 166:18, 170:2, 174:11, 174:19, 175:12, 193:8, 202:3, 205:6, 205:17, 215:8, 224:1, 226:2, 228:4, 230:9, 232:13, 235:11, 237:20, 244:14, 250:21, 251:2, 261:5, 267:11, 268:18, 273:6, 277:13, 297:4, 297:5 back-and-forth 222:13 back-end 168:20, 169:11 backed 26:19 backer 30:15 background 55:20, 58:18, 193:5, 198:7, 199:8, 199:9, 199:10 backgrounds 163:19 backup 203:20 backups 206:20
--	--	--	--

Transcript of Justin Marston
Conducted on November 11, 2025

81

bad 37:11, 54:4 bamboo 24:20 bank 33:18 banker 33:20, 34:3, 34:21, 34:22, 64:3, 137:21, 138:8, 144:7, 145:20 banks 35:14 bar 181:9 barrel 48:3 based 12:6, 37:14, 41:3, 57:11, 63:21, 69:16, 87:12, 96:18, 97:20, 98:19, 99:1, 99:5, 99:7, 100:2, 100:22, 101:19, 101:22, 102:3, 102:6, 102:8, 104:11, 111:3, 111:22, 118:11, 118:18, 121:16, 125:5, 127:18, 129:18, 133:11, 142:5, 146:14, 153:20, 155:15, 156:1, 185:22, 255:8, 257:21, 260:1, 279:18, 288:8, 299:22, 300:10 basically 63:19, 65:10, 70:18, 71:17, 79:4, 83:9, 91:7, 109:11, 151:5, 206:2, 209:7	basing 253:15 basis 160:4, 162:20, 254:18, 258:14 bates 62:4 bear 217:22 became 66:4, 71:14, 72:1, 72:20, 151:4, 176:13 because 17:20, 18:9, 18:12, 19:13, 20:22, 21:5, 21:22, 22:6, 33:21, 34:5, 34:17, 35:2, 35:20, 40:1, 41:6, 42:18, 44:20, 45:22, 50:3, 50:6, 51:13, 52:12, 54:20, 63:5, 63:10, 65:21, 66:2, 66:3, 67:2, 70:16, 82:20, 98:16, 108:6, 126:1, 132:18, 133:18, 144:8, 144:12, 146:11, 153:16, 158:3, 166:18, 183:20, 184:19, 192:11, 246:21, 248:19, 264:16, 272:20, 286:1, 287:8, 287:10, 288:1 become 36:14 been 7:2, 7:9, 27:2, 31:7, 44:6, 71:1, 74:8, 139:12, 144:12,	149:2, 150:11, 155:11, 170:16, 175:8, 175:10, 179:10, 181:15, 183:7, 184:5, 186:17, 187:20, 189:17, 191:17, 192:8, 194:18, 197:3, 197:11, 200:18, 201:19, 207:11, 220:1, 228:4, 243:6, 244:18, 244:21, 250:1, 252:17, 254:8, 254:11, 256:18, 257:6, 263:11, 267:18, 267:19, 270:21, 276:19, 286:19, 301:11 before 1:4, 2:6, 7:10, 31:7, 60:12, 157:6, 173:11, 185:22, 202:5, 209:11, 226:21, 227:17, 228:12, 302:7, 302:8, 302:10 beginning 223:22, 286:3 behalf 3:3, 3:11, 235:2, 238:4 behave 122:10, 132:20, 143:13 behaved 134:10 behaves 143:15 behavior 37:8, 37:12, 132:21, 133:11, 133:12 being 36:15, 38:12, 63:14, 71:13,	76:11, 76:15, 76:16, 87:20, 92:5, 92:6, 92:8, 127:17, 130:5, 136:9, 147:3, 229:1, 244:14, 249:5, 264:21, 268:13, 278:11, 282:2, 288:6 belabor 289:5 belgium 187:4, 187:6, 219:11, 219:12 believe 27:22, 32:5, 68:14, 68:16, 74:21, 75:1, 75:4, 75:5, 75:9, 95:22, 177:21, 178:16, 179:2, 179:21, 180:22, 184:16, 186:9, 189:5, 195:14, 201:21, 204:9, 207:2, 209:17, 210:13, 214:12, 214:18, 221:14, 221:21, 232:6, 235:21, 237:8, 237:11, 243:5, 247:14, 248:13, 250:7, 254:17, 256:2, 260:12, 260:18, 260:19, 260:20, 262:2, 263:7, 270:3, 288:10, 293:18, 294:4, 300:14 benign 271:11, 271:15, 272:1, 272:11 bermuda 280:11 bermudan-type 280:8
--	---	--	---

best 8:16, 29:3, 35:8, 74:3, 86:15, 103:8, 103:9, 134:11, 225:8, 226:19, 227:1, 228:2, 228:14, 233:15, 236:19, 265:5, 279:12, 288:11 better 33:10, 34:17, 107:16, 123:20, 128:16, 128:18, 129:19, 134:2, 134:7, 165:1, 300:6 between 15:22, 18:11, 19:17, 22:1, 27:14, 32:18, 48:13, 51:6, 54:11, 56:18, 57:14, 80:16, 101:16, 105:7, 145:7, 145:10, 154:1, 163:5, 167:13, 176:8, 182:15, 197:4, 255:18, 272:17, 282:5, 282:8, 288:19, 289:22, 291:5, 292:4, 292:19, 297:7, 297:16, 298:4, 298:21, 299:9, 299:12, 300:13 beyond 47:22, 86:21, 117:15, 117:22, 258:6 big 19:13, 20:15 bigger 149:8 biggest 16:21, 91:2 bioremediation 57:21	bit 9:10, 10:21, 74:6, 75:14, 247:6 bits 183:15 black 171:9, 195:19 blew 21:21 blocks 124:3 blog 153:9, 154:17, 155:13, 155:15 blogs 152:2, 152:9, 152:15, 153:3, 154:7, 154:20, 155:1, 155:8, 155:9 blood 302:21 bloomberg 50:15, 50:17 blue 195:19, 195:21 bluemail 60:14 bluespace 4:12, 5:8, 5:11, 5:13, 5:16, 5:19, 5:28, 6:10, 6:13, 10:17, 10:21, 11:1, 11:5, 13:13, 19:8, 20:4, 20:21, 22:8, 23:1, 23:9, 23:14, 26:8, 26:11, 26:22, 27:14, 27:20, 28:4, 29:15, 29:18, 30:8, 30:15, 31:8, 31:16, 34:8, 43:8, 43:18,	45:16, 45:17, 46:7, 46:9, 48:7, 52:4, 52:18, 53:6, 54:20, 59:6, 75:15, 77:11, 173:6, 175:20, 175:21, 176:19, 178:4, 178:7, 190:4, 193:2, 204:5, 210:9, 215:3, 215:16, 216:10, 216:16, 217:4, 217:13, 220:22, 222:7, 223:8, 223:10, 223:18, 224:13, 224:17, 224:22, 228:21, 229:22, 252:4, 252:14, 253:16, 253:22, 254:15, 255:18, 261:22, 274:5, 279:3, 279:7, 280:3, 281:14 bluespace's 30:19 bluespaces's 30:10 board 1:4, 30:19 bobby 4:24, 94:10, 94:11, 96:17, 99:8, 100:6, 107:22, 108:5 body 93:11, 136:18, 136:19, 191:5 bored 17:16 both 43:7, 43:17, 58:4, 70:19, 104:3, 136:20, 154:3, 154:22, 164:6, 173:16, 182:9, 182:11,	203:16, 204:4, 245:20, 248:5, 256:2, 257:4, 284:6, 286:5, 295:14 bothered 116:11 bottom 62:3, 137:9, 154:6, 181:6, 181:21, 202:10, 208:1, 243:15, 266:22 bought 30:10, 45:17 box 80:1, 100:20, 103:20, 124:22, 135:9, 171:9 boxes 79:19 bracket 182:3 brain 149:13, 194:2 break 8:17, 38:4, 74:12, 148:19, 148:21, 197:6, 197:8, 250:18, 262:6, 296:14, 296:16, 301:1 brevity 154:7 brian 226:14, 227:4, 227:22, 238:20, 245:10, 245:13, 252:8, 254:20, 270:2 brian's 247:10 bridge 51:6 briefly 185:20, 219:1 bring 49:18, 186:15
--	---	---	---

bringing 237:20 british 56:21, 57:19, 58:4 broad 80:8, 223:21 broader 65:22, 134:1 broadly 152:11, 257:19 broken 121:6 brother 216:22 brought 186:5 browser 64:21, 65:1, 65:3, 65:8, 65:12, 66:17, 66:19, 67:5, 67:17, 70:12, 87:21, 88:3, 88:11, 91:8, 91:12, 91:18, 91:20, 92:2, 92:3, 92:12 browsers 66:13, 67:7, 89:9 browsing 103:22 build 15:8, 15:10, 15:16, 19:18, 20:17, 21:3, 21:4, 41:1, 43:2, 49:11, 51:5, 58:4, 58:10, 71:22, 72:21, 86:12, 122:17, 123:22, 124:4, 156:3, 156:13, 156:17, 279:12 building 15:11, 19:9,	57:20, 87:11, 124:3, 166:9, 202:20, 215:21 builds 41:13 built 15:7, 15:18, 25:8, 25:14, 38:9, 58:4, 58:5, 58:6, 65:9, 69:14, 71:13, 71:14, 72:18, 72:22, 199:17 bunch 92:1, 186:19, 208:19, 277:3, 282:1 buried 53:18, 53:20 burk 216:17 burning 21:19 business 63:15, 218:2, 279:16, 279:17, 280:2, 302:17 button 70:9 buy 86:16 C calculate 81:3, 160:18, 160:20, 160:21 calculated 94:13 calculates 80:5 calculating 161:15, 167:4 call 227:8, 268:10, 268:17, 268:18, 268:20 called 23:10, 31:16,	31:18, 38:14, 48:8, 56:9, 163:17, 213:7, 286:12, 293:19 calls 227:11 came 29:2, 33:16, 94:9, 201:22, 203:19, 207:1, 207:2, 208:20, 221:9, 246:19, 260:9 can't 12:4, 23:16, 27:5, 31:13, 35:1, 42:17, 48:10, 61:10, 67:22, 111:1, 111:5, 111:13, 114:21, 175:22, 176:4, 188:20, 194:12, 194:13, 197:2, 209:12, 216:20, 218:15, 219:20, 230:14, 230:18, 231:19, 232:2, 232:8, 235:10, 235:16, 236:20, 239:3, 244:3, 247:15, 250:8, 250:10, 256:1, 256:20, 258:22, 259:9, 264:22, 265:20, 266:1, 273:3, 277:10 cannot 262:16, 265:16 cap 23:1 capacity 193:2 capital 218:12 captive 65:7 care 35:13, 35:14,	35:16, 70:21, 116:1 cared 35:21 carried 85:3 carries 230:20 case 1:15, 3:6, 12:3, 76:4, 76:21, 192:11, 247:18, 254:17, 256:3 cases 154:3 cassy 217:14, 217:15 catlin 244:22 cause 2:5 caused 93:3 causing 19:13 cc'ing 37:1 cc's 37:3 center 302:17 centers 21:22 central 37:17, 177:16, 219:22 ceo 27:2, 28:16, 46:4, 219:1, 223:8, 224:13, 225:1, 244:9, 244:14, 244:18, 244:20, 282:3 ceo-ship 244:5, 245:1 certain 99:9, 250:8
---	---	---	---

certainly 184:18, 185:6, 204:9, 248:3 certainty 188:21 certificate 4:6, 302:1 certified 2:7, 302:4 certify 302:5, 302:12, 302:15, 302:20 cetera 93:15 cfo 218:22 chain 37:14, 69:17, 243:15, 245:13, 273:1 challenge 49:2, 51:1, 61:21, 105:4 challenges 164:16 chance 133:18 change 162:13, 167:16, 167:20, 182:4 changed 24:16, 181:15, 181:18, 182:3, 233:6, 245:16 changes 150:13, 150:22, 164:11, 166:3, 175:9, 175:10, 257:7, 282:12, 282:18, 284:15, 284:20, 287:7, 287:10, 291:5, 291:22 changing 94:18 chaos 56:8 chaotic 56:18	chapter 27:11 characteristics 100:19 charge 227:15 chart 5:18, 79:22, 203:12, 205:20, 243:1 chat 41:2, 75:11 cheaper 166:18 cheated 55:5 check 207:3, 233:1, 276:17 chemical 59:2 chemistry 59:3 chief 176:15, 176:16, 186:8, 186:11, 276:21 chinese 33:22, 35:2 chris 218:14, 218:15 chronological 104:11 cigars 36:21, 37:20 circle 68:16, 153:17 cite 201:7, 203:12, 208:15, 266:20 cited 201:17, 242:19 citigroup 211:18, 211:19 city 216:21 civil 2:11	claim 5:18, 113:2, 113:8, 117:15, 117:16, 117:17, 117:22, 118:1, 118:5, 125:12, 126:22, 128:4, 129:19, 130:9, 130:19, 155:1, 243:1, 254:4, 256:14 claimed 212:20, 213:13, 214:6, 214:11, 214:14, 222:1, 229:6, 230:16, 232:12, 233:10, 233:20, 235:9, 236:18, 237:22, 238:12, 239:7, 239:12, 240:5, 240:8, 240:19, 240:22, 241:4, 241:8, 241:16, 242:2, 242:10, 252:10, 253:13, 254:14, 261:16, 274:6, 274:20, 280:19, 280:21, 281:1 claims 7:15, 139:4, 155:1, 254:7, 254:9, 254:11, 255:8 claire 108:1 clarification 43:14 clark 244:22 classification 11:16, 13:5, 14:20 classified 14:12, 14:16 clean 166:2	clear 32:9, 67:13, 67:19, 268:15 clearly 160:21, 280:22 cleary 218:9 click 70:9, 100:20 client 21:3, 22:6, 22:16, 43:3, 43:19, 88:19, 90:13, 91:5, 91:9, 270:21, 270:22 client-attorney 258:5, 272:18, 273:1 client-based 88:15 clients 73:11 close 16:5, 27:11, 54:14, 54:18, 55:2, 55:7, 257:1, 293:14 closed 277:15 closely 68:1 closing 281:20 cluster 108:19, 142:9, 142:12, 143:6, 143:13, 143:15, 143:17, 143:20, 144:1, 144:8, 144:11 clustering 85:16, 142:20 clusters 143:2 code 58:10, 59:6, 80:22, 82:21,
---	---	---	--

Transcript of Justin Marston
Conducted on November 11, 2025

85

86:13, 113:22, 114:3, 119:18, 120:3, 124:13, 130:1, 135:10, 135:12, 135:13, 135:14, 135:15, 136:2, 136:9, 136:14, 136:16, 137:2, 138:5, 144:2, 144:13, 144:17, 144:20, 148:9, 160:17, 164:1, 168:18, 168:20, 171:14, 172:4, 202:21, 295:19, 296:3, 296:4, 296:7 coding 58:3 cofounder 52:17, 175:20 cognate 108:16, 121:11, 121:13, 122:1, 122:2, 122:15, 123:13, 131:21, 132:3, 132:8, 132:11, 132:12, 132:16, 133:16, 134:12, 141:4, 141:5, 141:12, 143:2, 160:19, 166:21, 167:8 collaboration 72:19 collaborative 108:18, 110:22, 111:6, 141:12 colleague 177:15 collect 157:19, 157:22 collectively 172:18 colorado 217:21 column 68:5, 81:19,	82:1, 82:2, 84:14, 89:13, 89:17, 92:21, 94:21, 105:22, 107:1, 107:2, 108:10, 131:15, 140:18, 142:18, 147:5, 147:9, 215:12 comb 257:4 combination 82:8, 85:1, 109:2, 111:10, 288:9 combine 81:5, 109:21, 111:15, 112:17 combined 109:18, 111:10, 111:13, 111:14, 111:19 combining 91:8, 109:10, 110:12 come 26:21, 37:7, 103:20, 104:9, 124:8, 162:1, 221:7, 246:20 comes 69:9 coming 9:12, 10:6, 49:10, 65:21, 163:2, 183:7 commencement 302:8 commencing 302:18 comment 248:7, 249:5 commentary 189:3, 189:6, 196:9, 196:12 commented 177:18, 183:10 comments 6:8, 163:21,	179:18, 191:3, 191:4, 191:8, 195:8, 195:12, 196:5, 222:16, 222:17, 255:3, 257:12, 294:6 commercial 41:8 common 30:8, 30:10, 41:1, 51:8, 66:12, 89:9, 92:16, 92:18, 109:20, 110:4, 110:5 communal 172:19 communication 51:10, 137:15, 227:4, 229:20, 230:20, 246:15, 272:5 communications 49:2, 51:20, 178:17, 220:21, 221:20, 228:11 community 11:10, 14:7, 35:16, 35:20, 49:17, 61:14 companies 25:3, 28:17, 45:9, 51:18, 65:5, 156:22, 279:13 company 11:1, 22:20, 24:16, 27:4, 28:13, 28:16, 29:4, 30:6, 40:22, 43:20, 46:4, 48:14, 51:18, 52:7, 52:20, 63:22, 135:22, 136:1, 139:1, 157:4, 176:14, 185:21, 186:5, 186:10,	196:14, 196:15, 217:6, 218:13, 244:8, 244:13, 244:17, 280:8, 280:13, 282:3 compare 134:12, 257:5, 285:2, 290:8 comparing 256:2, 259:10, 285:11, 285:12 comparison 288:9 compatible 66:17, 68:17, 69:8, 70:6 compensated 76:12, 76:20 competition 56:22, 57:1 competitive 213:5 competitor 73:3, 73:7 complate 202:20 complete 37:21, 149:20, 149:21, 244:13 completed 254:21 completely 96:9, 271:11, 271:15 completeness 204:1 completion 150:16 complex 128:13, 166:12, 172:13, 173:8, 199:5, 202:20 complexity 172:17 compliance 17:7, 17:8, 17:10, 17:11, 17:14, 17:17,
---	---	--	---

33:16, 36:6, 38:11, 39:7, 71:8, 134:21, 135:4, 135:8, 138:20, 139:22, 140:5, 140:6, 147:13, 147:19, 147:21, 212:14, 213:22, 234:4, 234:11, 239:17, 239:19 complicated 87:11, 280:5 complying 171:4, 174:21, 183:1, 190:19, 213:16, 223:6, 225:6 components 69:11 compose 64:15 computational 57:14, 87:11, 166:5, 166:7, 169:3, 169:8, 169:10, 173:1, 173:14, 194:16, 200:5 computational-type 199:18 compute 84:21, 161:12, 162:6, 162:11, 162:21, 163:2, 163:5, 166:9, 166:12, 168:7 computer 55:20, 56:1, 56:4, 58:18, 58:19, 82:9, 82:13, 82:17, 83:10, 83:21, 84:5, 85:20, 86:1, 86:16, 88:17, 105:3, 113:7, 114:11,	114:17, 114:21, 115:4, 115:12, 115:14, 115:17, 115:18, 116:14, 119:20, 120:11, 120:13, 120:17, 122:18, 124:16, 124:19, 130:3, 131:4, 133:8, 160:1, 161:22, 164:17, 165:2, 202:14, 206:10, 208:20 computer-derived 101:6 computer-readable 84:21, 85:5, 113:6 computers 1:11, 18:22, 19:5, 85:15, 85:18, 85:22, 164:16, 166:18, 302:13 computes 146:22 computing 82:19, 132:3 concept 65:18, 99:17, 101:14, 290:12 concepts 16:16, 80:15 concern 39:9, 270:21 concerned 132:8 concerning 230:13, 230:15 concluded 301:22 conclusion 174:5, 174:13, 283:5 conferences 211:14 confidence 183:6, 217:21	confident 159:8, 184:11, 201:21, 232:14, 259:19, 259:21, 268:2 confidential 179:8 configured 117:7, 118:9, 127:14 confines 146:17 confirm 45:8, 55:19, 221:16, 241:13, 246:12, 250:22, 261:13, 271:14, 271:21, 273:22, 292:18 confirmation 231:7, 264:19 confirmed 57:9, 261:14 confusing 98:16 conjecture 53:15, 55:8, 191:12, 195:18 connected 19:14 connection 235:5 connections 18:11 considered 132:7, 136:13, 201:16, 267:19, 268:4, 268:12, 268:13 consisting 121:18, 125:7 construct 155:22 consult 193:3, 194:10 consultant 7:19, 193:1, 218:5	consulted 193:4, 193:6, 194:9 consulting 7:16 contain 195:11 contained 84:16, 84:20, 258:1 containing 93:9 contains 84:17, 256:13, 259:20, 259:21 content 36:15, 62:14, 62:18, 63:20, 66:4, 78:6, 78:17, 80:19, 81:2, 81:9, 81:10, 81:13, 83:6, 93:3, 94:14, 94:18, 96:14, 96:15, 97:11, 102:3, 104:10, 104:14, 104:16, 106:8, 107:19, 112:14, 118:11, 118:13, 118:19, 119:7, 119:10, 121:11, 121:16, 122:8, 122:19, 123:13, 125:5, 127:16, 130:9, 130:12, 130:21, 131:6, 131:10, 132:19, 133:1, 144:19, 145:7, 145:17, 148:5, 152:7, 152:19, 153:10, 154:3, 154:17, 156:1, 161:2, 181:15, 195:15, 212:18, 221:7, 221:13, 222:12, 233:7, 268:3
---	--	---	--

contents 231:20	coo 28:15, 243:22, 244:1, 244:12	119:16, 120:21, 128:5, 131:7, 132:14, 138:10, 147:13, 148:6, 150:1, 159:6, 165:11, 167:10, 171:15, 176:19, 196:3, 205:21, 210:4, 210:7, 210:21, 212:20, 214:6, 214:7, 221:18, 222:2, 226:15, 228:8, 242:1, 242:14, 243:16, 269:19, 274:7, 274:21, 288:14, 294:6, 295:16, 298:12, 299:18, 301:7	could 19:15, 26:18, 43:2, 66:6, 70:9, 70:10, 70:13, 80:21, 80:22, 82:16, 82:17, 82:18, 83:9, 84:2, 85:18, 85:19, 98:6, 98:8, 98:12, 99:6, 99:7, 99:18, 107:21, 108:2, 109:18, 111:15, 111:16, 120:18, 123:18, 123:21, 124:7, 124:8, 128:11, 128:14, 128:15, 129:17, 135:15, 135:22, 136:1, 136:17, 136:18, 137:1, 137:4, 140:12, 143:7, 143:16, 145:8, 145:9, 145:11, 151:2, 152:8, 152:14, 154:18, 154:21, 155:9, 156:3, 161:7, 164:8, 168:5, 168:6, 169:2, 207:3, 212:6, 215:1, 279:21, 280:10, 287:17, 288:1, 288:2
context 9:12, 62:22, 76:8, 97:13, 99:3, 103:15, 114:9, 114:13, 124:2, 127:2, 135:19, 138:22, 145:6, 199:14, 200:11, 203:8, 222:10, 228:19, 228:21, 229:2, 246:14, 250:14	copied 41:6, 63:6	correlate 167:13	couldn't 51:12, 83:15, 120:22, 183:5
continue 28:19, 279:22	copies 34:11, 34:12	correlating 133:11, 166:22, 167:9, 167:18, 168:8	counsel 8:7, 8:8, 10:13, 201:5, 209:1, 220:19, 220:22, 223:10, 226:21, 229:17, 231:10, 235:2, 240:15, 258:5, 262:6, 263:5,
continued 16:14	copy 12:16, 24:6, 26:2, 34:17, 37:11, 51:13, 77:18, 77:19, 178:20, 197:12, 257:2, 271:8, 301:7	correlation 108:21, 112:12	
continuing 166:5, 224:22, 283:12, 283:16	core 36:4, 37:6, 71:22	correspondence 4:16, 4:18, 229:16, 231:10, 235:2, 238:3, 240:15, 272:17	
continuously 16:15, 69:7	corner 12:22, 62:3, 208:2, 229:15	corresponding 240:14	
contract 7:16, 76:14	corp 295:21	corresponds 252:16	
contracts 77:8	corporate 36:19, 50:14, 154:17, 155:8, 155:9, 155:13, 279:3, 280:11	corroborate 223:15, 224:16, 224:19, 224:21	
contributor 263:12	corporation 1:6, 1:11, 302:13	corroborated 223:9	
control 34:16, 38:12, 62:14, 62:18, 63:1, 63:3, 63:4, 63:17, 203:17	correct 13:12, 21:16, 25:2, 27:22, 39:11, 44:18, 45:13, 48:2, 55:22, 58:12, 58:16, 58:20, 59:7, 64:1, 64:5, 67:15, 74:5, 75:6, 77:20, 84:7, 86:2, 86:13, 88:20, 92:14, 92:17, 93:20, 99:2, 104:17, 106:19, 106:22, 112:22, 114:5,	cost 163:5, 166:6, 166:7, 166:9, 196:19, 279:18, 280:15	
controlled 63:21		cost-effective 162:2	
controller 218:8			
conventional 120:10, 129:11			
conversation 100:5, 263:4			
conversations 12:6, 276:20			
convert 118:21			

270:6, 302:14 couper 192:22, 193:1, 193:18, 194:8, 195:2, 195:12, 196:7, 196:9 couple 239:15 coupled 117:6, 118:8 course 59:4 court 4:6, 24:10, 43:11, 102:13, 158:20, 301:6, 301:10 cover 60:4, 74:19 covered 259:1, 272:18, 272:22, 273:1 covering 273:8 covers 235:22, 273:18 cpu 83:18 crawl 230:9 create 15:1, 15:9, 17:2, 19:10, 40:14, 49:9, 67:2, 73:20, 96:18, 97:14, 116:3, 184:12, 287:13 created 13:17, 14:8, 32:22, 70:16, 139:2, 254:12, 286:22, 300:4 creating 72:9, 104:19, 166:2, 168:18, 233:4, 279:7, 295:15	creation 150:2, 155:3, 168:4 creative 204:3 creator 267:20 creators 246:4, 246:5, 268:5, 268:14 criteria 96:19, 98:4, 98:7, 98:11, 98:17, 100:8 critical 72:20, 264:18 cross-domain 11:8, 11:11, 11:13, 13:3, 13:18, 16:11, 18:8, 19:22, 31:20, 31:22, 32:1, 32:15, 40:9, 40:22, 42:16, 43:7, 43:17, 60:19, 60:22, 61:7 crossed 181:20, 182:2 crr 1:29 csr 1:29, 2:6, 302:3, 303:9 cto 176:12, 176:13, 185:21 cuban 36:21, 37:20 curating 66:3 current 8:22, 75:19, 150:16, 234:15 custodial 205:4, 205:14, 205:21, 206:1, 210:12	custodian 190:11, 204:22, 205:11 custody 203:17 custom 96:18, 137:6 customer 33:2, 40:18, 42:2, 42:11, 42:15 customers 16:22, 20:12, 21:8, 21:12, 21:13, 33:9, 33:13, 39:3, 51:16, 158:2 cut 279:14 cute 97:8, 97:9, 97:11 D d-r-o-i-d-c-l-o-- u-d 23:12 dad 10:3, 46:8, 164:6 daily 48:22 damn 93:21 dance 266:6 dancing 270:9 data 19:19, 33:14, 33:15, 42:19, 63:11, 65:21, 66:7, 123:7, 155:17, 155:19, 157:20, 163:17, 169:15, 198:21, 199:17, 200:6, 202:19, 203:9,	222:21, 227:18 database 135:2, 138:9, 233:7 datasets 104:22 date 12:10, 28:2, 60:3, 61:11, 68:1, 68:3, 68:8, 75:6, 97:21, 98:2, 100:8, 104:11, 165:14, 197:2, 210:21, 228:8, 252:20, 256:10, 277:10, 303:10 date's 74:22, 75:4, 247:3 dates 23:18, 23:20, 99:9, 224:5 davies 217:11, 217:12 davis 218:14, 218:15 dawson 3:13 day 37:19, 303:6 day-to-day 46:15 days 200:4 dc 3:8, 211:21, 218:3 dcs3ash 216:3 dead 72:16 deadlines 236:13 deal 160:9 dealt 142:14
--	---	--	---

debra 215:14, 215:15	267:4, 274:10, 277:14, 300:1	denominator 51:8	131:1, 141:3, 142:19, 161:20, 172:10, 172:11, 177:11
decade 71:5, 73:5	declarations 12:3, 12:17, 76:20, 201:8, 201:17, 232:2, 234:20, 237:1, 266:14	department 16:19, 58:8, 143:8, 177:16	description 4:8, 97:22, 128:13, 132:3, 185:11, 231:9, 253:19
december 60:1, 74:19, 212:10, 213:2, 213:18, 273:8, 273:19, 278:2, 278:10	declare 280:10	departments 143:4	designed 15:15, 43:3, 166:11, 280:6
decide 111:21, 153:19, 161:14	decrease 112:15	dependent 139:5, 274:20	designing 105:8
decided 32:13, 53:3, 196:17	deeper 169:16	depending 111:17	desirable 138:3
deciding 30:19	defeated 66:1	depends 115:4, 115:6, 115:7, 115:20, 146:7	desks 19:1
decision 54:6, 266:7, 269:2, 269:17, 270:12, 270:17, 279:16, 279:17, 280:2	defense 16:19, 25:1, 25:15, 35:15, 41:7, 61:18	deployments 217:8	desktop 82:17
decisionmaker 271:5, 273:3	defenses 285:19	deposition 1:18, 2:1, 9:8, 10:5, 10:14, 10:18, 301:7, 301:22, 302:7, 302:9, 302:14, 302:15	destinations 136:13
decisionmaking 271:5	defined 127:5, 127:6, 291:18	deposed 7:9	detail 152:17, 160:16, 162:8, 232:9, 263:3
decisions 21:9, 54:5, 256:18, 269:21	definition 22:19	depot 87:8	detailed 116:3, 184:19
declaration 5:5, 5:24, 9:21, 10:9, 10:18, 179:21, 180:6, 180:8, 180:22, 197:13, 203:4, 208:16, 222:20, 223:2, 225:3, 225:10, 230:5, 231:22, 232:7, 233:14, 234:18, 242:12, 242:19, 243:4, 250:3, 250:4, 255:10, 260:3, 260:22, 261:2, 262:19, 264:15,	definitions 286:12, 287:6	depth 163:22	details 265:20
	degree 57:7, 57:17, 58:19, 58:21, 59:1, 59:2, 59:3	derived 121:18, 125:6	determination 80:11, 80:12, 80:17, 80:18, 80:20
	delete 36:8, 36:16, 157:17	describe 78:4, 135:19	determine 81:9, 83:5, 101:14, 109:15, 114:4, 117:7, 117:11, 117:13, 117:18, 118:9, 118:16, 119:22, 121:15, 125:19, 126:4, 126:21, 127:15, 132:10, 132:12, 141:5, 141:11, 247:22, 268:7
	deleted 63:7	described 88:9, 93:14, 95:12, 106:4, 109:3, 119:1, 126:22, 128:3, 154:8, 162:9, 164:14, 176:22, 254:4, 254:8, 254:15	determined 108:16, 127:18,
	delivered 37:11, 136:19, 153:6	describes 141:7, 143:1, 145:2, 148:14, 193:13, 252:10	
	delivery 152:7	describing 89:22, 93:16,	

127:19, 127:20, 130:22, 131:1, 133:15, 148:9 determines 125:3 determining 37:13, 148:12, 155:8 devan 3:12, 137:17, 140:9 develop 161:14, 163:15, 283:12 developed 57:18, 187:3, 288:7, 290:12, 290:13 developer 72:3, 158:19, 163:10, 163:13, 169:10, 169:12, 176:14, 199:1, 215:21, 219:11 developers 23:4, 71:22, 187:4 developing 187:16 development 200:5, 218:3, 218:4, 219:19, 279:22 development's 36:10 device 82:19 devices 16:17, 41:17, 42:17, 42:18 diagram 287:5, 287:18, 291:19 died 65:20 difference 80:16, 92:6, 101:16, 102:5,	105:7, 153:8, 210:15, 221:5, 282:8 differences 255:18, 259:3, 259:9 different 11:15, 13:5, 14:11, 14:15, 14:20, 15:2, 15:3, 16:1, 18:12, 18:15, 19:12, 19:18, 20:15, 21:1, 23:3, 23:4, 23:5, 25:17, 33:8, 34:14, 39:15, 40:10, 40:15, 41:3, 43:16, 51:7, 64:4, 68:22, 69:20, 69:22, 75:11, 79:8, 81:4, 96:9, 99:11, 101:5, 104:21, 104:22, 105:5, 105:15, 105:19, 108:22, 109:10, 109:14, 110:13, 112:18, 124:8, 140:11, 141:8, 152:7, 153:3, 158:1, 160:9, 160:14, 160:18, 161:6, 175:5, 182:14, 193:7, 194:9, 202:2, 229:4, 282:2, 291:17 difficult 18:10, 26:20, 28:17, 28:19, 46:13, 51:3, 51:5, 61:21, 73:12, 104:15, 127:8, 161:3, 279:20 digest 49:10, 49:17,	69:10, 90:15 diligence 240:12, 240:16, 276:4, 276:5, 276:11 diluted 27:2 direct 35:4, 131:14, 178:14, 193:8, 197:18 directly 174:12, 178:14 disclosed 13:11, 149:16 discontinued 48:13 discount 30:11 discuss 284:14, 289:6, 289:7, 289:8, 292:7 discussed 60:12, 67:17, 75:14, 137:20, 203:3, 206:12, 230:17, 235:22, 236:1, 242:22, 267:14, 281:17, 294:4 discussing 90:4, 95:14, 106:17, 114:14, 147:13, 147:20, 155:11, 159:13, 162:8, 173:1, 234:3, 266:21, 276:4, 276:10, 276:12, 292:4 discussion 160:18 display 93:8, 130:16, 130:17 displayed 67:16, 99:18 distributed 34:13, 166:12	distributing 16:7 distribution 50:3, 50:4, 136:14, 137:2, 153:20, 155:19 diverge 286:17 diverging 133:18 divorce 53:1, 54:22 doc 239:4, 255:19 document 6:5, 12:20, 59:14, 59:21, 146:16, 146:22, 147:1, 147:3, 149:6, 149:16, 151:5, 158:12, 159:13, 160:8, 165:8, 165:16, 165:20, 166:3, 166:19, 168:12, 168:16, 170:9, 174:18, 175:14, 178:21, 179:15, 180:19, 181:1, 183:10, 184:5, 184:18, 185:7, 185:9, 188:4, 188:8, 188:9, 188:15, 188:19, 190:1, 190:4, 190:10, 191:6, 192:7, 195:11, 195:13, 196:2, 196:12, 201:1, 201:3, 201:7, 204:19, 206:1, 206:3, 206:4, 207:11, 207:22, 208:11, 208:16, 220:1, 220:6, 225:9, 225:14, 225:19, 227:16, 246:20, 252:5,
---	--	---	---

252:7, 252:9, 254:22, 255:2, 255:9, 255:14, 257:7, 258:9, 258:13, 258:19, 259:19, 266:4, 272:3, 274:1, 282:12, 291:16, 292:15, 294:16 documentation 217:16, 217:18 documents 5:20, 9:11, 11:18, 12:11, 145:3, 146:2, 146:5, 179:17, 183:21, 184:15, 190:13, 201:14, 202:5, 203:13, 203:16, 204:4, 205:4, 205:15, 205:19, 205:20, 205:21, 206:7, 207:6, 210:11, 212:7, 212:12, 212:14, 212:19, 213:4, 213:12, 221:19, 221:22, 223:9, 225:9, 242:13, 242:18, 243:4, 256:2, 257:4, 259:10, 261:8, 263:6, 263:17, 265:18, 271:6, 274:3, 277:11, 286:2, 286:5, 293:20 doing 11:8, 37:15, 37:16, 51:1, 61:13, 90:11, 90:13, 96:11, 98:19, 100:1, 110:10, 114:11, 115:9, 115:19, 116:9, 116:11, 126:1, 128:16, 137:5, 146:7,	154:16, 161:22, 167:8, 186:19, 200:4, 202:19, 218:4, 246:9, 262:22, 263:2, 281:18, 281:19, 281:21, 282:1 dollars 21:4, 26:14, 29:19, 47:5, 53:7 domain 17:19, 44:21 domains 14:15, 15:3, 16:3, 20:18 dominant 71:1, 72:5 domino 72:12, 72:16, 73:2 done 36:13, 54:4, 56:3, 58:2, 58:3, 264:16, 284:10, 288:19, 297:7, 300:3, 300:22 dot 97:19 doubt 191:16, 232:13, 259:8 down 8:17, 38:5, 43:12, 44:3, 79:7, 93:6, 137:8, 182:18, 202:1, 233:22, 278:19 downselect 97:10, 97:13, 98:19, 99:4, 100:9, 100:10, 100:13 downselects 98:22 draft 150:16, 177:19,	226:12, 227:17, 227:22, 253:22, 254:5, 282:6, 284:15, 289:9, 295:3 drafted 150:12, 189:4 drafting 254:22, 257:20, 264:14 drafts 300:4 dragging 22:22 dramatically 166:10 drive 9:1, 203:20, 207:8, 303:12 driver 39:1, 40:13 drivers 38:21 droidcloud 16:13, 23:11, 24:1, 24:15, 52:17 drones 25:16 drop-down 100:20 drove 30:18, 40:13 due 240:11, 240:16, 276:4, 276:5, 276:10 duly 2:3, 7:2, 302:8 dump 149:13, 194:2 duncan 216:7, 216:8 during 106:9, 223:8, 224:13, 233:17, 234:14, 234:20, 250:2, 262:6,	277:22, 281:3, 281:8, 284:11, 289:16, 293:15 E e 198:4 e-mail's 33:7, 230:12 e-mails 37:9, 37:19, 92:5, 96:17, 97:15, 98:9, 107:22, 108:1, 108:8, 136:2, 145:8, 145:10, 202:4, 222:19, 223:9, 224:15, 232:7, 233:5, 236:17, 238:15, 249:14, 260:14, 266:8, 273:4 e-x 289:1 each 12:16, 19:19, 19:20, 34:9, 37:13, 40:9, 42:9, 43:21, 79:1, 79:19, 80:5, 81:14, 83:6, 85:22, 93:2, 98:5, 106:7, 108:22, 111:22, 112:19, 116:20, 129:5, 132:6, 136:6, 155:15, 155:18, 155:20, 158:1, 163:1, 248:2, 254:4, 269:9, 291:17 earlier 53:5, 64:2, 70:15, 90:4, 106:18, 123:1, 137:20, 139:18, 187:21, 197:12,
---	--	---	---

249:13, 269:1, 269:16, 269:22, 270:8 early 159:19, 257:17, 276:14, 276:19 easier 128:8 easy 129:11, 129:14, 149:8 ecosystem 71:7, 71:16 edits 289:8 effectively 69:6, 135:18, 215:19 efficiency 169:3 efficient 161:14, 162:14 eight 18:15, 18:21, 227:9 either 99:18, 129:15, 184:17, 218:16, 230:18, 257:1 electrical 58:22 electronic 78:3, 78:5, 78:10, 78:16, 82:7, 84:22, 95:6, 95:9, 95:11, 95:12, 106:5, 107:9, 118:11, 118:13, 121:11, 121:16, 123:13, 125:5, 127:16, 130:20, 132:5, 232:16, 232:18 element 117:20, 126:4, 254:4 elements 79:17	else 10:13, 23:2, 44:1, 52:1, 71:10, 105:2, 108:6, 110:9, 187:7, 191:17, 265:1, 266:3 elsewhere 291:7 email 5:35 embedded 91:12, 91:18, 91:20, 92:1, 92:11, 206:9 embedding 90:12, 91:4 embodiments 95:7, 106:6, 132:5, 147:10 emerged 43:9 employed 46:9, 178:4, 302:22 employee 163:11, 186:7 employees 10:17, 163:11 employment 242:5 encryption 33:14, 42:20 end 16:12, 16:22, 28:21, 41:5, 55:2, 69:5, 73:13, 113:13, 116:10, 133:4, 154:4, 160:13, 196:17, 223:21, 275:12, 292:12 ended 19:8, 26:13, 186:19 ending 62:5, 64:12 ends 37:4	energy 28:14, 28:18 enforcing 234:4, 234:11, 239:16 engine 80:2, 80:10, 81:6, 95:10, 95:16, 96:4, 96:13, 96:21, 97:1, 97:5, 97:6, 98:13, 98:22, 101:12, 103:7, 234:13 engineer 216:9 engineering 58:22, 187:19 enormous 160:2 enough 83:22, 110:19, 169:7 enterprise 73:10 entire 61:22, 132:13, 182:6 entities 81:2, 81:12, 119:9, 279:4, 279:7, 279:8, 280:4, 280:9 entitled 149:12, 204:5, 231:6, 294:17 entity 16:6, 19:2, 21:2, 41:6, 41:13, 41:19, 80:21, 301:18, 301:21 entrepreneur 20:11, 21:12, 25:9, 25:19, 43:22 entries 236:11, 239:11,	242:9, 261:15 entry 237:7, 237:12, 239:6, 240:10, 251:5, 251:6, 251:11, 251:22, 252:1, 252:3, 259:13, 261:9 environment 153:1, 154:18, 155:10, 155:14 environmental 211:17 environments 154:10 epa 211:6, 211:16 equivalent 56:7, 57:6 esquire 3:5, 3:12 essay 34:5 essays 108:8 essentially 18:14, 23:9, 30:22, 90:11, 133:9, 135:14, 147:2, 286:7 estimate 46:22, 285:1, 285:4, 287:13 estimated 298:2 estimating 287:1 et 93:15 ethan 3:5 europe 219:22, 280:1 european 57:1, 278:22 evaluate 54:2 even 34:19, 46:6,
--	--	---	--

146:21, 153:18, 268:1 event 157:13, 157:14 events 56:18 eventually 29:12, 149:22, 277:9, 277:15 ever 7:9, 8:14, 13:13, 46:9, 57:10, 66:15, 97:19, 152:16, 169:17, 172:3, 178:3, 193:22, 194:4, 194:7, 295:18, 296:1, 296:7 every 12:10, 34:6, 37:3, 69:17, 69:18, 91:14, 94:14, 115:8, 115:22, 122:19, 122:20, 160:22, 161:1, 162:20, 162:22, 183:6, 236:20, 254:4, 259:18, 263:3, 263:5 everybody 21:7, 37:12, 49:5, 49:18, 51:22, 52:1, 71:10, 72:21, 73:13, 105:2, 108:6, 153:14 everybody's 50:17 everything 22:2, 23:2, 48:3, 51:13, 99:14, 101:18, 138:4, 138:13, 166:16, 185:7, 186:21, 201:18, 256:13, 258:3,	258:4, 261:1 everywhere 42:21, 63:11 evidence 256:8 evp 244:9 ex 4:20, 4:22, 5:20, 5:21 ex-spouse 55:3 exact 28:2, 52:11, 61:11, 258:22, 277:10 exactly 97:2 examination 4:4, 7:4 example 17:6, 63:21, 64:2, 74:1, 87:19, 93:7, 103:4, 107:21, 109:21, 135:21, 136:1, 137:21, 138:2, 142:5, 143:6, 144:6, 144:7, 145:21, 148:3, 148:9, 188:8, 198:3 examples 145:16 exchange 68:18, 69:4, 69:22, 70:22, 71:2, 71:7, 71:18, 73:3, 90:2, 90:21, 91:1 exchanged 223:10, 295:14 exchanges 223:15 exchanging 15:21 exciting 270:16	excluding 37:19 executing 85:4 executive 186:15 executives 21:1 exhibit 4:10, 4:12, 4:16, 4:18, 4:20, 4:21, 4:24, 4:27, 4:30, 5:1, 5:4, 5:7, 5:10, 5:12, 5:15, 5:17, 5:22, 5:27, 5:29, 5:32, 5:34, 6:1, 6:4, 6:7, 6:9, 6:12, 12:21, 24:3, 24:8, 24:12, 59:11, 74:14, 139:13, 139:14, 149:2, 149:3, 158:9, 165:5, 170:17, 170:18, 179:12, 180:13, 187:22, 189:19, 194:20, 197:12, 197:15, 200:19, 200:20, 204:14, 207:12, 207:17, 207:18, 208:22, 220:3, 220:12, 220:13, 220:17, 220:18, 228:5, 242:13, 243:8, 250:22, 252:1, 252:16, 253:1, 273:12, 275:17, 282:8, 284:20, 285:6, 285:8, 285:16, 286:15, 290:18, 290:22, 292:8, 292:9, 292:16, 293:1 exhibits 4:7, 4:26,	253:7 exist 166:13 existed 97:18, 105:2 existing 23:1, 30:22 exotic 265:2 expect 134:7, 144:16, 228:11, 255:22, 257:22 expectation 199:13 expedited 301:11, 301:14 expensive 165:1 experience 16:2, 19:6, 19:19, 87:18, 87:20, 88:11, 90:8, 92:8, 93:17, 93:19, 104:1, 130:15, 130:18, 198:18, 199:22, 203:9 experienced 186:16 expert 26:17, 54:1, 65:17, 66:9, 75:22, 76:3, 105:17, 193:16, 193:18, 193:21, 194:3, 194:6 expiration 303:10 explain 86:8 explicitly 182:2 explorer 88:2, 91:14 exscientia 186:18, 187:5 external 90:20
--	---	---	---

eyes 18:18, 18:19, 41:22	father's 183:11, 184:15, 196:6	fifth 57:7, 57:16, 251:5, 251:18, 251:22	99:14, 100:2
F	fax 303:16	figure 79:12, 79:16, 82:4, 87:13, 89:21, 123:1, 126:20, 134:18, 134:20, 151:14, 160:1, 195:15, 286:20	filtering 108:18, 110:22, 111:6, 141:13, 141:16, 172:20
f-e-r-n-y-h-o-u--	fbi2 213:7	figured 53:20	filtering's 141:22
g-h 159:1	feasible 166:17	file 5:30, 5:33, 190:3, 195:7, 206:8, 208:13, 209:21, 245:10, 253:3, 253:9, 253:10, 254:16, 255:18, 256:5, 256:13, 259:20, 260:5, 260:16, 260:21, 261:22, 262:8, 262:19	final 45:21, 46:21, 151:4, 151:9, 257:1, 257:8, 301:11, 301:14
facebook 49:14, 49:16, 49:19, 51:4, 69:12, 104:1, 145:13, 153:13, 160:5, 163:16, 296:8	features 50:10	filed 222:10, 225:19, 227:8, 246:5, 257:9, 292:15	financing 113:12, 255:14
facilitate 235:3	fed 119:4	files 31:14, 201:19, 204:8, 206:13, 206:15, 206:18, 206:19, 208:14, 208:19, 209:15, 209:20, 210:5, 210:12, 210:16, 211:10, 213:21, 214:5, 214:10, 214:14, 221:9, 260:19	finance 218:7
fact 224:21, 263:10, 268:1	federate 158:2	filter 96:19, 99:13,	financial 30:15, 213:22
fair 159:14, 191:3	federated 156:14		financially 303:3
fairly 92:15, 92:18	feedback 36:17, 57:20, 112:1, 113:1, 133:8, 169:6, 169:22, 178:1, 295:2, 295:8		find 69:17, 96:17, 112:5, 112:10
fall 223:22	feel 128:20, 244:16		fingerprinting 108:19, 109:22, 111:2
false 75:9	fellow 57:10		finished 227:14, 227:16
far 12:12, 110:11, 171:19, 206:17, 230:9	felt 26:19, 30:12, 41:7, 53:1, 53:21, 55:4, 279:20		fired 187:11
fast 9:6	fenced 15:22		firewall 19:16
faster 124:11	fenwick 221:8, 221:17, 221:20, 222:17, 226:14, 227:9, 228:1, 246:19		firm 218:12, 221:17, 303:11
father 58:7, 142:13, 159:10, 166:2, 177:15, 177:22, 178:19, 178:20, 179:8, 183:8, 183:19, 184:18, 189:13, 191:13, 191:14, 192:21, 195:20, 204:13, 283:12, 286:1, 287:22, 291:15	fernyhough 158:18, 158:22, 163:9, 196:13, 263:11, 264:21, 266:18, 267:18, 268:12		firm's 221:7
	few 68:21, 160:6		first 7:2, 32:21, 35:8, 38:8, 108:3, 113:10, 117:3, 117:5, 117:7, 117:12, 117:13, 117:18, 118:5, 118:7, 118:9, 118:16, 119:15, 119:17, 120:1, 120:6,
	field 135:18		

120:15, 120:19, 121:8, 127:19, 162:21, 187:3, 207:21, 215:8, 222:15, 228:18, 237:7, 239:13, 245:2, 264:2, 265:4, 278:17, 290:13, 294:7 first-class 57:7, 57:16 fitzpatrick 217:2, 217:3 five 18:19, 236:11, 261:9 flavors 14:17 flowchart 79:14 focus 22:6, 22:13, 22:16, 32:12, 32:15, 155:5, 167:17, 268:21 focused 46:6, 78:9, 78:19, 105:12, 187:15, 187:17, 267:22, 275:2, 293:13 focuses 60:18 focusing 60:12, 70:2, 105:9, 105:14 folder 206:9, 207:5, 208:14, 209:7, 210:18 folders 79:8, 207:2, 209:16 folks 280:16 following 93:8, 108:17 follows 7:3	font's 149:8 force 147:11 forcing 91:13 forecasts 212:14 foreign 17:21, 61:20 forensic 263:16 forensically 183:15 form 16:13, 23:10, 126:13, 270:15 formed 20:22 former 10:17 forming 267:3 formula 87:12, 179:19, 181:20, 181:21, 182:19, 192:13, 258:15, 291:6 formulae 6:3, 283:17, 288:1 formulas 86:8, 122:17, 182:14, 183:3, 184:4, 184:7, 258:16, 288:6 forth 302:7 forward 22:9, 34:3, 45:10, 119:2, 143:19, 174:22 forwarded 33:8, 108:5, 157:15 forwarding 33:9, 146:19 forwards 34:21	found 51:4, 51:5, 184:17, 190:14, 193:22, 206:19, 206:20, 207:8 foundation 28:7 foundations 169:16 founded 11:2 founder 28:13, 28:18 four 121:19, 125:8, 126:5, 160:9, 160:14, 242:9, 261:9, 261:15 fourth 229:11, 239:14, 240:10, 251:5, 251:18, 251:22 fragments 34:14 frame 278:1, 278:4, 278:7, 278:8, 278:11, 278:12, 278:14, 289:17 framework 15:8, 15:10, 15:13, 15:14, 31:17, 31:20, 32:1, 41:1, 48:7, 48:8, 286:4 frankly 61:15 free 63:11, 128:20 frequency 108:20, 109:21, 161:15 frequently 163:3 fresh 33:4 friends 153:17	front 11:18, 12:16, 25:10, 46:16, 188:7, 271:9, 271:12 fuels 57:19, 58:5 fulfill 100:7 full 30:11, 154:8, 227:17, 238:7 full-time 61:9 fully 52:19, 163:14, 254:15 function 28:20, 161:10, 164:2 functionality 84:22, 93:19, 115:12, 115:16, 120:5 functions 172:15 fundamental 92:4, 92:12 funded 244:13 further 182:18, 302:12, 302:15, 302:20 fuzzy 154:1
G			
gadsden 218:1, 218:2 gaps 19:13 garden 50:17, 65:11, 65:19 gardens 18:4 gateway 49:12, 69:13,			

90:2, 90:4, 237:18, 240:3 gateways 49:9 gave 26:13, 29:8, 29:15, 64:2, 66:8, 169:5, 177:21, 257:12 gefinor 276:7, 276:8, 276:9, 276:11, 276:15, 277:5 general 6:8, 83:10, 83:21, 84:5, 86:1, 101:13, 120:17, 124:19, 163:10, 163:13, 169:11, 218:3, 278:6, 278:11, 278:13 generalist 194:14, 198:22 generally 42:8, 89:6, 114:10, 115:10, 116:13, 116:16, 116:20, 188:16, 199:13, 210:8, 212:17, 222:7 generating 239:22 getting 22:4, 36:18, 37:19, 39:18, 42:16, 100:6, 112:2 giant 34:5, 123:6 give 21:3, 24:12, 32:14, 61:10, 79:9, 111:22, 143:9, 157:12, 167:21, 169:1, 170:8, 198:3, 290:21	given 27:1, 136:9, 162:4, 270:3, 302:11 giving 94:18 glass 93:9 global 17:22, 123:3, 127:4 go-to-market 211:21 goals 79:2 goes 78:4, 117:19, 117:20, 174:12, 175:1, 198:2, 202:15, 258:16, 259:1, 292:11 going 8:5, 15:19, 19:17, 22:9, 32:14, 41:20, 44:2, 45:10, 49:22, 55:16, 57:18, 68:2, 73:16, 74:9, 77:17, 98:4, 108:6, 112:7, 116:6, 122:6, 122:7, 122:9, 123:22, 126:6, 127:4, 131:14, 133:1, 133:19, 146:9, 148:16, 149:15, 151:8, 165:3, 165:17, 168:4, 170:7, 170:8, 171:2, 175:1, 175:11, 191:11, 193:8, 207:10, 207:16, 211:1, 215:8, 216:7, 218:10, 220:10, 220:11, 223:1, 232:8,	233:1, 239:9, 244:7, 247:2, 250:9, 253:6, 253:21, 255:13, 258:20, 258:21, 261:5, 269:10, 275:14, 284:9, 285:5, 285:20, 287:11, 299:22 gone 55:5, 146:12, 178:18, 221:12 good 7:6, 26:10, 30:13, 37:8, 42:20, 76:5, 112:6, 112:11, 133:1, 157:16, 157:18, 280:17 google 66:1, 69:15, 71:1, 95:21, 95:22, 96:1, 96:8, 101:16, 101:18, 102:6, 103:16, 103:20, 105:1, 105:8, 105:17, 105:18, 110:10 gosnall 238:16 gosnall-fenwick 239:4 government 11:9, 14:18, 16:6, 17:20, 18:3, 19:2, 21:1, 22:18, 41:6, 41:12, 41:13, 41:19, 42:1, 42:10, 42:14, 50:2, 214:1, 276:22, 301:18, 301:21 graham 218:20, 218:21, 244:18, 244:22 grand 7:18	grants 146:15 graphical 130:17 great 44:8 greatest 49:2 grenifor 276:5 grew 66:4 ground 187:8 group 108:16, 121:18, 125:7, 131:21, 132:9, 132:13, 132:17, 133:4, 134:12, 141:12, 145:13 group-based 108:18, 141:16, 141:19, 142:2 groups 141:4, 141:5, 143:2, 169:14 grows 161:11, 161:13 guadalupe 2:10 guess 8:4, 16:21, 23:17, 24:2, 26:8, 28:22, 78:1, 94:22, 141:2, 143:9, 159:9, 159:10, 159:11, 165:18, 180:5, 180:21, 183:4, 188:21, 205:5, 206:6, 218:11, 222:16, 238:21, 276:4, 284:9, 297:20 guessing 32:17, 33:5, 265:3, 265:15
---	---	---	--

Transcript of Justin Marston
Conducted on November 11, 2025

97

guy 30:14, 170:6, 189:9, 218:3	262:16	221:19, 223:7,	hire 163:16
guys 244:6, 253:6, 255:16	headcount 278:22, 279:14	228:12, 228:18, 230:11, 235:13, 240:10, 245:8, 245:22, 246:17, 247:9, 258:13, 259:12, 262:3, 262:14, 264:2, 267:7, 270:1, 270:5, 271:14, 271:15, 274:4, 274:14, 275:5, 275:10, 276:17, 287:10, 293:19, 296:22, 300:11	hired 59:9, 168:19, 185:20, 186:2, 187:4
H	hell 200:16	here's 258:14, 258:15	hiring 186:19
hackers 17:22	help 19:6, 81:9, 126:14	hereby 302:5	historically 18:22, 122:4
half 227:14, 278:17	helped 30:21, 142:14, 171:20, 216:21, 247:6	herein 302:7	history 22:22, 56:14
hand 77:17, 204:1, 207:10, 220:11, 285:5, 303:6	helpful 37:17, 38:3, 97:17, 124:10	hereto 2:13	hit 93:2
handed 203:22, 204:19, 244:5	helpfully 231:3	hereunto 303:5	hoffman 226:14, 227:4, 228:1, 245:13, 248:11, 248:17
handle 42:4	helping 163:7, 164:20, 171:18, 217:7	hey 7:8, 21:2, 34:9, 37:7, 168:5, 227:12	hold 24:10, 43:11
handled 17:18	here 17:16, 27:17, 35:18, 61:5, 61:7, 61:9, 61:12, 64:14, 67:16, 76:12, 78:1, 80:1, 82:21, 92:6, 97:4, 99:11, 99:16, 100:12, 102:9, 114:14, 124:5, 124:9, 125:20, 126:22, 128:3, 128:22, 137:8, 143:6, 144:2, 145:1, 150:15, 150:19, 152:1, 154:6, 156:12, 172:6, 172:20, 181:12, 183:7, 183:22, 190:22, 191:22, 196:5, 205:19, 208:6, 210:14, 216:18, 216:20, 216:22, 221:5,	high 56:7, 57:6, 58:6, 100:17, 133:17, 149:17, 196:19, 217:20	holding 30:10
happened 32:6, 187:1, 202:2	high-level 80:8, 80:15, 177:22, 222:14	highly 154:9, 155:6, 155:9, 173:7	holidays 293:14
happy 27:9	highlighted 249:5		home 87:8
hard 54:1, 161:4, 203:20, 207:8, 263:19	highlights 93:3		honest 183:18
hardware 19:5, 165:2	higher 154:9, 155:6, 155:9, 173:7		honestly 59:15, 208:12, 266:5
hash 146:22, 233:4, 233:5, 233:8			honeymoon 186:14
hatch 175:17, 175:19, 176:3, 186:3, 238:4, 238:6			honor's 57:7
hatch's 176:11			honors 57:16
hatt 216:15			hook 40:18
head 29:17, 53:8, 67:18, 217:3,			hope 8:1
			hour 74:9, 76:17, 76:18, 77:5, 227:15
			hourly 76:13
			hours 283:21, 284:19,

287:3, 287:19, 288:13, 289:15, 292:15, 292:19, 297:14, 297:16, 298:3, 298:21, 299:8, 299:15 however 120:22, 262:18 hr 34:2, 34:20, 34:22, 142:4, 142:7 html 92:2, 92:13, 92:15 human 112:13 hundred 16:18, 22:17 hundred-billion-- dollar-company 71:4 hundreds 34:12, 265:17 hungerford 303:12 hyperio 29:10 hyperion 22:9 hyperlink 193:15 hypervisor 19:3 hypori 16:13, 16:14, 20:22, 22:5, 22:10, 22:11, 23:13, 24:15, 26:13, 29:11, 29:15, 30:3, 30:4, 30:6, 30:8, 30:11, 31:1, 31:4, 31:14, 43:19 I i-k 192:12	ibm 72:12 ibm's 72:17, 73:4 icon 68:6 icons 93:14 idea 9:18, 33:1, 33:7, 36:4, 43:21, 44:1, 44:8, 61:19, 63:20, 66:3, 88:5, 112:11, 115:13, 123:15, 150:3, 154:15, 156:13, 156:14, 190:8, 190:9, 229:14, 280:17 idealized 166:14 ideas 44:4 identical 133:19, 134:9, 286:3 identically 134:10 identification 24:9, 59:12, 108:15, 158:10, 165:6, 166:21, 167:7, 207:19, 220:14, 275:18 identified 274:4 identify 96:13, 103:8, 104:15, 121:9, 122:1, 122:15, 123:11, 131:19, 132:16, 141:3, 143:2 identifying 62:10 identities 246:4, 246:12	identity 50:11, 50:12 imagine 19:15, 33:17, 62:20, 68:2, 68:10, 123:22, 253:21 immediate 25:10 immediately 25:12 impact 71:5 implement 44:20, 58:14, 60:21, 69:13, 84:6, 86:10, 87:2, 111:17, 119:14, 120:14, 122:13, 123:6, 123:14, 126:18, 127:8, 128:2, 128:15, 129:20, 130:4, 131:5, 138:16, 157:1, 161:7, 164:13, 198:19, 199:19, 203:11 implementation 119:20, 123:19, 129:18, 151:8, 161:6, 162:2, 166:14, 168:6, 170:12, 170:14, 171:6, 171:13, 171:21, 172:4, 172:6, 172:9, 172:12, 174:17, 283:2 implementation-l- evel 162:8 implementations 58:14, 158:6, 217:7 implemented 13:14, 39:20, 44:16, 83:1,	113:22, 114:4, 119:18, 124:13, 130:1, 160:16, 169:2, 202:13 implementing 129:7, 129:10, 160:13, 198:5, 198:15, 199:4, 200:1, 200:10 implicitly 179:7 importance 80:11, 80:17, 80:20, 81:1, 81:4, 81:11, 100:14, 100:16, 100:17, 108:20, 122:21, 123:3, 123:4, 127:5, 127:6, 132:4, 157:11, 167:9, 167:13, 168:1, 168:8, 188:9, 188:13, 294:18 importances 166:22 important 50:4, 64:6, 80:20, 119:8, 122:6, 132:15, 157:9 impossible 66:4 inability 107:18 inbox 14:19, 15:1, 17:3, 17:5, 37:5, 40:12, 40:14, 67:14, 69:18, 79:5, 103:15 inboxes 18:16, 18:21 incapable 131:9 incentivized 72:4
--	---	--	---

include 32:3, 47:19, 83:5, 98:7, 135:3, 252:12, 299:19 included 47:9, 47:17, 91:18, 150:15, 154:14, 201:19, 224:7, 278:9 includes 135:4 including 143:3, 223:9, 291:16 increase 112:7 increases 158:3 incredibly 19:16, 70:22, 116:3, 157:8, 161:22, 163:18, 194:14 incremental 172:12 index 4:1 indicate 179:22 indicates 181:15, 181:17 indicating 167:3, 167:6, 192:6 indication 143:15, 268:15 indicator 36:14, 112:6, 133:1, 157:16, 157:18 indicators 133:10 individual 136:7 individualized 152:20 industry 40:2, 89:6	infinitely 161:2 information 18:9, 22:1, 64:4, 94:10, 128:22, 129:3, 230:8, 276:22 informed 260:22, 261:1, 262:7 infrastructure 61:17 initial 38:22, 39:1, 39:3, 150:7, 150:11, 151:6, 178:21, 225:9 initially 176:13 inline 191:2 inman 4:24, 274:15, 275:5, 275:21 innovation 35:10, 151:15, 162:9, 178:2, 202:2 innovations 34:8, 164:14 inserted 166:20 inside 67:16, 90:12, 90:17, 91:5 inspiration 40:18 inspired 18:7, 43:1 instagram 50:6, 296:10 install 88:16 instance 2:3, 15:6, 38:12, 106:9 instances 14:14, 93:12	instantly 52:13 instead 34:11, 69:17, 88:15, 135:22, 136:6 instructed 8:8 instructions 85:4, 231:7 integrate 72:5, 74:3, 88:6 integrated 107:10, 154:19 integration 63:12, 69:21, 69:22, 72:22, 90:21 intellectual 46:17, 222:9 intelligence 11:9, 14:6, 16:8, 35:16, 35:20, 35:22, 50:3, 50:4, 61:14, 61:18, 277:1 intensive 162:22 intents 255:6 interact 71:18, 92:7, 112:14, 129:5, 145:19, 153:11, 178:14 interacted 155:17 interacting 92:12, 112:2 interaction 108:4, 115:22, 263:3, 265:20 interactions 107:20, 152:18 interacts 145:15	interchangeably 203:6 interested 39:3, 142:4, 303:2 interesting 37:2, 37:13, 122:8 interestingly 49:13 interface 64:15, 64:21, 66:16, 94:1 interim 151:3 internal 37:1, 49:1, 51:6, 51:10, 51:19, 72:19, 151:5 international 56:19 internet 18:5, 65:1, 65:3, 65:22, 66:13, 66:16, 87:21, 88:2, 91:14, 91:21, 92:11, 97:10 interoperability 90:21, 90:22 interrelationships 173:8 introduce 216:21 introduced 276:20 introduction 242:4 invention 124:5, 210:6, 212:20, 213:13, 214:6, 214:11, 214:15, 222:1, 230:17, 232:12, 233:3, 233:11, 233:20, 234:16,
---	--	---	---

Transcript of Justin Marston
Conducted on November 11, 2025

100

235:9, 236:18, 237:22, 238:12, 239:7, 239:12, 240:5, 240:8, 240:19, 241:1, 241:5, 241:9, 241:16, 242:3, 242:10, 253:13, 254:14, 259:20, 259:21, 261:16, 274:6, 274:20, 280:19, 280:21, 281:1 inventions 82:21, 86:11, 212:2, 229:6, 236:1, 252:10 inventors 175:17, 246:13, 248:12, 248:16 inventorship 246:8, 251:13 invest 31:1, 277:9 invested 218:13, 277:6 investing 30:7 investment 4:12, 33:18, 33:20, 34:3, 34:21, 34:22, 60:9, 60:16, 218:12, 274:15, 274:19, 276:13, 277:15, 281:20, 293:14 investor 211:13, 218:21, 219:13, 281:21 investors 23:1, 23:6, 26:17, 28:22, 30:5, 30:6, 30:9, 31:1, 216:22 involved 27:14, 27:18,	48:19, 54:20, 76:7, 77:14, 81:12, 93:13, 119:9, 178:6, 279:6, 282:2 involvement 176:21 involves 78:22, 173:7 ip 268:5 ipr 1:15 ironic 45:22 ironically 41:5 irrelevant 280:14 isaac 218:1, 218:2 isaf 18:20 issue 21:20, 39:4, 39:15, 159:17, 164:20, 167:12, 173:14 issues 88:22, 159:13, 173:2 items 93:3 itself 115:18, 117:16 J jackie 218:6, 218:7 james 190:4, 190:7, 216:17 january 213:19, 221:1, 226:8, 226:11, 226:22, 227:6, 228:1, 228:13, 243:14, 243:15,	245:14, 246:15, 249:7, 261:19, 268:19, 293:4, 299:13, 300:13 jason 217:2, 217:3 java-type 169:11 jeff 218:11, 218:17 jm 253:17, 255:19, 262:1, 274:5 job 1:26, 63:22, 80:22, 135:10, 135:12, 135:13, 136:2, 136:9, 136:14, 136:16, 137:2, 138:4, 143:21, 144:2, 144:9, 144:12, 144:17, 144:20, 148:9, 168:18, 186:12, 253:21 john 244:22 jon 158:15, 158:17, 158:18, 158:20, 158:21, 159:4, 163:7, 163:9, 164:5, 164:7, 164:19, 165:11, 168:10, 168:17, 169:16, 169:19, 169:21, 170:11, 170:13, 171:17, 196:13, 247:5, 247:6, 263:11, 264:21, 266:18, 267:17, 268:12 jon's 168:18 jones 177:18, 178:3, 178:6, 178:9, 178:15, 178:22,	179:4, 180:20, 181:2, 181:20, 184:22, 185:8, 294:7, 294:10 jones's 179:18, 180:1, 180:4, 294:5 joseph 216:15 journal 56:9, 56:12, 56:14 journey 44:3 judge 7:15 judged 98:10 judgment 268:10, 268:17, 268:18, 268:20 july 277:16 june 221:1, 224:4, 224:11, 226:7, 278:1, 278:9, 281:3, 282:5, 293:21, 297:8, 297:16 justin 1:19, 2:1, 4:10, 5:5, 5:24, 7:1, 158:15, 204:22, 205:11, 302:6, 302:16 K kaider 218:18 keep 8:1, 34:9, 37:11, 42:8, 61:19, 63:5, 93:6, 150:4, 161:4, 170:8, 175:1 kept 207:7
--	--	--	--

Transcript of Justin Marston
Conducted on November 11, 2025

101

key 35:10, 62:10, 249:4, 249:5, 267:17	199:3, 200:10, 233:16, 236:19	lawyer 238:7, 242:5	47:4, 53:7, 53:9, 54:11, 54:12, 66:6, 162:11, 163:2, 165:1, 166:10
keyword 97:15	known 157:8	lawyers 225:11	let's 25:21, 42:10, 68:11, 113:16, 121:2, 156:22, 168:2, 213:15, 228:16, 251:2, 278:16, 287:15
khan 9:15, 9:17	label 184:13	leader 71:13, 186:17	letter 4:24, 159:3, 164:4, 165:10, 182:3, 183:6, 275:4, 275:15, 275:21, 276:3
khan's 9:20	labeled 135:10, 208:1	learn 156:22	level 86:21, 108:2, 149:17, 217:20
kid 56:4	lack 28:7, 38:19, 39:4	learning 158:5	levels 11:16, 13:5, 14:21
kids 50:6, 55:1	lancashire 177:17	learns 133:9	leveraging 91:12
killed 49:20, 73:4, 73:5, 73:9	land 53:18	least 118:11, 121:9, 121:17, 123:11, 125:5, 127:18, 177:19, 227:9	liability 36:9
kind 11:4, 22:21, 30:18, 35:9, 35:11, 35:14, 36:2, 36:3, 38:4, 39:2, 42:15, 44:9, 50:16, 54:8, 55:4, 64:6, 65:1, 65:7, 65:20, 81:7, 123:2, 124:3, 137:2, 142:14, 151:13, 155:7, 157:6, 170:7, 173:21, 173:22, 174:22, 215:19, 217:15, 257:20, 289:11, 292:12	language 183:10	leave 26:10, 26:12, 52:13, 52:14, 53:2, 176:3, 191:11, 196:13	licensing 280:8
kinds 41:3, 145:3	laptop 207:3, 207:4	leaves 28:13, 292:22	life 25:14, 27:10, 149:8, 164:15
kitchen 87:8	large 39:16, 70:17, 83:16, 96:14, 104:14, 128:12, 199:5, 263:16	leaving 26:21	lifecycle 17:19, 35:5, 35:22, 36:5, 62:20, 106:9, 107:20, 234:15
kitties 97:8, 97:9, 97:11	last 168:14, 185:2, 185:4, 185:12, 185:15, 189:22, 195:1, 195:4, 204:17, 205:9, 210:20, 215:12, 219:4, 219:17, 239:6, 242:9, 249:11	led 170:22	liked 244:15
knowing 53:18, 127:7	lasted 187:9	left 16:13, 20:21, 22:5, 22:8, 23:14, 26:7, 27:1, 27:7, 31:19, 32:7, 32:12, 32:18, 48:14, 50:19, 191:7	likely 37:9, 37:10, 75:6, 116:6, 142:7, 211:19, 215:3, 271:22, 272:2, 272:11, 300:5
knowledge 35:8, 198:5, 198:15, 198:19,	later 23:13, 69:14, 225:15, 225:18, 225:19	legal 199:12, 229:17, 231:11, 235:4, 240:15, 257:22, 279:7, 279:8, 280:4, 280:6	likewise 138:11
	latifur 9:15, 9:17	length 288:2	
	launching 146:8	lengthy 121:5	
	law 221:7, 221:17	less 37:9, 37:10,	

limit 153:20 limited 15:21, 196:11 line 57:13, 81:19, 82:2, 89:19, 92:22, 94:22, 101:10, 113:5, 131:18, 154:1, 181:12, 229:10, 229:11, 234:21, 238:15, 238:22, 240:11, 241:18, 241:19, 241:21, 243:19, 245:3, 245:17, 257:5, 296:19 lines 84:13, 89:14, 94:22, 106:1, 107:6, 140:18 linked 4:10, 231:2 linkedin 23:21, 24:7, 25:21, 26:3, 50:20, 50:21, 51:4, 176:10 liquidate 30:17 list 98:3, 98:6, 136:14, 137:3, 208:13, 210:12, 222:5, 251:8, 261:15, 282:11, 282:18 listed 101:17, 125:8, 130:10, 188:5, 216:2, 249:9, 249:14, 274:4 listen 21:7 lists 121:19, 175:17, 184:22, 195:2,	228:18 literally 18:20, 134:10 little 9:10, 68:6 lived 19:19, 25:14 llp 3:6 load 162:11 local 127:5, 166:22, 167:9, 167:13, 168:8 located 206:13, 206:16 lock 48:3 locked-down 19:16 log 5:30, 5:33, 65:2, 116:4, 209:15, 210:19, 220:21, 242:9, 249:8, 249:9, 249:15, 256:21, 259:13, 260:9 logic 109:10 logical 19:12, 44:4 logically 16:3 logistics 142:8 logs 221:8, 242:16 long 9:11, 33:5, 36:8, 44:10, 57:2, 57:3, 63:5, 100:18, 143:18, 144:5, 146:16, 161:8, 175:21, 283:14, 287:13	longer 146:11, 245:17, 260:14 look 20:12, 21:12, 23:18, 23:20, 25:19, 25:21, 26:5, 27:16, 32:13, 42:15, 49:7, 58:1, 61:4, 62:3, 67:22, 68:4, 72:4, 74:1, 75:11, 77:22, 84:13, 86:12, 88:1, 101:10, 103:21, 104:18, 111:3, 113:5, 113:8, 114:3, 117:3, 119:13, 120:2, 121:2, 124:5, 125:17, 126:19, 127:2, 128:4, 134:18, 137:8, 142:17, 142:22, 146:1, 163:15, 163:20, 170:9, 172:21, 173:21, 179:17, 181:6, 191:21, 204:17, 210:17, 211:10, 212:6, 214:8, 215:11, 223:5, 225:5, 226:16, 227:15, 232:14, 234:21, 238:2, 240:21, 243:19, 247:17, 247:20, 249:8, 273:10, 276:1, 277:19, 281:2, 282:4, 285:20, 286:1, 286:11, 298:18, 299:7 looked 207:4, 265:18, 266:1, 279:15 looking 18:15, 21:13,	21:17, 30:17, 73:20, 81:13, 87:8, 98:12, 103:21, 114:10, 119:12, 123:16, 127:10, 130:8, 131:17, 141:9, 178:1, 185:1, 186:15, 210:16, 213:17, 214:13, 229:10, 237:12, 263:5, 268:11, 297:7, 299:3 looks 48:7, 208:13, 208:19, 220:7, 239:2, 285:14, 286:11 loop 113:1, 133:9 loops 57:20 lose 28:18 lost 52:4, 63:10, 108:7 lot 22:3, 35:16, 36:21, 36:22, 39:2, 58:2, 61:13, 128:8, 129:2, 133:7, 151:9, 153:16, 160:4, 169:5, 221:6, 222:12, 230:8, 230:9, 250:9, 257:18, 260:19, 262:21, 270:21, 283:13, 288:3 lots 36:18, 97:9 lotus 72:17, 72:19, 73:1 loud 147:17
---	---	--	--

Transcript of Justin Marston
Conducted on November 11, 2025

103

low 7:20, 8:1, 100:16, 280:12 lycos 66:1	98:6, 143:18, 143:19, 229:2 main 45:4, 168:18, 263:1, 263:8, 263:9, 285:19	manage 61:19, 83:19, 145:3 managed 17:6, 33:15, 36:5, 106:8, 146:6 management 282:1 manager 186:18, 215:16 managing 78:5 many 67:3, 80:14, 91:1, 179:17, 284:19, 290:3 mark 24:3, 24:11, 41:21, 93:10, 165:3, 207:16 marked 4:26, 24:9, 59:12, 139:12, 149:2, 158:10, 165:6, 165:14, 170:16, 179:11, 187:20, 189:18, 194:19, 197:11, 200:19, 207:11, 207:19, 208:22, 220:2, 220:14, 228:5, 243:6, 275:18 market 70:17, 71:2, 218:4 marketing 14:8 marriage 302:22 married 186:14 marston 1:19, 2:2, 4:10, 5:6, 5:25, 7:1, 7:7, 10:2, 10:13, 150:19,	159:11, 165:18, 167:3, 167:6, 168:11, 178:18, 190:11, 190:14, 195:5, 205:1, 205:12, 206:13, 206:16, 235:3, 289:21, 295:2, 295:7, 297:15, 298:11, 298:20, 299:8, 299:20, 300:11, 302:6, 302:16 marston's 10:8, 284:2, 284:4, 295:7 massive 159:22 massively 166:12 master 215:20 master's 59:2 match 233:8 material 252:13, 257:7, 289:13, 289:16 math 58:3, 129:21, 142:14, 150:22, 161:3, 161:15, 164:14, 166:15, 168:7, 169:10, 172:11, 174:2, 175:4, 175:6, 184:20, 192:7, 199:5, 204:12, 285:20, 290:11, 290:15 mathematical 81:18, 83:16, 87:12, 101:1, 119:5, 119:6, 122:17, 128:13, 151:7, 161:6, 169:9, 169:16,
M			
machine 2:8 made 11:6, 18:10, 31:16, 66:22, 149:22, 164:10, 196:4, 248:6, 256:18, 260:7, 268:10, 268:18, 280:14, 282:12, 284:15 magnifying 93:9 mail 5:8, 5:11, 5:13, 5:16, 5:19, 5:28, 6:10, 6:13, 38:13, 50:15, 69:5, 78:4, 78:10, 78:20, 78:21, 82:7, 84:22, 95:6, 95:9, 95:11, 95:12, 102:1, 106:5, 106:7, 106:10, 107:9, 107:13, 107:17, 132:5, 136:21, 152:22, 154:9, 154:20, 190:4, 204:5, 204:6, 215:3, 233:7, 252:4, 252:14, 253:16, 254:1, 254:15, 255:19, 261:22, 274:5 mail-based 155:10 mails 50:21, 63:6,	maintain 88:19 maintained 206:3, 206:4 maintains 64:7 major 38:21, 56:22, 73:6, 74:2, 101:16, 159:16 majority 278:21, 291:5, 291:21 make 8:12, 8:15, 8:19, 11:5, 13:14, 18:10, 25:4, 25:20, 27:3, 37:18, 39:17, 66:15, 66:17, 67:5, 69:1, 70:6, 71:5, 79:17, 90:6, 101:7, 123:18, 123:20, 129:18, 138:12, 147:16, 153:8, 162:10, 164:1, 164:10, 164:22, 196:17, 233:5, 247:17, 268:4, 269:2, 269:17, 269:20, 283:15, 283:21, 284:20 makes 101:8, 130:14, 130:15, 149:8, 166:6 maki 216:14, 216:15 making 154:4		

171:14, 172:2, 172:7, 202:21, 258:14, 286:4, 288:6, 290:7, 291:6, 291:22 mathematician 150:12, 150:18 mathematics 57:14, 161:20, 194:16, 258:16, 282:20, 283:9, 283:13, 286:9, 286:13, 287:21 maths 150:8, 150:11, 163:12, 169:6, 189:9 matola 28:16 matter 303:4 matters 55:10 maximizing 46:6 maybe 50:18, 68:15, 178:11, 187:9 md 303:14 means 11:13, 13:3, 37:9, 82:16, 85:14, 85:17, 96:5, 110:4, 119:2, 119:3, 142:3, 156:20, 156:21, 185:4, 200:14, 200:17, 202:18 meant 62:20, 62:22, 66:5, 111:6, 115:2, 200:16, 208:9, 284:7 measure 56:17, 117:8, 117:13, 117:18,	118:10, 118:17, 118:21, 121:15, 125:4, 125:19, 126:21, 127:19, 127:20 measurement 113:11, 113:12, 117:4, 117:5, 118:5, 118:8, 119:15, 119:18, 120:2, 120:6, 120:15, 120:19, 121:3, 122:1, 122:14, 123:15, 124:13, 124:21, 125:3, 126:19 measures 121:17, 125:6 mechanism 37:8, 152:18 mechanisms 152:8 medium 84:21, 85:5, 113:6 meeting 212:15 meetings 61:13, 277:3 memory 15:20, 83:18, 206:21, 220:7, 235:10, 236:21, 239:3, 263:20, 264:8, 264:12, 265:17 mention 274:14, 277:22, 281:7 mentioned 29:8, 29:14, 68:14, 68:17, 70:15, 72:11, 102:4, 102:5, 184:14, 227:19, 257:11, 278:18 mentions 144:1, 166:19	mesa 9:1 message 34:20, 35:1, 35:2, 35:6, 50:13, 79:10, 94:4, 97:20, 135:15, 135:20, 137:14, 137:17, 142:6, 152:12, 153:13, 153:16, 157:15, 234:14 messages 15:22, 17:18, 19:17, 36:22, 37:10, 49:16, 63:13, 64:7, 70:10, 79:1, 98:10, 99:8, 100:4, 100:7, 142:4, 145:9, 154:2, 154:21, 202:4, 237:19, 240:1, 240:5, 240:8, 240:22, 241:4, 241:8 messaging 11:6, 14:9, 35:9, 40:11, 49:5, 50:1, 51:6, 69:13, 78:17, 78:22, 96:11, 105:13, 136:11, 145:6, 231:12, 231:14, 231:16, 232:16, 232:19, 234:5, 234:11, 239:17 messy 54:22 met 178:10 meta 156:2 metadata 135:18, 184:21, 185:1, 185:9, 185:10, 185:13,	185:14 metadata-based 136:21 method 16:7, 119:19 methods 108:20, 141:8, 141:19 metrics 80:10 michael 30:14, 218:18 microsoft 67:1, 68:18, 70:17, 70:20, 71:6, 71:12, 73:3, 73:9, 73:14, 73:19, 74:2, 88:2, 90:1, 90:7, 90:10, 90:12, 91:4, 91:5, 101:3, 146:9, 146:10 microsoft's 69:4 middleware 15:8, 15:10, 15:13, 15:14, 19:9 might 29:9, 100:4, 144:8, 146:1, 166:17, 178:10, 227:18, 244:18 million 26:14, 29:19, 47:5, 53:7, 54:11, 54:12 millions 21:4 milner 215:14, 215:15 minneapolis 3:15 minor 194:14 minute 143:9, 184:14
---	---	--	--

minutes 68:21, 212:15 mispronounced 29:9 missed 219:5 misstates 61:2, 259:6, 271:19 mithril 24:22, 25:15 mm-hmm 17:4, 24:4 mn 3:15 mobile 16:17, 21:3, 22:16, 41:15, 41:17, 42:17, 42:18, 43:3, 43:19 model 17:7, 17:9, 17:10, 17:12, 17:14, 17:17, 38:11, 38:14, 38:15, 39:8, 81:8, 81:18, 83:1, 83:16, 83:20, 85:19, 86:8, 101:1, 101:7, 105:4, 106:17, 106:21, 108:3, 119:5, 119:6, 122:18, 123:7, 128:13, 134:7, 142:20, 147:13, 147:19, 147:21, 151:3, 155:22, 156:3, 156:14, 158:3, 172:2, 172:7, 172:13, 177:7, 177:11, 198:6, 198:15 modeling 142:10, 142:12 models 20:5, 86:17,	86:21, 87:2, 87:11, 108:19, 143:17, 152:22, 157:8, 160:3, 166:12, 171:14, 194:6, 198:20, 199:17, 199:18, 200:1, 200:11, 202:21, 216:12, 290:7, 295:8, 295:15 modified 210:21 module 79:20, 113:10, 113:11, 113:12, 113:13, 113:17, 113:18, 113:21, 114:5, 114:8, 114:18, 115:11, 117:4, 117:6, 118:8, 118:9, 119:15, 119:18, 120:2, 120:6, 120:15, 120:20, 121:3, 122:1, 122:14, 123:16, 124:13, 124:21, 125:3, 126:19, 127:11, 127:14, 128:3, 129:10, 129:22, 130:5, 130:10, 130:13, 131:6, 131:11, 200:14 modules 82:8, 85:1, 113:7, 113:9, 202:14 moldova 187:2 moment 14:1, 20:20, 27:1, 271:12 money 20:8, 20:9, 20:10, 22:3, 25:11, 40:4	monitoring 113:10, 113:17, 113:18, 113:21, 114:5, 114:7, 114:18, 115:11, 117:6, 118:8, 200:14 month 278:11 morass 63:11, 108:8 more 13:18, 15:8, 15:10, 35:17, 50:20, 61:13, 74:17, 85:3, 95:7, 96:7, 99:20, 106:6, 108:16, 111:2, 116:6, 116:7, 118:12, 119:2, 119:3, 121:17, 124:2, 125:6, 129:2, 132:4, 134:5, 142:7, 142:14, 147:9, 148:1, 151:9, 151:14, 152:9, 152:11, 153:1, 153:4, 153:9, 162:14, 163:13, 166:17, 167:21, 167:22, 172:13, 172:14, 172:15, 172:17, 183:11, 186:6, 186:16, 275:2, 287:19, 296:19 morning 7:6 morton-jones 177:13, 177:14, 184:12, 294:9 most 35:14, 56:11, 75:6, 79:3, 97:14, 98:10, 104:15, 122:6,	132:7, 133:10, 161:14, 162:21, 163:4, 297:2 mostly 135:7, 290:7 motivated 89:3 move 27:12, 46:5, 279:10 moved 11:7, 13:18, 13:22, 14:4, 14:10, 15:9, 22:9, 35:18, 61:8, 73:13, 176:7, 185:22, 196:15 moves 146:16 moving 22:4, 40:2, 89:7, 244:8, 279:15, 293:3 much 26:22, 27:18, 32:12, 36:19, 41:19, 45:15, 45:17, 54:10, 56:11, 65:21, 70:21, 76:15, 76:16, 99:20, 108:4, 111:21, 138:19, 157:6, 157:10, 157:11, 164:16, 169:16, 286:2, 298:10 multi-domain 20:6, 21:14, 22:14, 40:3, 60:13 multi-security 44:21, 275:1 multilevel 18:8, 20:1 multiple 11:14, 13:4, 14:14, 19:4,
---	---	---	--

Transcript of Justin Marston
Conducted on November 11, 2025

106

20:17, 85:15, 85:18 multivariant 81:8, 160:3 multivariate 122:18 must 8:9, 264:16, 287:6 myself 52:16, 122:5, 235:20, 298:5	33:2, 40:13, 40:18, 41:8, 63:20, 66:21, 86:11, 114:2, 116:14, 119:13, 120:2, 120:13, 124:5, 124:15, 125:17, 126:19, 127:1, 128:4, 131:5, 147:11, 150:12, 150:22, 151:9, 156:13, 156:16, 157:21, 162:2, 164:17, 180:5, 193:15, 194:3, 199:2, 199:3, 203:10, 247:20, 301:6, 301:13 needed 138:13 needs 33:10 neither 206:15 network 14:15, 15:3, 16:3, 17:19, 18:2, 18:3, 50:9, 50:12 networks 11:15, 13:4, 14:12, 16:1, 18:1, 18:4, 18:13, 19:12, 19:18, 19:21, 40:16 never 13:16, 39:20, 44:16, 53:19, 53:20, 67:4, 154:14, 160:16, 171:19, 194:5, 255:2, 268:3, 280:14 new 22:20, 22:21, 23:2, 23:7,	25:19, 25:20, 27:4, 27:8, 43:20, 43:21, 52:7, 52:20, 55:6, 147:3, 158:6, 181:21, 184:6, 187:12, 189:9, 189:14, 218:17, 245:3, 245:17, 245:19, 251:12, 251:13, 251:14, 251:15, 279:8, 279:21, 291:14, 291:16 newell 218:12, 218:17 next 27:12, 67:8, 68:11, 84:8, 212:4, 213:15, 217:9, 232:15, 232:20, 232:22, 234:21, 235:21, 237:12, 244:12, 245:12, 247:3, 281:2, 282:15, 284:9, 286:20, 292:3, 293:5 nexus 173:8 nods 29:17, 53:8, 67:18 nokia 83:17 non-internet 17:22 none 212:1, 241:13, 241:15, 267:16, 280:18 nonrelational 240:1 normal 65:1, 65:3 normalized 135:2 notes 6:5, 11:21,	72:12, 72:17, 72:19, 73:1, 73:2, 150:10 notice 11:18, 174:12, 210:15 november 1:20, 2:5, 211:2, 212:8, 215:2, 273:9, 273:20, 292:5, 292:20, 293:3, 299:4, 299:9, 299:13, 300:13, 302:18, 303:6 nuclear 57:19, 58:5 number 4:8, 12:21, 21:19, 21:20, 24:8, 28:11, 47:5, 51:1, 55:9, 59:11, 73:10, 74:14, 81:20, 86:7, 113:9, 139:14, 140:8, 140:9, 140:10, 141:7, 149:3, 158:9, 161:11, 161:12, 165:5, 170:18, 176:18, 179:12, 180:13, 187:10, 187:22, 189:19, 194:20, 197:15, 200:20, 204:14, 207:12, 207:18, 220:3, 220:13, 238:3, 241:18, 241:19, 241:20, 241:21, 243:8, 252:16, 275:17, 281:7, 281:13, 282:11, 285:8, 285:16, 290:18, 290:22, 293:22, 297:18 numbered 2:4
N name 23:11, 24:16, 172:8, 190:3, 195:7, 219:3, 219:6, 229:12, 238:8, 238:19, 239:2, 253:3, 294:8 named 32:2, 80:1, 231:3 names 157:21, 209:21 narrowing 16:20 narrowly 15:22 nation 17:21, 61:20 nato 18:19 natural 35:19 nature 56:9, 56:19, 57:17 nda 179:5 necessarily 138:8, 222:1 necessary 83:18, 86:13, 120:10 need 12:4, 21:5,			

numbers 62:4 numerous 208:16 nw 3:7 O oath 7:3, 259:1, 265:16 object 8:7, 34:15, 35:6, 36:12, 38:13, 53:10, 69:10, 106:9 object-oriented 35:9 objection 28:6, 29:6, 31:9, 40:5, 45:18, 47:1, 47:12, 48:15, 53:12, 54:15, 61:1, 61:3, 65:14, 78:12, 102:10, 102:15, 103:11, 105:10, 105:11, 109:12, 110:1, 110:15, 116:17, 126:7, 126:10, 126:13, 133:21, 247:11, 259:5, 259:6, 259:15, 269:11, 269:13, 271:18, 271:19, 272:6, 272:14, 298:7 objects 34:9, 36:4, 37:14, 95:12, 107:19, 234:14 obligations 179:5 obviously 58:7, 82:14, 97:18, 105:1, 146:8, 162:1,	266:1 occasions 208:17 occurred 302:16 october 165:13, 273:19, 288:20, 289:18, 290:1, 292:5, 292:20, 298:14, 298:22, 299:4, 299:9 off-the-shelf 114:17, 115:2, 115:12, 115:17, 130:3, 131:4 offhand 31:6, 140:8, 231:19, 253:11, 265:17 office 1:1, 218:17, 255:21, 278:19 officer 176:15, 176:17, 186:8, 186:11, 276:22 offices 2:9, 279:11, 302:16 often 28:14, 160:19 oh 72:10, 171:10, 203:18, 206:5, 219:7, 219:18, 220:10, 232:22, 242:17, 246:1, 251:17, 259:6, 275:11, 286:16, 294:1, 294:10 oil 53:18, 53:20 old 203:20, 206:9, 206:20, 207:5 once 178:11	one's 121:5, 208:5, 208:6, 291:8, 291:9, 291:11 one-sided 53:1 ones 124:8, 124:9, 167:20, 207:1, 212:22, 221:9, 232:9, 232:10, 242:15, 273:18 online 65:21 only 10:6, 34:17, 41:22, 64:8, 66:6, 76:6, 76:9, 97:19, 111:16, 128:14, 146:13, 161:8, 207:5, 242:9, 249:3, 261:15, 267:6, 267:9, 267:21, 268:8, 272:19, 274:4, 274:5 open 170:8, 173:17 operates 105:17 operating 15:4, 41:2, 95:11, 115:3, 115:5, 115:7, 115:20, 115:21, 116:1, 116:5, 116:9, 116:10, 116:15, 146:15, 244:1 operation 147:22 opinion 258:7 opinions 169:1, 267:3, 271:2 opposed 152:11	option 29:3 oral 1:18, 2:1 orchestrate 16:1 orchestrating 19:17 order 86:10, 86:12, 91:9, 108:3, 114:4, 119:22, 124:16, 126:18, 126:20, 128:2, 167:17 ordered 301:11 ordinary 87:1, 116:15, 126:17, 128:1, 129:12, 198:1, 198:4, 198:11, 199:20, 200:2, 203:2 organization 187:19 organizations 22:1 organize 79:3 organized 210:20, 228:8 organizing 281:19 original 32:22, 33:1, 33:6, 208:9, 286:8 originally 23:10 other 10:13, 11:17, 15:15, 30:5, 31:1, 37:21, 42:9, 43:9, 45:9, 46:8, 51:16, 63:6, 66:9, 75:21,
---	--	---	--

76:1, 77:2, 77:7, 79:1, 81:10, 81:11, 81:14, 83:19, 91:21, 104:2, 104:5, 110:5, 111:3, 112:10, 121:9, 123:11, 129:5, 131:19, 132:6, 132:20, 133:16, 143:16, 143:17, 145:3, 148:17, 157:13, 178:7, 182:7, 184:1, 184:3, 194:6, 201:14, 206:13, 211:4, 211:5, 215:1, 221:9, 222:8, 225:2, 225:9, 225:11, 227:11, 243:3, 243:18, 244:10, 248:2, 248:17, 252:22, 256:20, 261:7, 269:9, 275:1, 280:9, 281:13, 281:16, 287:7, 287:10, 288:3, 293:20 others 51:4, 71:14, 72:8, 96:7, 110:12, 215:6 otherwise 127:3, 200:13, 303:3 ourselves 171:22, 172:3 out 10:16, 15:7, 18:5, 23:8, 28:14, 29:16, 30:10, 33:4, 35:15, 49:16, 53:20, 57:19, 58:4, 66:7, 69:7, 85:3,	104:5, 112:5, 112:11, 122:17, 124:21, 126:21, 147:17, 151:14, 152:11, 157:14, 160:1, 163:22, 181:20, 182:2, 187:12, 195:16, 219:11, 223:2, 233:1, 237:19, 247:6, 296:22, 300:20 out-of-the-box 158:5 outcome 303:3 outlier 133:4, 134:14, 134:16 outlook 67:1, 67:2, 68:17, 69:1, 69:3, 69:21, 70:9, 70:11, 70:14, 70:19, 70:22, 71:2, 71:12, 71:18, 73:3, 90:7, 90:11, 90:13, 91:5, 91:9, 91:17, 100:18, 101:3 outside 87:8, 146:2 over 8:5, 11:7, 16:18, 17:18, 22:17, 42:9, 50:19, 52:19, 60:17, 63:1, 63:3, 63:4, 63:17, 133:3, 133:12, 142:17, 149:15, 192:12, 230:2, 242:16, 244:5, 245:1, 248:2, 269:9, 277:13	overall 229:21 overhead 116:11, 280:15 overly 280:5 overseeing 215:20 overview 155:16, 291:14 own 26:22, 41:12, 49:16, 65:9, 72:22, 75:22, 105:14, 116:21 owned 27:5, 30:8 owner 1:12, 3:11, 271:6 P padmanabhan 3:12, 3:13, 28:6, 28:11, 29:5, 31:9, 40:5, 41:21, 45:18, 47:1, 47:12, 48:15, 53:10, 53:12, 54:15, 61:1, 65:14, 74:8, 78:12, 84:15, 85:10, 102:10, 102:15, 103:11, 105:10, 107:2, 109:5, 109:12, 110:1, 110:15, 116:17, 117:14, 117:19, 125:11, 125:21, 126:8, 126:12, 133:21, 139:7, 139:10, 148:18, 151:19, 156:8, 156:16, 168:13, 174:4, 188:12, 197:7, 208:3, 225:15,	226:8, 232:20, 247:11, 250:17, 251:10, 251:15, 253:14, 253:18, 256:15, 259:5, 259:15, 269:6, 269:12, 271:18, 272:6, 272:14, 273:12, 273:15, 275:9, 293:5, 294:12, 297:9, 298:6, 300:19, 301:3, 301:8, 301:13, 301:20 page 4:2, 4:8, 62:3, 62:5, 62:7, 62:10, 64:12, 67:9, 68:12, 72:12, 78:1, 81:20, 81:21, 82:1, 84:9, 84:10, 89:14, 89:15, 89:16, 102:18, 113:3, 149:10, 150:5, 151:17, 156:6, 171:3, 171:8, 172:21, 173:19, 174:19, 180:12, 180:17, 181:7, 181:21, 181:22, 182:18, 182:22, 185:2, 185:3, 188:3, 189:22, 190:18, 193:11, 195:1, 197:19, 202:7, 204:17, 205:9, 211:3, 212:4, 212:7, 213:1, 213:15, 213:17, 214:8, 214:10, 214:13, 214:14, 214:17, 214:19, 214:21, 215:9, 217:9, 219:4, 219:17, 224:1, 231:4,
---	--	--	---

233:22, 234:1, 235:21, 236:4, 236:6, 236:9, 237:4, 238:2, 239:9, 240:4, 240:7, 240:21, 241:3, 241:7, 241:11, 241:17, 249:11, 251:2, 259:18, 261:10, 266:16, 273:7, 273:18, 282:16, 286:5, 286:14, 286:21, 287:11, 293:6, 297:9, 297:10, 297:22 pages 1:27, 103:16, 174:8, 175:1, 282:6, 286:7, 287:1, 288:14, 289:13, 290:3, 290:6 paid 76:16 pain 16:21 pane 92:9 paper 154:13, 168:12, 168:15, 170:3, 178:21, 189:4, 193:13, 195:12 paragraph 143:10, 156:19, 180:16, 197:19, 197:21, 203:3, 223:5, 225:5, 226:4, 266:16, 266:22, 274:12, 277:13, 277:19, 281:10, 282:4, 283:19, 284:10, 284:13, 284:14, 288:15, 289:7, 289:11, 292:13, 293:22, 294:5,	294:11, 297:18, 298:18, 299:7 paralegal 238:20 parallel 170:9 parkway 3:14 part 29:15, 43:7, 43:17, 56:16, 77:11, 80:4, 81:17, 85:19, 85:20, 92:5, 92:12, 94:10, 118:11, 120:10, 121:17, 125:6, 127:18, 141:2, 146:4, 147:21, 155:3, 163:10, 187:19, 201:17, 204:12, 295:14 part-time 52:17, 52:18 partially 85:2, 85:9 particular 20:20, 39:19, 98:11, 123:5, 132:11, 133:16, 143:3, 143:21, 299:15, 300:3 particularly 26:17, 27:13, 105:17, 139:5, 163:12, 208:12 parties 302:21, 303:1 partly 85:11, 85:13 partner 68:18, 211:21 partnership 72:13 parts 8:17, 14:6, 38:5, 78:5, 121:6, 222:8,	264:13 party 77:10, 302:13 pass 15:20, 300:18 passed 201:20 past 151:3 pat 28:15 patent-inventors-hip 245:19 patented 15:19 patents 47:22, 203:8, 227:9, 227:11, 245:18, 255:4, 257:18 path 16:15 paul 10:2, 10:8, 150:19, 159:11, 165:17, 165:18, 167:3, 167:6, 168:11, 178:18, 190:11, 190:14, 206:13, 206:16, 284:2, 284:4, 289:21, 295:1, 295:7, 297:15, 298:11, 298:20, 299:8, 299:19, 300:11 paying 7:19, 227:14 peered 18:1 peltier 1:29, 2:6, 302:3, 303:9 pending 235:6, 236:12, 238:9 penetrating 71:2	people 15:15, 16:18, 22:18, 25:11, 35:13, 36:18, 37:2, 37:15, 51:2, 51:14, 53:17, 54:1, 54:4, 54:13, 58:1, 59:9, 64:8, 66:10, 67:5, 79:1, 93:12, 109:15, 110:6, 111:2, 111:3, 112:13, 122:10, 132:13, 132:21, 134:5, 136:18, 136:20, 142:3, 142:7, 142:8, 143:3, 143:7, 143:13, 143:17, 143:18, 143:19, 143:20, 146:19, 147:4, 152:9, 153:11, 153:15, 154:2, 155:14, 169:13, 169:14, 186:20, 187:5, 196:18, 244:20, 279:19 percent 27:6, 66:6, 98:9, 188:20, 201:21, 237:11, 256:1 perception 54:21 perfect 168:9 perform 114:17, 116:14, 120:18, 124:16, 124:20, 165:1 performing 131:10 period 32:9, 49:15, 52:16, 186:13, 197:3, 223:21,
---	---	---	---

Transcript of Justin Marston
Conducted on November 11, 2025

110

244:5, 278:9, 281:8, 292:19, 293:13, 299:3, 299:12, 300:3, 300:4 periodically 162:19 permanently 61:12 permissions 146:15 permitted 155:20 person 37:2, 47:14, 56:13, 87:1, 111:12, 119:11, 122:12, 123:9, 125:16, 126:17, 128:1, 129:11, 132:11, 133:17, 133:19, 185:12, 185:15, 197:22, 198:4, 198:11, 198:14, 199:20, 203:1, 203:7 person's 34:22 personally 178:9 pertains 144:20 petitioner 1:7, 2:3, 3:3 phased 171:13 phone 83:17, 227:8, 303:15 photos 50:9 physics 58:6 picked 87:7, 87:9 picture 41:2, 67:14, 81:15, 87:15,	87:17, 122:22, 129:19, 139:6, 184:12, 291:11 piece 19:5, 26:13, 34:13, 35:21, 53:17, 80:6, 80:19, 81:12, 83:6, 94:14, 99:11, 106:7, 118:10, 118:13, 119:7, 119:10, 121:10, 121:16, 122:19, 123:12, 125:4, 127:15, 128:12, 130:20, 132:19, 132:22, 135:5, 144:18, 153:10, 154:3, 161:1, 264:18, 267:9, 272:20 pieces 191:16, 191:19, 270:18 pins 147:2 pivot 13:20, 44:2 pivoted 13:17, 14:3, 20:4, 44:20 pixels 130:16 place 19:8, 31:4, 279:12 planning 213:22, 217:8 platform 14:9, 15:15, 19:9, 31:20, 31:21, 35:9, 43:7, 43:10, 50:11, 71:14, 72:1, 72:18, 90:18, 153:19, 170:14 platforms 74:2, 74:4,	160:5 play 72:2 played 66:22 please 24:12, 24:13 plenty 53:16 pllc 3:13 plug-in 66:16, 67:1, 68:20, 69:1, 70:3, 70:5, 70:8, 70:16, 90:11, 91:4 plurality 121:9, 123:11 point 12:13, 22:22, 30:16, 32:13, 52:3, 54:19, 59:16, 67:1, 81:17, 179:3, 219:20, 227:13, 250:2, 257:17, 257:19, 265:3, 265:15, 277:4, 277:5, 286:17, 288:5, 289:5 points 16:21 policies 138:21, 140:7, 234:5, 234:11, 239:17 policy 33:16, 134:21, 135:4, 135:8, 138:15, 239:19 port 83:9 portfolio 46:2, 47:10, 47:18, 47:20, 47:21, 49:8, 222:9, 229:18,	229:21 portion 39:14, 268:8 portions 104:16, 179:22 posa 86:11, 203:1 position 30:18 possession 203:17 possible 114:16, 155:21, 163:4, 262:12 post 145:14 post-9 20:16 posts 145:12 power 83:12, 83:14, 83:18, 83:22 powered 168:21 powerful 161:22 pre-read 79:10 precisely 206:22, 259:18 predict 132:18, 133:10 predicting 112:13 prediction 134:7 predominant 73:19 preference 30:7, 30:12 preparation 9:21, 233:18, 237:3 prepare 9:7, 76:20, 201:3, 289:16, 292:15
---	--	--	--

prepared 12:6, 201:4, 201:15, 288:22 preparing 10:17, 222:20, 230:5, 231:22, 232:2, 232:7, 233:14, 234:18, 234:20, 237:1, 242:12, 243:4, 250:2, 255:10, 260:2, 262:19, 263:17, 289:21, 292:7 prescott 276:21 present 130:22, 131:6 presentation 4:13, 60:9, 60:17, 74:18, 130:9, 130:12, 131:6, 131:11, 211:7, 211:16, 211:17, 211:20 presentations 211:14, 211:15, 212:13, 213:5 presents 130:20 press 56:19 pressure 7:20, 8:2 prestigious 56:11 pretty 27:18, 56:11, 184:10, 184:11, 286:2 preview 92:9 previous 174:8 previously 4:26, 94:12, 155:11, 186:20, 261:8, 261:13	price 30:12, 45:21, 46:21, 46:22 primarily 145:2, 203:13, 286:10 primary 16:7, 30:15, 51:22 print 69:7 printing 202:8 prior 87:3, 110:14, 110:18, 139:1, 227:5, 228:1 prioritization 21:9, 101:19, 101:22 prioritize 102:6, 102:8, 102:17, 104:10 private 65:19 privilege 258:6, 270:22, 272:18, 273:2 privileged 51:19, 220:21 prizes 56:22 probably 13:21, 23:19, 41:18, 48:9, 56:10, 59:16, 59:22, 60:5, 68:1, 73:5, 85:14, 116:9, 147:14, 176:6, 189:5, 203:18, 216:19, 218:16, 238:19, 239:5, 246:2, 247:17, 271:9, 286:22 problem 18:6, 20:16, 37:18, 41:7,	41:10, 42:16, 42:17, 49:21, 51:22, 62:8, 71:11, 104:13, 105:5, 105:20, 107:17, 159:20, 160:7, 160:10, 160:15, 161:3, 161:18, 163:8, 173:10, 191:22, 192:7, 192:19, 199:14 problems 25:10, 25:19, 62:11, 62:13 procedure 2:12 process 63:12, 135:14, 150:3, 155:3, 168:4, 204:3, 254:22, 263:17, 265:18, 279:2, 283:11, 283:14 processes 63:15, 89:21 processors 85:4 produced 2:2 product 13:8, 13:14, 22:21, 23:3, 26:20, 31:16, 32:2, 32:21, 38:8, 40:10, 45:9, 48:8, 49:7, 64:20, 105:14, 135:17, 149:20, 151:10, 231:18, 281:22 products 11:4, 11:6, 43:6, 43:16, 59:6, 295:21 professional 217:4 professor 58:8	profit 280:14 program 116:14, 124:15, 202:14 programmed 114:19, 114:21, 120:14, 130:6, 131:5 programmer 56:2 programming 56:4, 56:17, 58:18, 58:19, 84:5, 86:18, 113:7, 120:18, 131:12 project 27:4, 50:12, 56:7, 56:16, 58:7, 135:14, 144:13, 169:20, 178:13, 215:15 projected 112:3 projections 133:12 projects 63:13, 176:19, 215:17 property 46:18, 93:14, 222:9 prosecution 225:11, 225:21, 226:13 protection 211:18 provide 8:6, 169:21 provided 189:3, 196:9, 196:11, 207:7, 208:14, 209:1, 220:19, 256:8, 263:14, 268:3 providing 83:11, 83:22,
---	---	---	---

229:17, 231:11, 263:9, 295:2 provisional 4:31, 170:21, 225:20, 226:12, 226:21, 227:5, 227:22, 236:13, 245:7, 245:11, 252:7, 253:22, 254:5, 254:8, 254:10, 255:3, 255:8, 255:16, 255:20, 256:8, 257:2, 257:14, 258:2, 259:4, 289:2, 289:22, 293:10, 293:17, 294:21, 297:17, 298:3, 298:22, 299:10, 299:17, 300:12 provisions 2:12 ptab 2:11 public 41:18, 41:20, 42:8 publish 153:13, 153:14, 153:15, 153:18 published 56:8, 56:13, 57:17 publishing 152:10, 153:4, 153:10, 154:1 pull 223:2 purchased 30:5, 86:16 purchasing 135:16, 136:3 purely 104:11, 129:18 purpose 83:10, 83:21, 84:5, 86:1,	120:17, 124:19, 263:9 purposes 255:6 pursuant 2:11 pursued 152:16 pushing 44:6, 49:5 put 74:7, 79:8, 90:16, 97:7, 171:20, 206:6, 297:15 Q question 8:10, 8:14, 44:13, 74:18, 93:10, 118:14, 125:22, 126:9, 126:14, 128:20, 141:2, 161:5, 179:1, 214:17, 214:19, 214:21, 220:9, 237:6, 246:7, 247:10, 248:1, 248:4, 248:10, 253:8, 253:10, 270:2, 270:6, 272:4, 272:8, 272:13, 286:1, 288:4 questioning 296:20 questionnaire 213:7 questions 8:6, 9:13, 44:5, 44:11, 45:4, 222:15, 239:16, 248:18, 300:18, 301:4 quick 25:22, 140:12, 156:7, 239:15, 296:19	quickly 250:16 quite 56:9, 57:3, 139:9, 160:6, 175:2 R range 97:21, 98:2 rarely 257:12 rate 76:14, 77:4, 155:16, 162:16, 280:11 rather 36:15 re-implement 186:21, 187:7, 187:18 reach 10:16 react 112:7 read 10:10, 10:11, 36:7, 36:20, 82:6, 84:20, 93:2, 93:7, 95:4, 106:4, 107:8, 107:22, 108:1, 108:12, 108:14, 111:7, 117:5, 118:1, 118:4, 118:7, 121:8, 121:14, 123:10, 123:19, 123:21, 124:1, 125:2, 126:3, 127:13, 128:9, 128:10, 128:17, 128:18, 129:20, 130:20, 132:2, 137:14, 137:18, 138:3, 140:22, 141:1, 142:21, 143:10, 143:17,	147:8, 147:12, 147:14, 147:16, 150:10, 154:7, 155:15, 156:12, 156:18, 165:21, 166:19, 173:5, 183:5, 189:8, 191:9, 195:14, 199:15, 199:16, 199:21, 200:12, 200:15, 201:19, 201:20, 202:11, 225:7, 226:6, 226:11, 229:16, 231:10, 232:9, 234:3, 235:1, 237:13, 239:16, 239:21, 240:14, 261:1, 281:12, 283:20, 289:14, 292:13, 294:20, 295:1, 301:5 readership 137:9, 137:16 reading 93:6, 123:10, 125:12, 129:12, 135:6, 154:17, 155:7, 180:22 real 25:22, 41:10, 140:12, 156:6, 164:15 real-time 166:16 realized 15:6, 244:6 really 16:14, 16:20, 21:5, 21:17, 26:16, 27:17, 30:13, 35:7, 35:20, 37:16, 39:14, 40:13, 41:8, 43:5, 43:8, 43:20, 45:4, 46:10, 59:15, 61:9,
---	---	---	--

66:1, 70:7, 73:2, 98:18, 103:15, 103:22, 137:6, 138:18, 145:7, 145:11, 152:16, 153:16, 157:6, 157:16, 164:9, 166:13, 168:2, 168:22, 169:4, 169:9, 179:16, 194:15, 196:18, 196:21, 201:22, 229:3, 247:7, 255:3, 267:21, 267:22, 290:12 realtime 2:7, 302:4 realtime 1:18, 2:1 reanswer 128:21 reask 128:21 reason 20:21, 44:19, 66:1, 67:5, 74:21, 75:1, 75:3, 75:8, 77:2, 201:10, 201:12, 272:19 reattached 146:21 recalculate 160:22, 162:16, 166:15 recall 175:22, 180:2, 180:3, 194:12, 194:13, 197:2, 208:18, 227:20, 230:7, 230:14, 230:16, 230:18, 231:19, 232:3, 235:10, 235:16, 236:20, 239:3, 247:15, 248:19, 248:22, 249:18,	250:8, 253:11, 258:22, 262:5, 262:11, 262:17, 263:3, 263:6, 263:19, 266:3, 267:13, 277:10, 283:10, 284:21 recap 12:15, 263:21 receive 136:7 received 68:5, 192:3, 192:8, 253:9 recently 297:2 recipient 121:10, 123:12 recipients 93:13 recognize 59:14, 59:19, 149:6, 158:12, 165:8, 179:15, 201:1, 207:22, 208:11, 208:13, 220:6 recognizes 147:1 recollect 209:21 recollection 225:8, 226:20, 227:2, 228:2, 228:14, 262:10, 265:5, 265:9, 267:6, 288:12, 300:7 recommend 209:20 record 2:13, 12:11, 39:10, 42:4, 115:8, 141:2, 250:16, 268:15, 302:10 recording 152:17	recordkeeping 214:2 records 206:7, 210:3 recovered 222:22 red 190:21, 190:22, 191:5, 191:16, 191:18 redact 269:21 redacted 5:35, 249:3, 250:1, 266:8, 268:9, 269:3, 269:18, 270:13, 270:18, 273:4 redaction 262:15, 264:2, 264:10, 265:6, 266:6, 268:18, 270:9, 270:15, 271:22, 272:11 redactions 264:6, 264:14 redline 190:21 redlined 179:22 redlines 180:19, 181:1 redo 182:5 reduce 164:1 reduced 172:1 refer 12:4, 97:4, 140:4, 158:17, 180:6, 238:18, 239:18, 240:1, 240:18 reference 34:10, 275:4, 300:2 referenced 111:8, 205:20	referencing 138:21, 138:22 referring 15:11, 29:21, 38:11, 38:13, 63:19, 68:21, 71:17, 76:4, 82:3, 95:19, 96:2, 96:20, 106:14, 117:16, 139:21, 140:1, 140:4, 150:19, 152:5, 189:11, 189:12, 189:15, 198:10, 198:12, 224:9, 224:10, 252:19, 253:3, 253:5, 278:5, 282:7 refers 17:13, 188:9, 294:5 refine 151:13, 163:14, 283:17 reflect 44:3, 122:7, 122:8, 122:9, 263:10, 293:9 reflected 41:11, 99:15 refresh 9:10, 262:9 regard 108:14 regarding 132:3, 220:22, 229:17, 231:11, 235:4, 236:12, 240:16, 246:22, 247:1, 295:2 registration 303:11 regular 95:5, 95:8, 100:16, 168:21 regus 2:9, 302:17
---	---	---	--

rehired 187:12	38:15, 39:8, 90:16, 95:5, 106:6, 106:15, 106:21, 107:13, 177:6, 177:11, 239:22	140:10, 141:9, 176:4, 186:22, 216:21, 218:15, 218:19, 232:8, 243:10, 244:3, 246:17, 247:5, 249:17, 249:20, 250:10, 250:12, 262:22, 264:3, 264:6, 264:7, 264:10, 264:11, 264:20, 264:22, 265:7, 265:16, 265:20, 265:22, 266:2	represent 208:21, 220:16
relate 13:9, 81:14, 97:15, 145:8, 145:9, 145:11, 210:5, 210:8, 211:13, 212:2, 212:12, 212:20, 213:4, 213:12, 213:21, 214:5, 214:10, 214:14, 222:1, 222:6, 222:8, 232:11, 233:3, 233:10, 233:19, 234:15, 235:8, 236:12, 236:17, 237:21, 238:11, 239:7, 239:11, 240:5, 240:8, 240:18, 240:22, 241:4, 241:8, 241:15, 242:2, 242:10, 261:15, 263:1, 280:20, 280:22	relations 281:22 relationship 75:15, 75:18, 75:20, 211:22 release 56:19 released 256:19, 266:9, 272:20 relevance-based 152:22 relevant 79:3, 79:10, 80:19, 96:7, 96:14, 97:14, 97:16, 98:11, 98:17, 99:20, 100:5, 104:16, 112:3, 119:2, 119:3, 124:17, 132:19, 133:2, 142:7, 152:19, 229:2, 229:5, 267:10, 267:15, 268:8, 271:3 relied 201:16, 260:6, 260:8, 260:15, 264:13, 267:2 relocating 196:19, 279:18, 279:19 relook 235:19 remember 12:4, 12:8, 12:9, 12:13, 23:17, 27:5, 31:5, 31:13, 59:20, 111:1, 111:5, 137:22,	remind 235:20 remodels 87:9 renamed 23:12 rendering 92:3, 235:3 rep 216:16, 217:12 rephrase 8:16 replace 186:2, 301:19 replied 246:12, 246:13 reply 119:3 replying 248:10 report 18:7 reported 1:28, 2:8 reporter 2:7, 24:10, 43:11, 43:14, 102:13, 158:20, 301:6, 301:10, 302:1, 302:4 reporter's 4:6 reporting 213:22	represented 302:14 required 168:7 requirement 107:14, 107:15 requirements 135:17, 217:17, 276:5, 276:11 requires 23:3 reread 257:4 research 214:1 resigned 23:9 resolve 34:14, 107:18, 146:20 resolved 166:4 resource 164:3 respect 237:6 respective 19:20 respond 25:10 responded 246:15, 246:22, 247:4, 248:14 responding 270:5 response 85:3, 90:15, 245:13, 248:16, 270:1 responses 196:5 responsible 116:21 rest 30:9, 42:19, 42:22, 50:8,

105:2, 113:8, 118:1, 118:4, 123:19, 124:1, 127:2, 128:9, 128:10, 128:17, 128:18, 129:21, 186:14, 250:13, 264:22, 268:9, 272:21, 272:22, 280:6 restart 196:21 restate 269:13, 272:8 restructure 280:3 restructuring 279:3, 281:20 results 93:4, 94:4, 94:8, 96:6, 98:13, 102:18, 103:8, 103:10, 136:18 resumé 55:17, 56:6, 186:16 retain 36:8 retired 280:1 revenue 23:5 review 9:20, 10:8, 162:20, 164:7, 222:19, 230:10, 233:13, 237:10, 243:3, 260:2, 260:21 reviewed 12:7, 201:15, 209:10, 230:4, 231:21, 232:1, 232:4, 234:17, 236:22, 242:13, 242:18, 242:21, 255:9, 260:16,	260:18, 260:20, 262:7, 262:18, 263:15, 295:18, 295:22, 296:7 reviewing 168:17, 249:21, 259:14 revised 283:8 revisions 282:19, 283:21 rewards 37:8 richness 155:17 rick 185:19, 185:20, 187:11, 188:5, 188:18, 189:1 rid 36:9 rights 63:3, 148:2 ring-fenced 65:19 rio 9:1 road 8:5 rockville 303:14 role 63:22, 108:17, 141:16, 141:19, 142:1, 142:5, 143:14, 176:11, 186:10, 186:12, 187:14, 217:5 roles 122:7 rolling 279:6 romania 219:19 romanian 219:19 rough 46:21, 285:1,	301:9 roughly 176:2 round 274:15, 274:19 rounds 281:21 route 18:4 routing 136:21 row 232:21, 232:22, 234:7, 234:8 royal 57:10 rudi 219:5 rule 29:6, 48:16, 53:13, 54:16, 61:2, 61:3, 102:11, 102:16, 103:12, 105:11, 109:13, 110:2, 110:16, 133:22, 259:6, 259:16, 269:14, 271:19, 272:7, 272:15, 298:7 rules 2:11, 8:5, 136:21, 136:22, 137:10, 234:13 run 14:11, 17:22, 19:4, 82:9, 82:13, 83:10, 83:12, 83:15, 83:19, 84:2, 86:17, 87:20 running 11:15, 13:5, 14:14, 14:20, 114:22, 116:2 runs 28:14, 115:19 S safe 61:20	said 12:19, 13:2, 20:3, 21:2, 22:5, 22:8, 22:21, 26:7, 29:19, 38:6, 38:19, 42:15, 45:22, 46:20, 48:12, 53:6, 54:10, 62:10, 98:16, 136:15, 151:6, 168:14, 170:11, 179:8, 194:8, 209:14, 209:15, 224:15, 227:12, 270:8, 271:21, 272:10 salaries 142:5, 142:6 sale 29:21, 29:22, 30:2, 30:21, 30:22, 31:4, 45:16, 47:9, 48:14, 54:10, 54:19 sales 211:15, 211:17, 212:13, 213:5, 216:9, 216:16, 217:12, 281:19 same 14:12, 16:16, 24:16, 34:12, 34:13, 48:9, 49:14, 77:4, 90:3, 90:16, 94:19, 99:5, 100:12, 117:20, 138:9, 143:7, 143:21, 144:9, 144:12, 144:13, 144:17, 144:18, 146:19, 146:22, 147:1, 152:14, 154:19, 154:21, 155:16, 202:22, 209:7, 214:17,
---	---	---	---

214:19, 214:21, 221:10, 236:4, 236:6, 236:14, 237:6, 245:20, 252:12, 252:22, 255:15, 258:19, 259:18, 260:4, 260:5, 265:12, 265:14, 288:2 sample 158:4 samples 134:1 sanitized 157:20 sat 20:22 save 185:5 saved 185:13, 185:15, 195:4, 215:12 saw 46:14, 264:17, 268:20 say 7:12, 7:22, 13:22, 14:2, 15:9, 17:2, 17:8, 21:11, 22:17, 34:19, 41:19, 42:1, 42:10, 43:2, 63:16, 76:2, 78:13, 81:22, 91:3, 96:16, 98:8, 98:12, 100:16, 102:14, 104:1, 110:5, 111:9, 115:10, 117:21, 120:9, 123:21, 126:7, 129:7, 129:9, 136:17, 136:19, 152:15, 154:17, 155:6, 156:22, 168:2, 183:5, 188:20, 197:21,	202:10, 209:12, 223:7, 226:6, 256:1, 256:20, 258:9, 258:21, 263:15, 271:9, 278:1, 278:16, 281:12, 282:5, 283:19, 287:2, 287:15, 287:19, 288:11, 288:22, 289:12, 294:20, 295:1, 301:4 saying 9:6, 33:17, 34:8, 36:7, 36:11, 41:15, 94:2, 100:11, 117:15, 117:21, 117:22, 152:6, 155:7, 156:5, 168:5, 192:10, 194:3, 247:5, 252:21, 253:1, 253:6, 253:12, 254:3, 254:13, 254:18, 255:17, 262:3, 278:6, 278:7, 278:8 says 60:4, 61:5, 64:14, 74:18, 78:3, 82:6, 84:20, 96:6, 101:11, 107:8, 108:14, 117:4, 117:17, 127:13, 137:9, 152:1, 154:6, 156:12, 158:15, 165:17, 173:5, 185:11, 189:7, 190:3, 191:22, 193:15, 204:22, 205:11, 220:20, 225:7, 229:15, 231:9, 235:1, 237:13, 240:14, 243:21, 246:16, 247:6,	253:16, 258:12, 258:18, 259:14, 281:3, 292:13 scalability 159:14, 159:16, 159:21, 160:10, 160:15, 161:18, 163:8, 164:20, 167:12, 173:10 scale 164:2, 199:5 scanned 230:6, 242:20 schema 93:8 school 25:16, 56:7, 57:6, 58:6 sci 14:17 science 55:21, 56:11 scientist 56:21, 57:1, 198:21, 199:17, 200:6, 202:19, 203:9 scientists 163:18, 169:15 scope 278:13 score 81:4, 94:3, 94:6, 94:7, 94:12, 94:15, 94:19, 99:17, 122:20, 122:21, 127:15, 127:17, 130:22, 131:2 scores 98:5, 98:7, 112:3, 119:7, 119:9, 152:19 scoring 102:2, 152:18 scratch 157:3 screen 70:14, 130:16	screenshots 290:13 scroll 79:7, 173:22, 174:19, 174:22 scrolling 150:5 scrum 215:20 search 5:8, 6:5, 6:10, 93:2, 93:4, 93:12, 93:18, 94:4, 94:5, 94:8, 94:17, 95:10, 95:16, 96:4, 96:13, 96:21, 97:1, 97:5, 97:6, 97:15, 98:1, 98:4, 98:7, 98:12, 98:17, 98:19, 98:22, 99:1, 99:5, 99:6, 99:22, 101:12, 103:3, 103:7, 103:20, 105:14, 105:18, 136:17, 147:21, 148:4, 190:4, 204:6 search-based 108:19 searching 94:1, 95:8, 97:3, 97:17, 97:19 second 5:23, 24:11, 24:12, 55:17, 71:11, 78:1, 113:11, 121:3, 121:14, 121:15, 121:22, 122:13, 123:15, 124:12, 124:17, 124:21, 125:2, 125:3, 125:19, 126:18,
---	--	---	---

126:21, 127:20, 165:22, 170:9, 220:10, 223:3, 234:1, 238:8, 251:5, 251:18, 251:22, 264:5, 265:11, 300:20 secondary 30:22 secret 14:16, 14:17, 18:2, 18:3, 18:17, 18:18, 42:21 secrets 61:19 section 149:12, 150:8, 152:4, 154:13, 155:6, 166:20, 167:4, 167:7, 171:5, 172:8, 174:2, 174:17, 175:5, 175:6, 175:9, 177:19, 224:3, 228:18, 275:7, 281:3, 282:19, 283:1, 283:4, 283:9, 284:9, 286:4, 286:9, 286:12, 286:13, 287:21, 291:6, 291:14, 291:16, 291:22, 292:4, 292:12, 293:4, 293:19 secure 11:6, 14:9, 33:7, 231:12, 231:14, 231:16 security 18:9, 19:13, 20:1, 20:6, 20:18, 21:14, 22:14, 33:2, 33:10, 33:14, 38:20, 39:4, 39:9, 40:3,	60:13 seeing 153:11, 247:15, 249:17, 250:10 seeking 240:15 seem 212:16, 214:3 seems 183:16 seen 132:22, 248:20, 248:22, 249:2, 249:3, 249:18, 250:9, 263:7 sell 28:4, 30:20 selling 16:9, 26:14, 29:2, 47:14 send 37:3, 49:15, 90:14, 100:21, 137:16, 152:11, 178:20, 225:8, 225:13, 226:20 sender 127:16 senders 93:13 sending 35:5, 79:1, 153:17, 154:2 sends 33:19, 34:1, 34:20, 137:17 senior 21:1, 186:6, 186:17 sense 8:12, 8:15, 8:19, 16:15, 27:3, 37:18, 39:17, 101:7, 101:8, 166:6, 196:17, 249:22 sensible 162:3	sensitive 51:20 sent 127:16, 145:7, 145:10, 145:18, 164:6, 226:7, 226:12, 227:18, 227:21, 237:19, 246:11, 252:7, 254:20, 255:1, 256:22, 261:18 sentence 84:16, 95:1, 119:12, 123:10, 123:21, 131:17, 144:5, 249:6, 250:12, 264:20, 267:8, 267:17, 267:21, 268:22 separate 14:19, 16:3, 17:9, 18:21, 18:22, 19:7, 30:2, 34:10, 43:6, 44:4, 49:4, 50:1, 50:16, 88:19, 138:20, 148:13 separately 70:13, 141:22, 233:6 september 284:11, 288:20, 293:20, 297:22, 298:13, 298:21 serial 25:18 series 244:6 server 69:5, 82:17, 161:9 servers 33:9, 91:2, 160:6 service 15:20 services 162:6, 217:4	set 93:13, 99:19, 101:4, 132:6, 136:12, 145:18, 149:21, 154:4, 154:20, 155:19, 202:20, 206:18, 206:19, 276:20, 302:7, 303:5 sets 105:20, 143:13 seven 18:15 several 26:14, 29:19, 51:18, 176:1, 262:21 sewell 218:20, 218:21, 244:18, 244:22 share 21:22, 70:17, 144:9, 179:2 sharing 50:9, 227:13 shelard 3:14 shootings 25:16 shopping 104:8 short 148:18 shorthand 2:9, 302:1 should 54:4, 55:6, 136:16, 136:17, 136:19, 137:13, 137:18, 151:15, 157:11, 157:12, 173:6, 179:1, 192:20, 197:6, 228:15, 248:7, 250:15, 267:19, 268:13, 285:22, 296:13, 300:14 shouldn't 41:19
--	---	---	--

show 91:13, 97:10, 98:8, 102:18, 223:17, 275:14, 290:15 showed 68:10 showing 93:11, 256:21 shown 74:15, 82:8, 85:2, 89:21, 139:15, 149:4, 170:19, 179:13, 180:14, 188:1, 189:20, 194:21, 197:16, 200:21, 204:15, 207:13, 220:4, 243:9, 285:9, 285:17, 290:19, 291:1 shows 123:2, 123:3, 123:4, 184:9 shut 278:18 sic 22:9, 23:4, 29:10, 84:18, 85:2, 106:10, 109:2, 188:9, 195:8, 229:16, 235:3, 273:8, 276:6 side 61:8, 74:7, 168:22, 181:10, 243:18, 257:5 sign 301:5 signature 243:19 signature-mig2k 303:7 signed 257:8 significant 46:2, 71:5,	150:13, 150:21, 175:9, 222:21, 247:7, 263:12 significantly 27:2 similar 25:4, 60:11, 93:14, 95:9, 95:15, 95:20, 96:3, 97:4, 101:11, 102:7, 104:13, 122:4, 122:7, 122:8, 122:9, 132:7, 134:6, 143:14, 144:18, 154:18, 155:22, 179:17 similarities 141:4 similarity 108:15, 110:13 similarly 122:10, 143:16 simon 244:21 simple 172:17 simplify 168:6 simply 192:12 since 173:16, 271:16 single 12:10, 14:19, 16:1, 17:19, 19:5, 19:10, 19:11, 19:18, 34:15, 36:11, 38:12, 39:10, 40:12, 40:14, 92:9, 106:9, 115:22, 146:21, 160:22 singly 109:5, 109:6 singularly 109:1	sit 46:16 sites 66:5, 91:21 sitting 183:22, 230:11, 235:13, 259:12, 262:13, 267:7 situation 46:4, 134:14 size 158:4 skill 87:1, 111:12, 119:11, 122:13, 123:9, 125:17, 126:17, 128:1, 129:12, 198:1, 198:4, 198:11, 199:21, 200:3, 202:20, 203:2 skilled 23:3, 87:6, 87:10, 124:10, 129:16, 129:17, 200:7, 202:11, 202:16, 202:18 slightly 162:13 slipped 210:14 slow 43:12 small 7:14, 73:10, 91:8, 93:22, 187:10 smart 57:3 smartxd 48:8 smpp 237:17 smtip 69:8, 90:22 social 50:8, 160:5 society 57:11	sock 35:19 software 15:15, 16:17, 58:13, 71:19, 82:21, 83:2, 83:3, 83:4, 83:9, 84:2, 84:4, 85:4, 86:13, 114:22, 115:19, 116:22, 163:10, 166:11, 169:10, 170:12, 170:13, 171:6, 171:21, 172:1, 172:4, 172:5, 172:9, 172:12, 174:16, 176:13, 177:3, 193:6, 193:7, 194:10, 194:16, 198:6, 198:16, 199:1, 200:1, 200:5, 200:11, 202:13, 219:10, 283:2 solaris 116:6 sold 27:20, 29:3, 29:18, 32:19, 48:2, 53:7, 53:17 solely 183:18 solution 22:14, 22:16, 39:20, 41:9, 43:17 solutions 11:8, 11:12, 13:18, 18:8, 20:1, 21:14, 32:16, 60:13, 60:20, 60:22 solve 104:13, 163:8, 199:15 solving 39:4
---	--	--	---

some 9:12, 11:18, 16:16, 27:6, 41:11, 51:6, 52:3, 56:4, 58:17, 59:16, 65:18, 78:5, 79:8, 79:9, 82:18, 88:13, 96:6, 100:22, 101:18, 101:21, 102:2, 104:2, 104:9, 108:2, 149:15, 153:12, 153:20, 155:15, 166:3, 168:6, 169:5, 175:2, 177:21, 179:2, 187:9, 190:20, 190:21, 190:22, 195:15, 216:22, 221:12, 222:4, 222:14, 230:21, 231:1, 232:8, 252:22, 276:4, 277:11, 279:15, 280:16, 284:15, 287:6, 287:9, 294:17 somebody 34:2, 87:7, 87:9, 124:10, 129:15, 129:16, 145:12, 163:16, 191:17, 198:21, 199:13, 199:16, 200:3, 200:7, 202:18, 202:19, 233:6 somehow 50:7, 210:15 someone 133:16, 184:5 someone's 63:21, 79:5 something 12:4, 14:3, 44:1, 55:5,	75:22, 78:22, 96:6, 116:7, 123:22, 128:15, 145:13, 151:12, 153:5, 161:8, 171:17, 179:2, 211:4, 211:5, 213:6, 227:13, 244:10, 287:3 sometime 32:18, 48:13, 176:8 sometimes 27:10, 38:14, 75:10 somewhere 111:8, 144:5, 176:10, 187:6 sophisticated 116:8 sorry 9:4, 9:16, 20:5, 22:7, 22:11, 28:7, 29:5, 43:13, 75:10, 85:12, 97:2, 102:5, 102:13, 117:12, 125:16, 125:21, 129:6, 129:8, 149:20, 167:5, 168:13, 172:14, 174:1, 203:1, 207:22, 209:14, 226:10, 238:6, 243:14, 250:5, 252:19, 261:8, 266:11, 267:14, 268:17, 284:14, 289:1, 295:7 sort 14:13, 15:5, 15:22, 18:21, 23:22, 27:16, 30:17, 31:22, 50:15, 50:18, 52:15, 68:6, 98:12, 99:21,	103:3, 103:9, 151:6, 151:11, 152:13, 186:16, 194:15, 218:22 sorted 67:20, 68:1, 68:2, 68:8, 100:8 sorts 79:7 sound 277:17 sounds 183:11, 271:10, 277:18 source 23:5, 59:5, 295:18, 296:3, 296:4 sources 207:6 space 16:12, 22:4, 36:3, 50:19, 54:2, 71:13, 72:8, 199:4 spam 36:21, 37:21 span 15:2, 20:17 spanned 19:11 spans 11:14, 13:4, 40:15 speak 9:14, 10:1, 10:12, 48:10, 232:8 speaking 126:7, 269:11 special 131:11 specialisms 23:4 specialist 194:15 specialized 65:12	specially 130:5 specific 26:20, 63:14, 100:2, 124:3, 138:4, 162:16, 199:4, 200:8, 201:12, 235:11, 235:19, 244:3, 293:9 specifically 8:8, 111:5, 120:14, 124:4, 130:19, 142:22, 164:4, 232:9, 293:16 specification 119:14, 124:6, 128:5 spend 25:11, 166:6, 299:14, 300:11 spending 263:2 spends 200:4 spent 22:4, 288:12, 289:21, 298:2, 298:20, 299:8, 300:7, 300:8 split 85:15, 85:18 spoke 9:9 spoken 10:4 spouse 55:2 spring 223:22 st 212:8, 298:13, 298:21 stack 69:16 stage 276:19
--	--	---	--

stages 276:15 stake 29:9, 29:15, 29:19 standard 52:2 start 11:7, 27:4, 32:20, 33:4, 34:16, 37:12, 44:2, 113:16, 151:12, 157:3, 172:16 started 14:22, 33:12, 38:6, 50:21, 55:5, 61:16, 71:20, 176:16, 202:3, 244:8, 257:20 starting 89:19, 131:17, 245:2 starts 95:1, 180:17 state 2:8, 17:22, 302:5 stated 2:12 statements 226:17, 237:3, 263:18, 266:13 states 1:1, 61:20 statistical 57:10, 81:8, 83:1, 86:7, 101:1, 101:7, 111:21, 112:8, 142:16, 157:8, 163:19, 291:17 statistics 57:8, 57:15, 58:8, 169:7, 177:15, 283:14 stats 57:11, 57:17	stay 52:22 stayed 55:6, 206:10 staying 66:5 steam 28:14 stenographically 1:28 step 40:10, 41:14, 300:20 stephen 217:11, 217:12 steps 40:10, 114:17, 116:15, 120:19, 124:16, 124:20, 131:10 sterling 1:11, 27:21, 28:5, 29:22, 31:8, 45:16, 45:17, 75:18, 75:20, 76:7, 77:8, 302:13 sterling_xipr 4:19 sterling_xipr_ 4:14, 4:25 still 8:9, 16:4, 16:8, 19:7, 19:19, 28:9, 32:11, 44:4, 54:19, 82:3, 97:22, 107:21, 108:2, 128:11, 145:10, 145:14, 146:5, 153:19, 161:10, 163:3, 168:10, 173:13, 185:22, 186:4, 262:11, 287:8, 288:6 stock 27:7, 30:3,	30:4, 30:7, 30:8, 30:10, 31:4, 48:3 stood 87:7 stopping 25:16 storage 42:22, 113:6 store 132:6 stored 85:5, 202:14, 233:6 storing 113:7 stovepiped 18:10, 22:2 straight 99:13, 101:2, 260:9 stream 13:8, 69:8 street 2:10, 3:7 strike 22:7, 86:21, 135:22, 149:20, 182:5, 182:12 strong 40:13, 112:12, 163:12, 163:18, 169:7, 186:16 struck 182:7, 182:8 structure 23:2, 280:6 structures 239:22 structuring 237:14, 237:16 struggle 128:6 struggling 101:10 stuart 238:4 stuck 207:8	studied 110:18 study 46:17 stuff 37:1, 37:4, 42:21, 92:2, 111:2, 135:8, 154:1, 157:6, 160:1, 161:12, 183:11, 184:20, 189:9, 189:14, 191:5, 207:7, 221:10, 232:1, 232:4, 236:8, 258:12, 270:14, 271:10 stupid 53:21, 58:1 subject 93:8, 138:14, 238:15, 238:22, 240:11, 245:3, 245:17, 245:21, 258:5 submessage 93:9, 93:11 submitted 255:14, 255:20 subparts 142:19 subsection 97:14 subset 123:5, 153:15, 278:12 substantially 51:7 subtracting 192:12 successful 112:20, 244:7 sufficient 83:11, 83:14 suggesting 160:8, 166:20, 167:14 suggestions 164:10, 169:1
---	---	---	---

suitable 161:9 suite 2:10, 3:14, 303:13 summarize 297:2 summary 295:6 summer 223:8, 223:16, 223:20, 224:8, 224:10, 224:14 sums 289:11, 292:12 superior 12:12 supplemental 5:23 supposed 33:22, 64:8 sure 26:1, 44:15, 45:6, 53:16, 55:18, 59:22, 67:10, 74:11, 101:13, 118:3, 138:12, 142:21, 144:4, 146:3, 147:7, 170:10, 176:9, 178:11, 179:7, 180:7, 184:10, 212:5, 219:20, 221:15, 226:1, 233:5, 237:11, 247:17, 248:5, 248:9, 256:1, 259:9, 259:13, 290:15, 296:21, 298:10 surveys 53:19 swear 217:22 swing 128:11 switch 148:16, 197:5	switching 139:8 sworn 2:3, 7:2, 302:8 system's 166:11 systems 13:9, 14:20, 41:12, 49:5, 71:21, 97:18, 101:14, 104:6, 104:8, 104:12, 104:19, 105:15, 107:10, 109:10, 116:5, 136:11, 145:6, 164:18, 194:7, 234:12, 239:17 T tagged 136:15, 156:2 tags 156:2 take 21:8, 31:4, 54:4, 69:6, 74:9, 118:20, 122:16, 122:22, 128:11, 148:18, 157:4, 164:13, 164:22, 196:18, 196:20, 197:6, 284:19, 289:15, 292:14, 296:13 taken 2:4, 74:12, 148:21, 197:8, 250:18, 283:20, 288:2, 296:16, 301:1, 302:9 taking 237:18, 280:21 talent 279:21 talk 10:20, 42:4, 52:1, 71:10,	75:17, 137:15, 138:19 talked 48:6, 74:6, 194:5, 227:7, 297:2 talking 33:12, 42:9, 109:9, 131:18, 162:17, 171:12, 173:11, 248:2, 251:10, 269:9, 278:10, 278:16 tamper-proof 232:15, 232:18, 236:7 targeted 39:14 task 168:22 tasks 281:13, 281:16, 282:2 tax 280:11 team 186:15, 187:2, 187:11, 187:12, 196:20, 197:1, 215:21, 219:20, 280:1, 280:7, 280:16 technical 186:17 technically 22:15 technology 176:15, 176:17, 186:6, 186:8, 186:11, 198:7, 199:8, 199:11, 279:13, 282:3 ted 219:13 tell 17:16, 21:8, 57:22, 183:15, 206:22, 239:4,	251:7 tells 94:11 ten 7:18, 18:21, 132:20, 161:8 tend 55:1, 107:22, 108:1, 132:20, 142:4 tens 34:12 term 93:12, 97:17, 127:5, 127:6, 142:16, 199:12, 258:22, 259:18 terminals 50:18 terms 26:10, 26:21, 127:3, 127:7, 129:4, 172:14, 172:15, 203:6, 222:12, 248:5, 287:12, 291:17 terrorists 21:21 testified 7:2, 249:13, 256:7, 269:1, 269:16, 269:22, 299:14 testimony 41:18, 61:2, 76:4, 260:7, 260:22, 261:2, 302:11 texas 2:6, 2:8, 9:2, 53:17, 302:3, 302:5, 302:17, 303:9 text 34:5, 34:13, 34:14, 63:11, 69:7, 75:11, 93:11, 108:8,
---	---	---	--

183:17, 190:22, 195:19, 195:20, 195:21, 287:17 th 211:11, 213:2, 213:18, 213:19, 221:1, 226:7, 226:11, 226:22, 227:6, 228:13, 243:14, 243:15, 245:14, 246:15, 261:19, 268:19, 273:8, 273:9, 273:19, 273:20, 282:5, 289:17, 290:1, 293:3, 293:4, 295:9, 299:5, 299:9, 299:13, 300:13, 303:6 thank 185:17, 219:7, 219:9 thanks 285:7, 285:10, 285:18 themselves 50:10 theory 56:8 therein 82:8, 85:2 they'd 200:9, 200:15 thick 153:6 thin 21:3, 22:6, 22:16, 43:3, 43:19, 57:13 thing 7:15, 7:18, 11:17, 21:20, 23:7, 27:8, 40:9, 40:11, 41:15, 48:10, 49:14, 62:1, 69:3, 71:9,	76:7, 76:9, 100:12, 100:15, 111:7, 112:5, 130:14, 147:12, 147:15, 152:15, 164:22, 182:5, 182:6, 184:10, 192:16, 263:1, 287:16 thing's 93:21 things 12:1, 25:8, 25:14, 25:20, 28:12, 41:3, 42:8, 46:15, 64:9, 64:10, 68:22, 69:20, 70:1, 75:11, 80:14, 83:19, 102:6, 102:8, 112:9, 121:19, 125:8, 126:5, 133:7, 146:14, 152:10, 154:16, 200:16, 210:17, 291:18 thinking 128:7, 163:22 third 193:14, 234:7, 234:8, 239:13, 252:3, 259:13, 264:9, 265:13, 278:11 third-party 71:19, 71:21, 72:9, 146:12 thirteenth 3:7 thought 37:7, 112:11, 151:9, 270:8, 280:16 thoughts 151:7, 169:5, 177:22, 294:17 thousand 16:18, 22:18	thousands 34:11 thread 44:11 threads 69:15, 69:16 three 12:17, 43:5, 43:15, 183:2, 184:4, 184:6, 210:14, 244:20, 261:7, 286:7, 287:2, 287:3, 287:19, 288:12, 298:3 through 14:7, 17:6, 33:8, 50:13, 64:15, 65:12, 66:19, 67:7, 84:13, 86:3, 89:14, 106:3, 107:6, 107:7, 108:11, 124:1, 126:5, 140:19, 140:20, 141:12, 141:16, 142:18, 143:1, 147:6, 148:9, 150:5, 153:6, 163:21, 168:4, 173:22, 174:1, 175:1, 178:18, 202:4, 207:4, 212:10, 213:2, 213:18, 221:1, 222:4, 224:11, 227:9, 228:10, 228:16, 230:7, 232:8, 237:19, 242:20, 261:14, 273:8, 273:19, 274:1, 278:17, 287:10, 288:20, 289:6, 289:17, 292:20, 293:4, 293:21, 297:21, 298:14, 299:4, 299:13	throughout 129:3 throwaway 152:14, 154:13 tie 63:13, 162:5 tied 92:8 tim 192:22, 193:1, 193:18, 194:8, 195:2, 195:12, 195:19, 196:7, 196:9 tim's 195:7 timeframe 197:22 timeline 12:5, 12:19, 27:17, 202:1, 243:1 tiny 7:14 tired 28:22 title 27:2, 186:9, 186:12, 244:4, 244:11 titled 171:5 toby 238:15, 239:4 today 8:1, 9:21, 16:19, 22:18, 41:13, 76:12, 105:18, 160:3, 163:16, 166:9, 166:17, 183:22, 230:11, 235:13, 259:12, 262:14, 267:7, 300:11 today's 9:8, 10:5, 10:14, 10:18 together 39:8, 171:20,
---	---	---	--

226:17, 249:21, 295:15 told 256:15 ton 232:1 tons 72:10 tony 177:13, 177:14, 184:12, 294:9 took 16:16, 36:3, 54:6, 71:3, 245:1, 279:16, 283:15, 287:13, 287:19 tools 71:8, 71:16 tooth 257:4 top 14:16, 14:17, 15:16, 18:2, 18:17, 42:21, 71:15, 79:4, 88:1, 98:8, 98:9, 158:14, 171:9, 181:7, 181:22, 189:7, 191:21, 220:20, 231:6, 251:11, 262:16 topic 139:8, 148:17 topics 197:6 total 37:21, 287:12, 289:12 totally 32:14 touched 296:1 touches 161:1 towards 20:13, 40:2,	49:6, 89:7 track 34:4, 126:1, 146:11, 146:13 tracked 36:5, 95:21, 166:3 tracking 115:22, 154:15 tracks 113:18 traction 50:20 trade 21:21 trade-off 163:5 trademark 1:1 traditional 38:20, 99:12, 100:1, 100:11, 107:10, 107:17 traditionally 136:10 traffic 220:8 trail 36:1 transition 28:15, 29:16, 52:12, 244:12 transitioned 52:6, 187:12 transmail 6:2, 14:8, 14:9, 14:14, 15:12, 16:4, 16:6, 32:4, 32:9, 32:20, 33:1, 35:8, 38:6, 39:21, 43:6, 43:16, 45:10, 48:12, 48:21, 49:3, 49:9, 51:9, 51:14, 51:17, 58:11, 60:18,	60:21, 62:1, 64:19, 66:17, 66:19, 67:14, 69:6, 70:6, 70:10, 87:16, 87:20, 88:7, 88:11, 90:7, 90:14, 90:17, 91:10, 91:13, 168:19, 168:21, 170:14, 173:7, 187:3, 187:8, 187:16, 193:5, 215:21, 222:11, 229:8, 229:12, 231:17, 258:15, 274:22, 275:2, 294:17 transmail-related 230:20 transmails 64:15, 69:2, 192:2, 192:8 transmittal 272:3 transmitting 245:6 trial 1:4, 265:19 tribe 24:22 tried 9:10, 9:11, 28:15, 49:8, 49:14, 49:15, 52:15, 69:13, 72:21 tries 69:15, 104:7 troll 202:3 true 39:22, 47:19, 67:21, 102:3, 105:12, 134:15, 183:9, 199:19, 201:22, 206:17, 228:15, 236:2,	255:2, 255:22, 256:12, 257:16, 269:4, 269:20, 270:4, 277:7, 279:9, 280:20, 288:10, 300:5, 302:10 trust-oriented 116:8 trusted 15:3, 15:20, 19:3, 41:16, 116:5 try 61:19, 66:21, 67:2, 69:16, 101:14, 104:8, 109:15, 128:11, 162:10, 168:22, 186:5, 195:15 trying 46:16, 54:9, 69:1, 69:6, 97:12, 101:20, 101:21, 102:2, 102:8, 102:17, 102:20, 104:13, 115:8, 128:6, 132:18, 138:15, 162:6, 164:7, 164:12, 164:21, 187:18, 199:15, 218:4 turn 136:14, 149:10, 171:2, 202:7, 205:6, 205:17, 211:2, 212:4, 273:6, 273:7 turner 185:19, 185:20, 187:11, 188:5, 188:18, 189:1 turning 89:20, 132:2, 250:21 turns 35:15, 112:11,
---	--	--	--

157:14 twin 134:9, 134:11 twitter 295:19, 296:1 two 18:18, 23:13, 68:22, 69:20, 69:22, 80:10, 80:14, 105:15, 105:19, 121:6, 144:8, 144:16, 182:15, 203:13, 207:1, 207:2, 207:5, 226:16, 239:13, 242:16, 261:9, 285:3, 286:2, 287:1, 288:1, 288:9, 288:14, 290:8, 291:6 tx 2:10 type 15:7, 82:9, 82:13, 82:18, 92:16, 112:8, 153:3, 157:12, 157:13, 200:7 typed 183:7 types 109:10, 110:13, 158:1, 198:19, 199:4, 200:10 typically 116:22, 122:7, 255:1	ultimately 20:21, 163:14, 187:10, 280:10 unclassified 18:16 under 179:5, 262:14, 264:1, 264:6, 264:10, 264:13, 265:6, 265:16, 270:14, 271:15, 271:22, 272:10, 272:18 underlying 260:15, 260:16 underneath 53:18, 53:21 understand 119:14, 125:18, 125:22, 126:14, 181:14, 198:1, 200:14, 202:12, 209:5 understanding 61:16, 96:9, 97:7, 126:9, 258:4 understands 199:14 understood 46:10 underwood 30:14 unified 15:1, 17:2, 17:5, 59:4, 81:18, 158:3 unique 35:10, 41:7 uniquely 61:21 united 1:1 universe 153:14, 153:19 university 33:5, 177:16 unix 116:6	unless 8:7 unlikely 183:16, 272:12 unredacted 247:21, 248:20, 249:1, 249:2, 249:19, 250:4, 250:10, 262:8, 263:8, 267:8, 270:15, 271:8, 271:16 unsanitized 247:16 until 61:10, 254:12 update 88:22 updated 4:20, 4:21, 208:5, 208:22, 209:6, 209:10, 220:17, 220:18, 273:7 updates 213:6 usda 211:22 use 39:7, 48:21, 51:11, 51:12, 66:13, 88:17, 89:4, 89:9, 103:2, 111:16, 137:1, 137:4, 154:21, 167:22 useful 9:13, 36:14, 133:10 user 16:2, 19:6, 19:18, 79:9, 80:22, 87:17, 87:20, 90:15, 93:16, 93:19, 100:3, 100:20, 106:8, 115:14, 115:22, 116:10,	118:12, 121:12, 122:1, 122:2, 122:15, 122:20, 123:14, 127:17, 130:15, 130:17, 130:21, 131:1, 132:6, 132:7, 132:11, 145:17, 152:18, 154:16, 155:17, 157:20 user's 81:13, 132:8, 132:12 users 16:22, 67:3, 95:20, 112:2, 112:6, 113:19, 114:11, 118:19, 121:10, 122:3, 123:5, 123:12, 131:19, 132:6, 145:8, 145:10, 145:13, 145:18, 152:20, 154:5, 155:13, 157:21, 161:9, 161:11, 166:21, 167:8, 167:13, 167:18 uses 80:10, 80:14, 103:5, 103:14 using 51:19, 67:3, 71:11, 88:14, 95:4, 95:14, 95:20, 96:3, 113:22, 114:5, 114:7, 118:22, 120:1, 143:1, 147:20, 152:21, 202:13, 202:22, 203:5 utility 254:10, 254:12, 255:5, 257:21 v vague 126:10, 126:12
---	--	--	--

validating 246:3 valuable 133:3 value 30:13, 46:2, 46:6, 46:14, 46:18, 49:22, 50:8, 50:9, 54:2, 71:22, 80:5, 108:21, 119:6, 131:1, 146:22, 162:4, 163:4, 164:8, 164:9, 168:9, 233:8 values 99:21, 102:20, 103:3, 157:22, 162:17, 167:21, 233:4, 233:5 vankeirsbilck 219:5 variables 182:12 variant 162:9 various 14:16, 143:1, 238:9, 279:7, 289:8 vast 278:21 verizon 211:19, 211:20 version 83:17, 166:2, 187:3, 209:1, 209:7, 209:11, 220:17, 220:18, 225:16, 247:16, 247:21, 248:20, 249:1, 249:3, 249:4, 249:17, 249:19, 250:4, 250:11, 262:8, 263:8, 271:16, 289:1	versions 204:3, 225:13, 225:18 versus 112:3, 143:18, 143:19, 157:13, 286:8 vested 49:22 via 90:15 video 7:15 view 14:19, 19:11, 29:2, 70:11, 70:13, 80:8, 90:12, 91:4, 91:13, 92:5, 96:18, 100:14, 135:3 viewable 94:18, 136:17 viewed 69:2 viewing 136:21 views 67:2 vip 50:17 virtual 11:14, 13:4, 19:4, 19:20, 40:15 visibility 146:14 volume 39:18	wall 35:2, 104:2 walled 18:4, 50:17, 65:11 walls 33:22 want 10:20, 26:12, 33:10, 42:20, 52:13, 52:14, 53:2, 53:3, 74:9, 96:17, 97:8, 99:20, 108:12, 111:17, 120:22, 125:22, 138:7, 138:11, 140:22, 147:7, 148:17, 156:21, 157:2, 157:3, 157:4, 157:19, 157:22, 167:22, 172:20, 173:21, 250:22, 297:1, 300:19, 301:4, 301:12 wanted 14:18, 30:19, 51:2, 51:22, 52:22, 55:19, 75:17, 91:15, 244:16, 280:7 wanting 14:11, 76:8, 162:4 wants 46:5 washington 3:8 wave 18:8 way 15:1, 15:21, 23:8, 34:4, 40:14, 63:13, 79:9, 90:6, 96:8, 96:10, 96:13, 96:16,	96:18, 98:15, 99:5, 100:11, 104:9, 112:17, 126:5, 129:15, 137:5, 148:12, 161:14, 162:12, 163:22, 167:8, 167:11, 178:7, 183:14, 184:1, 184:2, 184:17, 206:7, 215:1, 230:18, 247:3, 263:12, 269:8, 270:16, 271:14, 303:2 ways 72:4, 109:15, 122:4, 141:11, 143:14, 153:12, 160:9, 160:14, 160:18, 163:2, 164:22 we'll 42:3, 301:5 we're 32:8, 32:14, 100:11, 146:13, 158:4, 158:5, 213:17 we've 74:8, 141:1, 155:11, 235:22, 236:1, 242:22, 267:14, 294:4 web 31:21, 64:15, 65:8, 66:19, 70:12, 89:4, 89:7, 90:12, 91:4, 102:18, 103:8, 103:16, 105:14, 153:7, 162:5 web-based 153:1 webmail 64:16, 65:12, 66:13, 89:10
W			
wait 125:21 waiting 227:17 waive 270:22, 271:4 waiving 270:21			

webmail-based 88:14 webmail-like 64:19 website 213:6 websites 96:10, 97:8, 97:9 wednesday 261:19 weighing 188:9 weight 112:8, 112:15, 158:6, 167:22, 168:3 weighting 111:22, 157:11, 157:22, 188:12 weightings 156:14, 157:5, 157:7, 167:20 weights 112:18, 112:20 weiler 217:14 well-known 56:10, 114:8, 115:15, 120:6 went 16:10, 23:22, 40:22, 44:3, 52:19, 86:15, 172:4, 186:14, 222:4, 242:16, 244:14, 261:14, 273:22 weren't 21:17, 27:9, 27:13, 46:16, 51:14, 77:14, 244:7 west 53:17, 219:13, 221:8, 221:17, 221:20, 222:17, 227:10	whatever 7:16, 12:13, 37:20, 81:12, 138:15, 219:6, 227:14 whatever's 23:21 whenever 43:22, 77:1, 301:17 whereas 99:16, 157:17, 221:8 whereof 303:5 whereupon 24:8, 59:11, 74:14, 139:14, 149:3, 158:9, 165:5, 170:18, 179:12, 180:13, 187:22, 189:19, 194:20, 197:15, 200:20, 204:14, 207:12, 207:18, 220:3, 220:13, 243:8, 275:17, 285:8, 285:16, 290:18, 290:22 whether 36:16, 63:7, 114:4, 115:8, 115:21, 119:22, 153:5, 180:3, 183:6, 230:12, 235:14, 235:18, 247:22, 248:4, 267:13, 267:17, 268:12 whichever 252:15 white 3:6, 154:13, 168:12, 168:15, 170:3, 178:21, 189:4, 195:12 whole 7:18, 18:7,	22:20, 22:21, 23:7, 27:4, 27:8, 35:5, 43:20, 71:6, 92:1, 92:7, 111:7, 126:4, 143:10, 147:12, 147:15, 148:13, 162:5, 166:11, 182:5, 206:11, 206:18, 224:14, 253:2, 274:1, 277:2, 278:14, 282:1 wholly 85:3 williams 218:6, 218:7 willing 25:11 winter 276:21 within 17:19, 19:20, 63:22, 66:5, 67:2, 69:2, 70:9, 70:11, 70:14, 71:7, 78:10, 88:10, 91:8, 93:19, 94:8, 99:8, 106:21, 123:15, 146:6, 146:17, 224:3, 246:14, 258:1 without 19:12, 86:18, 91:13, 92:8, 114:22, 120:18, 123:16, 127:7, 129:12, 130:5, 131:11, 256:1, 259:9, 259:14 witness 2:2, 42:6, 43:13, 75:22, 76:3, 109:6, 125:14, 158:21,	174:7, 273:14, 296:15, 300:18, 300:21, 301:5, 302:6, 302:11, 303:5 witness's 61:2 won 56:21, 56:22 word 146:9, 146:10, 168:14, 182:1, 301:18 words 259:1 work 51:2, 61:18, 88:10, 129:5, 143:3, 143:7, 149:20, 151:15, 160:6, 164:20, 169:13, 169:14, 177:3, 177:6, 215:22, 216:11, 220:22, 223:7, 224:22, 262:21, 281:3, 284:10, 288:19, 292:4, 293:10, 293:16, 294:21, 297:7, 297:14, 297:16, 298:3, 300:3 worked 19:3, 23:8, 24:19, 52:17, 52:18, 61:17, 107:16, 158:19, 176:18, 184:20, 186:4, 186:20, 187:5, 216:10, 238:20, 286:10, 291:15, 291:18 working 14:5, 15:1, 23:11, 46:15, 52:19, 76:9, 144:13, 144:17, 148:6, 168:11,
---	---	--	--

169:19, 170:11, 170:13, 189:1, 196:8, 196:10, 207:6, 215:16, 215:17, 216:16, 217:13, 223:17, 224:12, 224:16, 224:20, 227:12, 227:20, 274:14, 281:13, 295:14 works 97:1, 97:3, 100:11, 101:4, 117:1, 161:21 world 36:19, 37:3, 50:14 worried 17:21 worry 88:21 wouldn't 108:4, 120:9, 129:7, 129:9, 138:7, 200:13, 206:22, 210:15, 217:22, 233:8, 254:7, 257:6 write 9:4, 59:5, 59:16, 169:11, 185:7, 191:18, 191:20, 196:1 writes 255:5 writing 154:3, 168:20, 170:1, 195:16 written 12:11, 62:16, 82:15, 106:8, 183:12, 183:15, 183:17, 191:5, 191:17, 192:16, 195:19, 195:20, 195:22, 255:7, 257:18, 271:11 wrong 74:22, 75:4,	247:3 wrote 59:21, 62:21, 149:7, 159:7, 163:21, 165:16, 188:18, 188:22, 191:10, 191:15, 191:16, 204:10, 204:13, 230:2, 249:6, 264:17, 284:7, 287:17, 287:18 x xd 31:17, 48:6 y yahoo 66:2, 101:17 year 13:21, 23:13, 57:19, 61:11, 97:19 years 12:9, 56:15, 59:16, 62:21, 69:14, 176:1, 187:10, 210:4, 230:2, 230:3 yep 45:2, 64:13, 87:14, 106:16, 134:20, 149:11, 174:21, 190:2, 190:19, 197:20, 211:9, 225:4, 228:6, 228:9, 231:5, 249:12, 261:6, 274:13, 274:18, 278:3, 278:20, 281:11, 282:14, 282:22, 283:3, 283:6, 288:18 york 218:17 young 56:21, 57:1,	57:8 youngest 56:13, 57:10 yourself 175:17 z zone 54:8, 54:9 \$ \$500 76:18, 77:4 \$500,000 53:9 . .3586 3:9 .3601 3:16 .3767 303:15, 303:16 0 0002055 4:19 0002835 4:25 00299 1:15 003199 4:14 0260710 5:3 03 180:10 06 197:9, 250:18 09 2:5, 302:18 1 1 4:21, 197:9 1/3/2025 4:21 10 27:6, 66:6,	67:10, 74:12, 74:13, 98:9, 107:6, 107:7, 211:11, 238:2, 274:12, 275:7, 277:14, 283:1, 298:16, 303:10 100 188:20, 201:21, 237:11, 256:1 1000 175:13 1001 4:28, 74:14 1003 4:31, 170:17, 170:18, 174:20, 175:5 1043 5:2, 139:13, 139:14, 175:12 11 1:20, 2:5, 18:7, 20:16, 72:12, 74:12, 148:21, 148:22, 171:5, 213:2, 213:18, 226:7, 226:11, 226:22, 227:6, 228:1, 228:13, 239:9, 243:14, 243:15, 252:15, 261:19, 273:8, 273:19, 277:20, 283:4, 293:4, 299:13, 302:18 12 84:13, 197:8, 213:19, 240:4, 246:15, 249:7, 266:16, 268:19 120 3:14 125 56:14 13 221:1, 240:7,
--	---	---	---

Transcript of Justin Marston
Conducted on November 11, 2025

128

245:14, 293:3, 299:5, 299:9, 299:13, 300:13 1305 252:15 131105 252:4, 252:15, 252:20, 253:4, 253:17, 255:19, 262:1 139 5:3 14 74:13, 211:11, 240:21, 303:6 149 5:11 15 106:1, 211:11, 241:3, 273:9, 273:20, 282:5 158 4:16 16 89:13, 89:17, 94:21, 197:19, 197:21, 203:3, 241:7, 282:5, 282:6 165 4:19 17 57:15, 241:11, 283:19, 289:12, 289:17, 290:1, 290:3, 290:6, 295:9, 297:19 170 4:31 179 6:3 18 241:17, 251:2, 261:10, 281:10 180 5:25 187 6:5	189 6:10 19 223:5 194 6:8 197 5:6 1st 212:10, 213:2 2 2 250:18, 250:19 20 12:9, 59:16, 62:21, 156:22, 180:10, 180:11, 210:4, 230:2, 230:3, 283:20, 284:13, 286:15, 297:14, 297:15 200 5:21, 37:19 2000 293:1 20005 3:8 2001 33:6, 38:6, 73:17 2002 73:17 2003 5:5, 180:10, 197:12, 197:15, 225:3 2004 5:3, 5:8, 5:20, 92:19, 114:8, 120:7, 197:22, 203:13, 204:1, 204:14, 204:20, 205:21, 293:20 2005 60:1, 74:19, 165:13, 166:10, 166:13, 166:18,	176:8, 197:4, 197:22, 221:1, 223:8, 223:16, 223:20, 224:10, 224:14, 274:16, 275:22, 278:1, 278:2, 278:9, 278:10, 278:14, 278:17, 281:3, 281:4, 293:21, 295:9 2006 5:11, 5:21, 14:4, 61:9, 149:2, 149:3, 170:2, 173:17, 174:2, 175:6, 193:9, 203:13, 203:22, 205:7, 205:20, 221:2, 226:7, 226:11, 226:22, 228:1, 243:14, 243:16, 244:2, 245:14, 249:7, 252:13, 261:19, 268:19, 277:16, 278:17, 282:8, 300:13 2007 14:2, 197:4, 282:8 2008 5:13, 176:9, 290:17, 290:18 2010 5:16, 290:21, 290:22 2011 23:15, 26:8, 27:14, 48:13 2013 292:16, 293:1 2014 5:18, 13:1, 27:15, 27:21, 48:14, 200:19, 200:20, 205:17, 242:21	202.626 3:9 2021 2:9 2025 1:15, 1:20, 2:5, 302:18, 303:6 2030 5:23, 180:9, 180:11, 180:13, 223:2, 223:4, 226:2, 266:11, 274:10, 297:5 2031 266:10 2032 5:28, 284:20, 285:6, 285:8, 286:11, 286:15, 287:14 2034 292:8 2035 292:9 204 5:8 2041 4:20, 5:30, 207:11, 207:12, 207:21, 208:1, 208:6, 208:9, 209:1, 209:11, 242:14, 273:7, 273:10, 275:5 2042 4:22, 5:33, 220:2, 220:3, 220:18, 242:13, 251:2 2046 5:35, 243:7, 243:8, 250:22, 252:1, 261:5, 266:20, 267:11 2047 6:2, 179:11, 179:12
--	--	---	---

Transcript of Justin Marston
Conducted on November 11, 2025

129

2048 6:5, 187:21, 187:22 2050 6:8, 194:19, 194:20 2054 6:10, 189:18, 189:19 207 4:20, 5:30 2073 6:13, 285:14, 285:16 20850 303:14 21 157:4, 180:17, 212:8, 224:4, 224:11, 281:4, 284:11, 288:20, 297:8, 297:16, 297:21, 297:22, 298:13, 298:21 217 13:11, 13:14, 20:5, 25:5, 47:22, 77:19, 140:16, 170:22, 254:14 220 4:22, 5:33 23 284:9, 284:10, 284:14 24 4:10, 92:21, 95:2, 296:16 243 5:35 25 94:22, 278:9 250 82:7, 85:1 256 80:11 258 80:12	26 288:15, 289:7 260 2:10 27 94:22, 289:7, 303:10 275 4:25 28 81:21, 82:1, 221:1, 250:19, 289:8 2800 9:1 285 5:28, 6:13 29 84:11, 147:5, 289:8, 296:17 290 5:13, 5:16 2nd 275:22, 293:20 3 3 2:6, 296:16, 296:17, 301:1, 301:2, 302:19 30 84:10, 92:22, 108:10, 113:5, 148:21, 180:11, 289:8, 292:15, 292:19, 299:8 301 4:5 302 4:6 303 1:27 31 303:10 32 67:10, 140:18, 140:20, 266:17, 286:15	3201 62:6 3209 64:12, 64:13 3210 67:10 3211 68:12 3212 68:15 3253 303:9 33 89:14, 89:15, 89:16, 131:15, 301:1 34 289:11, 298:18 35 148:22 36 197:8 37 108:11, 140:19, 140:20, 142:18 38 301:2 3807 3:8 39 2:6, 292:6, 302:19 4 40 89:14, 89:19, 259:18 400 303:13 401 247:12 403 247:12 41 190:18 43 108:10, 140:18, 175:14	44 147:6 45 143:1 451 303:12 47 107:1, 107:2, 292:13, 299:7 49 113:3 5 50 143:1, 151:19 500 54:11, 54:12 51 106:1, 151:17, 151:18, 151:20, 173:22 52 149:10, 174:1, 193:11 53 150:5, 156:6, 156:8 54 226:4 55 106:3, 286:5, 286:15, 289:15, 291:9, 298:21 55441 3:15 57 89:14, 173:19, 174:1, 174:4, 294:2 58 131:18, 180:16, 294:5 59 4:14, 174:19, 291:8 6 601 29:6, 31:10,
---	---	--	---

45:19, 47:2, 47:13, 48:16, 53:13, 54:16, 65:15, 78:13, 272:7, 272:15 602 29:6, 31:10, 45:19, 47:2, 47:13, 48:16, 53:13, 54:16, 65:15, 78:13, 272:7, 272:15 608103 1:26 611 40:6, 48:16, 61:2, 61:3, 102:11, 102:16, 103:12, 105:11, 109:13, 110:2, 110:16, 116:18, 133:22, 259:6, 259:16, 269:14, 271:19, 272:15, 298:7 612.444 3:16 62 142:18 63 294:11, 294:12 65 81:19, 82:2 686 303:11 6th 289:18, 290:1 7 7,716,217 1:16, 4:28 701 3:7 74 4:28 78705 2:11 78732 9:2	7th 224:4, 282:5, 292:5, 292:20, 293:21, 297:8, 297:16, 298:14, 298:22, 299:4, 299:9 8 83 171:3 86 172:21 888.433 303:15 888.503 303:16 8th 215:1, 215:2, 292:5, 292:20, 299:4 9 9 2:5, 302:18 9800 3:14 9th 211:2, 211:11	
---	---	--