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Transcript of George Edwards

Date: April 1, 2025
Case: Allani -v- Apple

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

FERID ALLANI,	)	
	)	
Plaintiff,	)	
	)	
VS	)	CASE NO. 7:24-cv-304-ADA
	)	
APPLE, INC.,	)	
	)	
Defendants.	)	

REMOTE VIDEOTAPED DEPOSITION OF
GEORGE EDWARDS, Ph.D.
April 1, 2025

Job No. 578948
Pages 1 - 151
Stenographically Reported by:
Susan S. Klinger, RMR-CRR, CSR

April 1, 2025

REMOTE VIDEOTAPED DEPOSITION OF GEORGE EDWARDS,
Ph.D., produced as a witness at the instance of
the Defendant, and duly sworn, was taken in the
above-styled and numbered cause on the 1st of
April, 2025, from 12:36 to 18:53, before Susan S.
Klinger, RMR-CRR, CSR in and for the States of
Texas and California, reported by stenographic
method, pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record
or attached hereto.

A P P E A R A N C E S

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Travis Perry, videographer

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E X H I B I T S

No.	Description	
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Transcript of George Edwards
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1	P R O C E E D I N G S	12:35:42
2	VIDEOGRAPHER: Here begins Media Number 1	12:35:42
3	in the videotaped deposition of George Edwards in	12:35:55
4	the matter of Allani versus Apple in the Western	12:35:59
5	District of Texas, Case Number 6:24-cv-00304-ADA.	12:36:04
6	Today's date is April the 1st, 2025. The	12:36:12
7	time on the video monitor is 12:36. The remote	12:36:16
8	videographer today is Travis Perry representing	12:36:22
9	Planet Depos. All parties of the video deposition	12:36:25
10	are attending remotely.	12:36:27
11	Would counsel please voice-identify	12:36:28
12	themselves and state whom they represent?	12:36:31
13	MR. HUDNELL: Lewis Hudnell for plaintiff	12:36:36
14	Ferid Allani and the witness.	12:36:39
15	MR. STEPHENS: Garland Stephens of Blue	12:36:39
16	Peak Law Group representing the defendant Apple,	12:36:42
17	Inc.	12:36:44
18	VIDEOGRAPHER: The court reporter today is	12:36:44
19	Susan Klinger representing Planet Depos. The	12:36:46
20	witness will now be sworn.	12:36:50
21	GEORGE EDWARDS, Ph.D.,	12:36:50
22	having been first duly sworn testified as follows:	12:36:50
23	EXAMINATION	12:36:50
24	BY MR. STEPHENS:	12:37:01
25	Q Good morning, Dr. Edwards.	12:37:01

Transcript of George Edwards
Conducted on April 1, 2025

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1	A	Good morning.	12:37:03
2	Q	Thanks for making time for this.	12:37:04
3	A	Sure.	12:37:08
4	Q	Can you please state and then spell your	12:37:08
5		name for the record?	12:37:13
6	A	My name is George Thomas Edwards spelled	12:37:13
7		G-e-o-r-g-e T-h-o-m-a-s E-d-w-a-r-d-s.	12:37:25
8	Q	What is your home address?	12:37:25
9	A	My home address is 1023 Green Lane in La	12:37:26
10		Canada, Flintridge, California 91011.	12:37:33
11	Q	And where are you physically located now	12:37:35
12		during this deposition?	12:37:38
13	A	I am currently in my office in downtown LA	12:37:39
14		at the offices of my employer, Quandary Peak	12:37:47
15		Research.	12:37:50
16	Q	I am guessing from your declaration in	12:37:50
17		this case and your curriculum vitae that you have	12:37:54
18		been deposed a few times and probably by Zoom	12:37:59
19		before; is that correct?	12:38:02
20	A	Yes, I have been deposed before and by	12:38:03
21		Zoom.	12:38:07
22	Q	So you are familiar with the process. I'm	12:38:07
23		going to be presenting some exhibits during the	12:38:11
24		course of this deposition and I plan to just drop	12:38:15
25		them in the chat and you should be able to	12:38:17

1 those elements or limitations that refer to a 14:16:39
2 direct access icon. So that is a analysis that I 14:16:43
3 would need more time to engage in. 14:16:50

4 I can say that, as I said in general, when 14:16:57
5 a user clicks one of these hyperlinks that does 14:17:03
6 cause an address or a URL to be transmitted over a 14:17:09
7 network whether, for example, the address that is 14:17:16
8 transmitted is an address for a web site or for 14:17:22
9 some other internet service that is not a web site 14:17:28
10 would need to be analyzed before I could offer an 14:17:36
11 opinion on that. 14:17:40

12 (Exhibit 5 marked.) 14:18:05

13 Q I've uploaded Edwards Exhibit 5, which is 14:18:05
14 the web page that appeared when I selected the 14:18:13
15 arts and humanities link shown in Edwards Exhibit 14:18:18
16 4. Let me know when you have that. 14:18:25

17 A Okay, I have Exhibit 5 open. 14:18:35

18 Q Does that help you understand if the arts 14:18:37
19 and humanities link in Edwards Exhibit 4 is a 14:18:40
20 direct access icon as you have construed that term 14:18:44
21 in your declaration? 14:18:49

22 A I think my answer would be the same, which 14:18:51
23 is that the -- when a user clicks on that 14:19:24
24 particular area of the screen that does cause the 14:19:32
25 underlying software to transmit a web address. If 14:19:38

1 I accept your representation, which I have no 14:19:44
2 reason to doubt, then that would, for example, 14:19:49
3 include a web address such as the one shown at the 14:19:54
4 top of Exhibit 5. 14:19:59

5 However, that does not necessarily mean 14:20:04
6 that that user interface element would meet all 14:20:09
7 the requirements of a -- of the direct access 14:20:18
8 icons that are enumerated in any of the claims of 14:20:21
9 the asserted patents. 14:20:28

10 Q I'm not asking about other limitations 14:20:29
11 that you don't address in your declaration. I'm 14:20:32
12 asking you about the phrase direct access icon as 14:20:35
13 you construe it in your declaration. 14:20:38

14 Is the arts and humanities link in Exhibit 14:20:42
15 4 a direct access icon as you've construed it in 14:20:46
16 your declaration without regard to other 14:20:49
17 limitations that may be imposed by different 14:20:51
18 claims? 14:20:54

19 A In general, I would say that those areas 14:20:56
20 of the screen where there is some kind of a 14:21:13
21 rendering of a user interface element that when 14:21:17
22 clicked causes an address of at least one web site 14:21:21
23 to be transmitted to a network, then that element 14:21:27
24 would include the characteristics of a direct 14:21:32
25 access icon that are in the construction that I 14:21:36

1 opined was the correct construction at least with 14:21:41
2 regard to the claims, the asserted claims of the 14:21:49
3 '877 patent. 14:21:52

4 There was a slightly different 14:21:54
5 construction proposed for some claims of the '058 14:21:55
6 patent. 14:21:59

7 Q So again, my question is, is the arts and 14:22:00
8 humanities link in Exhibit 4 a direct access icon 14:22:04
9 as you've construed it in your declaration for the 14:22:09
10 '877 patent? 14:22:13

11 A I think that is the same question that you 14:22:17
12 just asked, so my answer would be the same, which 14:22:21
13 is that without having done a full or complete 14:22:25
14 analysis of this web site in particular and 14:22:32
15 accepting the representations that you have made, 14:22:36
16 those areas of the screen that include a rendering 14:22:42
17 of a user interface element that when clicked 14:22:50
18 causes an address of a web site to be transmitted 14:22:55
19 over a network that would have the characteristics 14:22:59
20 of a direct access icon that are required by the 14:23:04
21 construction of that term that I opined was the 14:23:10
22 correct construction. 14:23:14

23 Q Okay. That is also true for your 14:23:15
24 construction for the '058 patent, right? 14:23:21

25 A There are two different constructions that 14:23:25

1	I opined were correct for the '058 patent	14:23:57
2	depending on which claim you are referring to.	14:24:03
3	Q Fair enough. I'm referring to claims 24	14:24:07
4	to 26.	14:24:10
5	A That would, I think, again generally be	14:24:18
6	the case. Without having analyzed this specific	14:24:35
7	web site, it was generally the case that web sites	14:24:39
8	such as Yahoo included user interface elements	14:24:46
9	that when clicked would cause the user's web	14:24:52
10	browser to transmit an address of a information or	14:24:56
11	service source to a network. And so that it would	14:25:03
12	include those characteristics of a direct access	14:25:08
13	icon that are enumerated in the proposed	14:25:12
14	construction.	14:25:16
15	Q So direct access icon, as you've construed	14:25:18
16	it, is nothing more than an ordinary HTML link,	14:25:21
17	right?	14:25:28
18	MR. HUDNELL: Objection, form.	14:25:28
19	A I think that a HTML link is one part of	14:25:28
20	the way that a direct access icon could be	14:25:45
21	implemented. It is not the only way that it could	14:25:50
22	be implemented and by itself likely would not be	14:25:55
23	sufficient to constitute direct access icon.	14:25:58
24	Q What else would be required?	14:26:03
25	A Well, aside from the link itself, there	14:26:08

1 needs to be a display or rendering of an icon of 14:26:13
2 some type within the screen or display of the 14:26:21
3 user's device. And there has to be functionality 14:26:28
4 programmed into the device to allow it to detect 14:26:35
5 when a user has clicked or selected that icon or 14:26:41
6 selected it in some other means such as a touch. 14:26:49
7 And then taking the corresponding action 14:26:54
8 of transmitting a address of the web site or a 14:26:59
9 remote information or service source depending on 14:27:05
10 which construction you are referring to. 14:27:08
11 Q Okay. Maybe I should ask a little 14:27:12
12 differently then. The construction of direct 14:27:15
13 access icon that you have included in your 14:27:21
14 declaration -- sorry, let me start again. 14:27:25
15 The construction of direct access icon 14:27:30
16 that you believe is correct as you explain in your 14:27:37
17 declaration is nothing more than an ordinary prior 14:27:40
18 art HTML link displayed by an ordinary prior art 14:27:45
19 browser like Netscape Navigator, right? 14:27:50
20 MR. HUDNELL: Objection, form. 14:27:56
21 A I think that the direct access icons that 14:27:57
22 are enumerated in the claims are -- 14:28:11
23 Q Let me stop you there. I don't care about 14:28:18
24 what is enumerated in the claims. I'm asking 14:28:20
25 about your declaration, so I'm going to repeat my 14:28:22

1	question. I'm sorry for interrupting you, but you	14:28:26
2	keep doing that. I'm asking about what is in your	14:28:29
3	declaration and the question is:	14:28:31
4	The construction of direct access icon	14:28:33
5	that you propose in your declaration is nothing	14:28:37
6	more than an ordinary prior art HTML link	14:28:41
7	displayed in an ordinary prior art browser like	14:28:47
8	Netscape Navigator, correct?	14:28:51
9	MR. HUDNELL: Same objection.	14:28:56
10	A I don't think my declaration contains a	14:28:57
11	discussion of Netscape Navigator.	14:29:03
12	Q That wasn't my question.	14:29:09
13	It is correct that the construction you	14:29:13
14	propose in your declaration for direct access icon	14:29:16
15	is nothing more than an ordinary HTML link	14:29:20
16	displayed -- sorry, let me ask it again.	14:29:25
17	The construction that you propose for	14:29:29
18	direct access icon in your declaration is met by	14:29:32
19	an ordinary prior art HTML link displayed in an	14:29:37
20	ordinary prior art Netscape Navigator browser,	14:29:42
21	correct?	14:29:47
22	A I think that a icon displayed in a browser	14:29:47
23	that is associated with a hyperlink will when	14:29:57
24	selected cause an address of a web site to be	14:30:04
25	transmitted to a network, and therefore, would	14:30:09

1	include those characteristics of a direct access	14:30:12
2	icon.	14:30:17
3	Q Are there any characteristics of a direct	14:30:33
4	access icon that you propose as a part of your	14:30:45
5	construction that are not met by an ordinary prior	14:30:51
6	art HTML link displayed in an ordinary prior art	14:30:57
7	browser like Netscape Navigator?	14:31:03
8	A Provided that the link was being rendered	14:31:05
9	as a icon within the user interface, then that	14:31:16
10	icon would include the aspects of a direct access	14:31:28
11	icon that are enumerated in the proposed	14:31:35
12	construction that I opined was correct.	14:31:39
13	Q And the anchor text in an ordinary HTML	14:31:45
14	link was rendered by ordinary prior art browsers	14:31:51
15	as an icon, right?	14:31:56
16	A It was rendered as a user interface	14:31:57
17	element within a displayed web page.	14:32:06
18	Q And that is an icon, right?	14:32:14
19	MR. HUDNELL: Objection, form.	14:32:18
20	A At least some of the hyperlinks that are	14:32:18
21	displayed within web pages could accurately be	14:32:25
22	characterized as icons.	14:32:33
23	Q Okay. But I'm asking something more	14:32:34
24	specific than that. I'm talking about a ordinary	14:32:36
25	plain vanilla HTML link using the AHTML tag and an	14:32:39

1	href tag that indicates the web address, and then	14:32:47
2	just including anchor text as you described, that	14:32:52
3	shows up in prior art browsers as blue text that	14:32:57
4	is underlined signifying that it is a link,	14:33:02
5	correct?	14:33:05
6	A That is possible.	14:33:05
7	Q It is not just possible, it is accurate,	14:33:10
8	right?	14:33:13
9	A It is not necessarily the case in every	14:33:13
10	instance, but it is true in at least some	14:33:17
11	instances.	14:33:20
12	Q Okay. And that is an icon according to	14:33:20
13	your testimony, right?	14:33:23
14	A As I said, it could be -- that hyperlink	14:33:24
15	could be associated with an icon. And web	14:33:32
16	browsers from the 1990s did have the capability of	14:33:38
17	rendering icons and associating those icons with	14:33:41
18	hyperlinks.	14:33:45
19	Q What I'm trying to understand is whether	14:33:46
20	the ordinary rendering of a hypertext link is an	14:33:49
21	icon, is it?	14:33:54
22	A I would have to --	14:34:00
23	MR. HUDNELL: Objection, form.	14:34:01
24	A I would have to consider a specific	14:34:01
25	instance in order to -- in order to think through	14:34:07

1	that question, because there are certainly some	14:34:14
2	circumstances in which that hyperlink might not be	14:34:20
3	rendered for example.	14:34:25
4	To the extent that it is -- there is an	14:34:27
5	icon that is being rendered on the screen within	14:34:30
6	the user interface, and that icon is associated	14:34:32
7	with a hyperlink, then I would agree that when	14:34:36
8	selected it will cause the address specified in	14:34:41
9	the hyperlink to be transmitted to a network.	14:34:50
10	Q What do you mean by rendered?	14:34:53
11	A It needs to be converted into pixels for	14:34:57
12	display on the screen in a way that makes it	14:35:09
13	visually apparent to a human user.	14:35:14
14	Q You wouldn't be able to see it if it	14:35:18
15	wasn't, right?	14:35:21
16	A That's right.	14:35:21
17	Q So all user clickable -- all visible user	14:35:25
18	clickable links in prior art web pages were	14:35:30
19	rendered, right?	14:35:32
20	A Provided that those links are associated	14:35:36
21	with a icon that was, in fact, visually rendered,	14:35:40
22	then I agree that clicking that icon does cause an	14:35:46
23	address of a web site to be transmitted over a	14:35:51
24	network.	14:35:55
25	Q And ordinary text that is rendered in blue	14:35:55

1	and underlined signifying that it can be clicked	14:36:00
2	to connect to another web site or web page is an	14:36:06
3	icon, right?	14:36:10
4	A I think that text can be certainly a part	14:36:11
5	of an icon. And there is no prohibition on an	14:36:21
6	icon containing text or being otherwise composed	14:36:26
7	of text as those --	14:36:32
8	Q I'm sorry, go ahead. I didn't mean to cut	14:36:36
9	you off.	14:36:38
10	A I said that is -- that is permissible.	14:36:39
11	Q So and I think you may have already said	14:36:40
12	this and I just want to make clear and I don't	14:36:45
13	need to just reiterate my questions. In Exhibit 4	14:36:47
14	the arts and humanities text rendered in blue and	14:36:50
15	underlined that I clicked to get Exhibit 5 that is	14:36:55
16	a direct access icon, right?	14:37:00
17	A Well, I think that that is the same or	14:37:01
18	similar question that you previously asked me. I	14:37:12
19	haven't analyzed this particular version of this	14:37:16
20	web site, which you have represented is a capture	14:37:20
21	of Yahoo.com home page from 1999, but I can say	14:37:26
22	that in general if you have a rendering of a user	14:37:33
23	interface element within a screen and that element	14:37:41
24	is displayed within a web browser and associated	14:37:49
25	with a hyperlink, then clicking it will cause a	14:37:53

1	address of a web site to be transmitted over a	14:37:59
2	network.	14:38:02
3	Q Is the arts and humanities text that is	14:38:04
4	rendered in blue and underlined, is that an icon?	14:38:08
5	MR. HUDNELL: Objection, form.	14:38:16
6	A I think that that is an icon assuming that	14:38:17
7	it is being rendered in the way that you have	14:38:33
8	represented here. That would be an icon as well	14:38:38
9	as the other graphical user interface elements	14:38:43
10	that indicate to a user they are representing some	14:38:47
11	aspect of the user interface.	14:38:54
12	Q You're familiar with HTML, right?	14:38:57
13	A Yes, I am.	14:39:00
14	Q And you are familiar with the anchor tag,	14:39:01
15	right?	14:39:04
16	A Yes, I am.	14:39:04
17	Q And the href modifier to the anchor tag,	14:39:07
18	right?	14:39:11
19	A Sure.	14:39:11
20	Q And so if you use a plain vanilla, like,	14:39:13
21	extremely simple web site and include an anchor	14:39:19
22	tag with an href to another web site, and then	14:39:23
23	enclose within that HTML tag just ordinary text	14:39:28
24	and then display that in a typical 1990s browser,	14:39:33
25	what does it look like?	14:39:38

1	A It would depend on many, many factors	14:39:39
2	regarding the page itself, the browser and a	14:39:49
3	number of other things.	14:39:54
4	Q I'm asking you to hypothesize that it is	14:39:56
5	the simplest possible web page and it includes the	14:39:59
6	simplest possible anchor tag with a working link	14:40:03
7	and plain vanilla text. It is rendered in blue	14:40:08
8	and underlined, right?	14:40:12
9	A It could be in some browsers.	14:40:13
10	Q It was in almost all browsers that existed	14:40:16
11	in the 1990s, right?	14:40:20
12	A I have not done that analysis to determine	14:40:21
13	which browsers displayed links in which particular	14:40:28
14	ways.	14:40:33
15	Q Simply remembering from your own	14:40:33
16	experience in the 1990s it was -- that kind of a	14:40:35
17	link was rendered just as we see in Exhibit 4 as	14:40:39
18	blue text with an underline that when selected	14:40:42
19	caused the browser to navigate to another web	14:40:46
20	page, right?	14:40:50
21	A I recall that that was the case in at	14:40:51
22	least some of the common browsers from that time	14:40:55
23	period.	14:40:57
24	Q And those are all direct access icons	14:40:58
25	under your construction, right?	14:41:01

1	A I would not be able to say that they're	14:41:02
2	all direct access icons.	14:41:11
3	Q Why not?	14:41:13
4	A Well, as I said, there is a number of	14:41:13
5	factors that could determine whether any	14:41:20
6	particular visual element whether it is a graphic	14:41:23
7	or text or some combination of the two is rendered	14:41:31
8	within the screen.	14:41:37
9	Q I simply asked about the typical	14:41:38
10	underlined blue text that when selected takes to	14:41:41
11	another web page, that is what I'm asking about.	14:41:45
12	A I think that that could be an icon or	14:41:50
13	could be part of an icon in at least some	14:41:53
14	circumstances. I would not be prepared to say it	14:41:55
15	is true in every circumstance.	14:42:00
16	Q And it is not just an icon, it is a direct	14:42:01
17	access icon, right, because it causes a web	14:42:04
18	address to be emitted onto a network when	14:42:06
19	selected?	14:42:10
20	A In at least some cases, yes, that's true.	14:42:14
21	Q What remote information or service sources	14:42:16
22	are disclosed in the '058 patent other than web	14:42:27
23	sites?	14:42:36
24	A Just opening up, I guess it is Exhibit 2.	14:42:36
25	Q The '058 is Exhibit 2.	14:42:56

Transcript of George Edwards
Conducted on April 1, 2025

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1 VIDEOGRAPHER: Stand by. This concludes 18:53:28
2 the deposition of George Edwards. We are going 18:53:30
3 the off record at 18:53. 18:53:32

4 (Deposition adjourned at 18:53 p.m.)
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CERTIFICATE OF SHORTHAND REPORTER

I, Susan S. Klinger, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was not discussed; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise in its outcome.

IN WITNESS WHEREOF, I have herunto set my hand on the 11th of April, 2025.



Susan S. Klinger, RMR-CRR, CSR

Texas CSR 6531, Exp: 10/23/25

California CSR 14487, Exp: 11/30/25