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Transcript of Henry Houh

Date: February 5, 2026

Case: Amazon.com, Inc., et al. -v- Datonics LLC (PTAB) IPR2025-00873

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

AMAZON.COM, INC., AMAZON WEB
SERVICES, INC., and AMAZON.COM
SERVICES LLC,

Petitioners,

vs.

DATONICS LLC,

CASE NO: IPR2025-00873
U.S. PATENT NO. 10,984,445

Patent Owner.

* * * * *

Deposition of HENRY HOUEH, taken on behalf of the
Defendants, via Zoom videoconference, commencing on
the 5th day of February, 2026, at the hour of 7:30
a.m. PT, before Jillian Doctor, CSR No. 14603,
pursuant to Notice of Taking Deposition.

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A P P E A R A N C E S

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I N D E X

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E X H I B I T S
(NO EXHIBITS MARKED.)

1 THE COURT REPORTER: We are on the record.
2 Doctor, I will go ahead and swear you in.
3 HENRY HOUH,
4 having been first duly sworn,
5 was examined and testified as follows:
6 EXAMINATION
7 BY MR. MILKEY:
8 Q. Good morning, Dr. Houh.
9 A. Good morning.
10 Q. Did you do anything to prepare for today's
11 deposition?
12 A. Yes, I did.
13 Q. And what did you do to prepare for today's
14 deposition?
15 A. I met with the attorneys. And I reviewed a
16 number of documents.
17 Q. And what documents did you review?
18 A. I reviewed my declaration. I reviewed the
19 patent, the '445 patent. I reviewed the -- four of
20 the references I used in the challenge grounds. And
21 then I also looked at a few other exhibits, such as
22 portions of file histories.
23 Q. Okay.
24 A. Yeah, and some of the other exhibits, like
25 background supporting exhibits.

1 Q. Okay. And you submitted a declaration in
2 this proceeding; correct?

3 A. Yes.

4 Q. Okay. And do you have a copy of that
5 declaration available to you?

6 A. I do. I have both a hard copy -- it's
7 clean -- and as well as an electronic version.

8 Q. Okay. Feel free throughout the day to refer
9 to copies of your declaration or any exhibit that's
10 referenced.

11 I'm going to put a version of your
12 declaration into the chat for the benefit of the
13 reporter so it can be seen as we refer to it today.

14 So I've uploaded Exhibit 1002, which has
15 already been marked in this proceeding.

16 And you understand that your declaration is
17 Exhibit 1002?

18 A. Yes.

19 Q. Okay. And you also have access to the '445
20 patent, the Gilmour reference, the Merriman reference,
21 and the Frauenhofer reference?

22 A. Yes, I have those both electronically and
23 printouts of those.

24 Q. Okay. And I'm also just uploading those
25 into the chat for the benefit of the reporter. Please

1 feel free to refer to your own copies as you like.

2 The '445 patent is Exhibit 1001. The
3 Gilmour reference is Exhibit 1012. The Merriman
4 reference is Exhibit 1013. And the Fraunhofer
5 reference is Exhibit 1014.

6 So you understand that Claim 1 is the only
7 independent claim of the '445 patent?

8 A. Yes.

9 Q. And in your opinion, what is the problem
10 that is at least purportedly addressed by Claim 1 of
11 the '445 patent?

12 MS. LIN: Objection. Form.

13 THE WITNESS: I don't know if I addressed
14 exactly your question when I talk about the '445
15 patent in my declaration, but I will point you to the
16 patent itself, the '445 patent.

17 And the abstract starts out to say: "To
18 improve monetization of electronic advertisement
19 placement, the profile owner company operates" -- and
20 it goes on to describe in abstract terms the -- this
21 patent. That's what the abstract's about.

22 And, also, at Column 7 in the '445 patent,
23 Line 5, it says: "What is needed generally is a more
24 efficient method of profile-based behavioral
25 targeting/advertisement placement services,

1 particularly for improving monetization of electronic
2 advertisement placement."

3 And I'd say that's consistent with the
4 opening sentence of the abstract as well. That's what
5 the patent says.

6 BY MR. MILKEY:

7 Q. Okay. Could you please turn to Paragraph 84
8 of your declaration. And let me know when you're
9 there.

10 A. Okay. I'm there.

11 Q. Okay. And do you see that this is the
12 beginning of your section regarding Gilmour under the
13 summary of the prior art?

14 A. Yes, I see that.

15 Q. Okay. And in Paragraph 85, you refer to a
16 requesting entity 50 and a profile service provider
17 34.

18 And my specific question is, what does the
19 requesting entity in Gilmour request?

20 MS. LIN: Objection. Vague.

21 THE WITNESS: One thing I say in
22 Paragraph 85 -- and that's at the top of the next
23 page -- I say that: "A requesting entity 50 that
24 wishes to access the user profiles for the purposes of
25 sending messages or advertisements to potential

1 customers sends a query to a matching engine and the
2 profile service provider. In response, the matching
3 engine performs a search, e.g. a matching operation,
4 against profiles stored by the profile service
5 provider. And the matching engine then produces a set
6 of query results to the requesting entity. Each
7 result comprising a collection of information
8 retrieved from profiles against which hits occurred
9 for the search conducted by the matching engine."

10 So that's what the requesting entity is
11 sending and then receiving as the results, that's
12 what's describing that. And by the way, I omitted
13 label name, numbers, and stuff when I read that.

14 BY MR. MILKEY:

15 Q. Okay. Thank you for that clarification.

16 So is it correct that the requesting entity
17 sends a query to the matching engine of the profile
18 service provider?

19 MS. LIN: Objection. Form.

20 THE WITNESS: I think if you look at the
21 figure that I provided on Page 52, that requesting
22 entity does send a message to the profile service
23 provider of Gilmour. And that's labeled a query. And
24 I talk about it -- I use that query, that word in my
25 declaration in that paragraph as well.

1 BY MR. MILKEY:

2 Q. Okay. And then does the requesting entity
3 receive profile information in response to that query?

4 MS. LIN: Objection. Form.

5 THE WITNESS: Well, the matching engine of
6 the profile service provider does produce a set of
7 query results to the requesting entity. And Gilmour
8 says that each result comprises -- well, comprises a
9 collection of information retrieved from profiles
10 against which hits occurred for the search conducted
11 by the matching engine.

12 So it's information from profiles that's a
13 collection of this information, a set of results that
14 are a collection of information retrieved from
15 profiles. That's what Gilmour describes it as.

16 BY MR. MILKEY:

17 Q. So is it correct that the query submitted by
18 the requesting entity determines what type of profile
19 information the requesting entity will receive in
20 response to that query?

21 A. Well, the -- there is a matching engine that
22 performs a matching operation against profiles stored
23 by the profile service provider. So it's from the set
24 of -- it is performing a matching operation to
25 retrieve the results. And then to be returned to the

1 requesting entity.

2 Q. Okay. So the matching engine looks at the
3 query and then determines what profile information to
4 return to the requesting entity on the basis of that
5 query?

6 A. It's --

7 MS. LIN: Objection. Form.

8 THE WITNESS: -- return of information --
9 Sorry.

10 It's returning a collection of information
11 retrieved from the profiles. And that's what the
12 matching engine is designed to do. That's what
13 Gilmour says it's doing.

14 BY MR. MILKEY:

15 Q. Okay. And does the matching engine use the
16 query submitted by the requesting entity in order to
17 determine what profile information is included in the
18 result returned to the requesting entity?

19 MS. LIN: Objection. Form.

20 THE WITNESS: So if you look in Paragraph 47
21 in Gilmour, it talks about how the query can have a
22 hit or match, and that's what the matching engine is
23 doing. So that is -- the query is submitted, and it's
24 used to perform a search and match. And if you get a
25 hit, then there is certain things -- Gilmour describes

1 certain things occurring.

2 So it is using the query to perform a match
3 from the information that's -- it's conducting the
4 search against. So Gilmour does describe using the
5 query for producing the results.

6 BY MR. MILKEY:

7 Q. Okay. And then going on to Paragraph 86 of
8 your declaration -- and just let me know when you're
9 there.

10 A. Okay. I'm there.

11 Q. Okay. And do you see that Paragraph 86 is
12 the beginning of your discussion of the Merriman
13 reference within your Summary of the Prior Art
14 section?

15 A. Yes.

16 Q. Okay. And Merriman is US Patent
17 Number 8,566,154; correct?

18 A. Yes.

19 Q. And does Merriman describe the DoubleClick
20 Boomerang product?

21 MS. LIN: Objection. Form.

22 THE WITNESS: I searched the Merriman
23 patent, and I didn't find reference to the word,
24 Boomerang. But I understand that this patent was
25 originally signed to DoubleClick. I talk about that

1 in Paragraph 88 of my declaration. And there are
2 numerous references cited that refer to DoubleClick
3 and some of their articles or papers or whatnot in the
4 Other Publications section of the patent.

5 It does mention DoubleClick a number of
6 times there. And then, also, this patent describes
7 this process known as retargeting.

8 BY MR. MILKEY:

9 Q. So looking at Paragraph 88 of your
10 declaration, you would agree that Merriman describes
11 DoubleClick's Boomerang product; correct?

12 MS. LIN: Objection. Form.

13 THE WITNESS: So that's in the background
14 section of the '445 patent, talking about how
15 DoubleClick has a service known as Boomerang for
16 advertisers. I didn't read it -- exactly what the
17 quote from the '445 patent is, but the Background
18 section of the '445 patent acknowledges that
19 DoubleClick has a Boomerang service for advertisers.

20 BY MR. MILKEY:

21 Q. Okay. So on the second sentence of
22 Paragraph 88 of your declaration, you state: "I
23 understand that DoubleClick, Inc. is related to the
24 DoubleClick reference by the '445 patent. And
25 Merriman describes DoubleClick's Boomerang product."

1 Did I quote that accurately?

2 A. Yes, I think you read that correctly.

3 Q. Okay. Would you agree that Merriman
4 describes DoubleClick's Boomerang product?

5 A. That's what I understand.

6 Q. Okay. And turning to Paragraph 89 of your
7 declaration, you state that: "Merriman relates to a
8 type of targeted advertising it calls retargeting."

9 Do you see that?

10 A. Yes.

11 Q. What is retargeting?

12 A. So retargeting refers to a new follow-up
13 advertisement from a specific advertiser who targets
14 that viewer previously. It is selected for that
15 viewer based on the viewer's own past behavior at a
16 specific advertiser's website.

17 And I have a citation to that as a
18 background reference. Oh, sorry. No. That's
19 Merriman. Sorry. On 13. 1013 is Merriman.

20 Q. So you're aware, correct, that Merriman
21 provides examples where the ad server targets an ad
22 based on profile information that was provided by the
23 advertiser; correct?

24 A. Well, Merriman does talk about a user
25 browser -- and I discuss this in Paragraph 90 -- and

1 that when the browser accesses the advertiser website,
2 the activities of the user at that site are
3 communicated back to the advertising server. And that
4 they may -- that communication may be done using what
5 they call spotlight tags. And I discuss spotlight
6 tags later in my declaration as well.

7 Q. So Merriman teaches that the spotlight tags
8 can be used to transfer profile information from the
9 advertiser to the advertising server; correct?

10 MS. LIN: Objection. Form.

11 THE WITNESS: Sorry. Could you repeat that
12 question, please.

13 BY MR. MILKEY:

14 Q. Yes.

15 Does Merriman teach that spotlight tags can
16 be used to transfer profile information from the
17 advertiser to the advertising server?

18 MS. LIN: Objection. Form.

19 THE WITNESS: So Merriman does talk about
20 this Feedback Path 18. And it talks about how the --
21 the activity lists, which is lists of user activities
22 at the advertiser's website, are compiled in the
23 advertising website, in that there is a feedback path
24 that permits the advertiser website to communicate the
25 activities of visitors at the advertiser's website

1 back to the advertising server. And there is a number
2 of different ways of achieving the feedback path that
3 is described in Merriman.

4 And if you look at Column 4, Line 51, it
5 talks about: "In a second embodiment, feedback of
6 individual activities of the user at an advertiser
7 site may be communicated in real time back to the
8 advertising server by using spotlight tags placed on
9 specific pages in the advertiser's website.

10 "A spotlight tag is a minimal graphic, e.g.
11 a one-pixel image, containing a redirect message back
12 to the advertising server. Spotlight tags are placed
13 on web pages by the advertiser and contain other
14 embedded information such as information identifying
15 the specific advertiser web page as, for example,
16 identifying a purchase confirmation page stating
17 "thank you for your order," et cetera."

18 And then it goes on to say that: "When the
19 user requests, i.e. visits, an advertiser page
20 containing a spotlight tag, a reply message redirects
21 the user's browser back to the advertising server via
22 request to access the minimal one-pixel graphic image.

23 "To request an image is not significant to
24 the event; however, by this process, the advertiser
25 website provides real-time reporting of user

1 activities while the user is in the advertising
2 website."

3 So what's describing -- what's being
4 described is that the spotlight tag is one method of
5 communicating the user activities back to the -- user
6 activities on the advertiser website to the
7 advertising server. But it describes other methods as
8 well, but the spotlight tag is one such method
9 described.

10 BY MR. MILKEY:

11 Q. Okay. And the spotlight tag allows the
12 advertiser's website to communicate that profile
13 information to the advertising server in real time;
14 correct?

15 A. The use of the spotlight tag is a
16 real-time -- it's described as being in real time.
17 And it is able to convey information about user
18 activities on the advertiser's web server, or website,
19 to the advertising server of Merriman.

20 Q. Does Merriman disclose that the advertising
21 server compensates the advertiser for the profile
22 information that it receives from the advertiser?

23 MS. LIN: Objection. Form.

24 THE WITNESS: I mean, I don't see -- I just
25 did a quick search through the Merriman, and I didn't

1 see the use of the word compensate or compensation or
2 anything with that kind of root.

3 But, I mean, Merriman is about targeted
4 advertising, and it's about a network for distribution
5 of retargeted advertising. So I think a person of
6 ordinary skill would understand that even if Merriman
7 is not discussing it, that there are payments flowing,
8 you know, in these types of systems. That's the whole
9 advertising ecosystem.

10 But, no, I didn't see the word compensate or
11 compensation or anything like that used. I didn't
12 find it in my search.

13 BY MR. MILKEY:

14 Q. Are you aware that in the Boomerang system,
15 the advertiser pays the advertising server in order to
16 target the advertisement to the user?

17 MS. LIN: Objection. Scope.

18 THE WITNESS: Well, did you say the patent
19 talks about that?

20 BY MR. MILKEY:

21 Q. So earlier, we discussed that you understood
22 that Merriman describes DoubleClick's Boomerang
23 product.

24 And so my question is, are you aware that in
25 the Boomerang product, the advertiser pays the

1 advertising server in order to target ads to the
2 users?

3 MS. LIN: Objection. Scope.

4 THE WITNESS: My declaration is about
5 Merriman as a reference. That is one of the
6 references that renders -- in combination with others,
7 renders the challenge claims of the '445 patent
8 obvious.

9 I haven't -- I'm not using the Boomerang
10 system itself as any prior art or anything like that,
11 so I haven't analyzed the Boomerang system with
12 respect to the challenged claims. I've used the
13 Merriman patent as one of the references, in
14 combination with others, to come to the conclusion
15 that the challenge claims are obvious.

16 BY MR. MILKEY:

17 Q. In your opinion, based on Merriman's
18 disclosure, would a POSITA have understood that the
19 advertiser would pay the advertising server in order
20 to target ads to the user?

21 MS. LIN: Objection. Form.

22 THE WITNESS: I don't recall that any of the
23 claims -- maybe I -- I don't remember every word of
24 every claim that's challenged here that I discuss that
25 talk about any sort of payment. I mean -- well, I

1 mean, I don't remember what words I used in the
2 challenged claims.

3 But if I wanted to discuss something with
4 respect to any payment issue, I would have done so in
5 the context of the claim requiring that. And we can
6 look at that in my declaration, if it's there.

7 But my -- the Merriman reference disclosed a
8 number of different things, which, in my opinion, a
9 POSITA would have found it obvious to make a
10 combination with Merriman and some other patents in
11 the specific ways that I laid out. I don't recall
12 that any of those are based on monetary compensation.

13 There is -- part of the motivation is that
14 you can do better targeting, and, therefore, a person,
15 you know, would be motivated to do that because better
16 targeting -- I don't remember what I said about it,
17 but typically, better targeting is desired. Getting
18 the right ad in front of the right person at the right
19 time is typically a desired thing in targeted
20 advertising. And I discuss that in my motivation to
21 combine Merriman with other references.

22 BY MR. MILKEY:

23 Q. Okay. In forming your opinions in this
24 proceeding, did you evaluate whether Merriman's
25 advertiser would pay Merriman's advertising server?

1 MS. LIN: Objection. Scope.

2 THE WITNESS: What I laid out in my
3 declaration is what I laid out. I don't recall -- you
4 know, I don't have it totally memorized. I don't
5 recall talking about that specific issue.

6 But there are motivations that I talked
7 about that persons of ordinary skill would have been
8 motivated to take teachings from one reference and
9 combine them with teachings from another reference.

10 BY MR. MILKEY:

11 Q. Okay. And in --

12 A. I mean, if I said anything about that, we
13 can go look at my declaration. But I don't have that
14 memorized, and I don't recall that specific issue
15 coming up.

16 Q. Okay. Do you have any opinions regarding
17 whether Merriman's advertising server would pay
18 Merriman's advertiser for the profile information
19 provided by the advertiser?

20 MS. LIN: Objection. Form.

21 THE WITNESS: Could you repeat the question,
22 please.

23 BY MR. MILKEY:

24 Q. Yeah.

25 Do you have any opinions regarding whether

1 Merriman's advertising server pays Merriman's
2 advertiser for the profile information provided by the
3 advertiser?

4 MS. LIN: Objection. Form.

5 THE WITNESS: I was just searching my
6 declaration for the word pay, and I didn't see that
7 used in conjunction with Merriman and what you're
8 describing in Merriman.

9 BY MR. MILKEY:

10 Q. Okay. In forming your opinions in this
11 case, did you evaluate whether Merriman's advertising
12 server pays Merriman's advertiser for the profile
13 information provided by the advertiser?

14 MS. LIN: Objection. Form.

15 THE WITNESS: I mean, I considered the
16 reasons why a person of ordinary skill would have been
17 motivated to combine Merriman with, you know, Gilmour
18 and other references, and the different challenge
19 grounds or different combinations in Frauenhofer.

20 I just -- again, searching through my
21 declaration for the word pay, I don't see that used in
22 conjunction with motivations combined with respect to
23 what Merriman is doing.

24 But the focus on Merriman are -- with
25 respect to combination, are around the advertising

1 server and around the spotlight tag and using those
2 teachings in the combination, for example.

3 BY MR. MILKEY:

4 Q. Are you aware of any teachings in Merriman
5 where the advertising server targets an advertisement
6 based on profile information other than profile
7 information that was provided by the advertiser
8 itself?

9 MS. LIN: Objection. Form.

10 THE WITNESS: In -- the Merriman reference
11 itself talks about various methods of targeting
12 advertising. For example in the Background section,
13 it talks about how -- this is Column 2 around Line 37
14 or so. It says: "The embedded reference causes the
15 user's browser to contact the advertising server to
16 provide the advertising image or information that will
17 appear on the accessed web page as displayed by the
18 user's browser. Using the address information and/or
19 other information passed by the user's browser to the
20 advertising server, including the page being accessed
21 by the user, the advertisement server determines an
22 appropriate advertisement to select for the particular
23 user."

24 So it's saying there that you can also use
25 the address information provided by the user, which

1 would be coming from the user itself.

2 And then further down in that column, it
3 talks about how -- it compiles -- this is Line 53.
4 "It compiles information on networks and user
5 selections. The advertising server is able to compile
6 information that can be used for targeted
7 advertising."

8 So that General Background section doesn't
9 limit the information for targeting only to
10 information provided by the advertiser website. But
11 furthermore, if you look in Column 5, it talks
12 about -- this is about Line 22. It talks about the
13 advertise -- "At the advertising server, a banner
14 advertisement to be displayed in the advertising space
15 is selected from a local database containing
16 advertising information and user data. The selected
17 ad banner is then displayed to the user."

18 And it goes down at Line 28 or so:
19 "Targeted advertisements are ads selected by
20 identifying the user and matching an advertisement to
21 the user based on various criteria. Retargeted
22 advertisements are selected by matching past behavior
23 of a particular user to that particular user's past
24 activities."

25 And this is in the description of the

1 invention of Merriman. It's not, here, limiting the
2 targeting only to the information provided by an
3 advertising web -- advertiser -- activity at an
4 advertiser's website, it's using all sorts of
5 information.

6 And so there is a section that talks about
7 retargeting based on, you know, a user visiting an
8 advertiser website and then retargeting an ad to that
9 user based on that. But it generally describes
10 targeted advertising based on a lot of different
11 criteria, not only the one that you're asking about.

12 BY MR. MILKEY:

13 Q. Okay. And does Merriman's advertising
14 server pay for any of the profile information that it
15 uses to target advertisings?

16 MS. LIN: Objection. Form.

17 THE WITNESS: I mean, I searched the
18 Merriman for the word pay, and I didn't find that
19 word. So I -- but my declaration is focusing on the
20 teachings of Merriman such as the spotlight tags, the
21 use of the advertising server, things like that. So a
22 combination -- but, no, I didn't see the word pay in
23 the Merriman reference -- the Merriman patent in
24 searching through it just now.

25 BY MR. MILKEY:

1 Q. Okay. Turning to Paragraph 91 of your
2 declaration -- and just let me know when you're there.

3 A. Okay. I'm there.

4 Q. Do you see that Paragraph 91 is the
5 beginning of your discussion of the Fraunhofer
6 reference within your Summary of the Prior Art
7 section?

8 A. Yes, I see that.

9 Q. And then on Paragraph 92, the first sentence
10 of your declaration states: "Fraunhofer discloses a
11 system for gathering, categorizing, and delivering
12 electronic content to users in response to user
13 requests."

14 Do you see that?

15 A. Yes.

16 Q. And what type of content does Fraunhofer
17 deliver to users in response to the user requests?

18 A. Fraunhofer describes it very generally as
19 electronic information or electronic content. So for
20 example, Column 2 at Line 8 says: "It's therefore an
21 objective of the present invention to provide a system
22 for gathering, categorizing, and delivering electronic
23 content to users in response to user requests."

24 And there was also the cite for electronic
25 information, so let me get that for you.

1 Yeah, so the bottom of Column 2 talks
2 about -- this is Line 66 -- how an end user will
3 specify the areas of interest for which that end user
4 wishes to obtain electronic information.

5 So that's very general, but it gives some
6 specific examples of types of some of the electronic
7 information. And it talks how there is web pages that
8 can be part of the channel and other documents that
9 can be part of the channel, and that certainly fits in
10 the category of electronic content or electronic
11 information.

12 But those are just specific examples. There
13 is a lot of things that fit into that category as
14 well.

15 Q. Okay. So turning to Paragraph 93 of your
16 declaration, you agree that Fraunhofer system stores
17 queries from end users specifying the areas of
18 interest for which they desire to obtain information;
19 correct?

20 A. I do see that.

21 Q. Okay. And Fraunhofer describes these user
22 requests for information as being user profiles;
23 correct?

24 A. So Fraunhofer does use the term user
25 profiles. For example in Column 2, it talks about

1 how -- let's see. Line 24. "For gathering user
2 interest information and creating a user profile for
3 matching to collected and categorized content
4 information."

5 So it is using the user profile that it
6 creates to match to collected and categorized content.

7 Q. Okay. Are you aware of any instances where
8 Frauenhofer discloses providing these user profiles to
9 any entities who request the user profiles?

10 MS. LIN: Objection. Form.

11 THE WITNESS: You know, I do talk about the
12 challenge claims later and how there is -- and I do
13 combine two teachings of Frauenhofer in a specific
14 way.

15 But Frauenhofer talks about providing the
16 documents that it's found that matches a profile that
17 can be provided to a user. But I'm not -- what I'm
18 relying on for the challenge grounds are combinations
19 of Frauenhofer, Merriman, and Gilmour. And then I
20 think for some dependent claims, maybe Julia.

21 But with respect to the combination, there
22 are other references that I rely on that discuss --
23 you know, Gilmour discusses, I think. But other
24 references I rely on for those part of the challenge
25 claims, I'm not saying that -- I'm not relying on

1 Frauenhofer for providing user profiles.

2 Frauenhofer does a specific kind of
3 matching -- and I think it's the teaching that I
4 discuss in the combination later -- that is why the
5 user would be motivated to combine from Frauenhofer
6 the technique of matching, which I discuss in detail
7 later.

8 But it's not because Frauenhofer returns
9 user profiles. Frauenhofer is returning documents to
10 the user and providing document information. I'm not
11 relying on the -- Frauenhofer returning user profiles.

12 BY MR. MILKEY:

13 Q. And Frauenhofer doesn't disclose, for
14 example, providing the queries provided by users to
15 any requesting entities; correct?

16 MS. LIN: Objection. Form.

17 THE WITNESS: Sorry. I'm not sure I
18 understand your question. Could you repeat it,
19 please.

20 BY MR. MILKEY:

21 Q. Yeah.

22 So if a user provides a query to Frauenhofer
23 and says, "I'm interested in topics X, Y, and Z," does
24 Frauenhofer disclose that another user could say, you
25 know, "I'm interested in knowing what the first user's

1 request was," and then Fraunhofer would disclose that
2 request to the second requester?

3 MS. LIN: Objection. Form.

4 THE WITNESS: I don't think I'm relying on
5 anything like that in my combination. Really,
6 Fraunhofer is disclosing a technique for matching and
7 doing comparison from certain things. And selecting
8 specific users to which -- so Fraunhofer talks
9 about -- it's got all these profiles of different
10 users that are different -- are interested in
11 different topics. And then there is a user profile.

12 So if there is a new document that comes in,
13 and Fraunhofer talks about determining which users to
14 provide this new document to based on their user
15 profile. So it's performing a specific kind of match.

16 I'm not -- I'm not pointing to anything,
17 with respect to the question you're asking, for -- in
18 any of the combinations. It's about taking the
19 teachings of Fraunhofer with respect to doing the
20 matching against user profiles. And you can see what
21 my declaration says about it. It's laid out
22 somewhere, you know, in the middle or second half of
23 my declaration, I think.

24 BY MR. MILKEY:

25 Q. Yeah. So let's turn to Paragraph 156 of

1 your declaration. And just let me know when you're
2 there.

3 A. Okay. I'm there.

4 Q. All right. And so the first -- before I ask
5 this question, by the way, I know I'm jumping into the
6 middle of a paragraph, so -- and in the middle of a
7 section, so feel free to orient yourself however you
8 need.

9 But the first sentence of Paragraph 156
10 begins by saying: "Given this environment, a POSITA
11 would have found it obvious to incorporate
12 Frauenhofer's teachings into the Gilmour-Merriman
13 combination."

14 And my question specifically is, what
15 component of Frauenhofer's teachings would be
16 incorporated into the Gilmour-Merriman combination?

17 A. So if you look towards the -- it's the last
18 full sentence of Paragraph 156. It's that -- I'm
19 saying here that: "A POSITA would have looked to
20 Frauenhofer's technique which provides" -- sorry --
21 "which performs ongoing or periodic matching using
22 stored queries to provide profile information from its
23 profile service provider to the requesting entities of
24 Gilmour."

25 So that's the technique, which is the

1 technique of Fraunhofer, which is performing matching
2 using the stored queries. And the stored queries -- I
3 talk about this, I think, earlier in this section --
4 are -- Gilmour talks about these queries. We
5 discussed that earlier in this deposition.

6 And I discussed the reasons why Gilmour
7 suggests that these queries are saved and stored,
8 because -- I can find the reference somewhere, but I
9 discuss that in there.

10 And so it's Fraunhofer's technique of
11 matching against -- using those stored queries to
12 provide information from the profile service provider
13 to the requesting entities of Gilmour. And that's the
14 technique which then selects a requesting entity based
15 on that match it's performing that's against the
16 stored queries, as taught by Fraunhofer.

17 So it's laid out in detail, I think, in this
18 section, you know, maybe earlier or, you know, right
19 around here, if you want to look at that.

20 Q. Okay. And the last sentence of
21 Paragraph 156 of your declaration, you state that: "A
22 POSITA would have looked to Fraunhofer's technique
23 which performs ongoing or periodic matching using
24 stored queries to provide profile information from the
25 profile service provider to the requesting entities of

1 Gilmour."

2 Do you see that?

3 A. Yes.

4 Q. And then in the middle of that sentence, you
5 have a citation to Fraunhofer at Column 3, Lines 12
6 through 19.

7 Is that the technique of performing the
8 ongoing or periodic matching using stored queries
9 you're referring to?

10 A. Yeah. That section does talk about how --
11 so 3 -- I'll start at Line 14. "The system can be
12 programmed to conduct ongoing matching, i.e. checking
13 every new document entry for a match with a user
14 profile or periodic matching, e.g. every 12 hours."

15 So those are examples -- the two examples
16 I'm talking about here, which is ongoing or periodic
17 matching using the stored queries.

18 I think elsewhere talks about the --
19 elsewhere in my declaration, I also point to
20 Fraunhofer about the matching that's done. But --
21 and how it's combined and used in the
22 Gilmour-Merriman-Fraunhofer combination. But that
23 citation is to support that there are these ongoing or
24 periodic matching, which is why I cited it right after
25 I said that.

1 Q. Let's go off the record.
2 THE COURT REPORTER: Off the record.
3 (OFF THE RECORD AT 8:45 a.m. PT.)
4 (ON THE RECORD AT 8:55 a.m. PT.)
5 THE COURT REPORTER: Back on the record.
6 MS. LIN: I'm ready. Sorry.
7 MR. MILKEY: Thank you.
8 BY MR. MILKEY:
9 Q. So, Dr. Houh, if you could, please, turn to
10 Paragraph 172 of your declaration. And let me know
11 when you're there.
12 A. I'm there.
13 Q. Okay. And the first sentence of
14 Paragraph 172 states: "In the combination, Gilmour's
15 profile service provider computer system redirects a
16 website visitor having a requested profile to the
17 server of the requesting entity computer system using
18 the technique taught in Merriman."
19 Do you see that?
20 A. Yes, I do.
21 Q. Okay. And then in the next sentence you
22 state, "For example, the profile service provider may
23 send the visitor's browser a web page having a
24 spotlight tag that redirects the visitor's browser to
25 a location on a web server of the requesting entity

1 computer system and/or cause another website to send
2 the visitor's browser a web page with a spotlight tag
3 that redirects to the requesting entity."

4 Do you see that?

5 A. Yes.

6 Q. Okay. And so as I understand it in the
7 second sentence of Paragraph 172, you have sort of two
8 different alternatives. You have the instance where
9 the profile service provider may send the visitor's
10 browser a web page having a spotlight tag, and then an
11 alternative where the profile service provider causes
12 another website to send the visitor's browser a web
13 page with a spotlight tag.

14 Is that fair?

15 A. Yes.

16 MS. LIN: Objection. Form.

17 THE WITNESS: I do talk about those two
18 different -- well, a number of different categories of
19 places where the spotlight tag can be placed or that
20 the service -- yes.

21 BY MR. MILKEY:

22 Q. Okay. So I just want to -- I just want to
23 ask about those separately. We'll get to both of
24 them, but I want to first ask about the example where
25 the profile service provider may send the visitor's

1 browser a web page having a spotlight tag that
2 redirects the visitor's browser to a location on a web
3 server of the requesting entity computer system.

4 And so my question is, where in your
5 declaration do you explain under what circumstances
6 the profile service provider would send the visitor's
7 web browser a web page having a spotlight tag?

8 MS. LIN: Objection. Form.

9 THE WITNESS: So I refer to Paragraph 38 of
10 Gilmour numerous times throughout my declaration. And
11 38 describes a couple of ways that the user profile
12 information is received at the service provider.

13 One is through -- a website may submit
14 information to the profile service provider for --
15 this is the bottom of the page that Paragraph 38 is
16 on -- for the construction of a profile regarding an
17 individual.

18 But if you look at the sentence before that,
19 it's about five or six lines from the bottom of that
20 page, it says: "For example, the individual 32
21 utilizing the claim computer system 36 may submit
22 information to the profile service provider 34 for the
23 purposes of constructing a file profile that is stored
24 and maintained by the profile service provider."

25 So this talks about the user going right to

1 the profile service provider and submitting
2 information, but it also talks about how the websites
3 that the user visits can also submit information.

4 And then it's in combination with the
5 teaching of Merriman where the spotlight tags can be
6 used to submit the information and can be used in
7 conjunction with the websites. And I think -- I'm not
8 sure -- yeah, the websites 42 or the profile service
9 provider 34. And so submitting information through
10 the use of the spotlight tags.

11 And I talk about where the spotlight tags
12 are used and where they're pointing to and where the
13 information is flowing elsewhere in my declaration.
14 But this paragraph basically supports that the
15 information can be obtained through different websites
16 submitting their information on the profile activity
17 or the user activity, and also the user can basically
18 submit it directly to the profile service provider.

19 MR. MILKEY: Okay. I'm going to object to
20 that as being nonresponsive.

21 BY MR. MILKEY:

22 Q. Dr. Houh, my specific question is, where in
23 your declaration do you explain under which
24 circumstances the profile service provider would send
25 the visitor's browser a web page having a spotlight

1 tag?

2 A. Well, that's -- it's the combination.
3 Right. So the combination is where -- because Gilmour
4 doesn't disclose a spotlight tag, it's Merriman that
5 discloses the spotlight tag. And so I talk about the
6 combination being used in different ways where -- we
7 were just looking at -- sorry. What paragraph were we
8 looking at just now?

9 Q. I believe it was Paragraph 172. Yes.

10 A. Yeah. So that the profile service provider
11 may send the visitor's browser a web page having a
12 spotlight tag. And that -- that for -- it could cause
13 another website to send the visitor's browser a web
14 page used with the spotlight tag that redirects to the
15 requesting entity.

16 Same with the spotlight tag on the service
17 provider -- sorry -- a profile service provider
18 redirecting to the requesting entity as well. But I
19 do talk about it there. And that's supported by all
20 the numerous references that I've cited to, to
21 Paragraph 38 in Gilmour, which describes the process
22 of how the information is transmitted. And we're
23 taking the technique of the spotlight tag as a way to
24 transmit information.

25 And then -- and the combination of placing

1 the spotlight tag can be either on the profile service
2 provider in a web page -- because, you know, Gilmour,
3 in Paragraph 38, teaches that the user can submit
4 information to the profile service provider.

5 Or through a website. In Gilmour,
6 Paragraph 38, talking about how a website might submit
7 information to the profile service provider here, but
8 in the combination, we're providing the redirect to
9 the requesting entity for the reasons I lay out here.

10 And so this is basically teaching how the --
11 there is a website and a profile service provider, and
12 that's the basis for having the -- a POSITA being
13 motivated to put it -- a spotlight tag on the profile
14 service provider page or on a web page of a website.

15 Q. Okay.

16 MR. MILKEY: I'm going to move to -- I'll
17 object to that as nonresponsive as well.

18 BY MR. MILKEY:

19 Q. So my -- I think in part of your response,
20 you said that it -- that neither Gilmour nor Merriman
21 discloses the profile service provider sending the
22 visitor's browser a web page having a spotlight tag.

23 So what I'm asking is, where in your
24 declaration do you explain under what specific
25 circumstances the profile service provider would send

1 the visitor's browser a web page having a spotlight
2 tag?

3 A. Yeah, I think that question --

4 MS. LIN: Objection.

5 THE WITNESS: -- has a false premise in it.
6 I'm not using either Merriman or Gilmour alone to
7 render this element obvious; it's the combination of
8 the two. Merriman's teaching the spotlight tag.
9 Gilmour doesn't teach explicitly the spotlight tag of
10 Merriman.

11 Gilmour talks about how the website can send
12 information, submit information. And it also talks
13 how the user can submit information to the profile
14 service provider. And so the -- so the user can be
15 talking to the profile service provider in both cases,
16 I talk about in 172, that it would have been in the
17 combination that Gilmour's profile service provider
18 system redirects a website visitor having a requested
19 profile to the server of the requesting entity
20 computer system using the technique taught in
21 Merriman.

22 So that's the combination of the two. The
23 technique taught in Merriman is using a spotlight tag
24 to submit information. And using this redirect
25 that's in the spotlight tag being placed on a web

1 page, which causes the user's browser to request
2 the -- one example is a one-pixel image from a
3 different server, which then causes information to
4 flow to that server.

5 So my combination is about using the
6 technique taught in Merriman with respect to the
7 spotlight tag, being able to transmit information in
8 the way it's laid out in Merriman into the system of
9 Gilmour that can be -- that spotlight tag can be
10 placed either on a service -- profile service provider
11 page or on a web page of 42, I guess. It's a website.
12 Sorry. Website of Gilmour.

13 And so, yeah, I'm relying on the combination
14 of those, not individually Merriman or Gilmour, for
15 this particular section here.

16 And I'm saying right here that that's, you
17 know, what the combination is. And I lay out
18 elsewhere why a person of ordinary skill would have
19 been motivated to make this combination. And so
20 that's where I'm laying this out, right here. And
21 it's the teaching of using the spotlight tag taught in
22 Merriman for communicating information through a
23 redirect with the information -- with the two possible
24 sites where you can place the spotlight tag here.
25 One, on a page for -- on a website in Gilmour; and

1 two, on a page for the -- sorry -- profile service
2 provider system -- server, where, you know, Gilmour
3 itself is teaching that the user can submit
4 information to the profile service provider.

5 So it's -- there is that situation where,
6 you know, clearly, a user can be visiting a website
7 and then -- and then a user can also visit this
8 profile service provider to submit this information as
9 laid out in Paragraph 38, which I cite throughout my
10 declaration.

11 MR. MILKEY: Okay. I'll object to that as
12 nonresponsive as well.

13 BY MR. MILKEY:

14 Q. Dr. Houh, so I do understand that you're
15 relying on the combination of Merriman and Gilmour for
16 this teaching.

17 My question specifically is, where in your
18 declaration do you describe the specific circumstances
19 under which the profile service provider would send
20 the visitor's browser a web page having a spotlight
21 tag in your proposed combination?

22 MS. LIN: Objection. Form.

23 THE WITNESS: I mean, we're looking at it
24 here, at least. It's in the situation where the
25 profile service provider may send the visitor's

1 browser a web page having a spotlight tag that
2 redirects the visitor's browser to a location on a web
3 server of the requesting entity computer system. And
4 that's one situation that I've laid out right here.

5 And the other situation is where another
6 website sends the visitor's browser a web page with
7 the spotlight tag that redirects to the requesting
8 entity. And that's a spotlight tag that's taught in
9 Merriman. That's the situation where it's being used,
10 is when there is a page -- a web page sent to the user
11 from the profile service provider and when there is a
12 web page with a spotlight tag on a website being sent
13 to the user. And that's laid out here.

14 There may be other places I talk about that,
15 but at least that's what it's talking about in
16 Paragraph 172.

17 BY MR. MILKEY:

18 Q. Okay. And where in your declaration do you
19 describe the specific circumstances under which the
20 profile service provider would cause another website
21 to send the visitor's web browser a web page with a
22 spotlight tag that redirects to the requesting entity?

23 MS. LIN: Objection. Form.

24 THE WITNESS: I mean, if you look back at
25 Paragraph 106 of my declaration, I talk about -- here

1 about the profile service provider and how -- citing
2 to Paragraph 42, for example, kind of the fifth or
3 sixth line down, it says: "The profile service
4 provider provides an outsourced profile construction,
5 maintenance, access, and brokerage function to sellers
6 and marketers, e.g. the website 42."

7 So one way of participating in this is that
8 they -- it would be recognized that the use of
9 Merriman's spotlight tag would be, as I say, a person
10 would have been motivated to include that on these
11 websites because that was providing information in
12 real time -- I talk about this in motivation to
13 combine.

14 And that's what -- that's the service that
15 this profile service provider is providing. And the
16 user wouldn't -- and it's recognized that -- by a
17 POSITA, that putting the spotlight tag would -- a
18 person would have been motivated to do that on a
19 website/web page for the reasons I talk about.

20 And so that's -- that's how these websites
21 are going to participate in the outsource functions of
22 the profile service provider as I'm talking about in
23 106. And for the reasons to combine that I lay out
24 elsewhere in my declaration.

25 MR. MILKEY: I'll object as nonresponsive.

1 BY MR. MILKEY:

2 Q. So my specific question is, where in your
3 declaration do you describe the specific circumstances
4 under which the profile service provider would cause
5 another website to send the visitor's web browser a
6 web page with a spotlight tag that redirects to the
7 requesting entity?

8 MS. LIN: Objection. Asked and answered.

9 THE WITNESS: I mean, just as I've laid out
10 already, the -- Gilmour is providing this outsourced
11 system using the profile service provider, as we just
12 pointed out, I guess, Paragraph 106. But with respect
13 to a redirection, there is very specific disclosure of
14 that.

15 If you look at Claim 11, it talks about
16 redirecting -- a result of a URL redirection. And I
17 talk there about how: "Gilmour explicitly states" --
18 this is in Paragraph 186 -- "that the website submits
19 profile information to the profile service provider
20 which a POSITA would have understood to mean the
21 profile service provider receives profile information
22 from the website."

23 And then in 189: "A POSITA would have found
24 it obvious for Gilmour's website to use Merriman's URL
25 redirection technique to submit profile information to

1 the profile service provider, such that the profile
2 service provider receives the profile information as a
3 result of URL redirection from the website."

4 And there is also that, you know, even if
5 you use a web bug, you can also then redirect that to
6 the requesting entity in Gilmour as well. And I talk
7 about that elsewhere. But these are techniques that
8 allow the user to participate in this outsourced
9 service of the profile service provider that I
10 discussed earlier.

11 And so it's not -- the user is not making up
12 a random address for the spotlight tag, it's using
13 information specific to a profile service provider
14 that they put on the page. In that sense, that
15 profile service provider is causing these websites to
16 put the spotlight tags that are specific to it on
17 their web pages. And that's part of the combination
18 of Merriman, using the spotlight tags to transmit
19 information because -- through a redirection. And
20 that's what Merriman's spotlight tag is about.

21 MR. MILKEY: Okay. I'm going to object as
22 nonresponsive.

23 BY MR. MILKEY:

24 Q. So, again, my question specifically is,
25 where in your declaration do you describe the specific

1 circumstances under which the profile service provider
2 would cause another website to send the visitor's web
3 browser a web page with a spotlight tag that redirects
4 to the requesting entity in your proposed combination?

5 MS. LIN: Objection. Form.

6 THE WITNESS: Well, I mean, what I've said
7 still applies, both for what we were talking about
8 earlier and then with respect to Claim 11. But the
9 Claim 13 also addresses the very specific issue of
10 redirecting to a requesting entity, maybe that you're
11 asking about.

12 And so if you look at Paragraph 192, I talk
13 about how: "Gilmour and Merriman further disclose
14 that the automatically arranging comprises the profile
15 owner computer being programmed to perform automatic
16 redirection to a URL provided by the selected entity
17 to place the visitor device in communication with
18 computer equipment controlled by the selected entity."

19 And so just to be clear, the profile owner
20 computer in Gilmour is the website 42. That's an
21 example of the profile owner computer.

22 And then: "As I discuss for
23 Limitation 1.b(ii), Merriman discloses that a first
24 server may use a spotlight tag to redirect a website
25 visitor to a second server. And, in the combination,

1 Gilmour's profile service provider redirects a website
2 visitor having a requested profile to the requesting
3 entity's server using the spotlight tag taught in
4 Merriman."

5 So that's redirecting -- the profile service
6 provider is causing the redirect to a website visitor
7 having a requested profile to the requesting entity
8 server. And that's done through the placement of a
9 spotlight tag for the particular service provider
10 system that is being -- providing the outsourced
11 services we discussed back in Paragraph 106.

12 And so that -- that causes that particular
13 website to have a redirection. It could be, then, to
14 the service provider server and then to the requesting
15 entity, or it could be -- and that's where I lay out
16 how the spotlight tag is used in different parts and
17 for different claim elements, because the claim
18 elements are -- and then the reasons why a POSITA
19 would make those combinations and use the spotlight
20 tags where they are, I discuss in other sections of my
21 declaration as well.

22 BY MR. MILKEY:

23 Q. Okay. So I understand it's your opinion
24 that Paragraph 192 relates to this idea of the profile
25 service provider causing another website to send to

1 the visitor's web browser a web page with a spotlight
2 tag that redirects the requesting entity.

3 And my question is, where in your analysis
4 in your declaration do you specifically explain how
5 and when the profile service provider, in your
6 combination, would cause another website to send the
7 visitor's web browser a web page with a spotlight tag
8 that redirects to the requesting entity?

9 MS. LIN: Objection. Form.

10 THE WITNESS: So, I mean, there is a lot of
11 background information that goes into what you're
12 asking, and I discuss all that in my declaration at
13 various points. For example, to understand what a
14 spotlight tag is, I talk about that on Page 109.
15 Sorry. What page is this? 109. 109.

16 So I talk about it as to what a spotlight
17 tag achieves. So a spotlight tag -- sorry. Go back
18 to 108, Paragraph 169. So it talks about using a
19 spotlight tag.

20 And so: "Merriman performs this redirection
21 using a spotlight tag, which is a minimal graphic,
22 e.g. a one-pixel image, containing a redirect
23 message."

24 And then: "The first server includes a
25 spotlight tag and a web page it returns to the

1 visitor's browser and the tag causes the browser to
2 request the graphic from the second server. When the
3 user requests" -- this is the cited passage.

4 "When the user requests, i.e. visits, an
5 advertiser page containing a spotlight tag, a reply
6 message redirects the user's browser back to the
7 advertising server via request to access the minimal
8 one-pixel graphic image."

9 And then: "Merriman uses the redirection
10 caused by the spotlight tag to convey profile
11 information about the visitor from the first server to
12 the second server in real time."

13 So that's a method taught by Merriman to
14 convey information about a visitor -- profile
15 information about a visitor in real time. And so
16 that's what a spotlight tag is.

17 And then I talk about how a POSITA would
18 have been motivated -- this is 173 -- to combine the
19 references because the combination beneficially
20 operates in real time. And so that's why someone
21 would want to use -- one of the reasons why I'm saying
22 a POSITA would want to use the spotlight tag, because
23 Merriman says: "The feedback of individual activities
24 of the user at an advertiser site may be communicated
25 in real time back to the advertising server by using

1 spotlight tags placed on specific pages in the
2 advertiser's website. And real-time operation
3 beneficially supports the ongoing matching performed
4 by the Gilmour-Merriman-Frauenhofer combination I
5 discussed for Limitation 1.b(i)(2) and supports the
6 advertisers' dream of delivering the right ad to the
7 right person at the right time."

8 And that's from a background reference. And
9 so that's why a POSITA would want to incorporate the
10 use of a spotlight tag.

11 And then elsewhere, I talk about how it can
12 be provided on a web page of the profile service
13 provider spotlight tag and how it could be -- a
14 spotlight tag on the -- that one redirects to the
15 requesting entity. And then how that spotlight tag
16 can also be used on a website of Gilmour, which is the
17 profile owner of the '445 patent claim. And that can
18 redirect -- I think -- well, I just pointed out it can
19 redirect to the profile service provider, and, of
20 course, that can redirect to the requesting entity
21 when requesting that page from the profile service
22 provider.

23 So -- and the reasons to do that -- why --
24 I've laid out. You know, it's -- one of the reasons
25 is this real-time aspect. So that you can get the

1 right ad to the right user at the right time.

2 MR. MILKEY: Okay. I'm also going to object
3 to that as nonresponsive.

4 BY MR. MILKEY:

5 Q. Dr. Houh, I think we're maybe talking past
6 each other a little bit. So I'm specifically asking
7 about in your declaration -- I'm not sure if you do
8 set forth anywhere in your declaration where this
9 happens.

10 But I want to understand if you provide any
11 detail in your declaration regarding the specific
12 circumstances, for example, how and when the profile
13 service provider would cause another website to send
14 the visitor's browser a web page with a spotlight tag
15 that redirects to the requesting entity in your
16 proposed combination.

17 And I'll reask that question in a second,
18 but I just want to make clear, I think your answers so
19 far have not addressed, for example, the profile
20 service provider actually causing another website to
21 do the redirection. I don't --

22 A. You mean to the requesting entity? Or at
23 all?

24 Q. I don't think -- well, yeah, I think they
25 haven't dealt with the profile service provider

1 causing another website to send the visitor's browser
2 a web page with a spotlight tag that redirects to the
3 requesting entity.

4 So I think you've talked about -- I'm not
5 sure, but some of your answers might relate to, for
6 example, another website having a spotlight tag, but I
7 haven't seen anything about the profile service
8 provider causing that other website to have a
9 spotlight tag. Any of that analysis in your
10 declaration, any analysis regarding the timing of when
11 that happens.

12 And that's what I'm trying to understand is,
13 where in your declaration do you provide that detail
14 regarding how your proposed combination would work.

15 And the reason I'm asking this is because I
16 think we agree that Merriman, itself, does not
17 disclose this. Gilmour, itself, does not disclose
18 this. So all I have to go off of is what's in your
19 declaration regarding how this would actually happen.

20 So with that in mind, my question, again,
21 is, where in your declaration do you specifically
22 explain how and when the profile service provider in
23 your combination would cause another website to send
24 to the visitor's web browser a web page with a
25 spotlight tag that redirects to the requesting entity?

1 MS. LIN: Objection. Multiple questions.

2 THE WITNESS: So it's -- are you referring
3 to a specific claim element that you're saying
4 requires this? Because -- can you point me to which
5 claim element you're actually asking about? Because
6 I'm -- which claim element are you asking about that's
7 required somehow in the combination?

8 BY MR. MILKEY:

9 Q. Dr. Houh, this is your own description from
10 Paragraph 172 of how your combination would operate,
11 and so I'm trying to understand the specifics of how
12 it would operate. And I don't need to provide you
13 with what claim element I'm asking about.

14 So, again, my specific question is, where in
15 your declaration do you specifically explain how and
16 when the profile service provider, in your
17 combination, would cause another website to send the
18 visitor's web browser a web page with a spotlight tag
19 that redirects to the requesting entity?

20 MS. LIN: Objection. Asked and answered.

21 THE WITNESS: So, right, so this -- this
22 is -- I am analyzing the claims. I don't know that
23 there is some requirement that you're now stating that
24 the claims require -- they don't use the word profile
25 service provider. This is what I'm describing.

1 But because -- my analysis is couched with
2 respect to the claims at issue. Now you're asking
3 about a statement that isn't really the analysis --
4 isn't the situation I'm analyzing.

5 I can put it together for you because I
6 think I do address this issue throughout my
7 declaration, but because it's not -- I don't -- I
8 don't know that what you're asking is required by any
9 claim element, that that discussion would be in any
10 one place.

11 So here is -- so we know -- so if you put
12 the web -- if you put the spotlight tag on the profile
13 service provider web page that you send back to the
14 visitor, then -- and redirect it to the requesting
15 entity computer system, that is one situation that I
16 discuss. And we talked about it.

17 You know, Gilmour discloses that the user
18 can actually submit their profile information to the
19 profile service provider. And I provide the cite to
20 that earlier in the discussion. And so we know that
21 that profile service provider can provide these
22 redirects in those situations.

23 And then I discuss elsewhere how the web
24 server then can have a spotlight tag on a web page
25 that redirects to the profile service provider also.

1 And then if -- then that profile service provider can
2 cause a redirect to the requesting entity in that
3 situation when the web page requested then also
4 provides the redirect to the requesting entity.

5 And in that sense, that profile service
6 provider can cause another website to redirect from a
7 visitor's browser with a spotlight tag on a web page
8 to the requesting entity through a redirection, again,
9 from the profile service provider to the requesting
10 entity, which I've laid out here, too.

11 So, I mean, it's in different places because
12 what I'm talking about here is with respect to
13 whatever claim element I'm analyzing here, which I've
14 laid out this situation. But I -- that situation,
15 yeah, I do describe in various parts of my
16 declaration. And so that's how that can cause that to
17 happen.

18 The other -- the other issue is that, you
19 know, to -- yeah, I mean, that's -- that's how --
20 that's one example of how that can be -- a profile
21 service provider can cause that redirection to the
22 requesting entity.

23 MR. MILKEY: Okay. So I'm going to, again,
24 object as nonresponsive.

25 BY MR. MILKEY:

1 Q. And so I'm -- I think we're getting close to
2 a spot where this is not going to be productive any
3 further.

4 But my question, again, to you, Dr. Houh,
5 is -- and feel free to refer to multiple paragraphs of
6 your declaration, by the way. I'm not limiting you to
7 a specific paragraph.

8 But my question is specifically, where in
9 your declaration do you explain how and when the
10 profile service provider in your proposed combination
11 would cause another website to send the visitor's web
12 browser a web page with a spotlight tag that redirects
13 to the requesting entity?

14 MS. LIN: Objection. Form.

15 THE WITNESS: As I said, it's in multiple
16 places. I pieced it together because this is not
17 required -- this particular issue is not necessarily
18 one that's required by this claim element that I'm
19 analyzing.

20 If one claim element was laying out this
21 requirement, then I would have the analysis pretty
22 much in one place; but this is just a statement I've
23 made, and it's supported because of all the other
24 things I explained elsewhere in my declaration.

25 We went back to part of it in Paragraph 106,

1 which talks about the profile service provider
2 providing an outsourced profile construction,
3 maintenance, access, and brokerage function to sellers
4 and marketers. And one way they do that is through
5 providing a spotlight tag. So if you put the
6 spotlight tag on your website, then you'll be
7 participating in this outsource system. That's one
8 way.

9 No one is going to put a random spotlight
10 tag that just points nowhere, right, so the spotlight
11 tags are specific to the system in which they're
12 operating. And the profile service provider has to --
13 the operator has to then communicate those spotlight
14 tags to put on your website. That's one thing.
15 That's -- you know, that's how you participate in the
16 outsource service provider service system in the
17 combination. That's one way of Merriman and Gilmour,
18 at least for that part of the claim.

19 So that's that part.

20 And then we know these spotlight tags are
21 being placed on these different pages. Any web page
22 can have a spotlight tag. If you're going to
23 participate in a particular profile service provider's
24 ecosystem, you're going to have the spotlight tags as
25 part of their ecosystems on your website.

1 So if you're -- I've talked about why, you
2 know, if you're now accessing the profile service
3 provider web page, for example, to provide profile
4 information, which is discussed -- I don't remember
5 what paragraph, but we talked about that and where I
6 cited to that paragraph in my declaration.

7 Then you can be redirected to the requesting
8 entity through the use of a spotlight tag, as taught
9 in Merriman, as a way to transfer information from one
10 server to a second server. And so I've laid that out.

11 And I've also laid out elsewhere -- I think
12 maybe it was Claim 11 -- how the website can be
13 redirected to the profile service provider. And if
14 you follow that chain, then you can actually -- then,
15 if the profile service provider is redirecting through
16 the requesting entity, that can actually cause the
17 user's browser visiting a website of a web -- a
18 website 42 to be redirected to the requesting entity.
19 And then that's a way of providing information from a
20 first server to a second server. And that -- through
21 this indirect -- or double redirection, perhaps, you
22 might call it.

23 And so that's -- there are all sorts of
24 things in my declaration that support my statements
25 here. And it's -- it is discussed, though.

1 MR. MILKEY: Okay. All right. I will,
2 again, object as nonresponsive.

3 BY MR. MILKEY:

4 Q. But I believe in your prior answer, you
5 mentioned an indirect or double redirection. I
6 think -- at a high level, I believe you're talking
7 about a redirection from the website to the profile
8 owner, then another redirection to the requesting
9 entity.

10 Is that fair?

11 MS. LIN: Objection. Form.

12 THE WITNESS: Well, I mean, now you're
13 mixing the words of the patent with the words of
14 Gilmour and Merriman. So that can be confusing at
15 times. And I may have done some mapping, like, you --
16 of those terms.

17 [Simultaneous speaking.]

18 THE WITNESS: I do talk -- I talk about
19 what's mapped a profile owner. But just to make it
20 easier, just to stay in the language of Gilmour, yeah,
21 I mean, I do talk about, right, how a profile service
22 provider can redirect a requesting entity and how a
23 website can be redirected to a profile service
24 provider.

25 And you can actually cause the redirection

1 to the requesting entity through this, you know,
2 re-redirection -- or it's still a redirection. A
3 redirection is -- you know, second redirection is
4 still a redirection -- you know, overall, it's still
5 part of a redirection.

6 And so, I mean, that's one situation in
7 which that can be -- cause that to happen. But
8 another situation is, you know, in the combination of
9 Merriman and Gilmour, you simply -- you have to -- the
10 advertisers have to know what spotlight tag to put on
11 it.

12 So a spotlight tag that participates in a
13 specific profile service provider's ecosystem,
14 outsourced profile management, or whatever was
15 described in the -- I think Paragraph 42 of Gilmour.

16 So that's -- there are many parts of what
17 you're asking discussed there. And I think I put them
18 all together. I'm not sure what you think I'm missing
19 about that discussion.

20 But, again, I'm not aware that that specific
21 issue you're asking about is required by any one claim
22 element that I'm analyzing. And so that's why many of
23 this might be not all together in one spot, and I have
24 to refer to multiple spots. Because you're asking now
25 about the different statement that's not structured

1 the way my declaration is structured, which goes
2 element by element through the claims. And I talk
3 about, I think, everything in one element in one
4 place.

5 And now you're asking about why I said
6 something in one paragraph, but it's still supported
7 by all these other discussions that I have throughout
8 my declaration.

9 And I'm not aware that I'm missing anything.
10 I think I answered your exact question. All the
11 pieces required in that are discussed in my
12 declaration, and specifically the how and the when.

13 BY MR. MILKEY:

14 Q. Okay. For the record, I will disagree that
15 I think you've answered the questions, but -- so if
16 you think you've answered the how and the when,
17 specifically what I want to understand is, in your
18 opinion, in your declaration, what do you specify as
19 to the -- when the profile owner computer will cause
20 another website to send the visitor's web browser a
21 web page with a spotlight tag that redirects to the
22 requesting entity?

23 MS. LIN: Objection. Form.

24 THE WITNESS: It's very confusing when you
25 mix claim terms and patent terms, but I'll do my best

1 here.

2 So first of all, you used the term profile
3 owner computer. And so I do talk about in
4 Paragraph 105 how Gilmour's profile service provider
5 is the profile owner computer. And requesting entity,
6 I think, is just a term within Gilmour. Right.

7 So I've talked about the situation about why
8 a person would have been motivated to use the
9 spotlight tags to redirect from a web page provided by
10 a profile service provider to the requesting entity.
11 And I've also talked about -- and so that only happens
12 when you request a web page from the profile service
13 provider.

14 One example that I've discussed is, Gilmour
15 talks about how a user can provide profile information
16 directly to the profile service provider or they can
17 get it through websites that provide the information.
18 But one way is through the profile service provider,
19 so that's why I say that one way of having -- you can
20 have a spotlight tag that redirects the requesting
21 entity. And that provides the requesting entity with
22 real-time updated information about how to best target
23 the advertisements. Because it's -- or target
24 information.

25 I think Gilmour does talk -- mention, like,

1 a form of, like, providing someone who is maybe
2 interested in a topic like cameras a discount on a --
3 you know, on a specific camera. But -- I'm pretty
4 sure that's Gilmour. It's in my declaration. If I
5 remember it incorrectly, I'll just refer you to what I
6 said about that in my declaration.

7 So we know that's when. But furthermore, we
8 also know that spotlight tags are placed on --
9 sorry -- website 42 of Gilmour. And I think that
10 might map to a profile -- a supplier, maybe. I can't
11 remember. Let me just double-check that.

12 Yeah. In Paragraph 138: "Gilmour's website
13 is operated by a profile supplier." And that's
14 website 42. That's in Gilmour. And so that's
15 operated by a profile supplier. So that's why it's
16 confusing when you mix claim terms and patent terms in
17 the same question.

18 So I'm not sure I got all of your question
19 because I'm only partway through it. I think it was a
20 long question. Could you repeat it, please.

21 BY MR. MILKEY:

22 Q. Yeah. So thanks for the clarification on
23 the mixing claim terms. So I think -- let me ask a
24 slightly better question. I understand.

25 So specifically, what I'm trying to

1 understand is, where in your declaration and what in
2 your declaration do you specify regarding when the
3 profile service provider in your proposed combination
4 would cause another website to send the visitor's
5 browser a web page with a spotlight tag that redirects
6 to the requesting entity?

7 MS. LIN: Objection. Form.

8 THE WITNESS: Well, one example that --
9 that, again, because -- because what you're asking is
10 not required even -- even if you map the language to a
11 patent -- the claim language by a single element.
12 Because, you know, some of these are talking about way
13 early in one element -- so that's why all these are in
14 different places. But I think it's -- my statement is
15 supported.

16 In the sense of when, well, I mean, when you
17 access a website in Gilmour and it redirects you to
18 the profile service provider and the profile service
19 provider redirects to the requesting entity -- because
20 part of the motivation is that the requesting entity
21 in the combination of Merriman and Gilmour is an
22 advertising server, and it needs the most up-to-date
23 information about the user's activity.

24 So when a user now visits a website, that's
25 current activity that could be used in the system --

1 and in combination, the requesting entity of Gilmour
2 is -- also is -- provides advertising server services
3 of Merriman. And so it's beneficial to have that
4 information real time, up to date, as I lay out in the
5 motivations to combine.

6 So it -- you know, if there is a redirect of
7 the website to the profile service provider, it can
8 then also redirect that same profile information
9 update just as if the user had gone directly into the
10 profile service provider and redirect to the
11 requesting entity to better perform and target
12 advertisements.

13 The same user profile information of what
14 websites they're visiting, what page, you know,
15 whether they are visiting or making a purchase or
16 they -- there is a -- some of these are discussed
17 in -- maybe that's Merriman. As part of the
18 motivation, then you still want to get that
19 information to the ad server through this redirection.

20 And then in that sense, the profile service
21 provider actually causes that when it receives the
22 first redirected request, that it can then further
23 redirect the request to the requesting entity. And so
24 that's when. And that's an example of how the profile
25 service provider can cause that to occur.

1 But it doesn't happen until someone accesses
2 the website, and that's when it occurs in that example
3 that can be pieced together.

4 BY MR. MILKEY:

5 Q. Okay. So I don't think I saw any of that
6 description in your declaration, but I -- now I'm
7 trying to understand, is it your opinion that the
8 profile service provider would receive the URL
9 redirection from the -- from the other websites and
10 then, in response to that redirection, would provide
11 the user's browser with, for example, another
12 spotlight tag that then redirects the user's browser
13 to the requesting entity?

14 MS. LIN: Objection. Form.

15 THE WITNESS: So, I mean, the spotlight tag
16 itself can be redirected. It's provided in the web
17 page, and that in itself is a redirection. But
18 another redirection can just be redirecting any
19 request to a website, to another web server.

20 And I already described why a person would
21 be motivated to make that redirection to start with,
22 because it's the requesting entity or the -- you know,
23 in the combination of Merriman having the functions of
24 an advertising server, that needs, you know,
25 real-time -- would benefit from having the best

1 real-time information provided to it. And simply can
2 be done through a series of these redirections.

3 And so that's how the information from the
4 first redirection to the -- from the website to the --
5 to the profile service provider can then have that
6 spotlight tag be redirected to the requesting entity,
7 just like the first case where the -- the profile
8 service provider itself provides a spotlight tag on a
9 web page that's -- redirects to the requesting entity.

10 MS. LIN: Counsel, we've been going for more
11 than an hour. I think it would be good for a lunch
12 break.

13 MR. MILKEY: Okay. Give me one second. I
14 might be wrapping up.

15 Okay. I will pass the witness.

16 MS. LIN: Okay. Let's go offline.

17 THE COURT REPORTER: Off the record.

18 (OFF THE RECORD AT 10:09 a.m. PT.)

19 (ON THE RECORD AT 10:47 a.m. PT.)

20 THE COURT REPORTER: Back on the record.

21 MS. LIN: No questions from us.

22 MR. MILKEY: All right. Thank you.

23 Let's go off the record.

24 THE COURT REPORTER: Do you want a rough
25 draft or expedited final at all?

1 MS. LIN: How long is the expedited final?

2 THE COURT REPORTER: I have it for five
3 business days for this job, but I can do it as soon as
4 you need it.

5 MS. LIN: That works.

6 MR. MILKEY: And then for us, our deadline
7 is coming up. I don't know if it's a problem for you.
8 If we could get it by tomorrow that would be amazing.
9 Otherwise, Monday would work.

10 THE COURT REPORTER: Tomorrow is fine.

11 (Whereupon, the deposition concluded at 10:48 a.m.
12 PT.)

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DECLARATION

I hereby declare I am the deponent in the within matter; that I have read the foregoing deposition and know the contents thereof; and I declare that the same is true of my knowledge except as to the matters which are therein stated upon my information or belief, and as to those matters, I believe them to be true.

I declare under the penalties of perjury that the foregoing is true and correct.

Executed this _____ day of _____,
20____, _____.

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C E R T I F I C A T E

I, Jillian Doctor, Certified Shorthand Reporter, holding a valid and current license issued by the State of California, do hereby certify:

That HENRY HOUH, the witness whose deposition is hereinbefore set forth, was duly sworn by me before the commencement of such deposition and that such deposition was taken before me and is a true record of the testimony given by such witness.

I further certify that the adverse party, Petitioners AMAZON.COM, INC., AMAZON WEB SERVICES, INC., and AMAZON.COM SERVICES LLC, was represented by counsel at the deposition.

I further certify that the deposition of HENRY HOUH, occurred virtually on Thursday, February 5, 2026, commencing at 7:30 AM to 10:48 AM.

I further certify that I am not related to any of the parties to this action by blood or marriage, I am not employed by or an attorney to any of the parties to this action, and that I am in no way interested, financially or otherwise, in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of February, 2026.

Jillian Doctor

JILLIAN DOCTOR, RPR,
CERTIFIED REALTIME REPORTER

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