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Transcript of Todd C. Mowry, Ph.D.

Date: February 10, 2026

Case: Google LLC v. Sandpiper CDN, LLC (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Sandpiper EX2017
Microsoft v. Sandpiper
IPR2025-00969

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

- - - - - x
GOOGLE LLC, :
Petitioner, : Case IPR2025-00969
v. : Patent No. 8,478,903
SANDPIPER CDN, LLC, :
Patent Owner. :
- - - - - x

Deposition of TODD C. MOWRY, Ph.D.
Conducted Remotely
Tuesday, February 10 2026
9:33 a.m. Eastern Standard Time

Job No. 617537
Pages: 1 - 137
Reported by: Janet A. Hamilton

1 Deposition of TODD C. MOWRY, Ph.D., held
2 remotely:

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10 Pursuant to Notice, before Janet A.
11 Hamilton, Notary Public in and for the State of
12 Maryland.

1 A P P E A R A N C E S

2 ON BEHALF OF THE PETITIONER:

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20 ALSO PRESENT:

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C O N T E N T S

EXAMINATION OF TODD C. MOWRY, Ph.D.	PAGE
By Mr. Tang	5

E X H I B I T S

(Attached to the transcript)

MOWRY DEPOSITION

Exhibit 1003	Declaration of Dr. Mowry	15
Exhibit 1001	United States Patent	18
	No. 8,478,03	
Exhibit 1005	International Publication	18
	No. WO 9641285	
	(Kenner reference)	

1 P R O C E E D I N G S

2 -----

3 TODD C. MOWRY, Ph.D.,

4 a witness herein, being duly sworn, testified as
5 follows:

6 EXAMINATION BY COUNSEL FOR PATENT OWNER

7 BY MR. TANG:

8 Q All right. Nice to meet you, Dr. Mowry.

9 I'm Tim Tang. I'll be speaking with you
10 today.

11 So to get started, could you please state
12 your full name for the record.

13 A Todd Carl Mowry, M-O-W-R-Y.

14 Q All right. Thank you.

15 All right. Thank you. And just so we're
16 on the same page, I'd like to go over some
17 guidelines before we dive into the questioning.

18 First, when I ask a question, can you make
19 sure to answer verbally so that the court reporter
20 can record your answer?

21 A Yes.

22 Q Okay. And you know that answers must be

1 verbal without any nodding or headshaking?

2 A Yes.

3 Q And counsel may object to some of the
4 questions.

5 Unless they instruct you not to answer a
6 question, you understand that you must answer that
7 question; is that right?

8 A Yes.

9 Q Okay. And so I typically like to take a
10 break about every hour or so.

11 Does that sound reasonable to you?

12 A Yes.

13 Q Okay. And if you need a break before that
14 time, let your attorneys know; and we'll do our
15 best to find a convenient stopping point.

16 Does that work?

17 A Okay. Yes.

18 Q Okay. And the only thing I ask is that if
19 we're in the middle of a question or there's a
20 question pending, that you provide your answer
21 before we go on break; is that reasonable?

22 A Yes.

1 Q All right. Please also tell me if you
2 don't understand a question.

3 If you answer the question, I'll assume
4 that you understood it; is that fair?

5 A Yes.

6 Q Okay. And you understand that a
7 transcript is being made of this deposition; is
8 that right?

9 A Yes, that's my understanding.

10 Q Okay. All right. Since we're in a remote
11 deposition, can I ask where you are located right
12 now?

13 A I'm in Pittsburgh, Pennsylvania.

14 Q Okay. Is there anyone in the room with
15 you?

16 A No. I'm here by myself.

17 Q Okay. Can you describe to me the
18 material -- materials you have with you today?

19 A I don't have anything with me. I just
20 have my laptop, and the only thing that's open on
21 it is the Zoom meeting.

22 Q Okay. So no hard copies of the exhibits

1 or anything like that?

2 A No. I don't have any hard copies.

3 Q Okay. Aside from the computer that you're
4 currently using, do you have any other electronic
5 devices with you?

6 A I have my phone silenced sitting on the
7 table over here, and I've got a smartwatch in my
8 pocket, which is also silenced.

9 Q Okay. Thank you.

10 Okay. Dr. Mowry, is there any reason that
11 you would not be able to provide a full, complete,
12 and accurate testimony today?

13 A No.

14 Q Okay. Dr. Mowry, you're here and you
15 understand that you're going to testify regarding
16 your declaration that you submitted for inter
17 partes review proceeding IPR2025-00969 regarding
18 US Patent No. 8,478,903; correct?

19 A I believe that's correct. I don't have
20 the proceedings in front of me.

21 I know it's the '903 patent, and I will
22 assume those numbers are correct. But I don't

1 have a way to check the numbers right now since I
2 don't have it in front of me.

3 Q Okay. Fair.

4 You recall writing a declaration for the
5 '903 patent?

6 A Yes.

7 Q Okay. And we will dive into that
8 momentarily. Okay.

9 Well, I guess before turning to the
10 materials, can you tell me what you did to prepare
11 for this deposition?

12 A I reviewed the '903 patent and my
13 declaration and the -- some of the -- and
14 references that I cited in my declaration and the
15 district court's institution decision.

16 And I also met with counsel.

17 Q Okay. And about how long would you
18 estimate you spent preparing?

19 A Maybe 12 hours, something in that
20 ballpark.

21 Q Okay. When you were first approached by
22 Google to provide the declaration, can you tell me

1 who approached you first?

2 A It was an attorney from the Finnegan law
3 firm, but I don't honestly remember exactly who it
4 was.

5 Q Okay. It's also my understanding that you
6 were approached by Microsoft as well; is that
7 accurate?

8 A I don't recall, to be honest.

9 Q Okay. Are you aware that Microsoft filed
10 a copy of your declaration in another IPR
11 proceeding?

12 A I don't remember that off the top of my
13 head.

14 Q Okay. So you don't recall providing
15 consent for your declaration to be filed in
16 another IPR proceeding?

17 A Oh, I wouldn't characterize it that way.

18 I'm just saying that it was a while ago
19 that I filed these declarations, and a lot of
20 things have gone on since then; so I just don't
21 remember a lot of specific details related to
22 Microsoft.

1 But I'm -- I'm happy to talk about the
2 declaration here that I submitted on behalf of
3 Google.

4 Q Okay. Do you recall talking to any
5 attorneys from any other law firms about the '903
6 patent?

7 A Not -- not specifically, not off the top
8 of my head.

9 Q Right.

10 So you recall just talking to attorneys
11 from Finnegan about the '903 patent?

12 A Well, no. Again, like I said, I wouldn't
13 characterize it that way.

14 It's possible that I had a conversation
15 with attorneys representing Microsoft, but this
16 would have happened a long time ago.

17 I was not refreshing, in my memory, on
18 those types of details. I was refreshing my
19 memory on the declaration for -- for the matter
20 that I'm here to discuss today.

21 MR. ANDERSON: I'll remind the witness not
22 to disclose any privileged information, but you

1 can otherwise answer the questions.

2 Q So you don't recall signing two versions
3 of your declaration; is that accurate?

4 A So I guess I have a question procedurally.

5 So I think -- I think my understanding is
6 that I'm here to discuss my declaration for -- on
7 behalf of Google. And I'm happy to do that.

8 But as I said, if I had discussions with
9 other attorneys for other clients, that was a long
10 time ago. I don't remember details about that off
11 the top of my head.

12 But I'm very happy to talk about my
13 declaration here for this, for the Sandpiper and
14 Google matter.

15 Q Okay. I guess when you say "a long time
16 ago," do you mean before speaking with the
17 attorneys from Finnegan?

18 A As I said, to prepare for today, what I
19 refreshed my memory on is details related to
20 this -- this declaration that I did on behalf of
21 Google.

22 So I didn't -- my understanding is that

1 that was the point of what I was supposed to talk
2 about today; so I did not refresh my memory on
3 discussions beyond that.

4 Q Okay. Just in your memory, you don't
5 recall Microsoft informing you that they would be
6 filing a copy of this declaration though?

7 MR. ANDERSON: Objection. Form.

8 A Well, I think I -- I think I answered that
9 already. I mean, it's the same answer I just
10 gave.

11 Q Could you remind me of your answer?

12 A My answer is that -- my understanding is
13 that I'm here to talk about the declaration that I
14 submitted on behalf of Google.

15 So I refreshed my memory on things related
16 to that declaration. So you're asking me
17 questions about other topics beyond that.

18 So I didn't -- I don't have -- I didn't
19 refresh my memory on any of those things. So I
20 just -- I'm happy to talk about my Google
21 declaration. I don't have specific memories of
22 other topics that aren't related to that.

1 Q Okay. So, well, then, turning back to
2 this Google declaration, then.

3 Did you personally draft that declaration?

4 A Yes, I did, in collaboration with the
5 attorneys from Finnegan. So I did a search of
6 prior art and combined the results that I found
7 with ones that they located.

8 And I selected the references that I
9 thought were the best, and I formed my opinions.

10 The attorneys did help me in terms of
11 putting my opinions down on -- on paper, so to
12 speak.

13 And then I reviewed everything in my
14 declaration, and it represents my opinions.

15 Q Do you recall how much time you spent
16 preparing that declaration?

17 A Not precisely, but I would guess it would
18 be in the ballpark of 80 hours, 80 to a hundred
19 hours, something like that.

20 Q Okay. So I guess I'd like to introduce
21 your declaration as an exhibit.

22 MR. TANG: For the Planet Depos folks,

1 what would be the best way to do that? Should I
2 drop it into the folder?

3 REMOTE TECHNICIAN: Yes. You could either
4 upload it into the repository with the link that I
5 sent you, or you could also send it in the chat.
6 If you would like to just send the -- attach the
7 PDF to the chat.

8 MR. TANG: I will go ahead and do both.

9 REMOTE TECHNICIAN: Okay. Thank you.

10 (Deposition Exhibit 1003 was marked for
11 identification.)

12 Q Okay. Dr. Mowry, are you able to access
13 this PDF?

14 A Yes, I have it.

15 REMOTE TECHNICIAN: And, Counsel, would
16 you also like me to share it on the screen?

17 MR. TANG: I think that's okay for now.
18 If Dr. Mowry can access it and scroll through it,
19 that's what I would like to confirm.

20 REMOTE TECHNICIAN: Okay. Sounds good.

21 A Yes, I can access it and scroll through
22 it.

1 Q Okay. So you now have access to a
2 document labeled Exhibit 1003, and that is titled
3 "Declaration of Todd C. Mowry, Ph.D. In Support of
4 Petition For Inter Partes Review of US Patent
5 No. 8,478,903."

6 Do you see that?

7 A Yes.

8 Q And I'll ask, can you scroll to the final
9 page of that document and confirm that that
10 signature on that final page is correct?

11 A Yes, that's my signature.

12 Q And I see that you signed this declaration
13 on May 8th, 2025. Is that accurate?

14 A Yes. That's what I see, yes.

15 Q Okay. And you don't recall signing any
16 other declarations before or after this date?

17 A I submitted several declarations related
18 to Sandpiper and Google.

19 Q All right. I'll rephrase.

20 You don't recall submitting any other
21 declarations related to the '903 patent before or
22 after this date?

1 A Well, as I said before, my understanding
2 is that I'm here to discuss this matter between
3 Sandpiper and Google. So I'm happy to answer
4 questions related to this -- this declaration.

5 Q Okay. So you don't recall?

6 MR. ANDERSON: Objection. Form.

7 A Well, I refer to the same answer I gave
8 before, which is that I prepared for this
9 declaration by reviewing the materials related to
10 this declaration and I'm happy to answer questions
11 about my declaration and this matter of Google
12 versus Sandpiper, the case that you mentioned.

13 Q Okay. So -- so this declaration, this
14 document contains your true and correct opinions
15 as far as it pertains to the '903 patent; is that
16 correct?

17 A Yes, that's correct.

18 Q Sitting here today, are you aware of any
19 errors or corrections that need to be made?

20 A No. Not currently, no. There might be
21 some typos, but I didn't notice any.

22 Q Okay. All right. I'd like to now

1 introduce the '903 patent as Exhibit 1001. I'll
2 put that in the chat and upload it as well.

3 (Mowry Deposition Exhibit 1001 was marked
4 for identification.)

5 Q And while we're doing that, I will also do
6 the same for the Kenner reference, which is
7 Exhibit 1005.

8 (Mowry Deposition Exhibit 1005 was marked
9 for identification.)

10 Q Dr. Mowry, are you able to access those
11 two documents?

12 A Yes.

13 Q Okay. So starting with Exhibit 1001, can
14 you confirm that that is U.S. Patent
15 No. 8,478,903?

16 A Yes.

17 Q And is this the '903 patent that you
18 analyzed in your declaration?

19 A Yes, it appears to be. I mean one caveat
20 is I -- I'm assuming this is the actual document.
21 I mean, I can't read the whole thing and check
22 that there hasn't been a modification, but I will

1 assume that this is the '903. It looked -- it
2 appears to be.

3 Q Okay. And so turning to Exhibit 1005, can
4 you confirm that that is International Publication
5 No. WO 9641285?

6 A Yes. That's what I see, yes.

7 Q And is this the Kenner reference that you
8 analyzed in your declaration?

9 A Yes, it appears to be.

10 Q Okay. So I'd like to first turn to the
11 '903 patent and specifically Column 9. And let's
12 start around line 44.

13 So if you'd like to read from line 44
14 until the end of the column, and let me know when
15 you've done that.

16 A Yes, I've done that.

17 Q Okay. So did you review this passage when
18 forming your opinions in your declaration?

19 A Yes. I reviewed the entire '903 patent in
20 forming my opinions.

21 Q Okay. So I'd like to turn to line 53 of
22 the same column. And in line 53 there is a name

1 in quotation marks that says wr1.example.com.

2 Is that an alias for repeater 1?

3 A The text there says that it's an alias for
4 repeater 1.

5 Q Okay. And the rest of this paragraph also
6 includes examples of alias names for repeater 1;
7 is that right?

8 A Yes. It also, at around line 62, says
9 that some other potential aliases might be
10 wr1.anotherexample.com or
11 www.anotherexample.com -- sorry. No. Strike
12 that.

13 I mean wr1.anotherexample.com would be
14 another potential alias.

15 Q Right. Or wr1.example.edu would be
16 another alias name for repeater 1; is that right?

17 A Yes, that's right.

18 Q Okay. So are each of these alias names
19 URLs?

20 A Well, the text is consistent with a host
21 name. A URL usually begins with a prefix like
22 HTTP://. So it may or may not be a URL, but these

1 are consistent with host names.

2 Q Okay. And would you consider them to be
3 Internet addresses?

4 A Well, the term Internet address more
5 commonly would refer to an IP address. That's
6 something else. So a host name and an Internet
7 address are -- are not necessarily the same thing.

8 A host name is a text -- is a string of
9 text with dots in it, typically, like the ones we
10 just were discussing, wr1.anotherexample.com, that
11 is consistent with the form of a host name, but an
12 IP address is a set of numbers.

13 Q Okay. Is -- well, let me -- let me start
14 again.

15 So you said that these are examples of
16 host names. Is that accurate?

17 A I said that the form is consistent with a
18 host name, but they may or may not be host names.
19 They are strings that have dots in them, but often
20 host name is used to refer to -- it might be used
21 to refer to a machine.

22 So, for example, this whole section is

1 under an alternate approach where you're not
2 explicitly naming a repeater server. This is an
3 alternative to putting a host name of a repeater
4 server explicitly inside of a URL.

5 So these are -- they look like host names,
6 but they appear to be something different from
7 that given the discussion of how -- how they
8 operate.

9 Q Would you say that they are domain names
10 or not domain names?

11 MR. ANDERSON: Objection. Form.

12 A So the term domain name and the term host
13 name are sometimes used somewhat loosely. A host
14 name often refers to -- at least in the early days
15 of the Internet, they refer to a specific machine
16 typically. And a domain name would be some later
17 part of a host name. For example, ESPN.com, that
18 might be a domain name, but that's -- those terms
19 are used sometimes a bit loosely, but in some
20 cases a domain name might be a part of a host
21 name. But, again, it would really depend on the
22 context.

1 Q Okay. And I think you mentioned this
2 previously, but what is the typical structure of a
3 host name?

4 A So it would have some -- a string of
5 characters or possibly numbers, usually
6 characters, and a set of periods or dots
7 separating things like, you know, www.espn.com,
8 for example. Those -- that would be an example of
9 a host name.

10 Q Okay. And within the host name, ESPN.com
11 would be a domain name; is that right?

12 MR. ANDERSON: Objection. Form.

13 A Well, as I said before, the term domain
14 name and host name are -- it depends on the
15 context, whether those are, like, what part
16 exactly refers to a domain name. Sometimes those
17 terms are used a bit loosely.

18 A A domain name has a -- has a similar form.
19 So sometimes the words are used interchangeably,
20 sometimes a domain name is a piece of a host name,
21 but it really depends on the context.

22 Q Okay. So looking at, again, lines 53

1 through 55 here, what does wr1 refer to?

2 A It is a piece of this -- of what they're
3 calling an alias. So they don't -- it doesn't
4 specify what they mean by wr1 specifically.

5 Q Is wr1 an identifier of repeater 1?

6 A Well, it says here that wr1.example.com
7 would be an alias for repeater 1. It doesn't say
8 that wr1 on its own is an identifier of repeater
9 1, as you stated it. It says that wr1.example.com
10 would be an alias for repeater 1.

11 Q And I think in line 60 it says repeater 1
12 is addressed as wr1.example.com.

13 Do you see that?

14 A Well, it actually says if repeater 1 is
15 addressed as wr1.example.com, the -- as this
16 passage says, there are -- there's -- there are
17 multiple ways to address the repeaters. They say
18 that repeater 1 can have multiple aliases.

19 Q And so how does the '903 patent describe
20 identifying repeater 1 versus repeater 2?

21 MR. ANDERSON: Objection. Form.

22 A I'm sorry. Can you -- I'm not following

1 in my declaration. Is there a part -- or in the
2 patent is there -- can you point me to what you're
3 talking about?

4 Q Sure. I can -- I can help out here.

5 So if you look at lines 50 through 52, do
6 you see those three alias names?

7 A Yes, I do.

8 Q Okay. And so the first one we have
9 wr1.example.com, and then the second one we have
10 wr2.example.com.

11 Would you -- is it your interpretation
12 that wr2 would refer to repeater 2?

13 A The '903 patent doesn't provide any detail
14 on how repeater 2 is addressed specifically.

15 Reading this, one might guess, given the
16 pattern, that if wr2.example.com is repeater 1
17 that is discussed, then perhaps wr2.example.com
18 might be repeater 2. It's not spelled out
19 explicitly, but that might be a reasonable way to
20 interpret this section.

21 Q Right. And if you see on lines 48 through
22 49, it also says that these are names for three

1 repeaters; right?

2 A Yes, it does say that.

3 Q Right. And so we have wr1, for example,
4 identifying repeater 1, wr2 identifying repeater
5 2, and maybe wr3 identifying repeater 3.

6 Is that a fair way to read that passage?

7 MR. ANDERSON: Objection. Form.

8 A Well, in your question, you used the word
9 "identifying." I wouldn't characterize it that
10 way necessarily.

11 It's discussing -- it's introducing these
12 names to discuss the concept of an alias and how
13 the -- it goes on to say that -- it talks about
14 repeater 1 and that wr1.example.com would be,
15 potentially, an alias for repeater 1. And it
16 would have other aliases.

17 So this is in the context of trying to
18 introduce what aliases are.

19 Q Okay. So to make sure -- maybe I'm being
20 not as precise as I need to be in my question.

21 When we receive something that is
22 WR1.example.com, the '903 patent describes

1 examining that alias name and recognizing, the
2 request should be directed to repeater 1; is that
3 accurate?

4 MR. ANDERSON: Objection. Form.

5 A I would not characterize it that way.

6 It's introducing the idea that there is --
7 that an alias name can be used in some form to
8 ultimately identify a repeater to be used.

9 It does not -- from your question, you
10 seem to suggest that there is a one-to-one mapping
11 between an alias name and a specific repeater.
12 And that's not my understanding of how this works
13 from reading this passage.

14 The alias is -- has some association. You
15 can use it to ultimately identify a repeater, but
16 it's not -- I think it would be incorrect to say
17 that this is simply the host name of the repeater.

18 This is described as an alternative
19 approach. Like around line 39 of Column 9, the
20 section heading is "Alternate Approach."

21 And it's discussing how this is different
22 from actually putting the repeater name directly

1 in the URL, which is the previous approach that
2 was discussed, for example, on -- in Column 8 at
3 around line 37 or so.

4 Q So I want to understand your answer a
5 little bit better.

6 You said that, looking at these alias
7 names, there is not a one-to-one mapping between
8 an alias name and a specific repeater.

9 Did I hear that correctly?

10 A What -- what is described is that you can
11 take an alias name and use that to determine a
12 repeat -- a repeater that would be used for
13 providing the content. That's what it describes.

14 So this is information that's used to
15 identify a repeater, but this is different from
16 what's described. This is -- this whole section
17 is labeled as an alternate approach.

18 The -- in the previous column, in Column
19 8, the earlier approach -- again, around Column 8
20 at around line 37 -- an alternative is that you
21 put in the explicit host name of the repeater and
22 host name of the server and the path in the URL

1 after HTP.

2 So this is an alternate, an alternative
3 approach to that. In this approach, you have an
4 alias name, which lets you locate a -- a repeater
5 to serve the request.

6 But it's saying here that this is not
7 simply the host name of the repeater. It has
8 multiple -- there are multiple aliases that can
9 end up pointing to the same repeater.

10 Q So you pointed to Column 8, I think, line
11 37; is that right?

12 A I believe that's what I said, yes.

13 Q Is that the format of an alias name?

14 A It's difficult to understand your question
15 because the -- as I discussed earlier, the
16 examples of alias names are things that look --
17 they're in the form of a host name like
18 wr1.example.com.

19 But in line 37 of Column 8, what they're
20 describing is creating a -- a somewhat lengthy URL
21 where you embed the repeater's host name and the
22 server's host name and the path, all of these

1 things, into a URL.

2 So the -- I'm not -- I'm not sure what you
3 mean by your question. The form in line 37 of
4 Column 8 is very different from just like
5 wr1.example.com, for example.

6 Q Okay. I guess I'm -- I'm asking about
7 Column 8, line 37, because you mentioned that in
8 this discussion of alias names.

9 So do you believe that there's content in
10 Column 8 that would be helpful for understanding
11 what an alias name is?

12 A As I mentioned before, line -- I believe
13 it's Column 9, line 39; that this is a section
14 heading labeled "Alternate Approach."

15 So this bottom half of Column 9 is
16 discussing -- like it goes on to say in line 40,
17 "Placing the origin server name in the reflected
18 URL is a good strategy." (as read)

19 It goes on to say below in the next
20 paragraph, starting in line 44, "It is possible to
21 avoid the need for placing both the repeater name
22 and the server name in the URL. Instead a family

1 of names may be created for a given origin server,
2 each name identifying whether repeater is used by
3 that server."

4 So this is being described as an
5 alternate, an alternative to what was described
6 before that.

7 And Column 8, line 37, I pointed that out
8 because that is giving an example of the other
9 approach that is -- that aliases are an
10 alternative, as they describe, to what's shown in
11 Column 8.

12 Where in line 37, it says one possibility
13 is you create this URL that begins with HTTP://;
14 then it says, "repeater" in brackets, which is the
15 repeater host name; then "server," the server host
16 name; and then "/"; and then the path.

17 So aliases are being described as an
18 alternative to what we see in Column 8.

19 Q Okay. So I guess, looking at Column 9,
20 lines 53 to 55, again, there are three name -- I'm
21 sorry.

22 There are three alias names that identify

1 repeater 1 in that passage; correct?

2 A That's what it says, yes.

3 Q And all three of those names include
4 "wr1"; is that correct?

5 A In this example, that's true, yes.

6 Q So then is there a correlation between
7 "wr1" and "repeater 1"?

8 MR. ANDERSON: Objection. Form.

9 A That's -- that's unclear. They say that
10 there can be a number of alias names for
11 "repeater." They list a few examples, but it does
12 not say that there is a rule that the first string
13 before the first period is an explicit identifier
14 of a particular repeater.

15 It -- I can -- one can easily imagine
16 having other arbitrary strings that could be used
17 as aliases for a repeater. It wouldn't
18 necessarily have that form.

19 These three examples happen to have that
20 pattern, but I think it wouldn't need to -- to
21 work that way.

22 Q So the '903 patent doesn't describe any

1 other examples, other than these, of alias names;
2 is that accurate?

3 MR. ANDERSON: Objection. Form.

4 A Well, starting in -- in Column 9 at line
5 45, it says, "a family of names may be created for
6 an origin server." It lists some examples of
7 alias names.

8 That -- I mean, that -- they're just
9 trying to show, I believe, that it can be a
10 variety of different things.

11 So I may have lost track of the -- the
12 point of the question.

13 But there -- there is a limited set of
14 names that are given as examples; but reading this
15 passage, it would be -- I wouldn't -- that doesn't
16 mean that this is the -- the full set of potential
17 alias names, certainly.

18 These are just given as some examples of
19 alias names.

20 Q And so in the section that you pointed to,
21 lines 46 and 47, says, "each name identifying one
22 of the repeaters used by that server."

1 Do you see that?

2 A Yes, I see that.

3 Q What does that mean to you?

4 A It means that there's some type of
5 association where, given that alias name, it can
6 be used to identify a -- a repeater for that --
7 the origin server.

8 Q Let me make sure I understand your
9 position.

10 You're saying an alias name can be used to
11 identify a repeater, but the alias name itself
12 does not identify the repeater?

13 MR. ANDERSON: Objection. Form.

14 A I don't understand your question. I don't
15 think that's what I said.

16 Can -- maybe, can you -- can you maybe
17 repeat the question? Or is there --

18 Q I'll -- I'll --

19 A Clarification --

20 Q -- rephrase.

21 A -- of the question?

22 Q Sure.

1 Is it your position that an alias name
2 does not need to identify the repeater?

3 A The alias name is used to identify a
4 repeater for a server.

5 So there's some type of association so
6 that you can take that name, and through some
7 mechanism, you can use that to identify a
8 repeater.

9 Q Right.

10 So you said, "is used to identify a
11 repeater."

12 And so is it your position that the alias
13 name itself does not identify the repeater?

14 MR. ANDERSON: Objection. Form.

15 A Again, I'm not following your question
16 because it sounds like you're just stating the
17 opposite of what I said.

18 The alias name is used to identify a
19 repeater. You -- there's some type of association
20 where you can take that name and then use that to
21 determine, in some form, what the repeat -- what
22 repeater should be used for delivering that

1 content for that origin server.

2 Q You were speaking a little bit in the
3 passive voice here.

4 Can you explain to me the flow of how an
5 alias name is used to identify a repeater?

6 A Well, for example, the Kenner reference
7 describes a way that this can be done. I mean,
8 you could use -- there's not just one way to do
9 that.

10 But you could have a -- a table, some kind
11 of a database table where you would use --
12 effectively have a query using the alias name in
13 some type of database. And it would -- the result
14 of the query would be to point you to a repeater.
15 That would be one possible way.

16 There are -- like many things in computer
17 science, there are a number of ways that this
18 could be implemented. But, conceptually, that's
19 one way you could think about it.

20 Q So did you use the Kenner reference to
21 help you understand how the '903 patent works?

22 A No. You asked for an example of how an

1 alias name could be used to identify a repeater,
2 and that's a very -- I mean, it's not -- there are
3 many ways that that could be done.

4 The '903 patent doesn't spell out a
5 specific way that it needs to happen, but an
6 obvious -- but one -- one way that it might be
7 done would be by looking up the name in a
8 database, and the Kenner reference has a concrete
9 example of that, but that -- I did not -- I read
10 the '903 patent first on its own. I had not read
11 the Kenner reference, that was identified -- that
12 was -- I read the Kenner reference later.

13 So to answer your question, I -- I did not
14 use the Kenner reference to -- I forget your
15 wording exactly -- inform my understanding of the
16 '903 patent.

17 Q So based on what I'm hearing is your
18 reading of this passage from the '903 patent -- in
19 your reading, can wr2.example.com refer to
20 repeater 1?

21 MR. ANDERSON: Objection. Form.

22 A This passage makes it clear that there can

1 be a number of different aliases that could be
2 referring to the same repeater. For example, in
3 lines 53 through 55, it shows that repeater 1 can
4 have a set of different aliases.

5 So as I mentioned a minute ago, a
6 common -- like one way to implement this that
7 would occur to, I think, most computer scientists,
8 is that you -- you take the name and you do some
9 type of query on a database and you use that to
10 figure out what repeater you're talking to.

11 So the details of the string are not
12 important. The key thing is it would be obvious
13 to a person of skill in the -- you know, of
14 ordinary skill in the art that -- that you could
15 have a variety of different names and have them
16 point to a particular repeater because it just
17 depends on how you maintain that mapping, for
18 example, through some type of database. That
19 would be a common way to map an alias name to a
20 particular repeater.

21 Q Right. So under your interpretation,
22 wr2.example.com could be mapped to repeater 1?

1 MR. ANDERSON: Objection to form.

2 A I didn't say that. What I said is that
3 there could be a wide variety of different names
4 that could map to the same repeater. This section
5 is very light on detail here about any -- it does
6 not describe specific constraints on how alias
7 names are constructed. In fact, it's showing that
8 there is -- that it would be obvious to a person
9 of skill in the art that you could have many
10 different alias names and have some way of mapping
11 them to a repeater name.

12 In this passage it says that there are
13 names for three repeaters and then it lists -- it
14 says there are alias names for three repeaters,
15 and then it lists three names. So a reasonable
16 interpretation of that would be that these three
17 names -- wr1.example.com, wr2.example.com and
18 wr3.example.com -- it says right before it lists
19 them that these are names of three repeaters.

20 So in this example it appears that the
21 wr2.example.com is referring to something other
22 than wr1 -- repeater other than the one pointed to

1 by wr1.example.com or wr3.example.com.

2 But, again, it's -- reading this passage,
3 the important point is there are -- you know,
4 alias names are -- these are families of names
5 that you, through some mechanism, can map from a
6 name to a repeater.

7 Q What does example.com refer to?

8 A Well, in line 6 -- like around 59 to 61 in
9 Column 9, it says that -- well, it's -- and even
10 before that, it's discussing that the alias name
11 needs to not just identify a repeater; it has to
12 be somehow -- it has to be associated with the
13 origin server, and it says that for the alias
14 wr1.example.com, the origin server in this case is
15 www.example.com.

16 So I mentioned before that an obvious way
17 to implement this would be through some type of
18 database. So you could have an entry in the
19 database where if you query it -- query it with,
20 in this example wr1.example.com, then you could
21 retrieve something that would point you to
22 repeater 1 and also point you to the origin server

1 being www.example.com.

2 Q So is example.com an identification of the
3 origin server?

4 A Well, there are a variety of ways that you
5 could take an alias name and map it to a repeater
6 and an origin server. As I mentioned a minute
7 ago, a common way that would, I think, occur to
8 most computer scientists would be to have some
9 type of database where you would enter the -- the
10 alias name as a query and you would find entries
11 that would point you to a repeater and the origin
12 server.

13 Q So was ample -- sorry.

14 Example.com then does not identify an
15 origin server?

16 MR. ANDERSON: Objection. Form.

17 A I didn't say that. What I said is that
18 there are a variety of ways that you could use to
19 take an alias name and -- and retrieve a mapping
20 between that name and both a repeater and the
21 origin server for the content.

22 You could do it in such a way that if the

1 origin server was example -- www.example.com, it's
2 possible that example.com doesn't appear in the
3 alias name at all. That would -- that is
4 certainly a possibility.

5 In this example it happens that
6 example.com appears in the alias and it's a part
7 of the -- the host name or domain name -- the host
8 name for the origin server, but a person of
9 ordinary skill in the art would appreciate that
10 that wouldn't necessarily be the case.

11 It's well-known that you can query a
12 database with a set of strings where you can set
13 up the database to have answers where you don't
14 simply extract a portion of that string as the
15 result. It could be other strings.

16 So, again, just because this is one -- one
17 simple illustrative example, they happen to have
18 example.com there, but they make it clear in this
19 passage that -- that this is just -- the alias is
20 used to somehow associate with a repeater and an
21 origin server for that content.

22 And as I said, there are a variety of ways

1 to implement that mapping.

2 Q But you'd agree the examples in this
3 passage all include an identification of the
4 origin server in the alias name; correct?

5 A Well, you said "identification." I don't
6 know -- I wouldn't necessarily use that term.

7 In these examples the origin server is
8 www.example.com. Www.example.com, that entire
9 string does not appear in any of those alias
10 names. They are using some mechanism to take
11 these alias names and map them to a repeater name
12 and a content server, but there are a number of
13 different patterns that they're showing here in
14 these examples, and a person of ordinary skill in
15 the art would appreciate that you could have a
16 number of different ways of doing this mapping.

17 You would not necessarily need to include,
18 even if the origin server is www.example.com,
19 example.com doesn't necessarily need to appear in
20 the alias name because you could simply look --
21 look that up -- look up its name through whatever
22 mechanism you use to map the alias name to an

1 origin server.

2 Q Let me make sure I understand your
3 position. I can use an alias name, like ABC, to
4 point to repeater 1. Is that your read of the
5 '903 patent?

6 MR. ANDERSON: Objection. Form.

7 A Column 9 does not place restrictions on
8 the form of an alias name. It simply says that
9 there can be these families of names that can be
10 used to identify both a repeater and an origin
11 server for that content. It gives some examples,
12 but it does not say that there are specific
13 constraints on the form of those alias names.

14 Q So is that a yes?

15 MR. ANDERSON: Objection. Form.

16 A Can you repeat the question, please?

17 Q Sure. So based on the '903 patent and
18 your interpretation, can an alias name like ABC
19 point to repeater 1?

20 A As I said a minute ago, there's not -- the
21 '903 patent doesn't place constraints on the
22 format of an alias name. The examples that are

1 given are consistent with a host name. So it's --
2 in these examples it's something.com or
3 something.edu, and so in practical terms possibly
4 someone might want to have an alias name that
5 looks like a host name, but I don't think that
6 they explicitly place any constraints on the
7 format of an alias name.

8 Q Okay. But at least all the examples we
9 see here are in the structure of a host name.

10 Did I hear that correct?

11 MR. ANDERSON: Objection. Form.

12 A There are, I believe, just three specific
13 examples here -- well, there's also, I guess,
14 five. There's wr1.example.com, wr2.example.com,
15 and so on.

16 These specific examples happen to be in
17 the form -- format of a host name, but they are
18 also -- this is an alternative approach, an
19 alternate approach, to actually using the
20 repeater's host name. So these -- although they
21 are in the format of a host name in these
22 examples, the '903 patent does not place any

1 formatting restrictions on alias names.

2 And the understanding here is that this
3 one name is associated both with a repeater and
4 the origin server, so it's not typically a host
5 name we would think of that as pointing to a
6 particular machine.

7 In this case, it's not -- it's not quite
8 the same concept. This is, you know, the -- hence
9 the word "alias." It's -- it's some name that can
10 be used to identify a repeater and an origin
11 server.

12 Q Right. So you said an alias name is some
13 name that can be used to identify a repeater and
14 an origin server; is that right?

15 A I -- that sounds like what I just said, I
16 believe. That's correct.

17 Q So then can I use an alias name like ABC
18 to identify a repeater server and an origin
19 server?

20 MR. ANDERSON: Objection. Form.

21 A I -- maybe I'm missing something. I think
22 that was the same question you asked a few minutes

1 ago, and I think I just answered that. It was a
2 lengthy answer, so I'll refer to my same answer.

3 Although, if I missed something and
4 there's something different in the question, if
5 you could point that out, that would be -- that
6 would be great.

7 Q Is it your position that an alias name
8 doesn't have to be in the structure of a host
9 name?

10 A The '903 patent does not say that it must
11 be in the format of a host name. It gives
12 examples where it is in the format of a host name,
13 but it does not say that that's a requirement.

14 Q All right. And all of the examples are in
15 the format of a host name; right?

16 MR. ANDERSON: Objection. Form.

17 A There are only five examples, and clearly
18 there are many ways that one could generate
19 aliases. So, for example, the wr1.example.com,
20 wr1.anotherexample.com, wr1.example.edu these
21 things are all very quite different from each
22 other. So there -- even with this very limited

1 set of examples, it's clear that -- that there's
2 quite a bit of flexibility with the -- how you
3 create these names.

4 But, again, the take-home point is that a
5 person of ordinary skill in the art would
6 appreciate that -- that using some kind of mapping
7 mechanism, there would be a variety of ways that
8 you could construct names -- alias names that
9 could be mapped to a repeater server and an origin
10 server.

11 MR. ANDERSON: Looks like we're at an hour
12 here. Do you want to take a break soon?

13 MR. TANG: Sure. Why don't we take a
14 quick break then.

15 Could we do ten minutes?

16 MR. ANDERSON: Sounds good.

17 MR. TANG: Thanks.

18 (A recess was taken.)

19 BY MR. TANG:

20 Q All right. Thank you, Dr. Mowry.

21 I guess, on your break, did you speak to
22 anybody about the contents of your deposition so

1 far?

2 A I did not speak with anyone during the
3 break.

4 Q Okay. All right. I'd like to turn back
5 to the '903 patent, and, specifically, I'd like to
6 turn to Claim 37.

7 A Okay.

8 Q And I'm looking at the first
9 "associating": "associating a plurality of alias
10 names with at least one shared repeater server..."

11 Do you see that?

12 A Yes, I see that.

13 Q Okay. And so this step is talking about
14 associating multiple alias names with a particular
15 repeater server; is that right?

16 A Sorry, can you just point me to the line
17 or what -- can you repeat the --

18 Q Sure. Yeah.

19 A -- the part you were pointing to exactly?
20 That has a lot of sections in it.

21 Q Yeah. So I'm looking at line 43,
22 "associating a plurality of alias names."

1 A Okay.

2 Q Okay. And so that line and that phrase
3 refers to associating multiple alias names with a
4 particular repeater server; is that right?

5 A Yes. Multiple alias names are associated
6 with alias 1 shared repeater server.

7 Sorry, in your question, did you say,
8 "one," or, "at least one"? I didn't -- maybe you
9 could repeat the question?

10 Q Sure.

11 It's just that, what this claim term is
12 referring to is associating multiple alias names
13 with a particular repeater server; right?

14 A No, that's incorrect. It says, "with at
15 least one shared repeater server."

16 You said, "a particular shared repeater
17 server." It does not say that.

18 Q Okay. So what does it mean to you that
19 there are a plurality of alias names associated
20 with at least one shared repeater server?

21 MR. ANDERSON: Objection. Form.

22 A I'm having trouble following your question

1 because, I mean, what it means to me is what it
2 says. I'm not sure what you mean exactly by the
3 question.

4 Q Okay. So is one way to interpret this
5 claim term as associating multiple alias names
6 with one shared repeater server?

7 A I mean, one way to satisfy that it's at
8 least one shared repeater server is if it is one
9 shared repeater server, but it could be -- I mean,
10 like, it says, "at least one shared repeater
11 server."

12 Q So how -- I'll start over.

13 What is your interpretation of this claim
14 and what it means to associate a plurality of
15 alias names with at least one shared repeater
16 server?

17 MR. ANDERSON: Objection. Form.

18 A I'm sorry.

19 Can you please repeat the question?

20 Q Sure.

21 What is your interpretation of this claim
22 and what it means to associate a plurality of

1 alias names with at least one shared repeater
2 server?

3 A Well, I mean, I refer to that section in
4 my declaration. I mean, I discuss, I discuss this
5 claim and the prior art.

6 Q Can you point me to -- in the declaration
7 where you're referencing?

8 A I mean, starting on page 64 of my
9 declaration -- it's 60 -- page 65 of the PDF -- I
10 talk about independent Claim 37.

11 Q And so I see here, it's discussion about
12 Kenner and what Kenner describes.

13 I'm just trying to understand your
14 interpretation of the claim term itself.

15 MR. ANDERSON: Objection. Form.

16 A That's too open-ended of a question for me
17 to know how to start to answer that.

18 Can you maybe rephrase the question?

19 Q Sure.

20 What -- what does it mean to associate a
21 plurality of alias names with at least one shared
22 repeater server?

1 A Well, that's not literally what it says.

2 It says, "associating a plurality of alias
3 names with the -- at least one shared repeater
4 server."

5 Q Okay. And so what is your
6 interpretation -- sorry, go ahead.

7 A Well, as we discussed before, there are --
8 there are a plurality of alias names; that it's
9 not -- it's -- as Column 9 showed, that there
10 could be multiple alias names potentially for --
11 for a repeater server.

12 So it's discussing a plurality of alias
13 names here.

14 And it goes on to say that those -- those
15 plurality of alias names are associated with an
16 origin server.

17 So that's something that I discuss in my
18 declaration.

19 Q Okay. So you referenced Column 9.

20 And so, for example, we have multiple
21 alias names that have "wr1," and all of the alias
22 names with "wr1" point to "repeater 1"; right?

1 A That's what it says in Column 9, yes.

2 Q Okay. And so your interpretation of the
3 claim is in line with that example; is that fair?

4 A Yes. It's -- there's -- there's -- yes.
5 They're -- they're consistent, yes.

6 Q Okay. And, similarly, the claim says,
7 "the plurality of alias names are associated with
8 a first origin server" -- I'm sorry -- "wherein a
9 first alias name of the plurality of alias names
10 is associated with the first origin server."

11 Did I read that correctly?

12 A I think so, yes.

13 Q Okay. And what is your interpretation of
14 what that means?

15 A There's an association between an alias
16 name and an origin server. And repeaters can
17 serve content from multiple origin servers.

18 So just because you're talking to a
19 repeater, that doesn't mean that you're referring,
20 necessarily, to, for example, only one origin
21 server because there are multiple content
22 providers. So the alias name needs to also map to

1 an origin server.

2 So they're saying that there is a first
3 alias name of the set of potential alias names
4 that is associated with a first origin server.

5 Q Okay. So in Claim 37, we have a first
6 alias name that identifies a repeater and an
7 origin server; is that right?

8 A Yes.

9 Q Okay. And that's your interpretation for
10 the other independent claims as well; is that
11 accurate?

12 A Alias names in the '903 patent are
13 associated with a repeater and with an origin
14 server, yes; that's -- that's my understanding.

15 Q Okay. So I'd like to move to Claim 25.

16 And let me know when you've gotten a
17 chance to review.

18 A So I might be missing something; but I
19 believe, in my declaration I don't discuss Claim
20 25.

21 Is -- is that -- my understanding
22 incorrect?

1 Q I was going to ask you about that.

2 So do you recall whether you analyzed
3 Claim 25 when preparing your declaration?

4 A I read the entire '903 patent, but I was
5 not asked to. As I recall, if -- if I'm not
6 discussing Claim 25 in my declaration, then I was
7 not asked to provide an opinion on that claim.

8 Q And can you look at Claim 34?

9 A Well, similarly, I -- it appears I
10 didn't -- I don't think I discussed, analyzed
11 Claim 34 in my declaration.

12 Q So I'll help you. Yeah.

13 On page 79 of your declaration, you
14 analyze Claim 34.

15 A Oh, okay. Thank you. Okay.

16 Q So my first question is, was there a
17 decision made between your opinions as they relate
18 to Claim 34 and then your opinions as they relate
19 to Claim 25? Is there a difference?

20 MR. ANDERSON: Objection. Form.

21 A Can you point me to the part of my
22 declaration -- you said my opinions on Claim 25?

1 Can you please point me to where I provide
2 opinions on Claim 25 in my declaration?

3 Q I don't think you provide opinions on
4 Claim 25 in your declaration.

5 So my question is, do your opinions as
6 they relate to Claim 34 apply to Claim 25, or is
7 there a reason why you did not opine on Claim 25?

8 MR. ANDERSON: Objection. Form.

9 A I provide opinions on the claims that I
10 was asked to provide opinions on.

11 Q You read Claim 25, you said; right?

12 A I read the -- the entire '903 patent.

13 Q Okay. Well, we can look at Claim 34, if
14 that would be more convenient for you.

15 I'm specifically interested in the first
16 portion of the claim where it says, "at least the
17 first alias name is a domain name."

18 Do you see that?

19 A Yes, I see that.

20 Q And what is your interpretation of that
21 clause?

22 MR. ANDERSON: Objection. Form.

1 A Well, as I discussed earlier today, there
2 are -- one -- one way that users use to describe
3 something on the Internet is with a host name or
4 domain name. Those terms are sometimes used
5 interchangeably, but they have a format of a
6 set -- it's a string of letters or alphanumeric
7 characters with dots or periods that separate
8 different parts. Something like www.espn.com for
9 example, that could be -- that's the format of a
10 host name, and the domain name service is the
11 mechanism that the Internet uses -- that's used on
12 the Internet to translate those more human
13 readable ascii string names into IP addresses,
14 which are numbers that refer to specific machines
15 or nodes on the Internet.

16 So this is talking about the alias is in
17 the format of a host name or domain name. It's
18 something that domain name service, DNS, would be
19 able to handle. So there's a well-known process
20 for resolving -- a well-known process and
21 mechanism for resolving domain names and turning
22 them into IP addresses.

1 Q Okay. So you're saying Claim 34 is about
2 resolving the DNS qualities of an alias name. Is
3 that accurate?

4 A Sorry. I don't know what "DNS qualities"
5 means.

6 Q Sure. Claim 34 says -- "provides domain
7 name service, DNS, resolution." So Claim 34 is
8 directed to the first alias name being a domain
9 name and then using DNS resolution to resolve the
10 first alias name. Is that accurate?

11 MR. ANDERSON: Objection. Form.

12 A Can you please repeat the question?

13 Q Sure. Maybe I'll break it up a little
14 bit.

15 Okay. So Claim 34 describes domain name
16 service, DNS, resolution; correct?

17 A It mentions DNS resolution. It doesn't
18 describe how it works, but it refers to DNS
19 resolution.

20 Q Okay. And it says the first alias name is
21 a domain name; correct?

22 A It does say that.

1 Q Okay. And the DNS resolution occurs by, I
2 think you said, resolving the domain name to an IP
3 address. Is that accurate?

4 A That's the ultimate result of DNS
5 resolution. It takes some -- something in the
6 form -- it takes some type of host name or domain
7 name, and it goes through a set of steps to
8 ultimately return an IP address, assuming that one
9 exists for -- for that host name or domain name.

10 Q Okay. So in the resolving step of
11 claim 4 -- in 34, I'm sorry.

12 Do you see that? Do you see the resolving
13 step?

14 A Well, I don't know if I'd characterize it
15 as a -- you said "step." I see where it talks
16 about domain name service resolution, yes. That's
17 in the -- in the beginning of the claim. I see
18 that part.

19 Q I'll help you here. I'm referring to the
20 resolving step in 34.b, which is on the bottom of
21 page 83 of your declaration.

22 A Okay.

1 Q So do you see the resolving step?

2 A Yes, I do.

3 Q Okay. And so what, if you could explain
4 again, is happening in this resolving step?

5 A Well, it's using some association between
6 this -- the alias name and the shared repeater
7 server. So it's turning that into an IP address
8 somehow.

9 Q But in Claim 34 the first alias name is a
10 domain name; correct?

11 A Well, at the beginning of Claim 4 it says
12 the first alias name is a domain name. It says
13 that, yes.

14 Q And so the association that you're
15 describing is between a domain name and an IP
16 address; is that correct?

17 A In this case, yes, the alias name is a
18 domain name, and DNS returns an IP address, so
19 it's taking the first alias name and converting
20 that into an IP address.

21 Q So in your interpretation of Claim 34,
22 does the first alias name identify the repeater

1 server?

2 A Yes. It's through the DNS resolution.
3 The first alias name is used to determine an IP
4 address of the at least one shared repeater
5 server.

6 Q Okay. And you see that Claim 34 depends
7 on Claim 28; right?

8 A Yes, 34 -- Claim 34 is a dependent claim
9 dependent upon Claim 28, that's correct.

10 Q Okay. And so I'd like to look at Claim
11 28, starting at line 34, with the associating
12 step.

13 Let me know when you see that.

14 A Okay. I see that.

15 Q Okay. And you can see it says,
16 "associating the at least one repeater server with
17 a first alias name"; correct?

18 A It does say that, yes.

19 Q Okay. And so what is your interpretation
20 of first alias name as it's recited in Claim 28,
21 relative to what is recited in Claim 34?

22 MR. ANDERSON: Objection. Form.

1 A I'm sorry. I'm not following the
2 question. Claim 34 is a different claim. It's --
3 it's a dependent claim on Claim 28, but it
4 discusses -- it's a more narrow claim.

5 Q Okay. Right. So you're saying Claim 34
6 is narrower than Claim 28; is that right?

7 MR. ANDERSON: Objection. Form.

8 A Sorry. I -- I'm not an attorney, so I
9 may -- I'm not sure if I'm using that term
10 correctly or not, but what I meant is my
11 understanding is that dependent claims provide
12 some additional -- like they build upon the claim
13 they depend upon, but they provide additional
14 details or constraints or whatever. They describe
15 things a little differently.

16 I thought that I've heard that as
17 narrowing, but I'm not sure. I didn't go to law
18 school, so I'm not sure if I'm saying that
19 correctly.

20 But Claim 34 is not identical to Claim 28.
21 Claim 34 describes some differences relative to
22 Claim 28.

1 Q Right. And like we talked about, Claim 34
2 has the DNS resolution elements in it; correct?

3 A Yes. Claim 34 discusses DNS resolution,
4 that's correct.

5 Q Right. And I think we said the first
6 alias name is a domain name in Claim 34 that
7 identified the at least one shared repeater
8 server; correct?

9 A Yes, that's correct.

10 Q Okay. And then in Claim 28, we still have
11 the first alias name, but there's no recitation of
12 DNS resolution; right?

13 A Yes, that's correct. I don't see any
14 discussion of DNS resolution in Claim 28.

15 Q Right. But the first alias name still
16 identified the at least one repeater server;
17 right?

18 A Yes. It's the first alias name is
19 associated with the at least one repeater server,
20 yes.

21 Q Okay. I'd like to turn to Claim 1 now of
22 the '903 patent.

1 A Sorry. Can you repeat the claim number?

2 Q Claim 1.

3 A Okay. Okay.

4 Q Okay. And I'd like to look at the clause
5 that starts on line 35.

6 Let me know when you've gotten a chance to
7 review.

8 A Okay.

9 Q Okay. And so as you see here, it says,
10 "Requests for the first resource from said client
11 machines are directed to the at least one shared
12 repeater server based at least in part on said
13 first alias name."

14 Did I read that correctly?

15 A Yes, that's what it says.

16 Q Okay. What does it mean to direct a
17 request to the shared repeater server?

18 MR. ANDERSON: Objection. Form.

19 A I think there's a section in my
20 declaration where I'm discussing this claim, so
21 I'm happy to talk about that. That's where I
22 provide my opinions on this particular part of

1 Claim 1.

2 Q Okay. We can turn to your declaration, if
3 that would be helpful.

4 A Okay.

5 Q I believe this is element 1.d on page 46,
6 but let me know if you're referencing a different
7 portion of your declaration.

8 A No. That sounds correct.

9 Q Okay. So I'll ask the question again.

10 What does it mean to direct a request to
11 the shared repeater server?

12 MR. ANDERSON: Objection. Form.

13 A I think I'm having trouble understanding
14 the question because -- I mean, I discuss this
15 here in the section that -- and I give several
16 examples of this, so I'm not -- I'm not sure what
17 you're asking me exactly.

18 It says, "Requests for the first resource
19 from said client machines are directed to the at
20 least one shared repeater server."

21 I think there's a request for a first
22 resource and, you know, the Kenner showed -- and

1 there are examples of this. Kenner describes this
2 working in the same way as the '903 patent.

3 Q I'm just trying to understand your
4 interpretation of this claim element and what it
5 means to direct a request to a shared repeater
6 server based on a first alias name.

7 MR. ANDERSON: Objection. Form.

8 A Well, the claim doesn't recite what you
9 just said in your question. The claim says based
10 at least in part on said first alias name.

11 Q Okay. So what is your interpretation of
12 that?

13 MR. ANDERSON: Objection. Form.

14 A Well, I refer you to my declaration,
15 paragraphs 88 through 90, where I discuss this
16 claim element.

17 Q So I'm looking at your paragraphs 88
18 through 90, and I see discussion of Kenner; but
19 I'm just trying to understand how you interpret
20 the claim and what the scope of the claim
21 includes.

22 MR. ANDERSON: Objection. Form.

1 A Well, if I understand this correctly, it
2 sounds like you're asking me to provide a claim
3 construction opinion, and I was not asked to
4 provide claim construction opinions. But I think
5 under any reasonable interpretation of what this
6 means, the Kenner reference would -- would --
7 would satisfy this -- this claim element.

8 Q Okay. So let me ask it a different way.

9 Does this claim element refer to
10 identifying a particular repeater server for
11 multiple repeater servers?

12 A Yes. And I give examples of -- of how the
13 Kenner reference does this, but yes.

14 Q Okay. And it says -- I'm sorry -- the
15 claim says that the request is directed based on
16 the first alias name; right? Sorry, let me be
17 more specific.

18 The claim says the request is directed
19 based, at least in part, on said first alias name.
20 Is that right?

21 A It does say, "based at least in part on
22 said first alias name," yes, that's correct.

1 Q Okay. And so how is a request directed
2 based on an alias name?

3 A Well, I give an example in my analysis
4 here. So, for example, in paragraph 90 -- I mean,
5 first of all, it says, "at least in part, on said
6 first alias name," not -- it doesn't say
7 "exclusively" or "entirely" on first alias name
8 but "in part, on said first alias name."

9 So, for example, on paragraph 90, the
10 request may be directed to the primary IM from a
11 neighboring IM.

12 So if the neighboring IM does not have a
13 copy of that resource, it says it will create a
14 closest IMs to determine if any of the remote SRUs
15 have the desired clip.

16 And to do so, it uses the content
17 coordinate data included in the video ID.

18 So in Kenner, the video ID is an alias
19 name. And an alias name contains a number of
20 different things.

21 One thing it includes is content
22 coordinate information. And this is essentially a

1 taxonomy of different types of information, for
2 example, news related, specifically sports. I
3 think that's -- might be one example that they
4 gave.

5 So it's -- based on that, it's deciding
6 which IM -- which IMs -- that is the terminology
7 in the Kenner -- and that's a repeater server in
8 the '903 terminology.

9 So it's basing that decision -- it's going
10 to only query IMs that match that content
11 coordinate data. So that is why that satisfies
12 the "at least in part, on said first alias name"
13 because of the use of the content coordinate data
14 to be selective about choosing the primary IM.

15 Since if it matches that content
16 coordinate data, it will be considered as -- as a
17 place that it would request the data from.

18 Q Okay. So let's go back to the example
19 where a first alias name is wr1.example.com.

20 And you, I think, agreed that is an
21 example of an alias name; correct?

22 A The '903 patent in Column 9, when it's

1 discussing alias names, it gives that -- it does
2 list that as one example of an alias name in that
3 specific example.

4 Q Okay. And so when a client is accessing a
5 resource, how does it use that alias name?

6 MR. ANDERSON: Objection. Form.

7 A That's a very broad question.

8 I mean, the client themselves, they -- I
9 mean, I don't think I follow the question.

10 The client doesn't necessarily even see an
11 alias name. That's something that's embedded in
12 the URL on a web page. So the client probably
13 just sees a link to a video that's -- if you're --
14 by a client, if you're referring to the user, they
15 don't themselves necessarily see the name.

16 It's just something that's embedded in the
17 web page. And it's used to -- to retrieve content
18 through this content delivery network; through
19 this, using the repeater server.

20 So maybe I missed something in your
21 question, but I'm not sure -- it was a very
22 open-ended question; so I'm not exactly sure how

1 to answer it.

2 Q Sure.

3 So I'm just trying to get at this claim
4 term, which says, right, "requests for the first
5 resource from said client machines are directed to
6 the at least one shared repeater server."

7 And so I think you mentioned a user might
8 be on a client machine that clicks a link to
9 access a video.

10 And so what happens from that user's
11 machine's perspective?

12 MR. ANDERSON: Form.

13 A I mean, we have to be talking about a
14 specific artifact. I don't know -- I mean, the
15 claims don't -- I mean, you sound like -- from
16 your question, like you're discussing a particular
17 system.

18 Like, Kenner is one example. I can talk
19 about that. That is described in detail in the
20 Kenner reference.

21 But I'm not sure what you're asking.

22 Q I'm -- I guess I'm asking -- we have,

1 again, wr1.example.com, which is an alias name;
2 correct?

3 A Well, it's given as an example of a
4 potential alias name. It's not -- wouldn't
5 necessarily be an alias name in -- in specific
6 systems. It's just given as an illustration of
7 something that they say could be an alias name.

8 Q So how is a request for a resource
9 directed using that alias name?

10 MR. ANDERSON: Objection. Form.

11 A In your question you're saying "that alias
12 name."

13 Are you suggesting that a system has to
14 use wr1.example.com? And I don't understand the
15 question.

16 Q Sure.

17 In my example -- I'm sorry, go ahead.

18 A I'm --

19 Q I'll repeat the question --

20 A Yeah, I'm not following your question.
21 I'm sorry.

22 Q Sure.

1 So in an example system that uses
2 wrl.example.com as an alias name, how does that
3 system direct a request for a resource from a
4 client machine that uses that alias name?

5 MR. ANDERSON: Objection. Form.

6 A To the extent that I understand your
7 question, it sounds like you're asking me to
8 create a hypothetical system and speculate on how
9 it might work.

10 I'm not -- I'm not sure if that's really
11 what you're asking, but I'm here to discuss -- the
12 Kenner reference, for example, is what I
13 identified as prior art that renders the '903
14 patent obvious.

15 And I can talk about what the Kenner
16 reference does. I can talk about what the '903
17 patent describes.

18 But there's not -- like I'm not -- I don't
19 understand the exercise of speculating on a
20 hypothetical system that's not really described in
21 detail.

22 Q So, yeah, I'm interested in the '903

1 patent. I'm interested in Claim 1, and I'm
2 interested in the example in Column 9.

3 And I'm just trying to understand how
4 Claim 1 works with the examples that have been
5 provided in Column 9.

6 And so we have in Claim 1 requests for the
7 first resource from said client machines are
8 directed to the at least one shared repeater
9 server based, at least in part, on said first
10 alias name.

11 And I'm just trying to understand what
12 that means.

13 So, using the examples in Claim 9, can you
14 explain to me what that claim term means?

15 MR. ANDERSON: Objection. Form.

16 A Sorry, but the -- you know, the -- the
17 Claim 9 -- sorry -- Column 9 does not provide
18 specific details.

19 You're asking for me to fill in details in
20 the specification that don't exist in the
21 specification to the extent that I understand your
22 question.

1 So the -- the Kenner reference provides
2 details that make it clear that it -- it renders
3 the '903 patent obvious. The specification
4 illustrates various things related to the '903
5 patent.

6 But you're asking me to fill in details in
7 the '903 patent that aren't there. And that's
8 not -- that -- I don't -- I don't know how to
9 answer your question.

10 Q Are you capable of analyzing this claim
11 term without reference to Kenner?

12 MR. ANDERSON: Objection. Form.

13 A That's -- a couple of things there.

14 So in your question before, you were
15 asking about some partially described example in
16 the specification.

17 So that's what I was just referring to, is
18 that you're asking me to fill in more detail in
19 the specification that doesn't exist.

20 But I was saying that that's not something
21 that I -- that -- I -- I don't -- I don't
22 understand what the -- what -- what you're really

1 asking for.

2 Yes, I understand the claim terms in the
3 '903 patent, and I understand them independent of
4 Kenner.

5 But you're asking for additional detail on
6 a system that is not -- that is not fleshed out,
7 not described in detail in the '903 specification;
8 so it's -- you're asking me to create a
9 hypothetical system.

10 I'm happy to discuss the '903 patent and
11 my opinions in my declaration, of course.

12 Q Well, I guess I'll ask again.

13 For this claim that we're looking at, I
14 just want to know what it means.

15 And so you're saying you're unable to tell
16 me what it means?

17 A That is absolutely not what I said.

18 MR. ANDERSON: Objection. Form.

19 Q Okay. So can you tell me what it means?

20 MR. ANDERSON: Objection. Form.

21 A You need to be more -- I -- what does it
22 mean? I mean, I don't know how to interpret that

1 other than you're asking me to do claim
2 construction on something.

3 It's -- it means what it says.

4 And, as I said, a person of ordinary skill
5 in the art would understand whether specific
6 examples of systems would fall within the
7 boundaries of this.

8 So it sounds like you're asking me to
9 define the -- the boundaries or the limitations of
10 what this means. My understanding is that's the
11 purpose of claim construction. I was not asked to
12 provide opinions on claim construction.

13 But when you just say, "What does this
14 mean," that's such an open-ended question, I don't
15 know really what you're asking; but I'm happy to
16 discuss this -- this claim.

17 Q Okay. So let me -- let me approach it
18 from another way just because it seems like we're
19 talking past each other maybe a little bit.

20 Okay. So there is an alias name -- for
21 example, wr1.example.com -- and, presumably, in
22 the claim, that alias name is included in a

1 request from a client machine for a particular
2 resource; is that fair?

3 MR. ANDERSON: Objection. Form.

4 A The claim term doesn't use the wording you
5 used in your question.

6 It says that requests for the first
7 resource from the client machines are directed to
8 the at least one shared repeater server based, at
9 least in part, on said first alias name.

10 If I remember your question accurately,
11 you said something -- you said something a little
12 different from that.

13 Q Okay. I will -- I'll ask it a little bit
14 differently.

15 There is a first alias name recited in
16 this claim term. Does this claim refer to using
17 that first alias name to identify the at least one
18 shared repeater server?

19 MR. ANDERSON: Objection. Form.

20 A As I said before, this claim element 1.d
21 says that -- it says, "requests for the first
22 resource from said client machines are directed to

1 the at least one shared repeater server based, at
2 least in part, on said first alias name."

3 I think you -- in your question you don't
4 include the "at least in part on" portion of this
5 claim language.

6 Q Okay. So does this claim refer to at
7 least using the first alias name to identify the
8 at least one shared repeater server?

9 A Can -- let's see. I want to make sure I
10 answer this accurately, so can you please repeat
11 the question? I'm not sure I followed every word
12 in the question.

13 Q Sure. Does this portion of the claim
14 refer to using the first alias name, maybe with
15 other information, to identify the at least one
16 shared repeater server?

17 MR. ANDERSON: Objection. Form.

18 A It says that it's directed to the at least
19 one shared repeater server. I think you said
20 identified, but this doesn't say identified in
21 this claim. It said that the requests are
22 directed to the at least one shared repeater

1 server based at least in part on said first alias
2 name.

3 Q So to direct a request to the at least one
4 shared repeater server, does that at least one
5 shared repeater server need to be identified?

6 A I mean, it needs to be directed. There --
7 it needs to be directed to the shared repeater
8 server based, at least in part, on the alias name.

9 So the decision to direct it to that
10 repeater server has to be based, at least in part,
11 on the first alias name.

12 Q Right. And so that decision includes
13 identifying the repeater server based, at least in
14 part, on the first alias name; right?

15 MR. ANDERSON: Objection. Form.

16 A I believe that's the question you asked me
17 previously, so I'll refer to my same answer to
18 that question.

19 Q Was that a "yes" then?

20 MR. ANDERSON: Objection. Form.

21 A No. My answer wasn't a yes. It's what I
22 said previously. So I refer to my same answer to

1 that same question.

2 Q Can you remind me of your answer?

3 A Sorry. I mean, I didn't write down my
4 answer, so I can't reproduce it word from word,
5 but I think it's in the transcript. So we can
6 refer to that.

7 Q Okay. So I'll ask one more time and you
8 can say "I refer to my previous answer," I
9 suppose.

10 But are you saying it's possible to direct
11 a request to the at least one shared repeater
12 server without identifying the at least one shared
13 repeater server first?

14 MR. ANDERSON: Objection. Form.

15 A You -- I mean, it just needs to be
16 directed to the at least one shared repeater
17 server based at least on -- in part on the said
18 first alias name.

19 I -- in my declaration, I go on to
20 describe examples of this happening in the Kenner
21 reference.

22 Q Okay. So, for example, if we have -- like

1 we had in Column 9, repeaters 1, 2, and 3, and a
2 system receives wr1.example.com, there's still an
3 identification of repeater 1 based on that first
4 alias name; right?

5 MR. ANDERSON: Objection. Form.

6 A Sorry. Are you referring to Column 9 in
7 the specification or are you referring to
8 particular claims?

9 Q The examples are from Column 9, and I'm
10 just trying to use the specification to help
11 understand what the claims are saying.

12 So I'll ask it again. In Column 9 we have
13 wr1.example.com, and Column 9 also describes three
14 potential repeaters.

15 When the system receives wr1.example.com,
16 it identifies repeater 1; correct?

17 MR. ANDERSON: Objection. Form.

18 A So the first alias name -- so we were
19 talking about claim element 1.d. so your question
20 is -- I assume you're asking about that same claim
21 element; is that correct?

22 Q That's correct.

1 A Okay. Well, this claim element says
2 that -- that when you have a request for this
3 first resource with a particular alias name, the
4 request is for a resource is a video. It's --
5 it's -- or -- or something like a video, and
6 the -- and the -- the client machine -- sorry.

7 Rather, the at least one shared repeater
8 server, the request gets directed there, and that
9 has to be at least, in part, based on the first
10 alias name. I mean, that's what's described here
11 in claim 1.d.

12 Column 9 is not specific to this. There
13 are many claims, and this is not -- I mean, this
14 is -- this claim element is discussing a specific
15 aspect of Claim 1.

16 Q Okay. Can you turn to Claim 2?

17 A Okay.

18 Q So what does it mean for the at least one
19 shared repeater server to be addressable using the
20 first alias name?

21 MR. ANDERSON: Objection. Form.

22 A So a -- some type of -- when the user is

1 requesting some resource like a video, there is
2 a -- some type of URL that is constructed, and
3 this is referring to -- the first alias name is --
4 is a part of that URL, and that is used to -- and
5 the -- the request ultimately goes to that -- that
6 at least one shared repeater server based upon
7 that first alias name, at least that part. So I
8 discuss this in my declaration.

9 Q All right. And in your declaration it's
10 discussed with reference to Kenner again; right?

11 A Well, my -- my declaration is discussing
12 the grounds for why Claim 2 is obvious in light of
13 Kenner.

14 Q So did you analyze Claim 2 with reference
15 to the content in Column 9?

16 A I -- yes.

17 MR. ANDERSON: Objection. Form.

18 A I analyzed the entire '903 patent. That
19 was something I did in order to understand the
20 claims and the -- and the Kenner reference renders
21 those claims obvious, including the information in
22 Column 9 of the '903 patent.

1 Q Okay. And so in Column 9, like we talked
2 about, there's an example of an alias name that
3 could be wr1.example.com.

4 What does it mean for a -- for the at
5 least one shared repeater server to be addressable
6 using that alias name?

7 A Well, as I said, the -- I discuss this in
8 my declaration in paragraphs 97 and 98, and it's
9 the first alias name and the second alias names
10 can be included in a -- in a URL, and that
11 those -- including that name, along with other
12 information about the resource that you're
13 requesting causes the at least one shared repeater
14 server to be the -- the request ends up being
15 directed there ultimately to provide the content.
16 There's an association, in other words, with it,
17 and with the virtual -- that first alias name and
18 the shared repeater server.

19 Q Can an alias name identify a group of
20 repeater servers?

21 MR. ANDERSON: Objection. Form.

22 A Sorry. Is there a part of my declaration

1 that you're referring to or the patent? I know
2 that the '903 patent discusses an alias name
3 referring to a particular repeater server.

4 Q So there's no portion in your declaration
5 that I'm referring to, but -- so it's your
6 recollection that the '903 patent does not
7 describe an alias name referring to a group of
8 repeaters; is that right?

9 MR. ANDERSON: Objection. Form.

10 A So, unfortunately, I have to go back and
11 reread the patent to see whether it discusses
12 that. I don't remember off the top of my head. I
13 know that it discuss as alias being used to --
14 being used to identify a particular repeater, as
15 I -- that's -- that's what I recall. It
16 definitely discusses that.

17 I don't -- I can't tell you that it
18 definitely doesn't discuss it, referring to
19 multiple repeater servers, without going back and
20 rereading the patent. I'd be happy to do that,
21 but I would take some time.

22 Q Yeah. Let's just limit -- limit it then.

1 So how about in Column 9 and Column 10.
2 Those two columns don't talk about an alias name
3 referring to a group of repeater servers. Is that
4 fair?

5 MR. ANDERSON: Objection. Form.

6 A Well, I'm going to have to spend some time
7 reading those two columns to answer that question
8 as you posed it. I can do that, but it's going to
9 take some time.

10 Q Please. Go ahead.

11 MR. ANDERSON: Looks like we're past
12 another hour. Do you want to take a break soon?

13 MR. TANG: Yeah. Sure. After the
14 question, we'll take a break.

15 A So as you phrased the question, I don't
16 see explicit text in Columns 9 or 10 that talk
17 about mapping an alias to multiple repeaters, but
18 what I will mention is -- and it definitely talks
19 about it identifying a repeater.

20 One thing that comes to mind, though, is
21 it is common when you're delivering web content to
22 use some type of load balancer to where you -- if

1 you think you're talking to, say, an origin
2 server, you have maybe even a specific IP address
3 that you're sending your request to, and there
4 could be a set of machines sitting behind a load
5 balancer that could send things -- direct them to
6 one of a set of different things.

7 So I'm just mentioning that as -- you
8 know, that is not discussed here but the patent
9 does cite a number of -- it talks about load
10 balancing and there -- it cites a number of papers
11 that discuss load balancers, so...

12 But what is discussed here explicitly is
13 that it goes to a repeater, conceivably this
14 could -- process of mapping an alias name to a
15 particular repeater could go through a couple of
16 hierarchical steps where at some point along the
17 way you narrow it down to a subset of repeaters
18 and then ultimately choose one of them that a
19 person of skill in the art would probably -- would
20 be familiar with that type of thing, but these
21 sorts of details are not discussed explicitly in
22 Columns 9 and 10.

1 Q Okay. Well, I think this is probably a
2 good place for a break, then.

3 MR. TANG: I guess, how are you all
4 feeling? Did you want to take a shorter break and
5 push through, or do you want to take a longer
6 break?

7 MR. ANDERSON: How long do you expect it
8 to go after the break? Is there a good amount to
9 go?

10 MR. TANG: Yes. That's going to depend.

11 THE REPORTER: Counsel, do you want to go
12 off the record for this discussion?

13 MR. TANG: Sure. That sounds good. Thank
14 you.

15 (A discussion was held off the record.)

16 (A recess was taken.)

17 MR. TANG: We'll go back on the record,
18 then.

19 BY MR. TANG:

20 Q All right. Dr. Mowry, welcome back.

21 During that break did you have any
22 conversations with anyone regarding the contents

1 of your deposition testimony?

2 A No, I didn't speak with anyone during the
3 break.

4 Q All right. Okay. So I'd like to turn
5 back to Claim 1 of the '903 patent.

6 And I'd like to talk about the term "at
7 least one shared repeater server," specifically,
8 from about line 18.

9 A Okay.

10 Q Okay. Are you familiar with the term
11 "antecedent basis"?

12 A I'm not sure. That sounds like a legal
13 term to me. I'm not sure what that means.

14 Q Sure. I can explain it to you.

15 So it's this concept that when you're
16 reading a claim, if you see the word "the" or
17 "said," it's referring to the same noun that was
18 previously introduced in the claim.

19 Are you familiar with that concept?

20 A I think so.

21 Q Okay. And do you recall interpreting
22 Claim 1 with that in mind?

1 A I mean, I believe that's consistent with
2 how I've interpreted the claims, yes.

3 Q All right. So I guess, moving down, like,
4 we can look at lines 35 through 37, which we
5 looked at previously.

6 And in that passage, it says, "the
7 requests are directed to the at least one shared
8 repeater server."

9 Do you see that?

10 A Yes, I see that.

11 Q Right.

12 And so the "repeater server" referenced in
13 that passage is the same one as in line 18; right?

14 MR. ANDERSON: Objection. Form.

15 A So can you -- sorry, I was -- I was
16 reading Claim 1 to try to answer your question
17 accurately.

18 Can you please repeat the question?

19 Q Sure.

20 So looking at lines 35 through 37, there's
21 a reference to "the at least one shared repeater
22 server."

1 Is it your interpretation that that's
2 referring to the same "repeater server" as recited
3 in line 18?

4 A Well, there is some subtlety here.

5 The first -- around line 18, it's
6 discussing this structure where you have repeater
7 servers, at least one of them, and it talks about
8 how they can -- they replicate resources.

9 And it's discussing some of their features
10 and that they can provide content from a plurality
11 of content providers.

12 When we get down to the part at line 35,
13 it's talking about "requests for a resource." And
14 it says that they are directed to -- it says, "the
15 at least one shared repeater server based, at
16 least in part, on said first alias name."

17 And this section is discussing that
18 requests for resources are directed to -- the
19 system has shared repeater servers. And it's
20 directed to them, at least part, based on a first
21 alias name.

22 So in your question, you said, "Is it the

1 same one?" And the answer would be, it depends on
2 what the resource is, not -- it wouldn't make
3 sense to say -- you can interpret -- I think if I
4 take your phrasing of your question literally, I'm
5 not sure that the system works.

6 Because, if the -- and it's possible
7 there's a typo here, to be honest, because if I --
8 if I read it literally saying that, when it talks
9 about the -- "the same shared repeater server,"
10 that, to me, suggests that all requests for
11 content for all resources go to just a single
12 repeater server out of this entire system.

13 That -- that's not the -- my understand --
14 that's not the point of these two sections. That
15 first part at line 18 is discussing that there's a
16 set of these repeater servers and they provide
17 multiple content for multiple content providers.

18 And then starting at line 35, it's
19 discussing that it's based, at least in part, on
20 the alias name, a request for resource goes to the
21 corresponding shared repeater server.

22 So to -- to get back to your question, the

1 answer, I think, is not necessarily. It may refer
2 to -- I don't think this was written to say
3 that -- that the part at line 35 is singling out
4 that all -- all requests for content go to one and
5 only one of the shared repeater servers. I don't
6 think that that makes sense.

7 Q Right.

8 So looking at line 35 to 37, it's the
9 requests that include the first alias name are
10 directed to that at least one shared repeater
11 server; right?

12 MR. ANDERSON: Objection. Form.

13 A Sorry, can you repeat the question?

14 Q Sure.

15 I think I agree with you that not all
16 requests for content go to one shared repeater
17 server.

18 But the requests that include the first
19 alias name are directed to that one shared
20 repeater server; right?

21 A I don't think that -- I don't think you're
22 quoting this -- this claim element correctly.

1 There's -- it's discussing a first --
2 there's a first resource, and it's being
3 discussed. And it has an alias name, but I think
4 you reworded the claim -- the claim element. I
5 don't think that your question -- as I recall it,
6 I think it -- I don't think it's accurately
7 describing what this claim element says.

8 Q Okay. So the claim says, "requests for
9 the first resource from said client machines are
10 directed to the at least one shared repeater
11 server based, at least in part, on said first
12 alias name."

13 Did I read that correctly?

14 A Yes. You read that correctly, I think,
15 yes.

16 Q And it's your position that "the at least
17 one shared repeater server" is different than the
18 "at least one shared repeater server" recited in
19 line 18?

20 MR. ANDERSON: Objection. Form.

21 A That's -- that's not what I said. I
22 didn't say it's different.

1 I said that it may or may not; that the --
2 the first claim element, it begins at line 18,
3 from line 18 to line 24 is describing that there
4 is a set of shared repeater servers and -- and
5 that they provide content for multiple content
6 providers.

7 And the part that begins at line 35, what
8 it's describing is that, based on -- for -- for a
9 request, which they're labeling a request for a
10 first resource -- that request for a first
11 resource, that -- that request has an alias name
12 in it. And based, at least in part, on that, that
13 is directed to a shared repeater server.

14 And so it -- they're -- it would not make
15 sense to say, among the set of repeater servers,
16 that requests always go to just one of them.

17 So, as I understand the phrasing of your
18 question, I don't think that that -- that is --
19 would make sense.

20 In the request for the first resource
21 contains an alias name, it ends up going to one of
22 the set of shared repeater servers, the one that

1 is -- that has this association with this alias
2 name.

3 Q Okay. Sorry, was that the end of your
4 answer? Did you have more?

5 A Yes, that's the end of my answer.

6 Q Okay. So how about we look at lines 33
7 and 34, then.

8 And here it says, "said first alias name
9 being associated with said at least one shared
10 repeater server."

11 Is that the same repeater server as in
12 line 18?

13 MR. ANDERSON: Objection. Form.

14 A Sorry. Can you repeat the question,
15 please?

16 Q Sure.

17 So in line 34, it says, "said at least one
18 shared repeater server."

19 Is that the same "at least one shared
20 repeater server" recited in line 18?

21 MR. ANDERSON: Objection. Form.

22 A So that -- I think the, you know, claim

1 language is written in a kind of particular style,
2 which is not necessarily the way that a technical
3 person would write something.

4 But when, in this clause, this -- or
5 whatever, claim element, that begins at line 31
6 through 34, what it's talking about is that
7 there's a resource; and the resource is from a
8 content provider.

9 And it has an alias out of a set of alias
10 names and that that alias points you to a shared
11 repeater server. So that -- that's the point of
12 this clause.

13 You're trying to add -- like you're
14 asking, does -- is this -- you know, there's a
15 clause at the beginning, beginning at line 18, is
16 what I said before. There's a set of these shared
17 repeater servers.

18 The point of the clause is -- beginning at
19 line 31, is that this -- this alias name is
20 associated with one of that set of repeater
21 servers.

22 So you're saying, Is it the same one? I

1 mean, it -- that question doesn't really make
2 sense to me. It's one of them.

3 So if you want to single out one of them
4 in the earlier clause, it may or may not be that
5 arbitrary one that we want to choose; but it's one
6 of them within the set.

7 So there will be some alias names where it
8 would be a particular one, but each alias name is
9 associated with some -- one of the shared repeater
10 servers.

11 Q So I want to make sure I heard your
12 interpretation correctly.

13 Are you saying that in line 18 there could
14 be multiple shared repeater servers; and then, for
15 example, in line 34, it's identifying a specific
16 shared repeater server from that subset -- I'm
17 sorry -- from that set?

18 MR. ANDERSON: Objection. Form.

19 A The claim element that begins at line 18
20 says there's at least one shared repeater server.
21 So at least one means one or more than one.

22 So I believe in the question you asked me

1 whether there's multiple. I don't recall exactly
2 what I said in my previous answer to be honest,
3 but this system is -- this claim element says at
4 least one. So it's one or more.

5 If there's only one, then the claim
6 element that begins with -- at line 31 -- well, if
7 there's only one of them, then if it points to one
8 of them, it would point to that specific one. If
9 there's more than one, in any event, it's pointing
10 to one of them. But I mean, to be honest, this --
11 yeah, I -- yeah, that -- they seem like kind of
12 word games to me in terms of the phrasing of these
13 questions, but I'm trying to, like, reconcile your
14 questions with what makes sense to a technical
15 expert.

16 Q Okay. So let me maybe ask it this way.

17 So we have at least one shared repeater
18 server in line 18. We have that again in line 34,
19 and then we have that again in lines 36 through
20 37.

21 Did you interpret all three of those
22 instances to refer to the same thing?

1 MR. ANDERSON: Objection. Form.

2 A I believe I've answered this question
3 already, which is that these things are describing
4 different aspects of the system, and if you say
5 that it's -- if there's -- if there's -- if the
6 first part at line 18 says -- it says at least
7 one. Let's say there's more than one, then the
8 later parts are -- the later claim elements there,
9 like, at -- starting at line 31.

10 And starting at line 35, they're
11 describing specific aspects of this -- this
12 system, and it -- as I said before, for example,
13 in the part beginning at line 35, it's saying that
14 based at least in part on the first alias name
15 for -- that's associated with this first request,
16 that that is what directs you to a shared repeater
17 server.

18 Now, which one it directs you to depends
19 on the alias name. So if you -- if I -- as you're
20 phrasing the question, it sounds like you're
21 saying that it would only send it to one of them
22 out of a set of them, and that would be a strange

1 way to -- to think about how the system works. It
2 wouldn't make sense for requests to go only to one
3 of them, but I mean this -- this feels like
4 it's -- anyway.

5 So, I mean, I interpret these things as
6 they -- as they make sense. So I think I've
7 already answered this question, but let's see.

8 Yeah, I mean, the question doesn't really
9 make sense, in my opinion.

10 Q Okay. So we have, for example, at least
11 one shared repeater server in claim -- in line 18.
12 If that's two shared repeater servers, do you
13 interpret line 34 to refer to both of those two
14 shared repeater servers?

15 MR. ANDERSON: Objection. Form.

16 A Well, as you phrased the question, it
17 sounds like what you're asking is can an alias
18 refer to -- in your hypothetical scenario, if
19 there were two shared repeater servers -- servers,
20 does a specific alias refer to two repeater
21 services -- sorry -- is it associated with
22 multiple repeater servers? And it refers to one

1 of them. It doesn't refer to both of them at the
2 same time.

3 But it depends on the resource. So
4 that -- I mean, the -- it depends on the alias
5 name. So alias names are associated with a
6 repeater server. So it doesn't refer to all of
7 the repeater services -- servers. It refers to
8 whichever one it's associated with in line 34.

9 Q Okay. So I'd like to turn to your
10 declaration. And let's look at paragraph 69.

11 A Do you know what page of the PDF that's
12 on?

13 Q Yeah. So it's 38, and then PDF page 39.

14 A Okay.

15 Q Okay. So I believe it's your position
16 that you've been -- you mapped Kenner's primary IM
17 to the claimed at least one shared repeater
18 server; is that correct?

19 MR. ANDERSON: Objection. Form.

20 A Well, as I say at the beginning of
21 paragraph 69, there Kenner has a network of IMs
22 from the perspective of a particular user.

1 There's one that is their primary IM, the -- so
2 which one is your primary IM depends on where --
3 you know, where the user is in the system. So a
4 primary IM is one of a set of IMs.

5 Q Okay. So -- excuse me.

6 So are you relying on Kenner's primary IM
7 to teach the claimed at least one shared repeater
8 server?

9 A Well, there are -- Kenner discloses a
10 network of IMs. There are many IMs, and the one
11 that is primary is the one that is closest to a
12 particular client, and so they're all -- each of
13 the IMs can be -- is -- functions as a primary IM
14 for its nearby users or clients.

15 I do talk about the primary IM. It's
16 described the function -- it's -- in its role as a
17 primary IM, it has certain functionality that I
18 describe. So I'm discussing the network of IMs
19 and I'm also discussing the role of a primary IM
20 for a request.

21 Q Okay. So looking at Claim 1, lines 33 and
22 34, we have said first alias name being associated

1 with said at least one shared repeater server.

2 Is it your interpretation that that means
3 that there needs to be a first alias name
4 identifying the primary IM 64?

5 A Well, in Kenner there is -- there are
6 alias names that would identify the primary IM.
7 The video ID, as I described, is used to -- is
8 used to direct requests to the primary IM as -- as
9 I discuss in my declaration, assuming that it
10 mapped -- it's associated with that primary IM.

11 Q Okay. So in what you said then, for
12 example, in lines 36 to 37, directed to the at
13 least one shared repeater server, you're saying
14 that refers to directing a request to the primary
15 IM; is that right?

16 MR. ANDERSON: Objection. Form.

17 A Sorry. Can you repeat the question?

18 Q Sure. So I'm looking at Claim 1 again,
19 lines 36 through 37, and my question is, again, it
20 says "the at least one shared repeater server" in
21 those lines.

22 Are you mapping Kenner's primary IM to

1 that instance of the at least one shared repeater
2 server?

3 A Yes. I mean, I'm using that in the --
4 now, as I said before, Kenner has a network of
5 IMs. Each IM functions as a primary IM for the --
6 the clients that are -- that are in its region
7 that are close to it. So -- but in the -- in
8 Kenner, as when it's in its primary IM role, it is
9 functioning as the shared repeater server for
10 particular content.

11 And so as I'm discussing this claim
12 element, I am referring to the -- to the primary
13 IM role of an IM.

14 Q Okay. I'd like to turn to Kenner now
15 specifically, if you have that available.

16 A Okay.

17 Q And specifically turning to page 36.

18 A Is that 36 on the page or 36 in the PDF?

19 Q 36 on the page. 38 in the PDF.

20 A Okay.

21 Q Okay. So I'd like to move to line 19. If
22 you'd like to read that paragraph to yourself.

1 A Okay.

2 Q Okay. So in this passage it's saying that
3 if the local SRU does not already store a desired
4 clip, it passes the video ID to the PIM 64; is
5 that correct?

6 A Yes, that's correct.

7 Q Okay. And in passing the video ID, the
8 local SRU 51 doesn't use the content of the video
9 ID to identify PIM 64; is that correct?

10 MR. ANDERSON: Objection. Form.

11 A Can you say that again, please? Can you
12 repeat the question?

13 Q Sure. The local SRU 51 doesn't use the
14 content of the video ID to identify PIM 64; right?

15 A Well, in this particular step that's being
16 described here it's sending the request on to the
17 PIM, and from there it will determine whether it
18 needs to access -- yeah. It will figure out where
19 the content is actually available.

20 It is only invoking -- it's only
21 accessing -- sorry.

22 It's only passing this on to the PIM

1 because there was an embedded URL that included
2 video ID. So the fact that the embedded URL
3 actually had a video ID in it is what triggers it
4 to send on this request to the PIM.

5 (Interrupted Internet connection.)

6 (A discussion was held off the record.)

7 MR. ANDERSON: Go off record until he
8 returns.

9 MR. TANG: Sorry. I will repeat the
10 question then.

11 BY MR. TANG:

12 Q Okay. Apologies for making you have to
13 answer this again.

14 MR. ANDERSON: Are we back on the record?

15 THE REPORTER: Yes.

16 MR. TANG: Okay.

17 Q So the local SRU 51 doesn't use the
18 content of the video ID to identify --

19 A Did his feed freeze? It paused in the
20 middle of the sentence. It looks like his video
21 is frozen.

22 REMOTE TECHNICIAN: It looks like there's

1 some technical issues going on. Let me see.

2 (A discussion was held off the record.)

3 MR. TANG: Very sorry.

4 (A discussion was held off the record.)

5 MR. TANG: Okay. I guess we're back on
6 the record I see.

7 THE REPORTER: Go ahead.

8 BY MR. TANG:

9 Q So does -- the local SRU 51, it doesn't
10 use the content of the video ID to identify PIM
11 64; is that correct?

12 A Well, the local SRU 51 would know which of
13 the IMs was its primary IM.

14 The fact that it's sending this request to
15 its -- to its PIM is triggered by the fact that
16 there was a URL that contained a video ID. So in
17 this embed field of a web page, the -- but it
18 knows which of the IMs is its PIM.

19 MR. ANDERSON: Mr. Tang, are you frozen
20 again?

21 (Interrupted Internet connection.)

22 MR. TANG: Hi, this is Tim Tang.

1 REMOTE TECHNICIAN: We hear you.

2 MR. TANG: Can you hear me okay?

3 (A discussion was held off the record.)

4 MR. TANG: I see the transcript is going;
5 so I guess we can back on the record.

6 REMOTE TECHNICIAN: Sure.

7 BY MR. TANG:

8 Q Okay. So I'm very sorry about this.

9 But I'll ask the question again.

10 The local SRU does not use the content of
11 the video ID to identify PIM 64; is that correct?

12 A Well, the local SRU, in what's being
13 discussed here, it starts by sending a request on
14 to the IM that is its primary IM so that it can
15 see whether or not it can -- has the content to
16 respond to the request. And each of the IMs can
17 act in the role of PIM.

18 So, at this point, the fact that it's
19 passing on the request from local SRU 51 to PIM
20 64, that is triggered because a video ID appeared
21 in -- as an embedded URL on a web page.

22 So it is due to the existence of that

1 video ID that this part gets triggered. And this
2 is the beginning of a process that will ultimately
3 result in determining which of the IMs in its PIM
4 role will -- and which of the IMs will provide the
5 content to the client.

6 Q Okay. So I'd like to turn to page 37,
7 then, of Kenner and specifically looking at
8 line -- starting at line 7 all the way through 17.

9 If you'd like to take a look at that
10 paragraph.

11 A Okay.

12 Q So is this saying that even if a desired
13 clip was located, the video ID is still passed to
14 PIM 64?

15 A So, yes, if the -- if the clip is located
16 on the local SRU -- in this -- they're talking
17 about a preferred embodiment here.

18 And they say in this embodiment, if you do
19 find it in the local SRU 51, then a request is
20 sent to the PIM 64 that indicates the particular
21 version of the file that was located on the local
22 SRU.

1 Q Okay. So regardless of whether or not the
2 desired clip was found by local SRU 51, the video
3 ID is always passed to PIM 64; correct?

4 A That's what's described in this paragraph,
5 yes.

6 Q Okay. And does Kenner describe
7 Terminal 50 or local SRU 51 sending the video ID
8 to any other IMs?

9 A Well, I'm not sure if this is what you're
10 asking, but every IM in the system is a primary IM
11 for its nearby clients. So every IM will receive
12 a video ID from whatever clients are nearby.

13 So I'm not -- again, I'm not sure if
14 that's what you're asking, but every IM in the
15 system with nearby clients will receive requests
16 with video IDs, presumably.

17 Q Yeah. So let's look at Figure 4, for
18 example, which I believe is on the same page that
19 we're looking at in your declaration.

20 Do you see Figure 4?

21 A Okay. Which page of my declaration were
22 you referring to?

1 Q Page 38.

2 A Okay.

3 Q Okay. And I think you said that
4 Terminal 50, for example, it has a primary IM 64;
5 correct?

6 A Yes. That's how that part of the figure
7 is illustrated, yes.

8 Q And so Terminal 50 never sends a request,
9 for example, to IM 88; is that right?

10 A So IM 88 may provide content as a -- to
11 the client at Terminal 50 if the PIM doesn't have
12 it and if the PIM determines that it -- that IM
13 would be a good source of that content.

14 In the step that you pointed me to
15 earlier, this process begins by the local SRU 51
16 sending a message to PIM 64. That's what begins
17 the process of locating the content.

18 And as I mentioned earlier, all of the
19 IMs -- these -- this is a symmetrical system where
20 the -- each IM, it serves a role of PIM for --
21 primary IM for any clients that are nearby and,
22 for that matter, in, you know, IM 90, which is a

1 web server, IMs also act as origin servers if
2 there are content providers that are uploading
3 content into them.

4 Q Okay. And I think I heard you say PIM 64
5 is Terminal 50's primary IM because it is nearby;
6 is that accurate?

7 MR. ANDERSON: Objection. Form.

8 A Well, the system has -- I'd have to go
9 back through Kenner to look up the part that
10 describes exactly how there's an association
11 between the PIM and a user.

12 The -- conceptually, it is attractive to
13 have the PIM be closer rather than further away.
14 But the system assigns a primary IM to each
15 client.

16 So shouldn't read too much into when I
17 said it was nearby, but that's -- that's generally
18 a desirable feature, is to have the -- it would be
19 desirable to have the PIM be not too far away in
20 terms of communication latency with the client.

21 Q Okay. And so, right, like, due to this
22 assignment, for example, PIM 64 to Terminal 50,

1 PIM 64 services all the requests on behalf of
2 Terminal 50; is that fair?

3 A I would not characterize it that way.

4 You said, "services all of the requests."

5 This is a -- a distributed network of a
6 content serve -- I mean, all of the IMs can
7 provide content to respond to requests. The --
8 it's -- it's a distributed system where it begins
9 by a client will communicate first to its PIM.

10 But I've described in my declaration,
11 Kenner then determines, using its databases,
12 whether it actually has the content that the
13 client is looking for, and if it does not, then it
14 determines which IMs can provide that content.

15 So I wouldn't characterize it as
16 servicing. It's not servicing the request in its
17 entirety. It will service a request if it
18 actually has the desired resource that the user
19 wants to access.

20 Q And if, like, PIM 64 doesn't have that
21 resource, it reaches out to another IM like IM 88
22 to retrieve that; is that right?

1 A Yes. It will consult -- it will look in
2 its databases and figure out if there's a good set
3 of -- if there are other near -- hopefully
4 nearby -- but other IMs that can provide the
5 content. For example, the content coordinate
6 information in the clip database is used -- is one
7 way that it determines which other IMs would be
8 good candidates for -- that -- which other IMs
9 potentially have the type of content that you're
10 looking for.

11 And that coordinate --

12 Q Okay. And so --

13 A -- content coordinate data --

14 Q Sorry, go ahead.

15 A Oh, and that content coordinate data is in
16 the video ID. It's part of the alias name.

17 Q Right.

18 And so, like you said, the video ID
19 includes content coordinate data.

20 Does the video ID include an identifier of
21 PIM 64?

22 A Yes, because, for example, when a client

1 on another node, for example -- hold on here.

2 Shoot. I lost track of the -- okay.

3 So when a client in another part of the
4 Internet wants to access content, then, based on
5 the content coordinate data in its video ID, it
6 would indicate that PIM 64 would be the
7 appropriate IM to send its request to.

8 So video IDs do -- are used -- do have an
9 association with -- with repeaters, servers, which
10 in Kenner terminology are IMs.

11 Q So if I can turn you back to Kenner on
12 page 37. And looking at that paragraph starting
13 in line 7, this paragraph talks about a virtual
14 URL.

15 Do you see that?

16 A I see that, yes.

17 Q And this says that the virtual URL
18 includes the Internet address of the PIM 64.

19 Do you see that?

20 A Yes.

21 Q And so what does that mean?

22 MR. ANDERSON: Objection. Form.

1 A I mean, it means what it says. I'm not
2 sure what you mean beyond that.

3 Q Does the virtual URL identify PIM 64?

4 A Well, what the sentence says -- and this
5 is -- it says this is a -- one of -- this is a
6 preferred embodiment.

7 But in this one it says, the virtual URL
8 is constructed in the form http:// plus the
9 Internet address of the PIM 64 plus other things
10 like user, subscriber ID number, and the video ID.

11 So this virtual URL includes the Internet
12 address of PIM 64 plus other things.

13 Q So does the Internet address of PIM 64
14 identify PIM 64?

15 A That question's a little confusing.

16 I mean, the Internet address of PIM 64 is
17 one way to talk to PIM 64.

18 Q So how -- you mentioned it's one way to
19 talk to PIM 64.

20 So does local SRU 51 know how to talk to
21 PIM 64 because of the Internet address of PIM 64?

22 A Well, earlier on the previous page, it

1 talked about the fact that local SRU 51 passes the
2 video ID on to PIM 64. There are a variety of
3 ways that the local SRU can know which -- which IM
4 it should communicate with.

5 It's in that page 37, starting in line 37,
6 this part that we were just talking about, there
7 it's including the, presumably, IP address of PIM
8 64 in the URL.

9 But that doesn't necessarily mean that's
10 the only way that local SRU 51 knows which of the
11 IMs is serving the role of its PIM.

12 Q Okay. Can we turn to page 36 of Kenner.
13 I think you might be looking at that already.

14 A Okay.

15 Q And I'm interested in -- yep -- line 28,
16 where it starts, "The video ID consists of"?

17 A Okay. I see that.

18 Q Okay. And it says here the term content
19 characterization coordinates.

20 Can you tell me what that means?

21 A Well, in the following paragraph it goes
22 on to provide some more detail of what's in the

1 video ID. It says that there's a text name of the
2 file. There's the content account, the content
3 provider's account number. There is a category
4 coordinate, which I mentioned earlier. This is a
5 representation of the -- it's like a taxonomy of
6 the type of information, like, for example, sports
7 news or something like that.

8 And it says the geographic coordinate used
9 to determine where the file is relevant, like
10 city, state, a time stamp, and a time period over
11 which the file is relevant. So those -- those are
12 examples. It says that's in one embodiment. So
13 those are examples of the types of things that are
14 in the video ID.

15 So when it says a multidimensional set of
16 content characterization coordinates, I think it's
17 referring to all of those things beyond just the
18 file name.

19 Q So how does PIM 64 use content coordinate?

20 MR. ANDERSON: Objection. Form.

21 A Well, that's a somewhat open-ended
22 question, but one -- one example of what the --

1 what an IM or PIM does with content coordinates
2 is, as I discuss in my declaration, if -- if the
3 PIM does not have a copy of -- an up-to-date copy
4 of a clip of the appropriate version and so on in
5 its extended SRUs, then it consults its clip
6 database and it -- well, it uses the content
7 coordinate information to identify other IMs that
8 might be suitable for providing the content.

9 So that's one way that the -- sorry.
10 Actually, I'm not sure if I -- I think you said
11 category coordinate; is that right?

12 Well, it uses the category coordinate to
13 determine which other IMs would be suitable
14 candidates for providing that content.

15 Q Okay. So the PIM uses content coordinates
16 or category coordinates to identify other IMs; is
17 that right?

18 MR. ANDERSON: Objection. Form.

19 A Well, that's -- as I just said, that's one
20 aspect of what it does with category coordinates.
21 They are a -- an IM uses a -- an IM -- when it
22 does -- when it has a request for information from

1 its local client or the client for which it serves
2 as a primary IM, it then -- and, again, all IMs
3 serve a role of -- can serve in this role of
4 primary IM.

5 So it uses it to determine which other IMs
6 can potentially provide video that it doesn't
7 have.

8 Now, from the perspective of Figure 4,
9 where we're looking at the -- the PIM 64, other
10 IMs will get requests for things that they don't
11 have and, like for example, IM 88, it serves a
12 role also of PIM for certain clients, and when
13 they request information that they don't have,
14 then IM 88 will use the category coordinates to
15 identify that, for example, PIM 64 is the
16 appropriate IM to request the data from.

17 So that's -- you know, like I said, that's
18 one aspect of how it uses the category
19 coordinates.

20 Q Okay. So, for example, Terminal 50
21 doesn't use a category coordinate or a content
22 coordinate to identify PIM 64; correct?

1 A Well, a particular client like
2 Terminal 50, the system is set up so that it --
3 the local SRU knows which of the IMs is serving
4 the role of its -- of its primary IM.

5 Q Sorry. Was there more to your answer?

6 A No. I was finished.

7 Q Right. And so, like you mentioned, the
8 local SRU knows which IM is the primary IM.

9 So Terminal 50 doesn't need to use the
10 content coordinate to identify its own PIM;
11 correct?

12 MR. ANDERSON: Objection. Form.

13 A Well, as I said, in the context of -- in
14 my discussion of mapping Kenner to the claims, I
15 am sometimes -- I'm referring to the PIM. And
16 when I'm referring to it in the context of it
17 being the repeater server that's providing
18 content, that's -- that's different from when it
19 initially gets the request from a local SRU just
20 saying that it has a request for something.

21 So the content coordinates are in the
22 video ID, and those get passed on to the PIM in

1 the initial phase of retrieving content. But if
2 it does not have the content itself, that gets
3 forwarded to another IM, which is the primary IM
4 for other clients. And so something ultimately --
5 whichever IM is sourcing the data, it -- the
6 content coordinates are used when -- when the --
7 say the PIM 64 gets a request from a client at
8 Terminal 50 and it doesn't have an appropriate
9 match in its extended SRU 66, then it uses the
10 content coordinates to identify which IM it should
11 retrieve the data from. From the perspective of
12 the clients near that other IM, say 88, it is --
13 that IM is also a primary IM.

14 So I'm not sure if it's what you're asking
15 about, but the content coordinates are used in
16 identifying which repeater server will provide
17 content.

18 Q Do the content coordinates identify a set
19 of IMs?

20 MR. ANDERSON: Objection. Form.

21 Counsel, looks like we're at another hour,
22 if you want to take a break soon.

1 MR. TANG: Sure. We can do that after a
2 couple more questions.

3 MR. ANDERSON: Sure.

4 A Can you repeat the question, please?

5 Q Sure. Do the content coordinates in
6 Kenner identify a set of IMs?

7 A Well, the content coordinate data is
8 when -- when -- say an IM does not have content,
9 it uses the content coordinate data to identify
10 IMs that are likely to have the clip, that might
11 be one or more than one, or even possibly zero,
12 other IMs.

13 Q Sorry. Give me one second. I'm looking
14 at page 38 of Kenner. And specifically I'm
15 looking at line 5, if you'd like to turn to that.

16 So in line 5, is this saying that there is
17 a database that maintains Internet addresses of
18 IMs and correlates those addresses with content
19 coordinates?

20 A Can you repeat the question, please?

21 Q Right. So in this passage is it saying
22 that there's a database that maintains Internet

1 addresses of IMs and correlates those addresses
2 with content coordinates?

3 A Well, it doesn't use the word "correlate."
4 It says that IMs contain a database that has
5 information -- some information about the other
6 IMs. It has the -- the Internet address of the
7 other IMs and the content coordinates of the
8 audio/video files that are maintained by those
9 other IMs.

10 MR. TANG: Okay. I think with that, I
11 think that might be a good place to take a break.

12 Did we want to go off the record?

13 THE REPORTER: Okay.

14 (A discussion was held off the record.)

15 (A recess was taken.)

16 MR. TANG: I guess we'll go back on the
17 record again.

18 BY MR. TANG:

19 Q Dr. Mowry, just to confirm, did you speak
20 to anybody during this break about the contents of
21 your deposition?

22 A No, I didn't speak with anyone.

1 Q All right. So I'd like to turn back to
2 page 37 of Kenner. And, again, looking at the
3 paragraph that starts on line 7.

4 A Okay.

5 Q Okay. And you see that Kenner described
6 the virtual URL; correct?

7 A It mentions a virtual URL, yes.

8 Q Okay. And then it also says at the
9 Internet address of PIM 64; right?

10 A Yes. It mentions that.

11 Q Okay. Is the virtual URL a host name?

12 A Well, in this paragraph it's saying that a
13 virtual URL contains a number of things, including
14 the Internet address of PIM 64, the user's
15 subscriber ID number, plus the video ID.

16 So it's a full -- it's a URL. It's not
17 merely a host name.

18 Q Would the Internet address of the PIM 64
19 be a host name?

20 MR. ANDERSON: Objection. Form.

21 A Well, sometimes -- I mean, more often than
22 not Internet address typically means IP address

1 and host name -- an IP address is a set of
2 numbers, and a host name is a textual string,
3 something like www.espn.com, but it's possible
4 that by Internet address they were speaking more
5 generally and maybe it is in the form of a host
6 name, but my assumption would be that this is an
7 IP address.

8 Well, that would be the most likely
9 interpretation of -- when it says Internet address
10 of PIM 64 is that an IP address.

11 Q Is the video ID a host name?

12 MR. ANDERSON: Objection. Form.

13 A Well, as we discussed earlier, there's a
14 section that discusses what's in a video ID,
15 that's the paragraph before -- before this.

16 A video ID consists of a number of
17 different pieces of information, so it's -- I
18 don't think one would normally characterize that
19 as being a host name, but it's something that's
20 used -- it's associated with -- it's associated
21 with a content provider -- with a content provider
22 and with a repeater in this implementation.

1 Q Is Kenner -- sorry. I'll start again.

2 Is Kenner's virtual URL an alias name?

3 MR. ANDERSON: Objection. Form.

4 A Well, in my analysis I am identifying the
5 video ID as the alias name in Kenner. The virtual
6 URL includes the video ID. Also, in the -- as I
7 recall in the '903 patent, the -- the alias, as
8 described in Columns 9 and 10, is not the full URL
9 for a resource. It's -- it's a portion of the
10 URL. It's not the entire URL. It would also
11 include more information.

12 Q So in your declaration I don't believe you
13 state that the virtual URL is an alias name. Is
14 that accurate?

15 MR. ANDERSON: Objection. Form.

16 A I'm going to need some time to go look
17 through my report.

18 Q And if it's helpful, I'm looking at page
19 43.

20 A Well, as I said before, the virtual URL
21 contains three things, and one of them is the
22 video ID, which I do identify as being an alias in

1 my analysis. So the virtual URL does contain the
2 alias along with other information.

3 And that's consistent with how it would be
4 used in the '903 patent because, for example, in
5 Column 9 -- like if we -- actually, just even
6 before I get there, in Column 8 in the '903
7 patent, it shows that when -- like at around
8 line 34 to 37, it talks about how, if you want --
9 in the implementation that does not use aliases,
10 then it has a URL that has HTTP and then the
11 repeater's host name, the server's host name, and
12 the path. And the path is the thing that actually
13 identifies the specific video from the server that
14 you're requesting.

15 And the point of the alias is that it's
16 a -- it's a replacement for the combination of the
17 repeater host name and server host name.

18 But it does not replace the path
19 information. For example, wr1.example.com, that
20 doesn't tell you which particular video you're
21 looking for from the example.com content provider.

22 That's more information that it would be

1 needed in the URL. So, as described in the '903
2 specification, these alias names are a portion of
3 the URL.

4 And that's exactly what is described in
5 Kenner where the virtual URL contains several
6 things, and a part of that is the alias.

7 Q Let me make sure I heard that correctly.

8 Is your position that the virtual URL
9 contains a video ID and, therefore, that makes the
10 URL itself an alias name; is that correct?

11 MR. ANDERSON: Objection.

12 A No. You mischaracterized what I just
13 said. I think I said it clearly a minute ago.

14 I said the -- the alias is the video ID.
15 And a virtual URL contains the alias along with
16 other information and that this is exactly
17 consistent with how aliases are used with URLs for
18 video files, as described in the '903 patent
19 specification.

20 Q Understood.

21 So you are not relying on Kenner's virtual
22 URL to be the claimed alias name; is that correct?

1 MR. ANDERSON: Objection. Form.

2 A The virtual URL, as I just said a few
3 times, contains the video ID.

4 So the video ID is the alias, and the
5 virtual URL contains that alias along with other
6 information. And this is exactly consistent with
7 how aliases are -- would be used in the -- are
8 used in the specification of the '903 patent.

9 Q So just to confirm, for example, in
10 paragraphs 79 and 80 of your declaration, you're
11 not referencing virtual URLs in those paragraphs;
12 correct?

13 MR. ANDERSON: Objection. Form.

14 A Well, as I said a minute ago, video IDs
15 are what I'm pointing to as aliases. The virtual
16 URLs contain the video IDs; so there's a portion
17 of the virtual URL that is an alias.

18 And that's exactly how the URLs in the
19 '903 specification make use of aliases. They
20 contain the alias plus other information that's
21 needed to specify the content that is being
22 requested.

1 MR. TANG: Well, I have no further
2 questions.

3 MR. ANDERSON: Let me just review my
4 notes. One second.

5 Yeah, no questions from me.

6 MR. TANG: All right. Well, thank you,
7 Dr. Mowry, for your time, then. I appreciate the
8 conversation.

9 THE WITNESS: Okay. Thank you.

10 MR. ANDERSON: Thank you.

11 And we'd like to request the rough draft
12 of the transcript, just to confirm. And we
13 reserve the right to have Dr. Mowry sign off on
14 the transcript as well.

15 THE REPORTER: Understood.

16 Did you want a final also, Mr. Anderson?

17 MR. ANDERSON: Yes, please.

18 (Off the record at 2:10 p.m.)
19
20
21
22

* * *

ACKNOWLEDGMENT OF DEPONENT

I, TODD C. MOWRY, Ph.D., do hereby
acknowledge that I have read and examined the
foregoing testimony, and the same is a true,
correct and complete transcription of the
testimony given by me, and any corrections appear
on the attached Errata sheet signed by me.

(DATE)

(SIGNATURE)

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2
3 I, Janet A. Hamilton, Certified Reporter
4 and Notary Public within and for the State of
5 Maryland do hereby certify:

6 That TODD C. MOWRY, Ph.D., the witness
7 whose deposition is hereinbefore set forth, was
8 duly sworn by me before the commencement of such
9 deposition and that such deposition was taken
10 before me and is a true record of the testimony
11 given by such witness.

12 I further certify that the adverse party,
13 Google, LLC, was represented by counsel at the
14 deposition.

15 I further certify that the deposition of
16 TODD C. MOWRY, Ph.D., occurred remotely via Zoom
17 videoconference on Tuesday, February 10, 2026,
18 commencing at 9:33 a.m. to 2:10 p.m. Eastern
19 Standard Time.

20 I further certify that I am not related to
21 any of the parties to this action by blood or
22 marriage, I am not employed by or an attorney to

1 any of the parties to this action, and that I am
2 in no way interested, financially or otherwise, in
3 the outcome of this matter.

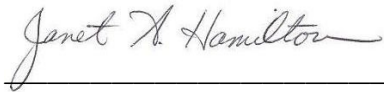
4
5 IN WITNESS WHEREOF, I have hereunto set my hand
6 this 12th day of February, 2026.

7
8 My commission expires:
9 February 4, 2028.

10

11

12



13 Notary Public in and for the

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