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Transcript of Gerald Christensen

Date: June 2, 2026

Case: CentralSquare Technologies, LLC -v- Carbyne, Ltd. (PTAB)

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CentralSquare Ex. 1012
CentralSquare v. Carbyne
IPR2025-01179

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4
5 CENTRALSQUARE TECHNOLOGIES, LLC,

6 Petitioner,

7 v.

8 CARBYNE, LTD.,

9 Patent Owner.

10
11 IPR2025-01179

12 U.S. Patent No. 11,689,383

13
14 DEPOSITION OF

15 GERALD CHRISTENSEN

16 Tuesday, June 2, 2026

17 10:05 a.m. EST

18
19 Job No. 635984

20 Pages 1 - 269

21 Reported Stenographically by:

22 April Reid, RPR, CRR, CA CSR #19463

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1 A P P E A R A N C E S cont'd

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10 ALSO PRESENT:

11 JAKE McKAY, Carbyne representative

12

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

2 THE STENOGRAPHER: As we begin this
3 proceeding, I will ask our witness to please
4 raise your right hand.

5 THE WITNESS: (Complies.)

6 THE STENOGRAPHER: Do you swear or
7 affirm that the testimony you're about to
8 give will be the truth, the whole truth, and
9 nothing but the truth?

10 THE WITNESS: I do.

11 THE STENOGRAPHER: Thank you.

12 If counsel present, starting with the
13 petitioner, will please state their
14 appearances.

15 MR. CUTRI: Good morning. This is
16 Gianni Cutri, Yan-Xin LI is with me as well,
17 for the petitioner.

18 MR. HERMAN: This is Patrick Herman from
19 Orrick, Herrington & Sutcliffe, here on
20 behalf of the patent owner.

21 THE STENOGRAPHER: We may begin.

22 ///

1 THEREUPON:

2 Gerald Christensen

3 being first duly sworn or affirmed to
4 testify to the truth, the whole truth, and
5 nothing but the truth, was examined and
6 testified as follows:

7 EXAMINATION

8 BY MR. CUTRI:

9 Q. Good morning, Mr. Christensen. How are
10 you?

11 A. Good morning. I'm fine.
12 How are you?

13 Q. Good.

14 I don't think we've met before. My name
15 is Gianni Cutri. I'm an attorney representing the
16 petitioner, CentralSquare, CentralSquare
17 Technologies, in this proceeding.

18 Just so we have it in the record, do you
19 mind telling us your full name?

20 A. Yes. My full given name is Gerald Todd
21 Christensen.

22 Q. And you're giving testimony today in

1 connection with the IPR 2025-01179; is that right?

2 A. What was that, again? The full --

3 Q. Yeah. I have it as 2025 -- so I have it
4 as IPR 2025-01179.

5 A. Yeah, I believe that's correct.

6 Q. And that's concerning the U.S. patent
7 11,689,383; right?

8 A. Correct.

9 Q. Okay. Have you been deposed before?

10 A. Yes, I have.

11 Q. How many times?

12 A. Roughly, eight times.

13 Q. Okay. In what -- have those all been
14 patent matters or patent and other matters?

15 A. Some of them have been intellectual
16 property matters. Some of them have been disputes
17 of -- of a different nature. But they're all
18 technical in origin.

19 Q. Okay. What -- what are the patent
20 matters you've been involved with other than this
21 one?

22 A. A variety of different topics. Some of

1 them involve location services. Some of them
2 involve the use of Internet protocol. Some of
3 them are application oriented. Some of them are
4 network oriented.

5 Q. Okay. Have you -- have you ever
6 testified -- so you're here testifying on behalf
7 of a patent owner; right?

8 A. Correct.

9 Q. Have you ever testified on behalf of a
10 defendant in a patent litigation?

11 A. I have provided testimony on behalf of
12 defendants. I've also provided testimony on
13 behalf of plaintiffs.

14 Q. Okay. Are you -- what would you say the
15 split is between those two?

16 A. Roughly, 50-50. It may not be exactly
17 that. Maybe 40-60. I don't know. But pretty
18 balanced.

19 Q. Okay. I'll come back to -- to that in a
20 minute, but just so we get some of the ground
21 rules.

22 Is there any reason today that you can't

1 give honest and accurate testimony?

2 A. No. No reason whatsoever.

3 Q. Okay. And where are you physically
4 located right now?

5 A. I am in Taylors, South Carolina.

6 Q. Anyone else in the room with you there?

7 A. No.

8 Q. And do you have any documents or notes
9 with you?

10 A. No.

11 Q. And do you have any other -- and you're
12 in front of a computer; right?

13 A. That is correct.

14 Q. And do you have any documents open on
15 your computer other than the -- well, do you have
16 any documents or other applications open on your
17 computer other than the Zoom that we're using to
18 do the deposition?

19 A. I have a variety of different
20 applications open, like Excel and things like
21 that. Should I close them?

22 Q. Yeah, if you -- well, let me ask you

1 this: Do you have any documents open?

2 A. Let me see.

3 I do have documents open. I don't see
4 anything that's case related, though.

5 Q. Okay. Yeah. If you -- if you have any
6 documents related to the case, I would ask you
7 just close them, just so that we have, you know, a
8 record that you're only referring to documents as
9 they've been introduced.

10 A. Yes. Of course.

11 Q. Okay. If at any point you don't
12 understand a question or my question is unclear or
13 confusing, will you let me know so I can rephrase
14 it?

15 A. Will do.

16 Q. Okay. And I'm going -- I'm happy to
17 take a break like every hour or so, but if you
18 need it earlier or if you prefer -- some people
19 prefer, like, a longer morning, just let me know.
20 Okay?

21 A. That -- that would be great. And that
22 cadence works well for me.

1 And I presume that we will take a break
2 for lunch. I don't know how long this deposition
3 might go in its entirety, but I'm on the east
4 coast; it's currently 10:11 a.m.

5 So shall we take a break for lunch at
6 roughly 12:00?

7 Q. 12:00 Eastern, you mean?

8 A. Correct.

9 Q. That's fine with me.

10 If we can -- well, I'm in Central, so if
11 we could split the difference, that's a little
12 better, but I don't really care. I can make
13 either one work.

14 A. Works for me.

15 Q. Okay. All right. So let's shoot for
16 like 12:30 Eastern, if that's okay.

17 A. That'd be great. Thank you.

18 Q. What did you do to prepare for today's
19 deposition?

20 A. I reviewed my declaration. I reviewed
21 all of the case material associated with my
22 declaration. And that's pretty much it.

1 Q. Did you meet with anyone or speak with
2 anyone?

3 A. No.

4 Q. Okay. You didn't speak with Carbyne's
5 counsel or do any preparation with them?

6 A. Ask the question again.

7 Because did you -- did you say
8 immediately preceding this deposition? Or what
9 was -- what was -- please repeat the question.

10 Q. Sorry.

11 In preparation for the deposition, did
12 you meet or talk with anyone else?

13 A. In prep- -- in preparation in general.
14 Okay.

15 Yes, I did. I -- I spoke with Patrick
16 Herman, who is on the phone with us.

17 Q. Uh-hmm.

18 Anyone else?

19 A. He was on -- who is on the Zoom with us,
20 rather.

21 No, nobody else.

22 Q. About how many times did you speak with

1 Mr. Herman and for how long?

2 A. In preparation for this deposition, if
3 that's what your question is, twice. And as I
4 recall, it was perhaps a couple of hours.

5 Q. Okay. A couple of hours total or each
6 time?

7 A. A couple of -- I would say a couple of
8 hours total. Maybe three hours. I don't know. I
9 can't recall.

10 Q. Okay. And when was that?

11 A. I met -- my memory's a little fuzzy
12 because we pushed off this deposition, but it was
13 last week, I believe, early last week.

14 Q. Okay. As you sit here today, do you
15 have any opinions on the issues in the case that
16 differ from those expressed in the declaration you
17 filed in this matter?

18 A. No.

19 Q. Do you have any opinions on the issues
20 in this case that are not in your declaration?

21 A. No.

22 Q. And have your opinions that are

1 expressed in the declaration you filed in this
2 matter different in any way than how they're
3 expressed in the declaration?

4 A. Can you repeat the question, please?

5 Q. Sure.

6 Are the opinions -- let me ask it this
7 way. Have the opinions that you filed -- that you
8 expressed in the declaration that you filed in
9 this matter changed since you filed it?

10 A. Oh. I understand now.

11 No, they have not changed.

12 Q. Let's introduce your declaration, which
13 I know is marked as Exhibit 2020 -- sorry. Your
14 declaration in the IPR proceeding is marked as
15 Exhibit 2004.

16 Let's go ahead and introduce it and mark
17 it as Exhibit 1 to this deposition.

18 (Exhibit 1 was marked for identification
19 and is attached to the transcript.)

20 A. So I see this now in chat. Am I allowed
21 to download this now?

22 Q. Yeah.

1 That's -- with this platform, that's the
2 approach that we're going to use. We'll just
3 download the exhibit. If you click on it, it
4 should give you a place to download it.

5 A. Okay. I've done that, and I now have
6 that available to me.

7 Q. I'll do the same.

8 I'm catching up to you right now.

9 In your declaration, Mr. Christensen,
10 you expressed the opinion that a Carbyne product
11 practices Claim 1 of the '383 patent; correct?

12 A. Correct.

13 Q. And you can feel free to refer to your
14 declaration if you'd like, but -- let's do that.
15 If you would -- I believe it's on page 59, is
16 where that...

17 And when I say "59," I am referring
18 to -- in the lower right-hand corner, there is
19 some bold black text that says, "Patent Owner
20 Ex. 2004, p. 59."

21 Do you see that?

22 A. I see that.

1 And it appears that that coincides with
2 the actual page number as well, in this case,
3 page 59.

4 Q. That's right.

5 And that is the case for this exhibit,
6 but I think we'll see that for other exhibits it's
7 sometimes not the case. So what I will try to do
8 is to refer to what's in the lower right-hand
9 corner when I say to go to a particular page.

10 So here you -- in paragraph 236, you say
11 you -- you had been asked to review "two documents
12 summarizing the features and functionality of
13 Carbyne's Universe product (a next-generation 911
14 system that can be employed with a PSAP's existing
15 call-handling infrastructure)."

16 Do you see that?

17 A. I do see that.

18 Q. And you reference two documents. One is
19 Exhibit 2013, which is public documentation of
20 Universe Product published by Washoe County
21 Sheriff's Office; and Exhibit 2014, a public
22 documentation of the Universe published by

1 Miami-Dade County.

2 Do you see that?

3 A. I do see that.

4 Q. And those are the two documents you rely
5 on in order to establish that the Universe product
6 practices Claim 1 of the '383 patent; correct?

7 A. Correct.

8 Q. And did you -- did you rely on anything
9 else to reach the conclusion that the Universe
10 product practices Claim 1 of the '383 patent?

11 A. No.

12 Q. And did you speak with anyone else with
13 regard to that opinion?

14 A. No, I did not.

15 Q. So you didn't speak to anyone at Carbyne
16 about how the system works?

17 A. No.

18 Q. Okay. So if you'd like, you can open
19 up -- why don't we do this. Why don't we
20 introduce as the Exhibit Number 2 what was
21 previously marked as Exhibit 2013 by Carbyne,
22 which is public documentation from the Washoe

1 County Sheriff's Office.

2 A. I have that in front of me now.

3 Q. Okay.

4 (Exhibit 2 was marked for identification
5 and is attached to the transcript.)

6 Q. So for the record, Exhibit 2 was
7 previously marked as Exhibit 2013. It is a
8 document that runs from page 1, in the lower
9 right-hand corner, to page 77.

10 Is -- is that what you have in front of
11 you, Mr. Christensen?

12 A. Yes, it is.

13 Q. Okay. I'm going to try to share this
14 document with you.

15 So, Mr. Christensen, can you see page 1
16 of Exhibit Number 2?

17 A. Yes.

18 Q. The -- what I'm showing you here is
19 page 4 of the c-Live Universe presentation.

20 I'm sorry. I'm showing you page 4 of
21 Exhibit Number 2. Can you see that?

22 A. I can, but the resolution's not very

1 good. It's difficult to read the text, for
2 example.

3 Q. Are you able -- is it easier to read --
4 I'm enlarging it a little bit now, but is it
5 easier to read in the native version that you
6 have?

7 A. It's -- what you're sharing with me
8 currently is much easier to read now. I can read
9 it.

10 Q. Okay. Great.

11 So -- and you should feel free to flip
12 through this, but I want to talk to you about some
13 of the features that c-Live has -- I'm sorry, that
14 the Universe product has. And I'm going to scroll
15 to PD -- page 11 of Exhibit 2.

16 Do you see that?

17 A. I see that.

18 Q. And this is where Carbyne sets out what
19 it thinks are the distinguishing features of
20 Universe; right?

21 MR. HERMAN: Objection, form.

22 A. I see the word Distinguishing Features

1 on this document.

2 Q. Okay. Do you know who drafted this
3 document?

4 A. Sitting here at this moment right now,
5 no, but I suppose that may be listed on the
6 document itself somewhere.

7 Q. Okay. Well, if we scroll -- I believe
8 the way this document is oriented, and I could be
9 wrong, but I only just -- just looked at it, there
10 is a two-page memo on the front of it. And I say
11 it's a two-page memo because page 1 of Exhibit 2
12 says -- at the very -- at the upper right-hand
13 corner, it says "Page 1 of 2."

14 Do you see that?

15 A. I do see that.

16 Q. And then beginning on marked page 3 of
17 Exhibit 2013, there looks to be a PowerPoint slide
18 that says, Washoe County - Proposal Essentials.

19 Do you see that?

20 A. I do see that.

21 Q. And that continues through to a slide --
22 sorry. Yeah, to -- to a -- to page 8 where there

1 is a slide that says Thank You.

2 Do you see that?

3 A. I see that.

4 Q. And then on page 9, there is a page that
5 says Carbyne's c-Live Universe Solution Sales
6 Order - 5-year, Prepayment.

7 Do you see that?

8 A. I do see that.

9 Q. And then on page 10, it says Welcome to
10 Carbyne. "We welcome the opportunity to" display
11 -- "to deploy c-Live Universe with Washoe County
12 Sheriff's Office, Nevada, with the ultimate desire
13 of earning your business. Our goal will be to
14 make this solution, c-Live Universe, a game
15 changer in your agency. We thank you for your
16 consideration."

17 Do you see that?

18 A. I do see that.

19 Q. And that, in the lower right-hand corner
20 of Exhibit 2, in bold is labeled as page 10, but
21 there's also, above that, something that says
22 "Page 2" and -- below the date, "December 21,

1 2020."

2 Do you see that?

3 A. Yes, I do see that.

4 Q. And then if you track, in the lower
5 right-hand corner, the date of December 21, 2021
6 [sic] persists in this document.

7 So we get, for example, a table of
8 contents that suggests that this document runs
9 until marked page 35, for example.

10 Do you see that?

11 A. I do see that.

12 I think you may have just misspoke
13 yourself. I think you said 2021. It's 2020.

14 Q. You're right. December 21st, 2020.
15 You're right.

16 So -- and you can confirm this for
17 yourself, but this -- this is the document --
18 Exhibit 2013 is the document you relied on to
19 establish that Claim 1 of the '383 patent is -- is
20 practiced by Universe; right?

21 A. Yes. That's correct.

22 Q. Okay. Now that I've oriented --

1 oriented you a little bit, do you know who created
2 Exhibit 2013?

3 A. I think you asked me that question just
4 a little while ago.

5 And sitting here right now, I don't
6 know. I can't recall who did that. But I suppose
7 that may be evident within the document itself
8 somewhere.

9 Q. Okay. Well, let me ask you this.
10 What's your basis for concluding that this
11 document -- okay. What is this document? What is
12 Exhibit 2013?

13 A. Well, Exhibit 2013, as you described it,
14 appears to be a PowerPoint presentation or some
15 type of presentation that is intended for a
16 customer. It looks like, in my opinion, a
17 sales-type document. And based on the wording
18 within it, it sounds like the sale had closed.

19 So in my expert opinion, it would
20 encapsulate marketing and sales information,
21 future functionality information, which would be
22 conclusive in terms of defining the capabilities

1 and features of the solution.

2 Q. All right.

3 A. So, in other words, it wouldn't be
4 speculative. It would be something that is
5 definitive.

6 Q. Okay. And if you look here on page --
7 I'll say page 14, in the lower right-hand corner
8 of Exhibit 2013, it describes some of the features
9 of the Universe product; right?

10 A. Correct.

11 Q. And one of the features that the
12 product -- the Universe product has is "Advanced
13 Mobile Location to provide 9-1-1 calls with
14 precise location from the operating system."

15 Right?

16 A. I see that.

17 Q. And it also provides a separate feature,
18 Device Based Location; correct?

19 A. I see that.

20 Q. And there is a feature called Live
21 Video; right?

22 A. I see that.

1 Q. And there's another feature called Photo
2 Capture; correct?

3 A. I see that as well.

4 Q. And there's a feature called Text
5 Communications; right?

6 A. I see that as well.

7 Q. Another feature listed is Instant
8 Implementation; right?

9 A. I see that.

10 Q. And another feature of the Universe
11 product is Citizen Data Protection; right?

12 A. I see that.

13 Q. And the -- the Universe platform also
14 has Audit and Tracking as a separate feature;
15 right?

16 MR. HERMAN: Objection to form.

17 A. I see that.

18 Q. And there is listed in this document
19 several enhanced -- enhanced components here on
20 page 16; right?

21 A. Where does it say "enhanced"? Oh.

22 Q. All right.

1 A. I see, "Carbyne c-Live Universe solution
2 adds the following enhanced components." I see
3 that.

4 Q. Right.

5 And the first enhanced component that
6 the Universe solution has is "precise, persistent,
7 and dynamic device location of the caller."

8 Right?

9 A. I see that on row 1.

10 Q. And that is an enhanced component of the
11 Universe solution; correct?

12 MR. HERMAN: Objection, form.

13 A. That is how it's being conveyed here in
14 this document.

15 Q. Okay. And this is the document that you
16 relied on to understand how -- Universe's features
17 and functionality; right?

18 A. Correct.

19 Q. And another enhanced component is this
20 two-way -- item 3, "two-way silent instant chat
21 with no audible notifications"?

22 MR. HERMAN: Objection, form.

1 Q. Right?

2 A. I see that listed there.

3 Q. And that is a enhanced component of the
4 Universe solution, two-way silent instant chat;
5 right?

6 MR. HERMAN: Objection, form.

7 A. I see that on row 3 as being depicted as
8 one of the enhanced components, correct.

9 Q. And dropped-call protection is also an
10 enhanced component of the Universe solution;
11 correct?

12 MR. HERMAN: Objection, form.

13 A. I see -- I see that listed here on
14 row 4.

15 Q. And then on 5, another enhanced
16 component of the Universe solution is network
17 outage mitigation; right?

18 MR. HERMAN: Objection, form.

19 A. I see that listed on -- as row 5.

20 Q. And that is -- network outage mitigation
21 is an enhanced component of the Universe solution;
22 right?

1 MR. HERMAN: Objection, form.

2 A. As per this document, it's one of the
3 enhanced components that they chose to list.

4 Q. Correct.

5 And, finally, profile information that
6 is securely stored in AWS GovCloud about the
7 caller, precise location breadcrumbs to include
8 in-motion/moving devices with all incident
9 details, is another enhanced component of the
10 Universe solution; right?

11 MR. HERMAN: Objection, form.

12 A. I see that listed as row 6.

13 Q. And then there is, on item 2, an
14 enhanced component that is recited as follows:
15 "The 9-1-1 Telecommunicator receives the Caller's
16 consent to enable their camera presenting an"
17 on-sign -- "on-scene video stream providing
18 situational awareness between the caller's
19 wireless device and the ECC. This is a one-way
20 multi-media path where the Telecommunicator can
21 see what the caller's camera is seeing, receive
22 photos, and take photos through the caller's

1 device. During the session, the caller does not
2 see the Telecommunicator. Once the session has
3 ended, the Telecommunicator/Agency has no access
4 to the original Caller's device without initiating
5 a new session and gaining consent."

6 Do you see that?

7 A. I do see that.

8 Q. And that's another enhanced component of
9 the Universe solution?

10 A. Yes, it's listed under row 2 as an
11 enhanced component.

12 Q. Okay. Which of these do you think is
13 the most important enhanced component of the
14 Universe solution?

15 MR. HERMAN: Objection, form.

16 A. I didn't consider priority or which is
17 the best one or anything of that nature as part of
18 my work as an expert witness on this case.

19 Q. Okay. And do you see that there is a
20 listing of Next Gen Features that begins on
21 page 14 of Exhibit 2013, and they include AML,
22 Device Based Location, Live Video, Photo Capture,

1 Text Communications, Instant Implementation,
2 Citizen Data Protection, Audit and Tracking?

3 Do you see -- and then Carbyne Call as
4 the last one.

5 Do you see that?

6 A. I do see all of that.

7 Q. Which of those would you say is a
8 feature that provides the most value in the
9 Universe solution?

10 MR. HERMAN: Objection, form.

11 A. Similar to your previous question, I did
12 not consider any of those types of things as part
13 of my analysis as an expert witness on this case.

14 Q. Okay. And so you didn't try to
15 establish whether any of the Next Gen Features
16 listed on page 14 through 16 were the most
17 relevant, important, or innovative features of the
18 Universe product; is that right?

19 MR. HERMAN: Objection, form.

20 A. I -- well, you just asked me a
21 multi-part question there.

22 So it's hard to answer each one of those

1 because those different attributes of your
2 question mean different things depending on the
3 context.

4 But, in general, I assessed this
5 document in terms of its applicability to the case
6 as proof that the -- the -- Carbyne is actually
7 implementing what they have in the '383 patent.

8 Q. Okay. But you didn't try to establish
9 which features were most important or innovative
10 in the Universe products; is that fair?

11 MR. HERMAN: Objection, form.

12 A. For purposes of evaluating this
13 document, I did not go through an exercise of
14 determining what is the most innovative.

15 Q. Okay. Nor the most important feature;
16 is that right?

17 MR. HERMAN: Objection, form.

18 A. It would depend on your definition of
19 "important."

20 But if your definition of "important"
21 means greatest priority, most relevance, most
22 commercial value, then the answer's no.

1 Q. Okay. Okay.

2 So I wonder if I am able to -- give
3 me -- actually, let me stop sharing.

4 So, Mr. Christensen, if I've done this
5 correctly, on the screen you should be able to see
6 on the left what we have marked as Exhibit 1 --
7 I'm sorry, on the left should be what we have
8 marked as Exhibit 2, which was previously marked
9 as Exhibit 2013. Do you see that on the left of
10 your screen, share?

11 A. I do see that.

12 Q. And then on the right, you should be
13 able to see what we marked as Exhibit 1, which is
14 your declaration in this IPR matter. Do you see
15 that shared on your screen?

16 A. I do see that.

17 Q. Okay. Great. That means -- that means
18 it worked.

19 So I'm going to go back to -- in your
20 declaration and your -- and feel free -- if you
21 prefer to look at a local copy for yourself, feel
22 free to do that. But I am going to go to page 59

1 of your declaration on the right.

2 And on the left, I think we'll kind of,
3 you know, jump around a little bit; but we'll go
4 to where you've cited those documents, that
5 document.

6 So -- so, Mr. Christensen, if you'd
7 like, you could feel free to scroll through. I'm
8 just going to kind of briefly scroll through your
9 declaration to just kind of orient you to the
10 claims. Right? And I'll just do that by pointing
11 out that, here on page 60, the first claim element
12 is, "A method implemented via execution of
13 computing instructions configured to run at one or
14 more processors."

15 And the first step is listed as
16 "obtaining a phone number of a mobile device used
17 by a user making an emergency call, wherein the
18 emergency call is conducted with the recipient
19 through a first connection."

20 And then you have in -- in
21 paragraphs 243 and 244 some quotes and an image in
22 245.

1 Then you have, "Transmitting a uniform
2 resource locator" -- I'm on page 61.

3 "Transmitting a uniform resource locator (URL)
4 link to the mobile device through an electronic
5 message, wherein the electronic message is
6 transmitted through a second connection using the
7 phone number, wherein the second connection is
8 different from the first connection."

9 Do you see that?

10 A. I do see that.

11 Q. And then you say, "Carbyne's Universe
12 product also allows an emergency dispatcher to
13 'initiate an SMS text to the calling party for
14 approval to share their location as well as live
15 video stream for on-scene situational awareness.'"

16 That's in 246 of your declaration;
17 right?

18 A. Correct.

19 Q. And you cite to page 11.

20 And I'll scroll up a little bit.

21 But my understanding is that, in
22 paragraph 241, you had cited to Exhibit 213, and

1 then in each of the paragraphs thereafter you cite
2 to Id., which I understand to be referring back to
3 Exhibit 213.

4 Is that how you -- is that correct, my
5 understanding?

6 A. Correct.

7 Q. So if we look over on -- so, for
8 example, if we look over on -- and, by the way,
9 when you cite to, you know, Exhibit 213, p. 11,
10 you are referring to the page that is marked in
11 the lower right-hand corner with p. 11.

12 Is that the right -- is that how I
13 should understand your declaration?

14 A. Correct.

15 Q. Okay. So, for example, here on 246, you
16 cite to page 11 of Exhibit 2013; is that right?

17 A. That is right.

18 Q. And I think we can try to find this
19 language. It's here under Additional Features,
20 the second bullet, the ability to "initiate an SMS
21 text to the calling party for approval to share
22 their location as well as live video stream for

1 on-scene situational awareness."

2 Do you see that?

3 A. I do see that.

4 Q. And that's the sentence that you're --
5 that you quoted in paragraph 246; right?

6 A. That is correct.

7 Q. And then you say the SMS message
8 includes a "unique URL link," along with other
9 information, Id. page 39; right?

10 A. I did say that in my declaration,
11 correct.

12 Q. And then if we go to page 39 of
13 Exhibit 2013, we can see a box -- it looks like a
14 grid of -- with six boxes in it. And to the left
15 of the second column -- sorry, the first column,
16 second entry, says "SMS Title Text & Logo."

17 Do you see that?

18 A. Yes.

19 Q. And it says -- and just to orient you a
20 little, Mr. Christensen, so you know, on page 38,
21 this says, Exhibit B - c-Live Universe Technical
22 Requirements, and then it says, "The following

1 hardware components [sic] are provided by
2 Customer."

3 Do you see that?

4 A. I do see that.

5 Q. Okay. And so we are looking at the
6 second page of that listing. When we turn to
7 page 39, which you cited, we are looking at the
8 second page of the technical requirements for
9 Universe; right?

10 A. Right.

11 Q. Okay. And on the second page, there's a
12 reference to "SMS Title, Text & Logo."

13 Do you see that?

14 A. Yes.

15 Q. And here in the second column, it says,
16 "String text can be inserted into the SMS, which
17 precedes the unique URL link."

18 Do you see that?

19 A. I see that.

20 Q. What does that mean, "unique URL link"?

21 A. A unique URL link in this context, or it
22 could be in other contexts as well, is a U -- is a

1 URL, universal resource locator, which is
2 essentially the type of thing that you would see
3 at a web page or -- or any other type of IP,
4 Internet protocol, connection to identify
5 uniquely -- I hate using a circular reference, but
6 to identify something uniquely.

7 Q. Okay. What is being identified -- so
8 what does "unique URL link" mean here?

9 A. One that can be used for purposes, in
10 this context, of mapping a first communication
11 instance, which is voice, to a second
12 communications instance, which is some other type
13 of a connection.

14 And the reason why you have a unique URL
15 is so that that mapping can take place. It's one
16 of the reasons.

17 Q. What do you mean by -- what do you mean
18 by "unique URL"?

19 What makes this URL unique?

20 A. It's distinguishable from any other URL
21 for purposes of the context of establishing and
22 maintaining these two communications instances

1 that I just referred to.

2 Q. And how is it unique?

3 I'm sorry. Let me use your language.

4 How is the URL that's referenced on
5 page 39 distinguishable from any other URL?

6 A. Well, this particular document does not
7 get into the technical details there. And -- and
8 I'm not going to speculate on the specific nature
9 or engineering behind exactly how it works. So
10 I'm going to have to generalize, if that's okay
11 with you.

12 Q. It's your opinion. I don't want you to
13 do something that you're not comfortable doing.

14 A. So, in general, it's unique in the sense
15 that it is recognizable as being associated with
16 the first communication instance and for purposes
17 of establishing the second communications instance
18 insomuch as it synchronizes the specific type of
19 communication that is to occur during that second
20 communications instance; for example, establishing
21 a video stream.

22 Q. Okay. So is it unique in the sense that

1 there is, you know, one URL that is -- let me see
2 if I -- I'm trying to understand what "unique"
3 means in this context.

4 Does it mean that it's unique to the
5 Universe system but the URL can be sent -- the
6 same URL can be sent to multiple 911 callers?

7 A. Well, that's somewhat of an open-ended
8 question.

9 Q. Uh-hmm.

10 A. Could you rephrase a little bit to make
11 it a little more precise?

12 Q. I'll try.

13 But I'm trying to understand your
14 reference to "unique" and what you understand
15 "unique" to mean.

16 Does unique in -- in -- as you
17 understand it, is the unique URL link here unique
18 in the sense that it is a Carbyne URL but the same
19 U -- so that makes it unique from, for example,
20 like, a competitor to Carbyne's URL, but it's --
21 but it is the same --

22 MR. HERMAN: Objection, form.

1 Q. -- that URL can be sent to multiple
2 callers, the same URL?

3 MR. HERMAN: Objection, form.

4 A. It is -- it is unique in the sense that
5 it's very context-specific. And the context here
6 is that a person had initiated a first
7 communications instance, and there's a desire,
8 motivation on either one or both parties to
9 establish a second communication instance. So
10 it's unique in the context that it facilitates
11 that, allowing it to happen, and synchronizing
12 these two communication instances.

13 Q. Can you use the same -- does the Carbyne
14 Universe system use the same URL with multiple
15 callers, or is it specific to each caller, if you
16 know?

17 MR. HERMAN: Objection, form.

18 A. I did not get that much into the
19 technical details and functionality of the system
20 in terms of how it works.

21 Q. All right.

22 A. So I would have to speculate as to

1 whether they could reuse URLs.

2 Q. Okay. Okay. And -- so it's possible
3 that the Carbyne Universe system uses the same URL
4 with multiple callers?

5 MR. HERMAN: Objection, form.

6 A. As -- as I just mentioned, I would have
7 to speculate. And -- and I'm not here to
8 speculate. So I'm -- I can't say what's possible
9 or not possible regarding this.

10 Q. Okay. You see that there's a
11 requirement that the URL is associated with the
12 phone number of the mobile device? I'm looking at
13 your declaration, page 62 in the bolded text.

14 Do you see that?

15 A. I see that.

16 I can't see the page number, but it
17 looks like it's below 61. I see that.

18 Q. Yeah. It's 62. Yeah.

19 In the Universe system, is the URL link
20 associated with the phone number of the mobile
21 device?

22 A. It can be.

1 Q. Okay. How is the URL link associated
2 with the phone number of the mobile device in the
3 Universe system?

4 A. Well, again, I have not had in-depth
5 conversations or any conversations with the
6 engineering folks that put this together. So the
7 specific method and modality and feature
8 functionality of how they make that work has not
9 been disclosed to me.

10 Q. Okay.

11 A. So I would have to answer you in a very
12 general manner, if that works for you.

13 Q. Well, I just want to know what your
14 opinion is. I mean, it has to work for you,
15 Mr. Christensen, since it's your opinion.

16 So I'll ask the question again.

17 How -- does the URL -- is the URL link
18 in the Universe system associated with the phone
19 number of the mobile device?

20 A. So, generally speaking, one method of
21 synchronizing would be to include the telephone
22 number associated with the first communications

1 instance in which a person would have dialed 911.
2 One method would be to include that telephone
3 number as part of URL.

4 Q. Okay. Maybe I should take a step back.

5 Is the -- is the URL link in the
6 Universe system associated with -- maybe I should
7 take -- maybe this will be clearer.

8 Does -- did -- in your opinion, does the
9 Universe system meet the limitation of Claim 1 of
10 the '383 patent that states, "wherein the URL link
11 is associated with the phone number of the mobile
12 device"?

13 A. Please -- please repeat the question
14 again.

15 Q. Sure.

16 In your opinion, does the Carbyne
17 Universe system meet the limitation of Claim 1 of
18 the '383 patent that states "wherein the URL link
19 is associated with the phone number of the mobile
20 device"?

21 A. Yes, it does.

22 Q. How?

1 A. It meets the limitation in the sense
2 that -- based on my understanding of reviewing all
3 of the documentation associated with the case,
4 that the system relies on deriving that telephone
5 number from the first communications instance and
6 associating that telephone number with the second
7 instance to allow for synchronization where the
8 first instance and the second instance can occur
9 simultaneously.

10 Q. Okay. How does the Universe system
11 associate the telephone number with the second
12 communications instance?

13 A. Well, again, a detailed answer would
14 require somebody with great knowledge of how their
15 system works on the back end.

16 But generally speaking, once the system
17 has the telephone number as a result of the first
18 instance, it could map that to the second instance
19 in a way in which it understands that those two
20 are associated with one another. They are
21 concurrent, they're simultaneous and they are to
22 be mapped with one another.

1 Q. And how would you map the phone number
2 to the URL link?

3 A. Well, there's different types of
4 mapping.

5 One mapping would be on the back end
6 part of the system, which would allow, for
7 example, somebody at a PSAP, a public safety
8 answer point -- as they're looking at their
9 terminal and they're considering all the
10 information that's presented to them, a way in
11 which, for example, a PSAP operator could
12 associate the voice call of the first instance
13 with, for example, video that may occur in the
14 second instance.

15 So that back-end system that would allow
16 the PSAP to be able to have that information
17 available to an operator on her screen is one way
18 in which that mapping would be realized.

19 Q. Okay. What's -- are there any other
20 ways?

21 You said there's different types of
22 mapping. So what's another -- are there any other

1 ways that the URL link could be mapped to the
2 phone number of the mobile device?

3 A. Another way that it could be mapped
4 would be to include the telephone number in the
5 URL string that is sent to the mobile device, so
6 that, for example, when a WebRTC stream is
7 established, that that information is contained in
8 the URL, allowing the back-end system, when it
9 receives video, to know that that particular video
10 is coming from the telephone number that was used
11 by the caller that placed the 911 call in the
12 first instance.

13 Q. Okay. Any other ways that the URL link
14 can be mapped to the phone number of the mobile
15 device?

16 A. I don't see anything worth mentioning or
17 speculating here. I think what we've discussed is
18 the -- is most core to our discussion.

19 Q. Okay. And mapping a URL to a phone
20 number associates that URL with the phone number;
21 right?

22 MR. HERMAN: Objection, form.

1 A. May you repeat the question, please.

2 Q. Sure.

3 Mapping a URL to a phone number
4 associates the URL with the phone number; right?

5 MR. HERMAN: Objection, form.

6 A. The question itself doesn't really make
7 any sense to me because the mapping and the
8 placement on the URL are related but different
9 things.

10 Q. Okay. What is mapping?

11 The reason I'm asking this is because I
12 asked you:

13 "QUESTION: How does the Universe system
14 associate the telephone number with the
15 second communications instance?"

16 And you said:

17 "ANSWER: Well, again, a detailed answer
18 would require someone with great knowledge of
19 how their system works on the back end. But
20 generally speaking, once the system has the
21 telephone number as a result of the first
22 instance, it could map that to the second

1 instance in a way in which it understands
2 that those two are associated with one
3 another. They're concurrent, they're
4 simultaneous and they are to be mapped with
5 one another."

6 Do you remember giving that testimony?

7 A. I did.

8 And I can walk you through it a little
9 bit step by step, if that would be helpful.

10 Q. Well, what would be helpful is -- I just
11 want to make sure we have the same understanding,
12 which is that when you were talking about mapping
13 a URL link to a phone number, you were using those
14 as examples of ways that URL link is associated
15 with a phone number; is that right?

16 Is that understanding correct?

17 A. Correct.

18 And just to further elaborate, when the
19 first instance occurs, the first communications
20 instance, it includes a telephone number. That
21 telephone number is made available to the PSAP and
22 so, therefore, to the system that allows all this

1 to happen, the Carbyne system. That allows a
2 mapping to occur.

3 Q. And that --

4 A. How the mapping --

5 Q. Sorry.

6 A. Sorry?

7 Q. I'm sorry. I didn't mean to interrupt
8 you. I'll let you finish. Go ahead.

9 A. How that mapping actually occurs
10 engineering-wise is details that I'm not able to
11 discuss right now.

12 Q. Okay.

13 A. But generally speaking, a mapping, an
14 association, is possible at that point because
15 that telephone number was presented to the system.

16 How that mapping and that association is
17 maintained is evident, in part, by potentially
18 including the telephone number in the URL that is
19 sent back to the handset.

20 Q. Okay. You said that's how it's evident.

21 Did -- does the -- does the Carbyne --
22 to your knowledge, does the Carbyne Universe

1 system include the telephone number in the URL
2 link that's sent to a user?

3 A. I don't know that I have seen that. I
4 don't know that I've seen an actual URL.

5 We talked about the marketing and sales
6 document earlier --

7 Q. Uh-hmm.

8 A. -- and they did not provide a specific
9 example of that.

10 Sitting here right now, I can't recall
11 whether I've actually seen that in a specific URL
12 example.

13 Q. Right.

14 And so that's why I'm asking, because I
15 want to know -- we've established that you think
16 that the Universe system does associate the URL
17 link with the tel- -- with the phone number of the
18 mobile device; right?

19 A. Yes.

20 Q. But I don't know that I've -- we've
21 established how you think the URL link is
22 associated with the phone number of the mobile

1 device in the Universe system. And so if you
2 wouldn't mind telling me what the answer to that
3 question is.

4 And I apologize if you already answered
5 it.

6 But -- but how does -- let me -- let me
7 just make it a clean question. Okay?

8 How does the Universe system associate
9 the URL link with the phone number of a mobile
10 device?

11 A. Well, again, I don't recall whether I've
12 seen a specific example, but there could be at
13 least two different ways of doing that.

14 One would be the method in which we've
15 already discussed --

16 Q. Uh-hmm.

17 A. -- which is there's already a mapping or
18 an association on the back end, and now there's a
19 need or desire to perpetuate that mapping and
20 association in the URL. One way to do that would
21 be to simply put the phone number in the URL.

22 Q. Right.

1 But is that what the Universe system
2 does, what you just described?

3 A. Again, I don't know if I have seen a
4 specific example of it in practice, an actual
5 example of embedding the phone number.

6 Perhaps it's in my declaration or in
7 some of the material here, and I just don't recall
8 seeing that sitting here right now.

9 But -- but that's one way of doing it.

10 Q. That is one way of doing it, but you
11 don't -- you're not comfortable saying that that
12 is what the Universe system does, what you just
13 described?

14 A. Well, I'm comfortable --

15 MR. HERMAN: Objection, form.

16 A. I'm comfortable saying that it does that
17 or something similar to that --

18 Q. Okay.

19 A. -- because there would be a need to
20 maintain a context between the first
21 communications instance, which includes a
22 telephone number --

1 Q. Uh-hmm.

2 A. -- and does not include any other
3 arbitrary information or any other type of number
4 to map.

5 So the phone number would be one of the
6 key elements to use.

7 Q. I see.

8 Okay. So -- and, by the way, I want to
9 be -- I want to just make sure you have access to
10 everything that I do.

11 When you were map- -- when you -- in
12 your declaration, there is, you know, this phrase
13 above paragraph 250, this long phrase from the
14 patent Claim 1, and it says, "Wherein the
15 electronic message allows the user to click on the
16 URL link to access a web browser on the mobile
17 device, instead of a full application on the
18 mobile device, to establish a WebRTC (Web
19 Real-Time Communication) session to transmit a
20 realtime video stream from the mobile device, and
21 wherein the URL link is associated with the phone
22 number of the mobile device."

1 Do you see that?

2 A. I do see that.

3 Q. And then below that, you have
4 paragraphs 250, 251, 252, -53, -54, and -55 before
5 you move on to the next element; right?

6 A. I see that.

7 Q. Yeah.

8 And so you have, "Wherein the electronic
9 message allows the user to click on the URL to
10 access a web browser on a mobile device, instead
11 of a full application on the mobile device," you
12 cite to paragraph 250 and 251; right?

13 A. Correct.

14 Q. And then for the -- I believe for the --
15 "to establish a WebRTC Communication session to
16 transmit a realtime video stream from a mobile
17 device," you rely on paragraph 252, which says,
18 "After clicking the link 'realtime video' is
19 obtained from the Caller's device;" and 253 that
20 says, "According to the documentation I reviewed,
21 this video is transmitted from the caller to the
22 emergency dispatcher using WebRTC."

1 MR. HERMAN: Objection, form.

2 Q. Are those the two paragraphs that you're
3 relying on to establish the -- to show that the
4 element -- to establish a WebRTC communication
5 session to transmit a realtime stream from the
6 mobile device, are those the two paragraphs that
7 pertain to that part of the claim?

8 MR. HERMAN: Objection to form.

9 A. Which two paragraphs? Which two
10 paragraphs?

11 Q. 252 and 253.

12 Do those pertain to the element -- to
13 establish a WebRTC communication session to
14 transmit a realtime video stream from a mobile
15 device?

16 A. Can you scroll down to 252 and 253?

17 Q. Yeah. Sure.

18 A. That's part of what I relied upon,
19 correct.

20 Q. Okay. And then for the last claim
21 element, it says, "Wherein the URL link is
22 associated with the phone number of a mobile

1 device," you have two more paragraphs that say,
2 "The Carbyne system also employs a 'unique URL
3 link' that is specific to the texted caller."

4 And you rely on page 39 of Exhibit 2013;
5 is that right?

6 A. Correct.

7 Q. And that's over here on the left, which
8 is the part of Exhibit 2013 that we've been
9 talking about today; right?

10 A. I'm going to my copy so I can see it
11 better.

12 Q. Sure.

13 A. It's a little bit fuzzy.

14 Q. I'll try to zoom in a little bit.

15 A. Repeat the question again since it took
16 me a little while to catch up to.

17 Q. No problem. No problem.

18 Maybe I'll just -- maybe I'll just say
19 it this way.

20 Paragraph 254 says, "The Carbyne system
21 also employs a 'unique URL link' that is specific
22 to the texted caller."

1 Do you see that?

2 A. Yes.

3 Q. And then you say, "Thus, the link is
4 associated with the phone number of the mobile
5 device as required."

6 Right?

7 A. Correct.

8 Q. So what do you mean -- we talked a
9 little bit about this unique URL link. Here you
10 say the unique URL -- URL link is specific to the
11 texted caller; right?

12 A. Correct.

13 Q. You'll agree with me that the language
14 that says "specific to the texted caller" isn't in
15 Exhibit 2013, at least not on page 39; right?

16 A. I'm looking at it.

17 On page 39, I don't -- do not see those
18 exact words.

19 Q. Okay. So, then, what's the basis for
20 your conclusion that the Carbyne system employs a
21 unique URL that is specific to the texted caller?

22 A. Based on my expertise, I know how, for

1 example, WebRTC operates.

2 Q. Okay.

3 A. It uses a browser. And I know that
4 there is a requirement for the first
5 communications instance and the second
6 communications instance to not only occur
7 simultaneously but also to be synchronized.

8 And so based on my expert understanding
9 of how WebRTC works and the need for them to work
10 simultaneously, and as evidenced by this marketing
11 and sales document that we've already gone over,
12 that there would be a requirement to have some
13 form of a unique identifier in there that would at
14 least have to have some basis in the telephone
15 number because the telephone number was the unique
16 identity information that was presented in the
17 first communication instance.

18 Q. Okay. I believe you said -- you said
19 there's a requirement for the first communication
20 instance and the second communication instance to
21 not only occur simultaneously but also to be
22 synchronized.

1 What did you mean by that?

2 A. Which part? The simultaneous part or
3 the synchronization part?

4 Q. I guess what I meant was: What did you
5 mean when you said:

6 "ANSWER: ... a requirement for the
7 first communication instance and the second
8 communication instance to not only occur
9 simultaneously but also to be synchronized"?

10 What did you mean by that, to not only
11 occur simultaneously but to also be synchronized?

12 A. All right. So I'll break it down part
13 by part.

14 I'll -- I'll go over the "simultaneous"
15 part first. So the '383 patent, the first
16 independent claim requires that those two
17 communication instances occur simultaneously. And
18 so the only way that that would be possible would
19 be if there's some type of mapping of some
20 identifier associated with each of those
21 communication instances. So that's the
22 "simultaneous" part.

1 Q. Okay. And what do you mean by
2 "synchronized," they have to be synchronized?

3 A. Well, the intent in commercial practice
4 for this capability would be not only to establish
5 simultaneous communication but also to maintain
6 it.

7 And so synchronization here would be to
8 make sure that, as a PSAP operator, for example,
9 looking at the screen, that you continuously look
10 at the same video stream, for example, rather than
11 some miscellaneous video stream that may be coming
12 from somebody else or maybe even some other
13 emergency situation.

14 Q. Okay. And what's -- in your declaration
15 when you said, "There's a unique URL that is
16 specific to the texted caller," going back to what
17 is meant by "unique URL," does that mean that
18 every URL that goes out is different, every URL
19 that goes out to a caller is different, or does it
20 mean that same URL goes out but it goes out to
21 different phone numbers?

22 MR. HERMAN: Objection, form.

1 A. The answer to that question is very
2 scenario-dependent.

3 Q. Uh-hmm.

4 A. And it's also very
5 engineering-dependent, the latter of which, once
6 again, I'm not privy to the details.

7 Q. Okay. So, then, what do you mean when
8 you say that the URL -- "The unique URL link is
9 specific to the texted caller"?

10 What makes that URL link specific to the
11 texted caller?

12 A. I think I answered that earlier, but I'm
13 happy to reiterate.

14 It's unique in the sense that it
15 provides a context to allow the first
16 communication instance to be mapped and associated
17 and maintained with a second communication
18 instance.

19 Q. Is it specific to the texted caller
20 because it is sent to the phone of the texted
21 caller?

22 MR. HERMAN: Objection to form.

1 A. That's one reason. That -- that's one
2 reason. But it's only sent to the texted caller
3 because you first created that association.

4 Q. And how did you create that association?

5 A. That association in detail would be an
6 engineering thing.

7 But, in general, the association is
8 possible because of the first communication
9 instance and the fact that that first
10 communication instance includes a telephone number
11 allowing the back end to establish and maintain an
12 association.

13 Q. Okay. So the association between the
14 link and the URL is possible because you've
15 obtained the phone number for the caller as part
16 of the first communication instance and you've
17 associated that phone number with the URL?

18 Is that -- is that the way to think of
19 it?

20 A. Can you please repeat or --

21 Q. Sure.

22 A. -- or clean up the question?

1 Q. Sure.

2 A. Because, as I heard it, I thought I
3 heard you say "link in the URL," but link and URL
4 are synonymous.

5 Q. Sorry. You're right. I didn't say
6 that. It probably just sounded like that. Sorry.
7 And you're right, I misspoke.

8 The association between the URL link and
9 the phone number of the mobile device is possible
10 because you've obtained the phone number of the
11 mobile device as part of the first communication
12 instance; is that right?

13 A. That is correct.

14 Q. Okay. So is one way of associating a
15 URL link with the phone number of a mobile device
16 sending that URL link to the phone number of the
17 mobile device?

18 MR. HERMAN: Objection to form.

19 A. That -- that occurrence, the occurrence
20 that a unique URL was sent to a person that they
21 received on their smartphone that includes a
22 telephone number, is something that occurs after

1 an association has already begun.

2 That association is maintained in part
3 as a result of that telephone number, in this
4 example, being included in the URL.

5 So it's not so much that the association
6 is created as a result of the URL, but -- but,
7 rather, it's perpetuated through including the
8 telephone number in the URL.

9 Q. But is -- sorry.

10 Is that how the -- the -- you don't know
11 if that's how the Universe system works, though;
12 right?

13 MR. HERMAN: Objection, form.

14 A. It's a very open-ended question you just
15 asked me. When you said "that," I don't know what
16 you mean by "that."

17 Q. Sorry.

18 I think we've established that you don't
19 know if the Universe system includes the telephone
20 number in the URL link; right?

21 A. I don't -- what I said was I don't have
22 in front of me here, nor do I recall seeing in any

1 of the material that I reviewed, a specific
2 commercial example of an actual unique telephone
3 number and URL in use. Because I thought that was
4 the basis of your question.

5 However, I also answered that based on
6 my expert knowledge, that there would be a need to
7 include some unique identifier, which could be a
8 telephone number; and if not a telephone number,
9 it has to be on the basis of a telephone number,
10 which would assume some type of mapping between
11 some unique number or some unique identifier and a
12 telephone number that is handled on the back end.

13 But that would be engineering beyond
14 what I've been exposed to.

15 Q. Got it.

16 So why does there have to be -- I think
17 you said there has to be -- but you said:

18 "ANSWER: Based on my expert knowledge,
19 that there would need to be" -- sorry.

20 I'm trying to read it correctly.

21 "ANSWER: However, I also answered that
22 based on my expert knowledge, that there

1 would be a need to include some unique
2 identifier, which could be a telephone
3 number; and if not a telephone number, it has
4 to be on the basis of a telephone number."

5 Do you remember giving that testimony?

6 A. I have given that testimony, yes.

7 Q. Why is -- why would there need to be a
8 unique identifier which could be a telephone
9 number -- yeah, why would there need to be a
10 unique identifier which could be a telephone
11 number?

12 A. Because, again, there is a need to map,
13 associate, synchronize a first communication
14 instance with a second communication instance.

15 And in this case, my reference and my
16 context is the '383 patent, as it's disclosed and
17 described and -- and the claims within it, and
18 rendered to practice in this marketing and sales
19 document that we've already discussed; meaning
20 that the specific use of it in commercial practice
21 is a human being placing a phone call. And when a
22 human being places a phone call -- excuse me; one

1 second. I had to take a drink of water there.

2 Q. No problem.

3 A. When one places a phone call, there's
4 some identity information associated with that.
5 One piece of identity information is a telephone
6 number. So that is readily available to the PSAP.

7 And, in fact, the PSAP relies on that
8 for a variety of different things, including
9 things like calling the person back if they get
10 disconnected. It's very key to everything,
11 including authenticating that it's a legitimate
12 911 caller.

13 As opposed to some other type of
14 scenario, which is not what Carbyne does, as far
15 as I know. Some other type of scenario such as
16 contacting a PSAP with your laptop.

17 Q. Uh-hmm.

18 A. If that were even possible or done in
19 commercial practice. And I'm not sure that it --
20 that it is because, just sitting here right now,
21 it wouldn't make sense to me.

22 But if you were to do that, then maybe

1 you could rely on some other identity information,
2 like an IP address or a MAC address or something
3 like that.

4 But that's not what we're talking about
5 here. We're talking about Carbyne, the
6 '383 patent, and what they rendered to commercial
7 practice, which is somebody placing a phone call
8 with their phone and the identity information
9 that's available and used as a basis would
10 logically be the telephone number.

11 MR. CUTRI: All right. We've been going
12 about an hour and 20. I'm happy to take a
13 break now or -- or whatever you prefer.

14 THE WITNESS: Sure. Let's take a break.
15 When should we come back?

16 THE STENOGRAPHER: We're off the record.
17 (Recess in proceedings.)

18 THE STENOGRAPHER: So now we're back on
19 the record.

20 MR. CUTRI: Okay.

21 BY MR. CUTRI:

22 Q. Mr. Christensen, I'd like to mark as

1 Exhibit 3 your declaration from the District Court
2 proceedings.

3 (Exhibit 3 was marked for identification
4 and is attached to the transcript.)

5 Q. I'm trying to get back to my screen
6 here. I'll stop sharing.

7 And, Mr. Christensen, do you -- I'm
8 going to save...

9 And do you have Exhibit Number 3, which
10 was your declaration from the District Court
11 proceedings?

12 A. I do. I have that in front of me.

13 Q. Okay. Great.

14 And then we'll share that.

15 So I have up Exhibit 3, which is your
16 declaration from District Court proceedings. And
17 you gave an opinion concerning the phrase,
18 "wherein the URL link is associated with the phone
19 number of the mobile device."

20 A. Where is that?

21 Q. Sorry, Mr. Christensen.

22 Do you remember giving an opinion about

1 the meaning of the phrase "wherein the URL link is
2 associated with the phone number of the mobile
3 device"?

4 A. I suppose I did. It will be easier if
5 you direct me towards...

6 Q. Sure. Sure. I was on the Table of
7 Contents, but I can direct you to that.

8 It's on page 5.

9 So the issue here -- do you see on
10 page 5 that you give an opinion concerning,
11 "Wherein the URL link is associated with the phone
12 number of the mobile device"?

13 A. I do.

14 Q. And let me go back to this.

15 So I'm going to go to paragraph 13. And
16 you're welcome to look as much -- look at as
17 many -- as much of it as you'd like. But here you
18 say -- well, I'm going to start with paragraph 12.

19 Here you say, "The specification" -- you
20 say, "The term is not definite. Within the
21 context of this patent, a POSITA would understand
22 when a URL link is and is not associated with the

1 phone number of the mobile device in this system."

2 And you say, "The specification explains
3 that a user device, such as the caller to an
4 emergency call center, is connected with a
5 dispatch unit terminal at the emergency call
6 center and that the user of that device is
7 identified such as by using," quote, "'a phone
8 number' or other unique identifier associated with
9 the user device."

10 And then it says, "After that, and based
11 on the identification of the user device, the
12 dispatcher sends a link to the user device. The
13 link including an identifier unique to the user
14 device."

15 And then you say, "This can be either a
16 phone number or some other unique identifier."

17 Right?

18 A. Correct.

19 Q. And then you say, "This is just one way
20 in which the URL link is associated with the phone
21 number of the mobile device, and a POSITA would
22 understand it as such and would understand that

1 there are different possible ways to do this."

2 Right?

3 A. Correct.

4 Q. And so one way to -- for the URL link --
5 URL link to be associated with the phone number of
6 the mobile device is for the dispatcher to send a
7 link to the user device that includes the unique
8 identifier -- an identifier to the user device.

9 Sorry. Let me ask that question again.

10 One way that the URL link can be
11 associated with the phone number is for the
12 dispatcher to send a link to the user device where
13 the link includes the phone number; right?

14 A. Correct.

15 MR. HERMAN: Objection, form.

16 Q. Okay. And then it also says that -- you
17 also say that there are -- "The specification
18 provides other examples of how a phone number can
19 be used to deliver a link to a particular device
20 such that the URL link is associated with the
21 phone number."

22 Right?

1 A. Correct.

2 Q. And then you say in -- "One example is
3 where a first user gets assistance for a second
4 user. In such a case, a first user can provide a
5 second user's phone number so that the server can
6 transmit a link to that second device.

7 "A POSITA would recognize that mapping a
8 phone number to a message endpoint and directing a
9 URL to that endpoint associates the phone number
10 and the URL."

11 Do you see that?

12 A. I see that.

13 Q. A "message endpoint" in this case is
14 a -- is what?

15 MR. HERMAN: Objection, form, outside
16 the scope of direct.

17 A. Message endpoint in this context could
18 simply be a mobile phone receiving some type of
19 communication that's nonverbal.

20 Q. Okay. So what does it mean to be
21 mapping a phone number to a mobile phone?

22 A. Mapping a phone number to a mobile phone

1 in the sense that the telephone number represents
2 identity information. And as such, a mobile phone
3 may only be used with the telephone numbers that
4 it's allowed to use.

5 And so mapping to a phone number or a
6 telephone number, in this context, allows one to
7 understand, number one, that a first communication
8 has occurred; number two, that for purposes of
9 establishing and maintaining a second
10 communication, and if the intent is to send some
11 type of a message, that you make sure that that
12 message is sent to the correct device which is
13 associated with the telephone number that is
14 allowed to be used with that device, that --
15 that -- that mobile phone.

16 Q. Okay. So in this example, that -- the
17 phone number is mapped to the -- sorry.

18 Is the phone number of the mobile device
19 a message endpoint?

20 A. The phone number of the -- repeat the
21 question, please.

22 Q. Is the -- is the phone number of the

1 mobile device a message endpoint?

2 A. In a literal sense, the phone number of
3 the device is not a message endpoint.

4 It is identity information associated
5 with that device that enables a variety of things,
6 including for an intended message to get to the
7 proper recipient, which in this case happens to be
8 a mobile device associated with the first
9 communication instance.

10 Q. Okay. You say that "directing a URL to
11 that endpoint associates the phone number and the
12 URL."

13 What do you mean by "directing a URL to
14 that endpoint"?

15 A. Directing a URL to that endpoint in this
16 context would be, for example, a PSAP causing a
17 message to be sent to a mobile device that
18 includes a URL that encapsulates a unique
19 identifier that could be a telephone number.

20 And "sent to an endpoint device" means
21 that the message is sent to the mobile phone that
22 was used for that first communication instance.

1 Q. Well, here, are you saying that -- let
2 me see if I understand your testimony.

3 Are you saying that in order for -- that
4 when -- that in the '383 patent, directing a URL
5 to that endpoint requires that the URL include --
6 let me ask that question again.

7 Is it your opinion that, in the
8 '383 patent, the URL must include a unique
9 identifier when that URL is sent to a mobile
10 device?

11 MR. HERMAN: Objection, form. It's also
12 outside the scope of direct.

13 A. It's a requirement insomuch as if the
14 motivation is to realize the aims of the
15 '383 patent that was rendered to practice in that
16 marketing and sales document that we already
17 discussed, it's a requirement in the sense that
18 when received by the mobile device and when the
19 mobile device engages in a second communications
20 instance, such as WebRTC, it is required so that
21 that second communication instance is recognized
22 when it's received by the PSAP as being associated

1 with the first communication instance.

2 Q. And what unique identifier has to be
3 included in the URL in the '383 patent when it's
4 sent to a mobile device?

5 A. Well, it could be any number of
6 different unique identifiers, all of which would
7 have to have some basis in the telephone number.

8 Q. Okay. When you say "some basis in the
9 telephone number," what do you mean?

10 A. What I mean by that is that the back-end
11 system would have to orchestrate in some means --
12 if it were using a unique identifier other than
13 telephone number, it would have to orchestrate
14 that mapping to know that if some arbitrary number
15 was assigned, that it is in some way associated or
16 mapped with the telephone number.

17 Q. Okay. How does directing a URL to an
18 endpoint associate the phone number in the URL?

19 MR. HERMAN: Objection, form. Also,
20 outside the scope of direct.

21 A. Well, when a message is sent and
22 received, the receiving endpoint looks at the URL.

1 And when I say "look," I don't mean a
2 person is necessarily looking at this. It could
3 be read by a machine, to understand not only what
4 is intended for use by that URL, such as
5 establishing a WebRTC session, but also by means
6 of identity information, the telephone number, for
7 example, being encapsulated in the URL, it can
8 associate that second communications instance with
9 the first communications instance in which the
10 telephone number was originally derived.

11 Q. Okay. And when you say "the telephone
12 number," for example, "being encapsulated in the
13 URL," what do you mean?

14 A. Encapsulated could simply mean that if
15 you were to look at the URL string, that the
16 telephone number would be part of that string.

17 Q. And is that all it could mean?

18 A. It could mean other things, but it would
19 have to be part of that URL such that the mapping
20 could be maintained.

21 Q. What other ways could that mapping be
22 accomplished in the '383 patent?

1 MR. HERMAN: Objection, form.

2 A. I have -- I have not speculated on
3 anything like that as part of my work as an expert
4 witness in this case.

5 Q. Okay. Is sending a URL to a mobile
6 device directing the URL to that mobile device?

7 MR. HERMAN: Objection, form. Also,
8 outside the scope of direct.

9 A. More or less.

10 But there's a couple different things
11 involved here. One is simply sending it, a URL,
12 to a mobile device, which if it were sent without
13 a unique identifier, you would lose the ability to
14 map the first communications instance with the
15 second communications instance.

16 But the fact that it does include that
17 identity information allows that persistent
18 mapping to continue.

19 Q. And the URL has to include that identity
20 information, the URL itself; right?

21 MR. HERMAN: Objection, form. Also,
22 outside the scope of direct.

1 A. The URL has to include some form of
2 identity information that is a unique identifier,
3 which could be a telephone number.

4 Q. What form of unique identifier is
5 included in the URL of the Universe system?

6 A. Can you ask the question again?

7 Q. Sure.

8 What form of unique identifier is
9 included in the URL that is sent by the Universe
10 system?

11 A. Oh, I understand the question now.

12 So, again, sitting here right now, I
13 don't know if I have seen a specific example in
14 commercial practice. However, again, referring
15 back to the marketing and sales document that we
16 reviewed earlier, they were referring to using a
17 telephone number for that purpose.

18 Q. Oh, the marketing document referred to
19 using a telephone number?

20 A. I -- I thought that it did. I could
21 have perhaps misspoken. We could look at that
22 again.

1 Q. Sure.

2 I'm showing you Exhibit 2'13 again.

3 A. I see.

4 Q. Is -- there's no reference to using a
5 telephone number for -- for -- as a unique
6 identifier in the Exhibit 2'13 that we're looking
7 at now, is there?

8 MR. HERMAN: Objection, form.

9 A. You are correct. You are correct in
10 that I don't see the words "telephone number"
11 there.

12 Q. All right. So, then, I'll ask my -- my
13 original question again.

14 What form of unique identifier is
15 included in the URL that is sent by the Universe
16 system?

17 A. So I'll answer similarly, that I --
18 sitting here right now, I don't recall seeing how
19 it's actually rendered in commercial practice.

20 Q. Uh-hmm.

21 A. So I would have to speculate with
22 regards to the specific form.

1 But, again, whatever would be used by
2 Carbyne or anybody, for that matter, would have to
3 have some basis in the telephone number.

4 Q. What do you mean when you're saying
5 you're -- you have to speculate?

6 A. I would have to speculate because,
7 again, I have not seen what is actually occurring
8 in commercial practice.

9 Q. All right. And can the URL that is sent
10 by the Universe system be associated with a mobile
11 device phone number if the URL that is sent by the
12 Universe system itself does not include a unique
13 identifier?

14 MR. HERMAN: Objection to form.

15 A. Could you please repeat or paraphrase
16 that question because I'm not sure I understood
17 it?

18 Q. Sure.

19 Can the URL that is sent by the Universe
20 system be associated with the phone number of a
21 mobile device if the URL that is sent by the
22 Universe system does not include in the URL a

1 unique identifier?

2 MR. HERMAN: Objection, form.

3 A. That is possible.

4 Q. How?

5 A. But it would only be rendered -- it
6 would only be -- they would only be able to do
7 that if there's some basis in the telephone number
8 itself.

9 Q. I don't think I understand that.

10 So you said it was possible for the
11 Universe system to be associated with the phone
12 number of a mobile device even if the U- -- the
13 URL that is sent by the Universe system does not
14 include in the URL a unique identifier; is that
15 right?

16 A. Yes.

17 If I understand the question correctly,
18 and I'll -- I'll put it in my own words.

19 I understood the question to be, is it
20 possible to include a unique identifier that's not
21 a telephone number in the URL and still be able to
22 send a message to the -- the mobile number and be

1 able to orchestrate the simultaneous communication
2 between the first communication instance and the
3 second one.

4 And the answer is, yes, it's possible;
5 however, the back-end system would need to map
6 that hypothetical identifier with a telephone
7 number somehow.

8 Q. So I think -- so I think maybe that's
9 where the disconnect is. We're asking -- you're
10 answering a different question. So let me go back
11 and see.

12 Do you agree that it's possible for the
13 Universe -- sorry.

14 Do you agree it's possible for the URL
15 that is sent by the Universe system to be
16 associated with the phone number of the mobile
17 device even if the URL that is sent by the
18 Universe system does not include in the unique --
19 in the URL a unique identifier?

20 MR. HERMAN: Objection to form.

21 A. Let me think about that for a second.

22 No. There needs to be a unique

1 identifier, not only because of the need to
2 satisfy the simultaneous communication but also,
3 as we described earlier, the ability to
4 synchronize or orchestrate that to maintain the
5 context and the continuity between the first
6 communication instance and the second
7 communication instance.

8 Q. Okay. In the '383 patent, is it
9 possible for the URL link to be associated with
10 the phone number of the mobile device if the URL
11 link itself does not include a unique identifier?

12 MR. HERMAN: Objection to form. It's
13 outside the scope of direct.

14 A. If your definition of "association"
15 means simply that the back end has an association
16 and meaning that it's established that context,
17 then the answer's yes.

18 But if the -- the basis of it's to
19 satisfy the aims of the '383 patent and how it's
20 been rendered to commercial practice, then the
21 answer's no because there's a need to send that
22 identifier in the URL to maintain that

1 simultaneous communication and the orchestration.
2 So that, for example, if in the second
3 communications context a WebRTC link is
4 established, you need that unique identifier there
5 to be able to maintain the simultaneous
6 communication and the -- and the synchronization.
7 It must be there.

8 Q. I'm talking about strictly to meet the
9 claim limitation of -- and let me see if I can put
10 it -- there might be a way for me to put this on
11 the screen for you.

12 I'm showing you your declaration again.
13 Oops. It should be, if I've done this right, on
14 the right of your screen.

15 Do you see your declaration at about
16 paragraph 249?

17 A. I see that.

18 Q. But you have a portion of Claim 1 of the
19 '383 patent on the -- on -- in your declaration;
20 right?

21 A. I see that.

22 Q. And I've highlighted the last part of

1 that claim language which reads, "Wherein the URL
2 link is associated with the phone number of the
3 mobile device."

4 Do you see that?

5 A. I see that.

6 Q. Can that limitation be met by a system
7 that sends a URL link where the URL link itself
8 does not include a unique identifier?

9 A. No.

10 MR. HERMAN: Objection to form. Also,
11 outside the scope of direct.

12 Q. So the -- the link itself must have
13 within it a unique identifier in order to meet the
14 claim limitation that sets -- that states, quote,
15 "Wherein the URL link is associated with the phone
16 number of the mobile device"?

17 MR. HERMAN: Objection to form. Also,
18 outside the scope of direct.

19 A. It must include it because one of the
20 purposes of including it is to establish and
21 maintain a second communication instance which
22 could be WebRTC.

1 Q. Well, in your declaration -- let me go
2 back to the declaration you filed in the District
3 Court.

4 Paragraph 14 says, "Ultimately, a POSITA
5 would recognize that mapping or associating a
6 phone number or any unique identifier with a URL
7 can be done in ways beyond including the phone
8 number or identifier in the link itself."

9 That's what you said in the District
10 Court; right?

11 A. I did.

12 Q. What would be those ways, that you would
13 associate a phone number, a mobile device, with a
14 URL in the '383 patent beyond including the phone
15 number or identifier in the link itself?

16 A. So in this context here on row 14 where
17 it says, "Mapping or associating a phone number or
18 a unique identifier with URL can be done in ways
19 beyond including the phone number or the
20 identifier itself," what that means is that it may
21 be a identifier other than a phone number, but the
22 phone number itself is still the basis of that

1 identifier.

2 Q. Well, no. You say it can be done in
3 ways beyond including the phone number of an
4 identifier in the link itself. That's what you
5 say; right?

6 A. Uh-hmm.

7 Q. And you're saying you don't need a phone
8 number or a unique identifier in the link itself
9 in order to associate a phone number or a unique
10 identifier with a URL; right?

11 A. Correct.

12 Q. So how can you associate a phone number
13 with a URL if you're not including the phone
14 number in the link itself?

15 A. Well, first of all, here, I don't think
16 we're talking about the '383 patent.

17 Q. Oh, I'm sure that we are; right?

18 We're talking about this disputed claim
19 term; right? This language?

20 A. I see.

21 Q. And then are you saying here --
22 you're -- you're characterizing whether a POSITA

1 would understand when a URL link is and is not
2 associated with a phone number of a mobile device
3 in this system.

4 And by "this system," you mean the
5 '383 patent; right?

6 A. I see that now.

7 Q. Yep.

8 A. So -- so --

9 Q. So we are talking -- just to be clear,
10 in paragraph 14 you are talking --

11 MR. HERMAN: Counsel, Counsel, please
12 don't interrupt the witness. Allow him to
13 answer your question, and then you can ask
14 your next question.

15 MR. CUTRI: Sure.

16 Q. Mr. Christensen --

17 MR. HERMAN: The witness is trying to
18 answer. Please.

19 Q. Mr. Christensen, you are talking
20 about -- in paragraph 14, you are talking about
21 the '383 patent; right?

22 MR. HERMAN: Objection, form. Also,

1 argumentative.

2 A. So I appreciate you cleaning that up for
3 me, that -- that, yes, that is what's being
4 discussed here.

5 So let's go back to that original row in
6 your questioning. I'd be happy to elaborate on
7 it.

8 Q. I don't need to -- I don't know that I
9 need you to elaborate on it.

10 Let me just see if I can figure out
11 where we are.

12 I -- I -- this is the question and
13 answer.

14 "QUESTION: You're saying you don't need
15 a phone number or unique identifier in the
16 link itself in order to associate a phone
17 number or a unique identifier with the URL;
18 right?

19 "ANSWER: Correct."

20 This is my question.

21 So how can you associate a phone number
22 with the URL if you're not including the phone

1 number in the link itself?

2 MR. HERMAN: Objection, form. Also,
3 outside the scope of direct.

4 A. I'll answer that question.

5 So one way to associate the URL with the
6 phone number without including the telephone
7 number in the URL itself would require -- first of
8 all, would require some level of understanding on
9 the back end as to how exactly they're doing this
10 engineering wise.

11 But essentially, there would be a
12 mapping, and it could even be on a per-instance
13 basis, where the telephone number is associated
14 with some other number. And that other number --
15 and I say "number," but it could be -- it could be
16 character string. And that is what's placed in
17 the URL.

18 Q. You mean like a unique identifier?

19 A. Well, it -- it could be a unique
20 identifier, but -- but it could be a nonunique
21 identifier. But if it's a nonunique identifier,
22 it wouldn't satisfy the -- the claim language in

1 '383.

2 Q. Right.

3 So here you say, "A POSITA would
4 recognize that a mapping or associating a phone
5 number or a unique [sic] identifier with URL can
6 be done in ways beyond including the phone number
7 or the unique [sic] identifier in the link
8 itself."

9 Right?

10 MR. HERMAN: Objection, form.

11 You also misread that sentence.

12 MR. CUTRI: I added the word "unique" in
13 front of "identifier."

14 Q. That's what you meant when you said
15 "identifier" here; right, Mr. Christensen?

16 MR. HERMAN: Objection, form,
17 mischaracterizes the witness's testimony,
18 outside the scope of direct.

19 MR. CUTRI: Just keep it to "form,"
20 Mr. Herman, please.

21 MR. HERMAN: Then please keep your
22 questions --

1 MR. CUTRI: No. Just keep it to "form."

2 MR. HERMAN: -- in this relevant to this
3 particular proceeding. If you don't --

4 MR. CUTRI: Keep it to "form."

5 MR. HERMAN: I will object to the scope
6 of direct if you go outside the scope of
7 direct, which is what you're doing here.

8 MR. CUTRI: Please keep it to "form,"
9 per the rules.

10 Q. Mr. Christensen, when you say
11 "identifier" here at the end of paragraph 14, you
12 mean the unique identifier, don't you?

13 MR. HERMAN: Objection to form.

14 A. Let me read this. Let me read this
15 again because I haven't looked at this document in
16 awhile.

17 No, I don't necessarily mean unique
18 identifier.

19 Q. Oh. You mean that there could be -- you
20 could associate a phone number -- sorry.

21 You could associate a unique identifier
22 with a URL without including any identifier in the

1 link itself, is that what you mean?

2 MR. HERMAN: Objection to form.

3 A. No, I didn't say that.

4 Q. Okay.

5 A. I didn't -- I didn't say that. I said,
6 "unique identifier."

7 Q. You just said the word "unique" doesn't
8 necessarily belong in front of the last word,
9 "identifier," of paragraph 14; right?

10 A. Not by necessity.

11 Q. Okay. So that means -- do I understand
12 your testimony, then, to be that you can associate
13 a unique identifier with a URL in a way beyond
14 including any identifier in the link itself?

15 MR. HERMAN: Objection, form. Also,
16 outside the scope of direct.

17 A. No, that's not what I'm saying.

18 Q. Okay.

19 A. There's two different types or aspects
20 of mapping that's occurring. One aspect of
21 mapping is on the back-end system that simply
22 associates a first communications instance with a

1 unique identifier, which happens to be a telephone
2 number.

3 But to the extent that some other
4 identifier other than a telephone number could be
5 used, then that identifier could be transmitted in
6 the URL. That's all I'm saying.

7 Q. Okay. And those would be -- when you
8 say there's two different types or aspects of
9 mapping that's occurring, do you mean that that's
10 two different types or aspects of associating
11 that's occurring?

12 A. Well, the association starts with the
13 first communication instance.

14 Q. Ah.

15 A. In that first -- and in that first
16 communications instance, it includes identity
17 information, which is the telephone number.

18 Q. And that creates the association?

19 A. The back end is going to create the
20 association insomuch as an event has occurred.
21 That "event" is that somebody, for example, placed
22 a 911 call. And if there is a need to have

1 further communication with that mobile phone user,
2 that identifier is used to -- to map to that
3 mobile device.

4 Q. Got it.

5 A. And such has been the case with 911 for
6 a long time with callback, for example. The --
7 the caller is disconnected, there's a need to call
8 them back, then you could use that identity
9 information to call them back.

10 Q. Okay. What do you mean it's "been the
11 case with 911 for a long time"?

12 A. 911 was designed so that if a call is
13 disconnected, that the PSAP could call the person
14 back to establish communication with them because
15 there's an emergency event.

16 Q. And you're saying that in order to do
17 that, you have to, when the call comes in,
18 associate the phone number or -- with the mobile
19 device; right?

20 A. Correct.

21 Q. And that's been known for a long time,
22 to do that in 911?

1 A. Correct.

2 Q. And that's the type of association that
3 the '383 contemplates as well?

4 A. No.

5 Because what the '383 contemplates is
6 that there's actually two communications
7 instances.

8 Q. I see.

9 A. The first --

10 Q. There -- is there -- oh. Sorry.

11 Where -- I'm trying to figure out where
12 the association happens.

13 A. So step by step, when a 911 call is
14 placed, it includes identity information. The
15 PSAP receives that. An association is first
16 assigned on the back end of the system by Carbyne.
17 That association is used for potentially a variety
18 of purposes, including maintaining a --
19 establishing and maintaining a second
20 communications instance, in which that identity
21 information is maintained by, including a unique
22 identifier in the URL that's sent to that mobile

1 device.

2 Q. Oh, I see. So that's in the Carbyne
3 system that you're talking about.

4 A. Correct. In the '383 patent.

5 Q. You say "and the '383 patent."

6 Those are -- is that an example of how
7 the association occurs in the -- in the
8 '383 patent?

9 A. Correct.

10 Q. But it's not the only way that
11 association occurs in the '383 patent; right?

12 A. It's not the only way that it could be.

13 Q. Okay. In your -- let me show you
14 your...

15 So I have now reshared Exhibit 3, which
16 is your -- which is your District Court
17 declaration.

18 And you see here that the alternative
19 construction that CentralSquare proposed was the
20 URL link includes a unique identifier associated
21 with the phone number of the mobile device; right?

22 A. I see that.

1 Q. And in your opinion, that construction
2 is unsupported; right?

3 MR. HERMAN: Objection, form.

4 A. Let me -- let me read what I put in
5 there. I'm -- I'm going to look at my own version
6 because you keep moving.

7 Q. Sure. Sure.

8 Sorry, I'm trying to -- I'm -- I assume
9 you want to keep reading, but I -- I don't mean
10 to -- I don't mean to -- go ahead.

11 A. I'm going to look at my own version.
12 Please give me a couple minutes.

13 Q. Sure.

14 A. All right. So I've reacquainted myself
15 with this.

16 Q. Great.

17 A. So --

18 Q. I'm sorry.

19 Do you want me to re-ask the question?
20 I'm happy to.

21 A. Yes, please.

22 Q. Sure.

1 So if we go back to your declaration,
2 CSC offered -- I'm sorry.

3 "In the District Court proceeding,
4 CentralSquare offered an alternative construction
5 for the phrase 'wherein the URL link is associated
6 with the phone number of the mobile device.'"

7 Correct?

8 A. I'm sorry. Say that again.

9 Q. "In the District Court proceedings,
10 CentralSquare offered a construction for the
11 phrase 'wherein the URL link is associated with
12 the phone number of the mobile device.'"

13 Right?

14 A. Yes.

15 Q. And that construction was, "The URL link
16 includes a unique identifier associated with the
17 phone number of the mobile device."

18 Right?

19 A. Yes.

20 Q. And you said that that construction was
21 unsupported; right?

22 A. Yes.

1 Q. And it was inappropriate; right?

2 A. Yes.

3 Q. And you said that -- that, "The
4 specification discloses a link incorporating a
5 unique identifier does not foreclose a claim
6 like -- a claim like here that requires a URL link
7 be associated with the phone number of the mobile
8 device."

9 Right?

10 A. Correct.

11 Q. A POSITA would understand that such
12 associations can be implemented in different ways;
13 right?

14 A. Correct.

15 Q. And that the drafter of the '383 patent
16 chose to require that a link be associated with
17 the device's phone number, not that the URL link
18 include a unique identifier that is associated
19 with the device's phone number; right?

20 A. Correct.

21 Q. That's your opinion; right?

22 A. Yes.

1 Q. And you'd agree, then, that the
2 '383 patent does not require that the URL link
3 include a unique identifier that is associated
4 with the device's phone number; right?

5 A. Please repeat that.

6 Q. You agree that the '383 patent claims do
7 not require that the URL link include a unique
8 identifier that is associated with the device's
9 phone number?

10 A. Can you please scroll up and scroll so
11 that I can see the highlighted portion?

12 Q. All right. This is -- well, it's got
13 something on it. Let me try this.

14 A. So I see it's -- it's -- the way this
15 video is working, it's hard to see it --

16 Q. Uh-hmm.

17 A. -- because I see information at the
18 bottom of the screen that goes over it.

19 But, yes, I see the highlighted portion.
20 That is what I said. And -- and that is correct.

21 Q. Okay. And you also say, in
22 paragraph 16, the following, "For example, the

1 specification discloses that the use of the phone
2 number associated with the first-user device by
3 the server to re-establish the first connection
4 and to send a link over a second connection to
5 that device."

6 And then you say this, "That is, the
7 association between that URL link sent to the user
8 device may be accomplished on the back end and
9 need not necessarily result from the inclusion of
10 a unique identifier associated with the phone
11 number in the URL link itself."

12 That's what you said; right?

13 A. That is correct.

14 Q. And you stand by that; correct?

15 A. Yes, I do.

16 Q. Okay. So you don't need to include a
17 unique identifier in the URL link in order for the
18 phone number to -- of the user device to be
19 associated with that URL link; correct?

20 A. If "association" here means simply on
21 the back end and not for purposes of establishing
22 a simultaneous second communication and

1 maintaining that orchestration.

2 If it's simply to associate on the back
3 end, then, yes.

4 Q. Well, I guess what I mean is: I'm
5 talking about the claim phrase of the '383 patent
6 which is, "Wherein the URL link is associated with
7 the phone number of the mobile device."

8 Do you see that claim phrase?

9 A. I see that.

10 Q. To meet that claim phrase, you would
11 agree that that association in that claim phrase
12 can be accomplished on the back end and need not
13 necessarily result from the inclusion of a unique
14 identifier associated with the phone number in the
15 URL link itself?

16 A. Correct.

17 Q. Okay. Okay. There's another phrase
18 that says, "Wherein the realtime video stream is
19 associated with a unique identifier for the mobile
20 device."

21 Do you see that in your opinion --

22 A. I see that.

1 Q. -- on page 8?

2 And if you'd like, we can -- let's go
3 ahead and introduce the '383 patent.

4 (Exhibit 4 was marked for identification
5 and is attached to the transcript.)

6 Q. Okay. Exhibit 4 should be U.S. Patent
7 11,689,383.

8 And, by the way, I said,
9 "Mr. Christensen." Is it Mr. or Dr.? I apologize
10 if I've got that wrong.

11 A. Mr.

12 Q. Okay. Sorry.

13 Let's go ahead and open up Exhibit 4.
14 Should be sharing with you, Mr. Christensen, the
15 '383 patent.

16 Do you see that on your screen?

17 A. I see it.

18 Q. Let me scroll through.

19 So Claim 1 is broken across two pages.

20 So we have been talking about the second
21 reverse indented paragraph beginning,
22 "Transmitting a uniform resource locator."

1 That paragraph ends with the words
2 "associated with the phone number of the mobile
3 device" here in column 11.

4 Do you see that?

5 A. I see that.

6 Q. And then there's an element that says
7 "receiving the realtime video stream from the
8 mobile device through the WebRTC session."

9 Do you see that?

10 A. I see that.

11 Q. And then there's a reverse indented
12 paragraph that begins, "Sending the realtime video
13 stream to the recipient for display on the screen
14 of the recipient."

15 And then it continues, "wherein the
16 realtime video stream is received through the
17 WebRTC session while audio content of the
18 emergency call is received through the first
19 connection."

20 And then it ends, "and wherein the
21 realtime video stream is associated with a unique
22 identifier for the mobile device."

1 Do you see that?

2 A. I see that.

3 Q. What does that mean, "a realtime video
4 stream is associated with a unique identifier for
5 the mobile device"?

6 A. What it means is that, based on having
7 received the identity information associated with
8 the first communication instance and creating an
9 association on the back end of the system and
10 placing some unique identifier in the URL to
11 establish the simultaneous communication of the
12 second communication instance, that it allows for
13 realtime video, for example, via WebRTC, to occur
14 and to be associated with that unique identifier
15 of the mobile device in a sense that it maintains
16 that context, so that when a PSAP operator is on a
17 voice call with the first communication instance,
18 they know that that is mapped to or associated
19 with, for example, realtime video that they might
20 be seeing also on their display.

21 Q. What is a unique identifier?

22 MR. HERMAN: Objection to form.

1 A. A unique identifier -- a unique
2 identifier in this context is a -- potentially a
3 number or an alphanumeric code that maintains a
4 contact between the first communication instance
5 and the second communication instance. So it
6 could be a telephone number, for example.

7 Q. And does that unique identifier have to
8 be included in the URL in order to meet this claim
9 limitation?

10 MR. HERMAN: Objection to form.

11 A. The answer to that is, yes, to meet this
12 claim limitation, "wherein the realtime video
13 stream is associated with a unique identifier for
14 the mobile device."

15 Q. The claim doesn't actually say that
16 the -- does the claim say anything -- well, where
17 in the claim language of the claim do you find the
18 requirement that the URL itself must include the
19 unique identifier?

20 A. I'll take a look at the claim language
21 sitting here right now and -- and answer that.

22 However, I'll also answer that from the

1 basis of what's disclosed in the patent itself,
2 the specification in terms of how it's described,
3 that the system works, and also based, again, on
4 my understanding as an expert in terms of how the
5 secondary communication would work, such as
6 WebRTC, that there would be a need for a unique
7 identifier to be in that URL to establish and
8 maintain the simultaneous communication and to
9 further orchestrate that communication.

10 Q. Sure.

11 Well, let's start with the claim
12 language. You understand that we have to find it
13 in the claim language; right?

14 MR. HERMAN: Objection, form.

15 A. The question is whether I understand if
16 it needs to be found in the claim language itself?

17 Q. Yeah.

18 I guess, what I'm saying -- I asked you,
19 the claim doesn't -- I asked you where in the
20 claim language do you find the requirement that
21 the URL itself must include the unique identifier.
22 Do you remember that question?

1 A. I'm going to look at my version of it
2 here --

3 Q. Sure.

4 A. -- to see.

5 This is difficult, I should say. It
6 goes over two or three pages.

7 So I would refer to, in the claim
8 language --

9 Q. Uh-hmm.

10 A. -- on the second page at the top of
11 column 11, where it says, "from the mobile device,
12 and wherein the URL link is associated with the
13 phone number of the mobile device."

14 The phone number in this context would
15 be one way of achieving the unique identifier in
16 the URL itself.

17 Q. Oh. So are you saying at the top of
18 column 11 -- I guess, I'm asking: Where is the
19 required -- let me ask the question better.

20 Where do you find the requirement that
21 the URL itself include a unique identifier in the
22 URL? Where in the claim language do you find that

1 requirement?

2 A. My -- my read on the claim language --
3 again, referring to that top of column 11 where it
4 says, "wherein the URL link is associated with the
5 phone number of the mobile device" --

6 Q. Uh-hmm.

7 A. -- "associated" there means that the
8 unique identifier, by necessity, be included;
9 otherwise, there would not be an association.

10 Q. Be included in the URL?

11 MR. HERMAN: Objection, form.

12 A. One second.

13 So where it says, "wherein the URL link
14 is associated with the mobile number of the mobile
15 device," what that means is that there is a URL --

16 Q. Uh-hmm?

17 A. -- there is some form of an association.

18 But I'm agreeing with you that it does
19 not literally say that there's a unique identifier
20 there.

21 Q. You're agreeing with me that it does not
22 say -- the claim language does not say that the

1 URL itself includes the unique identifier?

2 A. I don't see it there.

3 Q. Right.

4 It's not which, anywhere in the claim;
5 right?

6 A. Well, at the bottom of the claim
7 language, it says "wherein the realtime video
8 stream is associated with the unique identifier
9 for the mobile device."

10 That combined with what we were just
11 going over, where there's a requirement that the
12 URL link is associated with the mobile number of
13 the mobile device, those two together satisfy it.

14 Q. Satisfy what?

15 I guess, what I ask -- let -- let me ask
16 this question. Mr. Christensen, we -- we spent
17 some time looking at the earlier -- the language
18 at the top of column 11, the URL link is
19 associated with the phone number of the mobile
20 device.

21 We were just speaking about that; right?

22 A. Correct.

1 Q. And we were looking at your District
2 Court declaration; right?

3 A. Correct.

4 Q. And in particular, we were looking at --
5 on Exhibit 3 in your District Court declaration,
6 in paragraph 15, this end phrase that says -- and
7 Exhibit 15 is talking about a proposed
8 construction that -- that CentralSquare supplied,
9 which was that the URL link comprises a
10 required -- that the recited URL link comprise a
11 unique identifier associated with the user device.

12 That's what you're opining about here in
13 paragraph 15; right?

14 A. Correct.

15 Q. You said, at the end of paragraph 15,
16 that the draft of the '383 patent chose not to
17 require that the link be associated -- sorry.

18 You said, "The draft of the '383 patent
19 chose to require the link be associated with the
20 device's phone number, not that the URL link
21 include a unique identifier that is associated
22 with the device's phone number."

1 That was your opinion; right?

2 A. Correct.

3 Q. And that still is your opinion; right?

4 A. Yes.

5 Q. Okay. So when we look back at the
6 '383 patent, we can agree that the language at the
7 top of column 11, lines 1 and 2 -- 1, 2, and 3,
8 which says, "wherein the URL link is associated
9 with the phone number of the mobile device," that
10 does not require that the URL link include a
11 unique identifier that is associated with the
12 device's phone number; right?

13 A. Well, there must be some identifier that
14 is -- in some way has a basis of the telephone
15 number as opposed to some other unique identifier
16 associated with the phone, such as a MAC address
17 or something like that.

18 Q. Well, you're -- I guess, what you're
19 saying is you're just not quite sure how the
20 association happens in the Claim 1 of the
21 '383 patent.

22 A. No, I'm not saying that.

1 Q. Okay.

2 MR. HERMAN: Objection to form.

3 Q. We do understand that in Claim 1, where
4 it says, "The URL link is associated with the
5 phone number of the mobile device" -- we do agree,
6 consistent with your declaration, that that does
7 not require that the URL link include a unique
8 identifier that is associated with the device's
9 phone number; right?

10 A. I'm sorry. Ask that question again.

11 Q. In Claim 1, where it says, "The URL link
12 is associated with the phone number of the mobile
13 device," we agree that, consistent with your
14 declaration, that that claim phrase does not
15 require that the URL include a unique identifier
16 that is associated with device's phone number;
17 right?

18 MR. HERMAN: Objection, form.

19 A. No. No.

20 Q. We don't?

21 A. We don't -- we don't agree with that.

22 Q. Okay. I -- I think we have some

1 testimony that suggests that we do.

2 A. No, because I can elaborate on that
3 testimony that you have highlighted.

4 Q. Well, I just want to make sure that
5 we're talking about the same thing.

6 We're talking about this language,
7 "Wherein the URL link is associated with the phone
8 number of the mobile device."

9 Right?

10 A. Yes.

11 Q. And CentralSquare's position with the
12 URL link includes a unique identifier associated
13 with the phone number of the device; right?

14 A. Yes.

15 Q. Do you agree that that's -- that this is
16 a requirement of this claim phrase, that "The URL
17 link includes a unique identifier associated with
18 the phone number of a mobile device"?

19 MR. HERMAN: Objection, form. It's
20 outside the scope of direct.

21 A. It depends on the definition of -- of
22 "associated with."

1 Q. All right. So -- oh. I'm sorry. Go
2 ahead.

3 A. It could -- it could be based on the
4 telephone number but be some other identifier.

5 Q. So do you think there is a requirement
6 that the URL link include a unique identifier
7 associated with the phone number of a mobile
8 device? Right?

9 MR. HERMAN: Objection, form. It's
10 outside the scope of direct.

11 A. I -- I can't agree with that because,
12 again, it's possible that a URL includes a unique
13 identifier that's -- let me think for a second.
14 Please give me a minute.

15 All right. So I think I can clean this
16 up. So I'm just going to refer back to my --

17 Q. So I just want to make sure --

18 MR. HERMAN: You're interrupting the
19 witness again. He was literally just about
20 to answer.

21 MR. CUTRI: Mr. Herman, just keep it to
22 "form," because the record is going to

1 reflect what it's going to reflect, including
2 that you're violating the PTAB's rules. I am
3 entitled to -- he asked for time --

4 MR. HERMAN: You are not going to
5 manipulate the witness's testimony. You're
6 entitled to --

7 MR. CUTRI: I am going to --

8 MR. HERMAN: -- ask your question and
9 wait until he answers. You're not entitled
10 to manipulate his testimony by interrupting
11 it.

12 Q. Mr. Christensen, do you think there is a
13 requirement in the '383 patent that the URL link
14 include a unique identifier associated with the
15 phone number of a mobile device?

16 MR. HERMAN: Objection to form.

17 A. The best way that I can answer that is
18 to refer to my own testimony, which is that the
19 draft of the '383 patent chose to require that the
20 link be associated with the device's number, not
21 that the URL link include a unique identifier that
22 is associated with the device's phone number.

1 Q. Okay. So there's no requirement, in
2 your opinion, that the URL link includes a unique
3 identifier associated with the phone number of a
4 mobile device; right? In the '383 patent.

5 A. So, again, there -- there is a
6 requirement that the link be associated with the
7 device's phone number, not that the URL link
8 include a unique identifier that is in some way
9 associated with the device's phone number.

10 Q. Okay. Great.

11 So let's go back to your declaration.

12 Okay. So, Mr. Christensen, if I've done
13 this right, you should have up Exhibit 2 of -- of
14 this deposition, which is Exhibit 13.

15 MR. CUTRI: Oh, by the way,

16 Mr. Christensen, we are at 12:35 your time.

17 Do you want to stop and have lunch?

18 I know I said I would kind of split the
19 difference. I'm happy to do that.

20 THE WITNESS: I'm willing to proceed if
21 everybody else is.

22 MR. CUTRI: It's -- it's getting late

1 where you are. I just don't want you to be
2 hungry and -- we can go for another 20 or
3 25 minutes, if that works.

4 THE WITNESS: Let's do that. Let's go
5 until the top of the hour, if that works for
6 you.

7 MR. CUTRI: It's totally fine with me.
8 I'm in the Central Time zone, so noon is my
9 normal lunchtime, so that's fine.

10 Q. Here -- so I'm -- I'm looking at the --
11 your testimony on page 63 of your declaration in
12 this proceeding, where you opine about whether the
13 Carbyne Universe system met the "wherein the
14 realtime video stream is associated with a unique
15 identifier for a mobile device," that limitation.

16 Do you see that?

17 A. I see that.

18 Q. And you should feel free to look through
19 the paragraphs that you cite because this is a big
20 limitation. I think some of these paragraphs
21 refer to other parts of the limitation. But I
22 believe that paragraphs 261 and 262 pertain to

1 this -- actually, let me just ask it. It's your
2 declaration.

3 Where in your declaration can I find
4 support for the -- the claim that "wherein the
5 realtime video stream is associated with a unique
6 identifier for the mobile device" is practiced by
7 Carbyne's Universe product?

8 A. I'm going to go back to my version here
9 because you're scrolling.

10 So, again, I would refer to the
11 marketing and sales document, which you have on
12 the leftmost column of the screen --

13 Q. Uh-hmm.

14 A. -- where they describe and define a
15 system that -- that does just that. And they
16 provide some screen grabs that describe a system
17 in which a first communications instance occurs,
18 provides the identity information, provides the
19 association; a second communications instance
20 occurs which enables the rendering of video,
21 et cetera, et cetera.

22 Q. So in your declaration, I should find --

1 if I want to find out your evidence for "wherein
2 the realtime video stream is associated with a
3 unique identifier for the mobile device," I should
4 look in these paragraphs, right, 256 through 262?
5 Right?

6 A. Yes.

7 Q. Which paragraphs should I look at to
8 find evidence supporting the claim that the
9 Universe product performs the "wherein the
10 realtime video stream is associated with a unique
11 identifier for the mobile device"?

12 A. So under 257 --

13 Q. Uh-hmm.

14 A. -- "on-scene situational awareness," in
15 quotes --

16 Q. Uh-hmm.

17 A. -- "and allows the
18 'Telecommunicator/Agency' to have 'a higher level
19 of confidence regarding incident response and
20 field resource support and safety.'"

21 Q. Okay.

22 A. And, as I mentioned, and -- and what's

1 expressed on row 258, document -- documentation I
2 reviewed explains that "viewing live video is a
3 tool," and that could occur on the basis of the
4 second communications instance.

5 Q. Uh-hmm.

6 Anything else?

7 A. As I mentioned on the row 260, that the
8 dispatcher is managing calls while at the same
9 time looking at video.

10 Q. Uh-hmm. Okay.

11 A. It's evident in the documentation
12 itself.

13 So that's it. Everything through 262.

14 Q. Oh. So including 261 -- I'm sorry. I
15 just want to make sure I have your testimony.

16 For the "wherein the realtime video is
17 associated with a unique identifier for the mobile
18 device," for that limitation, your opinion is
19 found in Exhibit -- I'm sorry, in paragraph 257 of
20 your declaration, 258 of your declaration, and
21 260?

22 A. All -- it's all the rows that follow,

1 256, 257, 258, 259, 260, 261, and 262.

2 Q. Okay. How does 261 and 262 relate to
3 your opinion that the Universe product meets the
4 "wherein the realtime video stream is associated
5 with the unique identifier for the mobile device"?

6 A. Well, on 261, it's talking about
7 historical records of videos, chat sessions, and
8 location information being captured. They could
9 not have been captured if they hadn't occurred.
10 And the fact that, as discussed in the preceding
11 rows, they happen concurrently, simultaneously.
12 261 simply supports and elaborates upon the -- the
13 rows that precede it.

14 Q. And what do you mean?

15 What does capturing information during a
16 session have to do with "wherein the realtime
17 video stream is associated with a unique
18 identifier for the mobile device"?

19 A. 261 builds on everything that precedes
20 it, 260, 259, 258.

21 261 is simply talking about historical
22 records of all the video chat sessions, et cetera,

1 that actually occurred, and in that occurrence was
2 simultaneous communication.

3 Q. When you say "received video is stored
4 along with caller number," and you point to
5 page 20A through 21 -- right?

6 A. Yes.

7 Q. And I've got on the left -- can you see
8 on the left side of your screen this Carbyne event
9 history, which is referenced on page 20 of what is
10 Exhibit 2 to this deposition, which was Exhibit --
11 patent owner Exhibit 2'13?

12 A. I see it.

13 Q. And you see that it describes Carbyne
14 event history, c-Live Universe comes with an
15 events history module which stores the history of
16 each incident report reported in the cloud?

17 A. I see it.

18 Q. And then it says, "Event history
19 features caller profile information but not
20 limited to caller number," and then if we -- is
21 the first sub bullet.

22 Do you see that?

1 A. Yes.

2 Q. And then the second-to-last sub bullet
3 is "Video and pictures, if applicable."

4 Right?

5 A. I see that.

6 Q. And you say, "Received video is stored
7 along with caller number" in your declaration.

8 Right?

9 A. Correct.

10 Q. And you're pointing out that a caller
11 number is stored with video; right?

12 A. Correct.

13 Q. And you're saying that that storage of
14 video along with the caller number supports your
15 opinion that the realtime video stream is
16 associated with a unique identifier for the mobile
17 device; right?

18 A. Everything that you just discussed in --
19 and what is mentioned in row 260 is related to the
20 previous rows.

21 Q. Uh-hmm.

22 A. So by -- by itself -- for example,

1 storing a video does not necessarily mean that the
2 video happened simultaneously, but taken in
3 conjunction with what is part of my testimony in
4 the preceding rows, as I was mentioning, it -- it
5 builds on those other things that are mentioned
6 that -- that do, in fact, support the -- the claim
7 language.

8 Q. What is the unique identifier in the
9 Universe system that is associated with the
10 realtime video stream?

11 A. What is the unique identifier?

12 Q. Uh-hmm.

13 A. What's its purpose or what is it
14 specifically, exactly?

15 Q. What is it specifically, exactly?

16 A. Well, as I mentioned, I -- I don't
17 recall seeing what they've actually used in
18 practice, so I couldn't tell you exactly what that
19 unique identifier is or it could be.

20 Q. Okay. Okay.

21 Is it the phone number?

22 A. Could be.

1 Q. Well, it's your opinion,
2 Mr. Christensen, so I don't want to put words in
3 your mouth.

4 Is the phone number in the Universe
5 system the unique identifier for the mobile device
6 that is associated with the realtime video stream?

7 A. It certainly could be.

8 Q. Well, Mr. Christensen, I need to know if
9 you are willing to say with a -- with a -- I -- I
10 want to know if you are expressing the opinion
11 that the telephone number of the caller is the
12 unique identifier that is associated with the
13 realtime video stream in the Universe system?

14 Are you offering that opinion or are you
15 not offering that opinion?

16 A. I'm -- I'm offering the opinion that the
17 unique identifier could include the telephone
18 number.

19 Q. Okay. And do you think it -- are you
20 offering the opinion that in the Universe system
21 the telephone number is the unique identifier that
22 is associated with the realtime video stream, as

1 Claim 1 of the '383 patent requires?

2 A. I'm offering the opinion that the unique
3 identifier -- that the -- that the URL that is
4 sent and includes a unique identifier could
5 include the telephone number.

6 Q. Well, you're offering an opinion that
7 the Carbyne Universe product practices Claim 1 of
8 the '383 patent; right?

9 A. Correct.

10 Q. But you can't describe with certainty
11 what the unique identifier is that is associated
12 with the realtime video stream; correct?

13 MR. HERMAN: Objection to form.

14 A. When you say I can't describe with
15 certainty, again, I can't cite to having seen the
16 specific construct that's used in commercial
17 practice of the unique identifier.

18 But I am offering the opinion that that
19 unique identifier could certainly include the
20 telephone number as part of that -- as part of
21 that URL.

22 Q. So your opinion is that the telephone

1 number -- if -- let me ask you if this is correct.

2 Your opinion is that if the telephone
3 number is included in the URL of the Carbyne
4 Universe system, then that would be the way that
5 the realtime video stream is associated with a
6 unique identifier for the mobile device; right?

7 MR. HERMAN: Objection, form.

8 A. Not exactly as you stated necessarily.
9 Because while the telephone number could be used
10 as part of the unique identifier, there could be
11 other elements of it which, again, I just have not
12 seen.

13 Q. Okay.

14 A. And -- and so I can't comment on.

15 Q. Okay. When you say you can't comment on
16 it, when --

17 A. I can't comment on things I haven't
18 seen. Because, again, I have not seen how this is
19 actually done from an engineering perspective in
20 practice. I haven't seen a specific example of
21 the URL that is sent to the mobile device.

22 Q. And you think you'd need to see that?

1 A. I think I would need to see that to
2 answer your question with the level of specificity
3 that you seem to want from me.

4 Q. I -- I -- do you need to see the URL
5 that is sent by the Universe -- the Carbyne
6 Universe system in order to opine that the
7 Universe system meets Claim 1 of the '383 patent?

8 A. No.

9 Q. Okay. So we don't actually need to see
10 the URL in order for to you have that opinion;
11 right?

12 A. Correct.

13 Q. Okay. So tell me, factoring in that you
14 don't need to see the URL, what evidence do you
15 have -- what are you pointing to as the unique
16 identifier for the mobile device that is
17 associated with the realtime video stream in the
18 Universe product?

19 A. Are we again referring back to this row
20 255?

21 Q. I am just asking you that question.

22 There is a requirement in the patent, in

1 the Claim 1 of the '383, that there -- that the
2 realtime video stream be associated with a unique
3 identifier for the mobile device; right?

4 A. Correct.

5 Q. And you said I don't need to see the URL
6 in order to have an opinion that the realtime
7 video stream is associated with the unique
8 identifier for the mobile device; right?

9 A. Correct.

10 Q. So tell me, what is the unique
11 identifier in the Universe product that is
12 associated with the realtime video stream, as
13 required by Claim 1 of the '383?

14 A. So, again, the unique identifier could
15 be, in part, based on the telephone number, and --
16 so, therefore, the telephone number would be
17 included in that URL, potentially with other
18 information as well, that would be sent to the
19 mobile device to enable a second communications
20 instance to occur.

21 And I believe I've discussed that in
22 other parts of my declaration beyond just this

1 particular section that we happen to be on right
2 now, which is referring to this other document,
3 which is the -- the marketing and sales document.

4 Q. But you just said that you don't know if
5 the URL includes -- you don't know -- sorry.

6 It's clear, Mr. Christensen, that you
7 don't know what the URL includes in the Universe
8 system, do you?

9 A. That's not true.

10 Q. Oh.

11 Does the URL in the Universe system
12 include a unique identifier?

13 A. It does include a unique identifier.
14 And, as I said, it could be, in part, the
15 telephone number.

16 Q. I'd rather you would tell me,
17 Mr. Christensen, what it is, not what it could be.

18 Are you able to do that during this
19 deposition or are you limited to just what it
20 could be?

21 MR. HERMAN: Objection, form.

22 A. I -- I am able to.

1 And in this context when I say "it could
2 be," what -- what I mean is there are different
3 potential options that they could use to -- to
4 convey the association with the first
5 communications instance, which is based on the
6 telephone number.

7 Q. So you can't go beyond what it -- with
8 respect to your opinion about whether the Universe
9 product practices the limitation wherein the
10 realtime video stream is associated with a unique
11 identifier for the mobile device, you can tell me
12 what that could be; right?

13 A. Not only could I tell you what it could
14 be. As I've already testified in -- in this
15 deposition earlier, and I'll reiterate it again,
16 is that any identifier would have to have some
17 basis in the telephone number --

18 Q. So what --

19 A. -- because --

20 Q. I'm sorry. Go ahead.

21 A. -- because the -- especially when the --
22 when the -- the scenario is involving public

1 safety, there's a strong need to authenticate any
2 communication as being genuine. And so the first
3 communication instance, the identifier, is the
4 telephone number. So any association that's made
5 with that telephone number that may be used, in
6 whole or in part, for the unique -- as part of the
7 unique identifier would have a basis on that
8 telephone number.

9 I've already testified to that.

10 Q. So you can tell me -- so with respect to
11 your opinion about whether the Universe product
12 practices limitation, "wherein the realtime video
13 stream is associated with the unique identifier
14 for the mobile device," we do agree that you can
15 tell me what that could be; right,
16 Mr. Christensen?

17 A. Correct.

18 Again, could be --

19 Q. And --

20 A. -- in the sense that I have -- I don't
21 recall, sitting here right now, having seen what
22 they actually do in commercial practice with

1 respect to the -- the actual taxonomy, the
2 construct, of the URL itself.

3 Q. Okay. So can you tell me in the
4 Universe product what the unique identifier is
5 that is associated with the realtime video stream?

6 Can you tell me what it is? Not what it
7 could be, but what it is?

8 A. It is a means of identification and
9 communication to enable that second communications
10 instance to occur such that it is simultaneous
11 with the first communication instance and
12 maintains that context so that the PSAP operator
13 knows that that second communications instance is
14 associated with the first.

15 Q. But, Mr. Christensen, you just answered
16 in a circular way, I believe.

17 What I want to know is: What in the
18 Universe system -- can you tell me what it is that
19 is the unique identifier for the mobile device
20 that is associated with the realtime video stream?

21 Are you able to tell me what it is in
22 the Universe system; i.e., it's on page 2013? No,

1 no, on page blank of Exhibit 2013? Are you able
2 to tell me what it is?

3 MR. HERMAN: Objection, form.

4 A. Let me look at Exhibit 2013 again and
5 see if I can point you to that.

6 Q. Yeah.

7 I mean, Mr. Christensen, maybe this will
8 help. You have on your -- in your declaration a
9 reference to "historical records of all video chat
10 sessions and location information captured during
11 a session," and then you end your declaration by
12 saying, "received video is stored along with
13 caller number."

14 Do you see that?

15 A. I see that.

16 Q. Does the fact that there is a received
17 video that is stored along with a caller number
18 have anything to do with whether or not the
19 realtime video is associated with a unique
20 identifier for the mobile device? Anything at
21 all?

22 A. Not necessarily.

1 Q. Okay. You just included it here for
2 what purpose, then?

3 A. As I was mentioning earlier -- and
4 you're referring specifically to the storage
5 aspect of what was -- what was included in the
6 declaration -- it builds on the preceding rows,
7 which the preceding rows, I believe it's -- you're
8 scrolling, but I believe it's 257 through 262 --
9 256 through 262, where what's described, there is
10 a system that relies upon the use of a unique
11 identifier. So that's why it's included.

12 Q. So we can agree that there is -- that
13 your opinion is that there is a unique identifier
14 in the Universe system; right?

15 A. Yes.

16 Q. And what is that unique identifier?

17 A. You keep asking the same question, and
18 I'll -- and I'll answer similarly.

19 Q. Mr. Christensen, I keep asking because I
20 don't think you've told me.

21 MR. HERMAN: Objection, form.

22 Q. That's why I'm asking.

1 MR. HERMAN: So, Counselor, once again,
2 you're interrupting the witness while he's
3 attempting to answer your question.

4 MR. CUTRI: The witness has asked for
5 clarification about why I'm asking the
6 question.

7 Q. I just want to make it clear,
8 Mr. Christensen, I think the record to this point
9 is clear that you don't know where to find a
10 unique identifier in the Universe system.

11 But I am giving you the chance right now
12 to clarify that. And I'd like you to so that we
13 can show the board what your opinion is, to tell
14 the board and to tell me, and anyone reading this
15 transcript, what your opinion is about what in the
16 Universe system is the unique identifier that is
17 called for by the claim phrase "wherein the
18 realtime video stream is associated with a unique
19 identifier for the mobile device."

20 So, Mr. Christensen, can you please
21 answer that question?

22 MR. HERMAN: Objection to form.

1 A. I'll answer that question, and I'll let
2 you know when I'm done speaking, so that way you
3 know if you're interrupting me or not.

4 So the answer to that question is: On
5 the basis of my understanding of your question,
6 which is you're asking me to cite a specific
7 example of the specific form and taxonomy of the
8 URL and specifically whether I can cite to that in
9 the 2013 exhibit. And I believe that the answer
10 to that is no, I can't cite a specific example for
11 exactly what that looks like and where that comes
12 from in that exhibit.

13 However, my previous testimony during
14 this deposition, I've said several times, in
15 several different ways, that there is by necessity
16 the use of a unique identifier. And Exhibit 2013
17 is just illustrative of its use, insomuch as
18 they've rendered it to commercial practice.

19 I'm done with my answer.

20 Q. Why do you think there must be a unique
21 identifier even though it isn't disclosed in
22 Exhibit 2013?

1 MR. HERMAN: Objection to form.

2 A. The answer to that -- the answer to that
3 is based on my expert opinion and my understanding
4 and knowledge of how not only PSAPs work, how they
5 operate, but also have WebRTC and other means of
6 realtime communication works, that there would be,
7 by necessity, a unique identifier to be able to
8 associate the first communications instance with
9 the second communications instance, and for that
10 to happen simultaneously and also for that to be
11 synchronized. That, by necessity, it would have
12 to be there.

13 Q. So if there is simultaneous audio WebRTC
14 that need to happen concurrently, there has to be
15 a unique identifier that associates the realtime
16 video stream with the mobile device?

17 Is that your testimony?

18 A. The way that you ask that question is
19 somewhat ambiguous, because I could interpret your
20 question as simultaneous voice and non-voice over
21 one communication channel, such as would be the
22 case with some of the other patents that are cited

1 in this case, such as the Ramanujaiaha -- and I'm
2 going to say "Raman" because I can't pronounce his
3 name.

4 So, like in the Raman patent, that
5 presumes that WebRTC could be used to invoke a
6 communications instance which, of course, could be
7 voice and non-voice, both -- either one or both.

8 So your question is somewhat ambiguous.

9 If you could reform the question, I'd
10 really appreciate it.

11 Q. Well, you said that you know how PSAPs
12 work and how they operate; right?

13 A. Correct.

14 Q. And you also know how WebRTC and other
15 means of realtime communication works; right?

16 A. Correct.

17 Q. And if you -- you said if you need to
18 associate a first communication instance with a
19 second communication instance and for that to
20 happen simultaneously, that you, by necessity,
21 need a unique identifier; is that right?

22 A. Correct.

1 Q. Okay. That's all I'm asking.

2 If you have to -- if you have those two
3 things, and they need to get associated with one
4 another, you, by necessity, need a unique
5 identifier to associate the realtime video stream.
6 I --

7 A. Correct.

8 Q. And I appreciate you telling me that.

9 Is that -- is that your testimony?

10 A. Yes.

11 Q. Okay. And everyone in the -- of
12 ordinary skill in the art would know that; right?

13 MR. HERMAN: Objection, form.

14 A. A POSITA should know that.

15 Q. Yeah.

16 And they would have known that for a
17 long time, even before the '383 patent?

18 A. I don't know about "a long time."

19 But my read on the patent itself and my
20 work as an expert witness in this case, that
21 around the time of the patent or immediately
22 preceding it, the answer is yes.

1 Q. Okay.

2 MR. CUTRI: All right. We're right at
3 12:03 by my clock, so I'm happy to stop and
4 take a lunch break of, I don't know,
5 40 minutes, 45? Is that okay? I'm happy to
6 do an hour. Whatever is best for you.

7 THE WITNESS: I'm -- let's do an hour,
8 if that's okay.

9 MR. CUTRI: Okay. That's totally fine.
10 That's totally fine.

11 THE WITNESS: Or a little less than an
12 hour, if you want to start right at the top
13 of the hour.

14 MR. CUTRI: Yeah, let's start -- I'll
15 try to be right back on at 1:00 Central Time
16 or 2:00 Eastern time.

17 THE WITNESS: Okay.

18 MR. CUTRI: All right.

19 THE STENOGRAPHER: We're off the record.

20 (Recess in proceedings.)

21 THE STENOGRAPHER: We are back on the
22 record.

1 MR. CUTRI: Okay.

2 BY MR. CUTRI:

3 Q. So, Mr. Christensen, before the lunch
4 break, we were looking at Exhibit Number 3 which
5 is your declaration from the District Court.

6 And I'll share it with you, just so you
7 have it.

8 My question for you, Mr. Christensen,
9 is: Do you still stand by all of the opinions
10 that are in your declaration that you filed in the
11 District Court proceedings which are expressed in
12 Exhibit Number 3?

13 A. Yes.

14 Q. Nothing you want to change about any of
15 those opinions; right?

16 A. No.

17 Q. Okay. So let's pull up your declaration
18 in this matter, which is Exhibit 4. No. I'm
19 sorry. It's Exhibit 1.

20 So, Mr. Christensen, one of the things
21 that you say at paragraph 263 in your declaration
22 is that: "Carbyne's Universe product has received

1 industry accolades including from Petitioner
2 itself."

3 Do you see that?

4 A. Yes, I see that.

5 Q. What do you consider to be the -- what,
6 if anything, in the -- in the '383 patent do you
7 think is an advance over what was in the prior
8 art?

9 MR. HERMAN: Objection, form.

10 A. Well, that would require me to have done
11 a analysis of prior art and to render opinion on
12 why it was innovative and why it should have
13 required -- and why it should have received a
14 patent, so on and so forth. So I don't know if
15 I'm prepared to answer that question right now,
16 sitting here right now.

17 Q. Okay. So -- okay.

18 If you -- if you are, then will you let
19 me know?

20 A. I -- I would let you know.

21 Q. Okay. Great.

22 So you say that one of the -- in

1 paragraph 264, that "Petitioner CST agreed to
2 market and distribute the product in the United
3 States 'for NG9-1-1 to provide dynamic, real-time
4 caller-generated live video, GPS, and chat
5 alongside CentralSquare's Enterprise CAD
6 solution.'"

7 Right?

8 A. Correct.

9 Q. And so you also say -- does -- does any
10 of that relate to the claims of the '383 patent,
11 what you said -- what you quote out in
12 paragraph 264?

13 MR. HERMAN: Objection, form.

14 A. Well, it relates insomuch as I included
15 it in my declaration as evidence that
16 CentralSquare themselves saw Carbyne's solution as
17 worthwhile and -- and something that they needed.

18 In fact, I believe I even mentioned in
19 the declaration some of the things that
20 CentralSquare said themselves. And it may have even
21 been in a press release, if I recall correctly,
22 something that they said in terms of the reason

1 why they selected them.

2 Q. Okay. That -- I have your declaration
3 here. I think these are the two paragraphs that
4 you talk about CentralSquare. Because in
5 paragraph 266 you go on to Frost & Sullivan.

6 But my -- my -- and feel free to review
7 those paragraphs.

8 But my question is: Is chat something
9 that is captured by the claims of the '383 patent?

10 MR. HERMAN: Objection, form.

11 A. I don't know that it's explicitly
12 captured, but it's captured sort of indirectly
13 insomuch as chat is conceivably one of the things
14 that could occur over the second communications
15 instance.

16 Q. Do you mean that you could meet the
17 claim limitation of the '383 patent by just having
18 a chat session over the second communication
19 channel?

20 A. No.

21 Q. Okay. So if the system is -- is -- so
22 chat by itself is not covered by the claims of the

1 '383 patent?

2 A. Sitting here right now, I don't recall,
3 but I don't think so.

4 Q. Okay. And CentralSquare's Enterprise
5 CAD solution is not covered by the claims of the
6 '383 patent; correct?

7 MR. HERMAN: Objection, form.

8 A. I -- I don't think it's explicitly
9 captured.

10 Q. Okay. And here, is GPS covered by the
11 claims of the '383 patent?

12 MR. HERMAN: Objection to form.

13 A. Not -- not explicitly, but implicitly
14 insomuch as GPS is one of the technologies that's
15 used in conjunction with modern PSAPs for purposes
16 of locating a called party -- calling party,
17 rather.

18 Q. Is locating a calling party something
19 that's claimed in the '383 patent?

20 A. Not that I recall explicitly.

21 Q. Okay. Let's go ahead and pull up
22 Exhibit 2006.

1 A. And can you share 2006 with me in the
2 chat?

3 Q. Yeah. I think we're working on that
4 right now.

5 A. Okay.

6 Q. There it is. It will be Exhibit 5.

7 A. Okay.

8 (Exhibit 5 was marked for identification
9 and is attached to the transcript.)

10 A. Okay. I've got it.

11 Q. Actually, I'll withdraw that exhibit.

12 (Exhibit 5 was withdrawn for
13 identification purposes.)

14 Q. I'm not going to ask about it just yet.
15 We'll just -- we won't add that one to the record
16 just yet. We'll skip 5 for now.

17 Instead, we'll go to what was previously
18 marked as Exhibit 212.

19 All right. I'll make that Exhibit 6.

20 (Exhibit 6 was marked for identification
21 and is attached to the transcript.)

22 Q. Save that. Open it.

1 So going back to your -- and I'll --
2 let's go back to your declaration.

3 The other thing that you talk about in
4 your declaration concerning industry praise is
5 this 2025 award from Frost & Sullivan.

6 Do you see that?

7 A. I see that.

8 Q. And you say, "Carbyne was honored
9 from -- with a 2025 award from Frost & Sullivan, a
10 respected market research firm, for being," quote,
11 "'Best in Practice' in the North American
12 emergency call handling industry."

13 Do you see that? And you cite to
14 page 1.

15 A. I see that.

16 Q. Okay. Is the Best in Practice in North
17 American emergency call handling industry award
18 something that Frost & Sullivan gives out every
19 year?

20 A. I don't know right offhand, to be
21 honest, sitting here right now. I don't know if
22 that's something they do on a recurring basis or

1 not.

2 Q. Okay. If we -- if we pull up Exhibit 6,
3 are -- are -- so...

4 You're still active in the -- are you
5 still active in the 911 space as an industry
6 participant?

7 A. I'm active as an industry consultant,
8 including 911 emergency services and related
9 technologies, yes.

10 Q. Okay. And you don't know whether this
11 award is something that is given out every year or
12 if this was the first time it ever was given out?

13 A. Correct. That's my answer.

14 And -- and being active doesn't mean
15 that I'm aware of all of the different promotional
16 PR, marketing, et cetera, activities that occur
17 out there.

18 Q. Okay. You said that you thought -- in
19 your declaration you said you thought -- well,
20 actually, let's look at your declaration, which is
21 Exhibit 1.

22 You say, "The award highlighted

1 Carbyne's ability to consolidate communication
2 channels into a single interface, reducing the
3 need for multi-platform navigation. This enables
4 users to easily view and resize video windows
5 according to operational needs, a feature provided
6 by Carbyne's Universe product, as detailed in the
7 previous section."

8 Is the ability to "easily view and
9 resize video windows, according to operational
10 needs," a claimed -- a feature that is claimed in
11 the '383 patent?

12 A. No, not explicitly.

13 And the reason it's cited in the
14 declaration is because, number one, it's a quote,
15 so it is something that can be cited.

16 But the ability to be able to do that is
17 enabled through the core functionality which is at
18 hand here and -- which is actually the whole basis
19 for the -- the other exhibit, the one from
20 Frost & Sullivan, I believe it was, where they won
21 an award for innovation, and that's actually
22 related to the other exhibit where the -- I

1 believe it was the CentralSquare CEO himself
2 referred to as an innovative solution. So all
3 these things tied together are the reason why I
4 cite them as -- as being innovative and -- and
5 evidence that -- that there is, in fact,
6 innovation.

7 Q. You mean -- sorry. I guess I'm a little
8 confused.

9 We're talking about the "easily view and
10 resize video windows according to operational
11 needs."

12 Do you see that?

13 That's the feature that you call out in
14 your declaration; right?

15 A. Correct.

16 Q. The claims don't cover resizing video
17 windows according to operational needs; correct?

18 A. Correct, they do not.

19 That's what I answered a moment ago.

20 Q. Right.

21 And -- and so you could practice the
22 '383 patent claims without resizing video windows;

1 right?

2 A. I suppose so.

3 Q. Yeah.

4 And it says, "video windows," plural.

5 Does the '383 require that there be multiple video
6 windows?

7 A. I don't believe so.

8 Q. Okay. So the feature that is being
9 highlighted, according to you, is not actually
10 present -- is not actually covered by the
11 '383 patent claims; is that fair?

12 MR. HERMAN: Objection, form.

13 A. It's not covered explicitly, but that
14 wording, in conjunction with the previous citation
15 "consolidate communications channels into a single
16 interface, reducing the need for multi-platform
17 navigation," is implicit in what the Carbyne
18 innovation enables, which is timed together first
19 communications instance with the second
20 communications instance, because based on my
21 understanding as an expert in the field, if one
22 were not to be able to facilitate that, it's

1 conceivable that you would have to have two
2 separate platforms and so, therefore, the ability
3 to do things like sizing and resizing might not
4 even be possible.

5 Q. Are you saying that before the
6 '383 patent came along, you couldn't have more
7 than one communication channel in a single
8 interface?

9 A. No, I'm not saying that.

10 Q. Okay. That was known in the art, to
11 have multiple communication channels in a single
12 interface before the '383 patent; right?

13 A. Of course.

14 Q. And so you wouldn't need to -- the --
15 the '383 patent, since it didn't disclose for the
16 first time multiple communication channels in a
17 single interface, it follows, then, that, like,
18 viewing and resizing video windows wasn't
19 something that was enabled by the '383 patent;
20 right?

21 MR. HERMAN: Objection, form.

22 A. I answered your question. I -- I

1 answered your question as it was asked.

2 You said "a communication interface."

3 You did not say a PSAP communication interface. I

4 would have answered differently if you asked me

5 PSAP communication interface.

6 Q. Yeah, no, I -- I understand how you

7 answered.

8 So let me ask you this. It follows --

9 well -- sorry.

10 Since the '383 patent didn't disclose

11 for the first time multiple communication channels

12 in a single interface, it follows, then, that

13 viewing and resizing video windows wasn't

14 something that was enabled by the '383 patent;

15 right?

16 MR. HERMAN: Objection, form.

17 A. I wouldn't agree with that.

18 As I said, my logic is such that the

19 '383 patent enables, as the one citation mentions,

20 consolidation of communications channels into a

21 single interface reducing the need for

22 multi-platform navigation. And this is

1 specifically within the context of a PSAP.

2 Q. Okay. I mean, I --

3 A. And I could elaborate on that, what I
4 mean by that, in terms of why a PSAP is important
5 in this regard.

6 Q. Well, I guess what I'm saying is: You
7 don't have a -- let me ask you this. Why do you
8 say that Frost & Sullivan is a -- is a respected
9 market research firm?

10 A. Well, I'm not the only one that says
11 that. You could ask any number of folks that
12 would say the same thing, along with the likes of
13 Gartner or IDC. They're what's considered to be a
14 tier one market research firm.

15 Q. Okay. Let me ask you this. The
16 report -- well, who provided the Frost and
17 research -- sorry, Frost & Sullivan research
18 report to you?

19 A. Who provided the report to me?

20 Q. Uh-hmm.

21 A. Sitting here right now, I can't recall.

22 Q. Carbyne paid Frost & Sullivan for this

1 award; right?

2 MR. HERMAN: Objection, form.

3 A. I don't know that that's true or not
4 true. I don't know the answer to that.

5 Q. Did you ask anyone?

6 A. No, I did not.

7 Q. Okay. Did you ask what involvement
8 Carbyne had with the Frost & Sullivan 2025 product
9 leader award that you cited in your declaration?

10 A. No, I did not.

11 Q. What's the Wikipedia entry for
12 Frost & Sullivan?

13 A. I'm sorry. Was there a question there
14 that I missed?

15 Q. Yeah. I'm sorry. I'm introducing
16 another exhibit.

17 A. I don't know if the Wikipedia for
18 Frost & Sullivan is something that I relied upon
19 for my -- my...

20 Q. That's going to exactly be my question.

21 A. Okay.

22 Q. So --

1 A. So, in other words, if I didn't rely on
2 that for my declaration, this may be the first
3 time I'm seeing it.

4 Q. I think that's -- that's probably right.
5 Let's take a look at Exhibit 7.

6 (Exhibit 7 was marked for identification
7 and is attached to the transcript.)

8 Q. Do you have it in front of you?

9 A. Yes, now I do.

10 Q. Okay. I'll share it with you as well.

11 A. Okay.

12 Q. Can you see it shared on the screen?

13 A. Yes, I can see it now.

14 Q. Okay. This says Frost & Sullivan is an
15 American business consulting firm; right?

16 A. I see that.

17 Q. And this is from the Wikipedia entry for
18 Frost & Sullivan; right?

19 A. I'm going to trust you on that. I just
20 got the PDF just now, seeing it for the first
21 time. So I'm going to say yes, based on what you
22 just said.

1 Q. Okay. The last paragraph says,
2 "Frost & Sullivan issues industry awards based on
3 research using a proprietary methodology, which is
4 sometimes based on a single article produced by
5 the receiver of the award."

6 Do you see that?

7 A. I do see that.

8 Q. Is that correct?

9 MR. HERMAN: Objection, form, outside
10 the scope of direct.

11 A. It's correct that I see the same words
12 on that page that you see. I can't confirm or
13 deny that that is, in fact, what they do.

14 And -- and I will further say that, just
15 from personal and professional experience, I don't
16 read -- I don't rely on everything I see on
17 Wikipedia, because I know that it's crowd-sourced,
18 and it's not always factual.

19 So I honestly don't know whether that's
20 true or not.

21 Q. Okay. You do rely on Wikipedia in your
22 expert report?

1 MR. HERMAN: Objection, form.

2 A. I would say -- I would say, generally,
3 no, because I rely on a variety of different
4 sources that I cross-check one with another. So
5 one thing I would never do is rely on just one
6 source for anything. And certainly not something
7 that I know is crowd-sourced.

8 Q. Okay. So you would say -- so, like, for
9 example, the next thing it says is, "Organizations
10 that receive Frost & Sullivan" -- "a
11 Frost & Sullivan award must pay a fee to
12 communicate the outcome to the public."

13 Do you see that?

14 A. I see that.

15 And I'm familiar with -- go ahead. I'm
16 sorry.

17 Q. And you see there are some citations to
18 that at the end; right?

19 A. I see that.

20 And I was going to add, and I'm familiar
21 with that, that practice --

22 Q. Uh-hmm?

1 A. -- because Frost & Sullivan is not the
2 only one that does that type of thing.

3 And it's important to note that, as a
4 market and research firm, one needs to separate
5 the -- the record -- the analysis and the outcome
6 of that from the public relations part of it.

7 So my read on that is that to be able to
8 communicate it and promote it, they need to pay a
9 fee, but that fee doesn't necessarily have any
10 bearing on what the market research firm actually
11 thinks about the subject at hand.

12 I think that's an important thing to
13 note as a common practice among certain market --
14 market research firms, such as Frost & Sullivan.

15 So I do know that much as an expert in
16 the industry, even though I haven't been to this
17 page. And I don't know the details about this
18 particular occurrence.

19 Q. I guess, what I'm curious about is,
20 Mr. Christensen, is you seem to -- you seem to
21 have referenced the Frost & Sullivan methodology;
22 right?

1 Like, the way they -- they gather
2 research; right?

3 Do -- do you know anything about how
4 Frost & Sullivan, like, researched the award that
5 they gave out to Carbyne?

6 A. You just made an assertion before you
7 asked a question, that I reference their
8 methodology. Where do I reference that?

9 Q. Okay. Let me ask that question. Maybe
10 I -- maybe that's -- I jumped ahead.

11 Do you know how Frost & Sullivan, like,
12 researches the awards that they give out?

13 A. I don't know Frost & Sullivan, how they
14 do their research, anymore than I do anybody else.

15 Q. Okay.

16 A. And you can see for yourself that it's
17 based on using a proprietary methodology. So I'm
18 not sure how I or anybody else, unless they work
19 for Frost & Sullivan, would know that.

20 Q. Exactly. Right.

21 So we don't know how Frost & Sullivan
22 came up with this award; right? Because it's

1 proprietary.

2 A. Well, we, on this particular Zoom call,
3 don't know, but I would presume that
4 Frost & Sullivan knows and -- and perhaps whoever
5 they're working closely with would know. I would
6 presume there would be some level of disclosure
7 there. But I have not been privy to that. I do
8 not know.

9 Q. Okay. Let's do this. Okay. So we're
10 on Exhibit 8, I believe.

11 A. Okay.

12 Q. And we'll go ahead and make that --
13 we'll put that in the chat.

14 A. Okay. I don't have it yet in the chat.
15 Okay. I'm pulling it down now.

16 Q. Great.

17 A. I've got it.

18 (Exhibit 8 was marked for identification
19 and is attached to the transcript.)

20 Q. And the title of Exhibit 8 is IPVM --
21 it's from a website called IPVM; right?

22 A. I think this is the first time I'm

1 seeing this.

2 Q. Uh-hmm.

3 A. So I'm just going by what you presented
4 me here. Yes. I don't know what IPVM is.

5 Q. Sure. It says -- the title of this
6 article says, CEO Refuses to Pay for
7 Frost & Sullivan Award.

8 Do you see that?

9 A. I see that.

10 Q. And the article is from April 19th,
11 2018; right?

12 A. That's what it says here on the screen,
13 yes.

14 Q. It says, "In 2009, we published an
15 article on why Frost & Sullivan awards should not
16 be trusted since awardees need to pay people --
17 pay to tell people they won them, and since the
18 awards themselves are usually dubious in nature
19 and quality."

20 Do you see that?

21 A. I see that.

22 Q. Do you -- did you do any research into

1 whether Frost & Sullivan awards should be trusted?

2 MR. HERMAN: Objection, form.

3 A. No, I did not.

4 But again, as I mentioned just a few
5 minutes ago, I'm very aware of how the market
6 research business works, and it's extremely
7 important to separate the analysis in terms of
8 what a market research firm thinks about a subject
9 matter versus what they do or not do, what they're
10 paid for or not paid for, with respect to
11 promotion, and that includes the rights and
12 licensing to do promotion. Those are two very
13 separate and distinct things.

14 Q. Well, they can be.

15 You don't know if they're distinct in
16 this instance, do you, because you don't know
17 what -- you don't know the details of
18 Frost & Sullivan's business; is that fair?

19 MR. HERMAN: Objection, form.

20 A. That's fair.

21 Q. Okay. So let's look -- there's a
22 reference in here to an article that says, One CEO

1 Says He Refused to Pay for a Frost Report.

2 Do you see that on Exhibit 8?

3 A. Do I need to scroll?

4 Q. I'm highlighting it. It's above a
5 little picture of a guy named Sean Moolman.
6 There's a line that says, "One CEO say he refused
7 to pay for a Frost report."

8 A. I see that. It looks like it's
9 hyperlinked.

10 Q. That's correct.

11 So let's go ahead and pull up as
12 Exhibit 9, that hyperlinked article.

13 A. Okay.

14 (Exhibit 9 was marked for identification
15 and is attached to the transcript.)

16 Q. So this is a LinkedIn post from
17 August 18th, 2017 by someone named Sean Moolman.

18 Do you see that?

19 A. I see that.

20 Q. So if we scroll down, he says -- he
21 begins on page 2, "A personal story will
22 illustrate this point."

1 Do you see that?

2 A. I see that.

3 Q. And he talks about, you know, being --
4 receiving an e-mail that he was in the Marquis
5 Who's Who. Do you see that?

6 A. I see that.

7 Q. And he goes on and talks about his
8 experience with that Who's and Who -- I'm sorry,
9 Who's Who business.

10 And then on page 3 he says, "Enter
11 2017..."

12 Do you see that?

13 A. Where it says, "Enter 2017, and
14 receiving the excellent(?)..."

15 Q. Uh-hmm.

16 A. I see that.

17 Q. Yeah.

18 And he says he thought Frost & Sullivan
19 was a well-known global company with a global
20 reputation; right?

21 A. I see that.

22 Q. But then he says, "A few warning signs

1 started to appear, however. Firstly, in the first
2 few conversation, I got the strange feeling that
3 the award was being, quote, 'sold to me.' I could
4 not understand it at the time why a well-known
5 company offering prestigious awards would need to
6 convince me of the value and prestige of the
7 award."

8 Then he says, "The reason for this
9 behavior became clear, however, when in a
10 subsequent conversation I was made aware" -- "I
11 was made of, quote, 'copyright,' quote, to the
12 award. When probing further, I discovered that
13 one actually has to pay for the award! And not an
14 insignificant amount, but in the order of R200,000
15 (about U.S. \$15,000)."

16 Do you see that?

17 A. I see that.

18 Q. "I had a very negative reaction to this,
19 since according to me, paying for an award creates
20 a perverse incentive for all parties involved in
21 such a transaction, especially the company
22 offering the awards."

1 Do you see that?

2 A. I see that.

3 Q. Do you agree that that's -- that the
4 point of this author -- the point this author is
5 making, that paying for an award creates a
6 perverse incentive for all parties involved?

7 MR. HERMAN: Objection to form.

8 A. I understand -- I understand that the
9 point of view of the author is -- is what you just
10 said.

11 Q. Do you disagree with that?

12 A. Do I disagree with that point of view?

13 Q. Yeah.

14 A. Well, first of all, again, this is all
15 stuff that I haven't seen and I haven't relied
16 upon in my declaration.

17 And -- and, secondly, for the different
18 items that I've relied upon in -- in some cases, I
19 look at not just any one item, but I look at an
20 item and how it relates to another item.

21 So, for example, the fact that Carbyne
22 won this award from Frost & Sullivan, in and of

1 itself, you could poke holes at it in the manner
2 in which you're suggesting; however, if you look
3 at one of the other items that I relied upon for
4 my declaration, which is -- I think it's -- I
5 can't remember which exhibit it was, but it was
6 the -- the one in which CentralSquare is -- is
7 saying that they're now offering Carbyne c-Live
8 Universe, I -- I looked at that, and I read on the
9 quote from the CEO where the CEO himself is
10 referring to it as innovative.

11 So I look at those two things together
12 rather synergistically and as some level of
13 confirmation that Frost & Sullivan -- even though,
14 yes, they are a market research firm and, of
15 course, they follow the same business model that
16 others do, which, again, is -- you could call it a
17 pay-to-play model when it comes to the promotion
18 of an award or even being able to say that you
19 have the award; however, I also have experience
20 myself, knowing that there still needs to be some
21 level of rigor in terms of analysis, to come to
22 the conclusions of the award. And so --

1 Q. What do you mean by -- sorry.

2 A. And that can't be overlooked.

3 Q. What do you mean by "pay to play"?

4 A. Well, those are the words that I use to
5 refer to what you're suggesting --

6 Q. Right.

7 A. -- and what this person, I guess it's an
8 Indian person, is suggesting in that LinkedIn
9 post; that they were appalled that they had to pay
10 to even get the award or talk about it. That's
11 what I mean by "pay to play."

12 Q. And is that what Frost Sullivan does?

13 MR. HERMAN: Objection, form.

14 A. As I mentioned, I think, several times
15 now, Frost & Sullivan is not alone regarding the
16 business model where you have two different parts
17 of the business, as I understand it. One is the
18 analysts that look at the subject matter and come
19 to a conclusion and then there's the other side of
20 the house that is involved with sales and
21 marketing and promotion; and it's that other part
22 of the house that would require you, as in this

1 instance, the one cited by this Indian person in
2 the LinkedIn article, to apparently have a license
3 to be able to talk about the award and claim the
4 award and so forth.

5 Q. Yeah.

6 But to be clear, you don't know if there
7 is any rigor and analysis that -- that -- I'm
8 sorry. Let me back up.

9 To be clear, you don't know what
10 analysis was done with respect to the award that
11 you cited in your declaration from
12 Frost & Sullivan; right?

13 A. I -- I don't know specifically what
14 analysis happened in this case.

15 However, I do know from firsthand
16 experience what type of analysis occurs. And as a
17 tier one market research firm, that they hold much
18 more credence, much more water than, say, a
19 no-name company, one that people -- that you have
20 name recognition with them. That -- that I would
21 hold suspect, if it was somebody I never heard of
22 before. But Frost & Sullivan, IDC, companies like

1 that, hold -- hold a lot of water.

2 Q. Do you have visibility to how
3 Frost & Sullivan conduct its research?

4 A. No. I think I answered that question
5 already. I don't.

6 Q. Okay. So the Wikipedia article
7 suggested that sometimes the proprietary
8 methodology is just getting an article from the
9 recipient of the award; right?

10 A. I don't know if that's what it said
11 verbatim or if that's just your interpretation.
12 I -- I don't know.

13 Q. Okay. This person goes -- this person
14 says, "I had a very negative reaction to this
15 since according to me paying for an award creates
16 a perverse incentive for all parties involved in
17 such a transaction, especially the company
18 offering the awards."

19 Do you see that?

20 A. I see that.

21 Q. And that's the view being expressed by
22 the author; right?

1 A. That is the view being expressed by the
2 author, correct.

3 Q. Do you disagree with that?

4 A. I honestly don't know if I have an
5 opinion on that because I have -- number one, I
6 hadn't looked at this; and, number two, I haven't
7 given much thought to this type of thing in a
8 really long time. So sitting here right now, I
9 don't really have an opinion on it.

10 Q. Okay. He says he -- he then talks about
11 going to the actual award banquet, and it says,
12 "The dilution culminated in the actual awards
13 banquet held in honor of the recipients. Still
14 being under the impression that the actual award
15 is handed out even if the," quote, "'copyright'
16 has not been paid for, I attended this event.

17 "As it turns out, only paid awards are
18 handed out, or, as Frost & Sullivan staff members
19 prefer to call them, 'licensed awards.'"

20 Do you see that?

21 A. I see that.

22 Q. "From the outside, the event is very

1 impressive and, for all intents and purposes,
2 looks and feels like an actual prestigious awards
3 ceremony; however, once you realize that all the
4 recipients on the stage paid a lot of money to
5 receive their awards, it loses all its
6 authenticity."

7 Do you see that?

8 A. I see that.

9 Q. Do you disagree with that last sentence,
10 that "once you realize that all of the recipients
11 paid a lot of money to receive their awards, it
12 loses all its authenticity"?

13 A. Similarly, I don't know that I have an
14 opinion on that.

15 Q. Okay.

16 A. I haven't really given this type of
17 thing much thought.

18 Q. Okay.

19 A. So I don't know if I really have
20 anything to add.

21 Q. And then it says, "It is disappointing
22 that a company held in high esteem by many seems

1 to have resorted to such practices to make money
2 (and build close relationships with recipient
3 companies)."

4 Do you see that?

5 A. I see that.

6 Q. Are you one of the people who holds
7 Frost & Sullivan in high esteem?

8 A. I would answer that question by saying
9 that I recognize Frost & Sullivan as a tier one
10 market research company, just as I do for IDC and
11 Gartner and other similarly-situated companies.
12 They are the most respected, most well-funded, and
13 the most equipped to engage in analysis.

14 And -- and, again, I would just point
15 towards the fact that the analysis itself should
16 be looked at separately and distinctly from the --
17 the marketing and sales side.

18 Q. Okay. The author then says, "What makes
19 an award have value? For an award to have value
20 as third-party validation or proxy for quality or
21 achievement, the following basic components should
22 be present: One, the nomination and selection

1 process methodology should be transparent."

2 Do you agree?

3 A. I think I'd have to answer that
4 question, again, similarly, where not only have I
5 not reviewed this, it wasn't part of what I relied
6 on for my declaration, but I haven't given these
7 processes or procedures much thought.

8 Q. Okay. You agree that the -- the
9 methodology is not transparent, that -- at least
10 the methodology that was used by -- well,
11 actually, let me ask this question.

12 The next sentence says, "The criteria
13 should be openly published and known."

14 Do you see that?

15 A. I see that.

16 Q. The criteria for this award were not
17 openly public -- sorry.

18 The criteria for the award that you
19 relied on in your declaration, Frost & Sullivan
20 award, were not openly published and known;
21 correct?

22 MR. HERMAN: Objection, form.

1 A. I don't know the answer to that
2 question. We've already established that I'm not
3 aware of the methodology. But it could have been
4 disclosed to people that I'm just not aware of.

5 Q. It says, "There should not be any
6 conflicts of interests or distorted incentives,"
7 item 4.

8 Do you see that?

9 A. I see that.

10 Q. Do you know if there were any conflicts
11 of interest or distorted incentives associated
12 with the Frost & Sullivan article that -- from
13 2025 that you relied on in forming your opinion?

14 A. I don't know if there were or if there
15 were not. I can't confirm or deny.

16 Q. Okay. Going back to your declaration,
17 and knowing what you know now about
18 Frost & Sullivan, do you still -- well, do you
19 believe that the Frost & Sullivan award is strong
20 evidence of industry praise?

21 A. I would say yes --

22 Q. Okay.

1 A. -- because these types of awards are
2 taken seriously, despite any dispersions that
3 somebody writing a LinkedIn article might -- may
4 cast about them.

5 Q. Who do you know who takes the
6 Frost & Sullivan award seriously?

7 A. I would answer that question but saying
8 I -- I know lots of folks that take these types of
9 awards seriously, whether they're from
10 Frost & Sullivan or IDC or Gartner, or anybody
11 else that's held in high regard as a
12 well-established, well-known market research firm.

13 Q. Do you know anyone who takes
14 Frost & Sullivan awards seriously?

15 A. It's difficult for me to answer that
16 question because I haven't had conversations of
17 any type with anybody recently about
18 Frost & Sullivan or the awards that they offer.

19 Q. Okay. So, no, you can't -- sitting here
20 right now, you can't tell me anyone who takes
21 Frost & Sullivan awards seriously?

22 MR. HERMAN: Objection, form.

1 A. Based on the memory that I have sitting
2 here right now, I can't tell you. It doesn't mean
3 that that hasn't happened at some point in the
4 past, but not recent enough that I can share
5 something with you easily right now.

6 Q. How about you, do you take
7 Frost & Sullivan awards seriously?

8 A. Myself personally?

9 Q. Yeah.

10 A. Yes, I do.

11 Just as I do IDC or Gartner. I think
12 I've -- I've tried to establish that with you in a
13 few different answers to my -- to your
14 questions --

15 Q. Okay.

16 A. -- but, yes, I do.

17 Q. Okay. Okay.

18 So let's go to...

19 Before we leave, do you think it's
20 important, knowing what you know now, to go back
21 and ask the folks at Carbyne if they had paid any
22 money to Frost & Sullivan for this award?

1 A. No.

2 Q. Wouldn't make a difference to you if
3 they had paid a million dollars to
4 Frost & Sullivan; right?

5 MR. HERMAN: Objection to form.

6 A. Well, that's a different question.

7 Q. Okay.

8 A. Because your first question you asked
9 was based on whether I thought it was important or
10 I thought it would have any impact on my thoughts
11 and, therefore, my declaration.

12 The second one is a complete
13 hypothetical. I mean, you could change that
14 number to 10 million or a billion or some -- some
15 number. I assume at some point it would get
16 ridiculous enough that, human nature, you might
17 change your opinion.

18 But it was not a factor that I
19 considered in my analysis, and it's not reflective
20 of my declaration in any way, shape, or form.

21 Q. But I'm asking you: Given what we've
22 looked at now, today, about Frost & Sullivan, do

1 you think it's important to know whether or not
2 anyone at Carbyne paid any money to
3 Frost & Sullivan in connection with this award?

4 A. Not important in terms of me rendering
5 an expert opinion in this case, no.

6 Q. Okay. So I can take from that that if
7 it is a fact that -- if it turns out that Carbyne
8 did pay money to Frost & Sullivan in connection
9 with this award, that wouldn't change your
10 opinion; right?

11 A. No, it would not change my opinion.

12 Again, in terms of looking at the
13 different source material that I've relied upon,
14 in some cases, I did not rely upon any one of them
15 in isolation.

16 In this case, I looked at that and I
17 looked at what the CEO of CentralSquare said
18 himself, that it was innovative. So it's easy for
19 a POSITA to come to the conclusion that it is, in
20 fact, innovative.

21 So you have this market research firm
22 that said it's one thing and the CEO of the very

1 same company -- or not the very same company, but
2 the -- but CentralSquare, who licensed -- who
3 apparently licensed from Carbyne, is saying that
4 they -- that he believes it's innovative.

5 Q. What do you think the CEO of
6 CentralSquare said was innovative?

7 A. Oh, I have to go back to that exhibit.
8 Right?

9 Q. I -- I don't know. I don't think we've
10 seen anything that says that, but you seem to have
11 that --

12 A. Yeah, you shared -- you shared the
13 exhibit with me, and then you said we'd come back
14 to it, so...

15 I read it.

16 Q. Okay. Well, let's pull it up.

17 What do you think -- let's reintroduce
18 it. I think it was originally Exhibit 5, but
19 we'll come back to it.

20 A. So you want me to answer that question?

21 Q. Yeah. Yeah.

22 Let's -- let's make sure that we have

1 the record clear about what Exhibit 5 is.

2 A. You want me to say what Exhibit 5 is?

3 Q. No. I'm sorry. I'm just -- just give
4 me a second, Mr. Christensen.

5 A. Okay.

6 Q. I'm getting to -- I'm trying to get back
7 to my Zoom. This is giving me a hard time here.
8 Oh, here we go.

9 Exhibit 5 is in the chat. Save it.
10 Okay.

11 Okay. So go ahead.

12 (Exhibit 5 was marked for identification
13 and is attached to the transcript.)

14 Q. I've got Exhibit 5, which was
15 Exhibit 2006, which you relied on in your
16 declaration; right?

17 A. Correct.

18 Q. And did you say you thought that the CEO
19 of CST said something was innovative?

20 A. Can you share the document on the screen
21 to make sure we're looking at the same thing?

22 Q. Oh, I'm sorry. I'm sorry. I am looking

1 at...

2 So, just to reorient ourselves,
3 Mr. Christensen, you said the CEO of
4 Christensen -- I'm sorry. Let me back up.

5 The CEO of CentralSquare says -- said it
6 was innovative; right?

7 A. Yes.

8 Q. What is "it" that you think the CEO of
9 CentralSquare said was innovative?

10 A. Well, it says right there,
11 "CentralSquare continues to expand the value and
12 capabilities that we offer our customers,
13 integrating the tools and data emergency callers
14 have in their smartphones to deliver greater
15 situational awareness for safer and more effective
16 emergency response."

17 Q. Okay.

18 A. "Our partnership with Carbyne is a
19 powerful example of that continual innovation."

20 So I assume that that second sentence in
21 quotations relates to the first sentence in
22 quotations, which would refer -- to answer your

1 question, refers to things like integrating the
2 tools and data emergency callers have in their
3 smartphones to deliver greater situational
4 insight, which is exactly what the '383 patent
5 teaches.

6 Q. But the sentence that talks about
7 innovation says, "Our partnership with Carbyne is
8 a powerful -- powerful example of the continual
9 innovation we are delivering."

10 Right?

11 A. Correct.

12 Q. But the example of continual innovation
13 is the partnership with Carbyne; right?

14 A. Right.

15 Q. Yeah.

16 A. And, again, my read on that, my
17 interpretation of that wording, is such that that
18 in -- that, number one, that sentence is referring
19 to or related to the previous sentence.

20 And that innovation that's being
21 referred to there is presumably intended to be
22 reflective of their partnership, which, as -- my

1 understanding, was some kind of a deal where
2 CentralSquare was using Carbyne's technology, and
3 presumably that would be the same technology
4 that's reflective of the '383 patent.

5 Q. Okay. But there's a fair amount of
6 assumptions in your conclusion; right?

7 MR. HERMAN: Objection, form.

8 A. Assumptions, yes. It's -- it's my read
9 on the understanding of -- of what's intended by
10 this -- this statement, which looks likes a press
11 release.

12 Q. Yeah.

13 And you haven't tested those
14 assumptions? I mean, one of the things you said
15 is you assume that Carbyne was using -- or
16 CentralSquare was using Carbyne's technology;
17 right?

18 A. Correct.

19 Q. And you said you assume that the
20 technology that's being used is the '383 patent;
21 right?

22 MR. HERMAN: Objection to form.

1 A. I said -- I said it was reflective of
2 the '383 patent.

3 Q. Right.

4 But you haven't done an analysis to
5 claim by -- an element-by-element analysis of
6 anything that was allegedly used by Carbyne and
7 whether it meets any claim of the '383 patent?

8 I'm sorry. Let me ask the question
9 again. It was poorly phrased.

10 You have not done an element-by-element
11 analysis of the technology that you assume was
12 used by CentralSquare; is that fair?

13 MR. HERMAN: Objection, form.

14 A. I would say that's fair.

15 I'm relying on public relation
16 statements from CentralSquare as opposed to
17 CentralSquare engineers providing to me, or
18 anybody else that I'm aware of, software or
19 hardware or anything that would indicate how they
20 may have integrated Carbyne's technology.

21 Q. Right.

22 And, of course, in the press release

1 itself, it refers to -- if you go to the first
2 line, it says that the "Carbyne's c-Live Universe
3 provides dynamic realtime caller-generated live
4 video, GPS and chat, alongside CentralSquare's
5 enterprise CAD solution."

6 Right?

7 A. Correct. I see that.

8 Q. Right.

9 And so chat isn't a element of the --
10 isn't a claimed element of the '383 patent; right?

11 A. Correct.

12 We -- we've established that already.

13 Q. Yeah.

14 And GPS isn't either?

15 A. Correct. Same.

16 Q. Okay. So at least based on what's here,
17 there are at least a number of other features that
18 are referenced by CentralSquare that are the
19 subject of this press release; right?

20 A. Can you restate the question, please?

21 Q. There are a number of other features in
22 this press release referenced here that are not

1 covered by the claims of the '383 patent; is that
2 fair?

3 MR. HERMAN: Objection to form.

4 A. Correct, I would agree.

5 Correct, I would agree with that. And I
6 would add that what does relate to it is where it
7 says, "To integrate and distribute audio and data
8 to first responders," et cetera, et cetera.

9 Q. Okay. You're not saying that Carbyne
10 was the first offering to distribute audio and data
11 to first responders and hospitals; right?

12 MR. HERMAN: Objection, form.

13 A. Was the question whether or not they
14 were the first ever to do that?

15 Q. Yes.

16 A. I am not aware of whether they were the
17 first to ever do that or not.

18 Q. Well, as an expert in this field, do you
19 think that Carbyne was the first company to ever
20 distribute audio and data to first responders and
21 hospitals?

22 A. Well, as an expert in this field and

1 given that they have a patent in this area and --
2 and that they're well known in this field for what
3 they do, I think it's a safe assumption that --
4 that they were the first.

5 But, again, sitting here right now, it's
6 not part of what I analyzed, whether they were the
7 very first to ever do it.

8 You know, what's at issue here is
9 CentralSquare versus Carbyne, not company XYZ
10 versus Carbyne. So I didn't look to see if they
11 had done something with somebody else other than
12 CentralSquare first. I don't know. I just don't
13 know.

14 MR. CUTRI: Okay. Okay. We're coming
15 up on an hour. I'm happy to take a break or
16 I can keep going. Whatever you want to do.

17 THE WITNESS: I'm okay to keep going.

18 MR. CUTRI: Okay. Okay.

19 Q. Let's pull up Ramanujaiaha.

20 A. Okay.

21 Q. All right. In the chat,

22 Mr. Christensen, you should have Exhibit

1 Number 10.

2 (Exhibit 10 was marked for
3 identification and is attached to the
4 transcript.)

5 Q. And if you could, just open that and
6 confirm that it is, in fact, what was marked as
7 CentralSquare Exhibit 1005, the Ramanujaiaha
8 Patent U.S. 9,762,733.

9 A. Yes. I've got it.

10 Q. Okay. You've read the Ramanujaiaha
11 reference before; correct?

12 A. Yes.

13 Q. And -- okay.

14 So let's look at the -- all right.

15 So let's look at page -- column 4 under
16 the Detailed Description. It begins,
17 "Hereinafter..."

18 A. Do you want to share that on your
19 screen?

20 Q. Oh. I'm sorry. You're not seeing that.
21 I -- I need to navigate to that. Okay. Sorry.

22 Okay. So here under "Contact" -- so

1 there's a detailed description in column 4 of
2 Ramanujaiaha; right?

3 A. Uh-huh. Yes.

4 Q. And, by the way, Mr. Christensen, I
5 heard you say before that you were just going to
6 call it "Rama."

7 Is that what you prefer that you call
8 it?

9 I'm used to calling it Ramanujaiaha, but
10 if you want to call it Rama, I can do my best to
11 try to call it that.

12 A. I'll call it Ramanujaiaha. Is that the
13 correct pronunciation? I'll refer to it as that.

14 Q. That's phonetically what I -- the best I
15 could do. I didn't ask anyone, but that's the
16 best how I could sound it out.

17 A. Okay. I'll do the same.

18 Q. Okay. It says, "Contact centers may
19 utilize a number of different communication
20 channels."

21 Do you see that?

22 A. I do.

1 Q. And it says, "e.g., mediums or
2 modalities."

3 Right?

4 A. Correct.

5 Q. And so examples -- Ramanujaiaha teaches
6 that examples of communication channels are
7 mediums and modalities; right?

8 A. Correct.

9 Can you make the screen a bit bigger, by
10 the way?

11 Q. Oh. I'm sorry. Yeah.

12 A. The resolution is very poor.

13 Q. How is that?

14 A. That's better.

15 Q. Is that better?

16 I can't -- I can even make it a little
17 bigger here.

18 A. No, I'm not vision impaired. It was
19 just really blurry.

20 Q. Yeah, I know. I -- tough time with,
21 like, all these different resolutions, but
22 hopefully it's much bigger. At least on my side

1 it's much larger now.

2 A. It is.

3 Q. Okay. So it says, "Contact centers may
4 utilize a number of communication channels."

5 Right?

6 A. It does say that.

7 Q. And then it gives mediums, modalities --
8 let me ask that question better.

9 Ramanujaiaha says that mediums and
10 modalities are communication channels; right?

11 A. Well, since they're providing that
12 parenthetically, what they're alluding to is that
13 a communication channel, a different channel,
14 could be also referred to as a different type of
15 medium or a different type of modality. Correct.
16 That's my read on it.

17 Q. Okay. And it says that these are
18 channels that can be utilized by contact centers;
19 right?

20 A. Yes, it says that.

21 Q. And says, "While telephonic
22 communications are still dominant for customer

1 engagement, customer are increasingly engaging via
2 digital," and it gives an example of video; right?

3 A. I see that.

4 Q. And it also says "WhatsApp."

5 Right?

6 A. Yes, it does.

7 Q. And then if we go to column 5,
8 Ramanujaiaha -- at the top of column 5, can you
9 see the paragraph, "Beginning further"?

10 A. I see that.

11 Q. "Many customers today regularly use two
12 or more communication channels to accomplish their
13 goals."

14 That's disclosed in Ramanujaiaha; right?

15 A. Yes.

16 Q. And it then -- line 9 says, "For
17 example, interactions between contact center
18 resources; (e.g., live agents and self-service
19 systems) and outside entities, (e.g. customers)
20 may be conducted over communication channels such
21 as voice/telephony (e.g. telephone calls)."

22 Right?

1 A. I see that.

2 Q. And then it also includes another
3 channel as video, and parenthetically, video
4 conferencing; right?

5 A. I see that.

6 Q. And then Ramanujaiaha says, "In many
7 cases, the customer may have access to one or more
8 devices capable of interacting with the contact
9 center resources over the different mediums
10 concurrently (e.g., simultaneously or at the same
11 time)."

12 Right?

13 A. I see that there.

14 Q. And so Ramanujaiaha is teaching that
15 today, meaning as of the time of Ramanujaiaha,
16 customers were using two or more communication
17 channels; right?

18 A. I see that.

19 Q. And customers -- and one of those
20 communication channels was telephone calls; right?

21 A. I see that.

22 Q. And another one of those communication

1 channels was video conferencing; right?

2 A. I see that.

3 Q. And that customers were -- had devices
4 that could interact with a contact center over
5 different mediums, different channels
6 concurrently; right?

7 A. I see that.

8 Q. And so that would have been known to a
9 person of ordinary skill in the art; right?

10 MR. HERMAN: Objection, form.

11 A. So what would have been known to a
12 person skilled in the art based on this patent is
13 that it's possible to use these different
14 channels, and it's possible to have both of these
15 channels -- two of these channels in use
16 concurrently, but not -- but not simultaneously in
17 the context of a urgent communication need.

18 Q. Okay. So this -- okay.

19 A. And I can elaborate on that.

20 Q. Well, I only want you to elaborate on --
21 well, hold on one second. Let me just get to
22 something here. See if I can get this to turn

1 here. Let's look at Exhibit -- okay.

2 Let's look at column 5, and it says,
3 "According to one embodiment, a multi-channel
4 communication may refer to a multimodal
5 communication or an omnichannel
6 communication/conversation."

7 Right?

8 A. I see that.

9 Q. And it says, "According to one
10 embodiment, a multimodal communication is a
11 communication where two or more communication
12 modalities (also referred to as modes of
13 communication, communication channels, media
14 channels, media types, or communication mediums)
15 are invoked concurrently during a single
16 communication session, engagement or
17 conversation."

18 Right?

19 A. I see that.

20 Q. So when we see multimodal communication,
21 we know that that is a situation -- in
22 Ramanujaiaha, we know that's a communication where

1 two or more communication modalities are invoked
2 concurrently during a single communication
3 session; right?

4 MR. HERMAN: Objection, form.

5 A. I see what's written there.

6 Q. And additionally, we know that the
7 different communication modalities that customers
8 can use include telephone and video; right?

9 A. Repeat that question, please.

10 Q. We know from Ramanujaiaha that the
11 different modalities that a customer's call in
12 call centers can use include telephone calls and
13 video conferencing; right?

14 A. Correct.

15 Q. And -- so we know from Ramanujaiaha that
16 customers can call, call centers and
17 simultaneously use a telephone call communication
18 channel and a video-conferencing communication
19 channel at the same time; right?

20 MR. HERMAN: Objection, form.

21 A. They refer to, in this embodiment,
22 concurrently. What they did not say is

1 "simultaneous" or refer to the need to associate a
2 first communications instance with a second
3 communications instance, such as would be the case
4 critically for an emergency call to a PSAP.

5 Q. Right.

6 But it does say "concurrently."

7 Right?

8 A. It does say "concurrently."

9 Q. And "concurrently" means simultaneously
10 per what I just highlighted in column 5, line 18;
11 right?

12 MR. HERMAN: Objection to form.

13 A. He -- he does have "simultaneously"
14 parenthetically after "concurrently."

15 Q. Uh-hmm.

16 A. But "concurrently" and "simultaneously"
17 do not necessarily have the same meaning,
18 especially when applied to what is being taught
19 [sic] in this patent as opposed to what is being
20 taught in the '383 patent.

21 Q. Okay. But we do know that this patent
22 is teaching you that the word -- examples of the

1 word "concurrently" in the Ramanujaiaha patent
2 would be "simultaneously," or at the same time;
3 right?

4 MR. HERMAN: Objection, form.

5 A. Again, this is a bit of semantics, but I
6 certainly cannot defy the fact that he --
7 Ramanujaiaha is trying to equate the word
8 "concurrently" with "simultaneously."

9 But, again, what is taught in this
10 patent is -- is not what is taught in the
11 '383 patent, so it does not have the same plain
12 and ordinary meaning to a POSITA.

13 Q. Okay. And Ramanujaiaha is also trying
14 to equate the word "concurrently" with at the same
15 time; right?

16 MR. HERMAN: Objection, form.

17 A. I -- go ahead and highlight there where
18 he says at the same time. I believe you said
19 that, but I just...

20 Q. Yep.

21 A. Oh, I see that there. Yes, he is trying
22 to -- yes. Correct.

1 Q. Okay. And if we go over to -- and
2 Ramanujaiaha discloses that two or more
3 communication modalities are invoked concurrently
4 to a person of ordinary skill in the art, that
5 would mean that these communication modalities
6 occur at the same time; right?

7 MR. HERMAN: Objection, form.

8 A. It would not necessarily to a POSITA
9 imply that they begin at the same time, that they
10 persist at the same time, and/or that they end at
11 the same time. But what it would imply is that at
12 some point they are occurring at the same time.

13 Q. Okay. Let's look at column 9,
14 column 46. Zoom in a little bit.

15 So this is Ramanujaiaha at line 46. It
16 says, "In various embodiments the term
17 'interaction' and 'communication' are used
18 interchangeably."

19 Right?

20 A. I see where it says that.

21 Q. And so a person of ordinary skill in the
22 art, reading Ramanujaiaha, knows that the term

1 "interaction" and "communication" are used
2 interchangeably; right?

3 A. I see those words there.

4 Q. And -- and that's what a person of
5 ordinary skill in the art would also understand;
6 right?

7 MR. HERMAN: Objection, form.

8 A. Different question. Different answer.

9 I see those words there. I'm
10 acknowledging that those words are there. A
11 POSITA would not necessarily interpret those as
12 being synonymous, especially if a POSITA was to
13 take those -- that language there within the
14 context of -- of this patent and -- and what is
15 taught within the patent.

16 Q. Well, we have a teaching right here in
17 the patent; right?

18 MR. HERMAN: Objection, form.

19 Q. Ramanujaiaha has a teaching here, column
20 9, line 46; right?

21 MR. HERMAN: Objection, form.

22 A. I don't see that as a teaching. I see

1 that more as nomenclature.

2 Q. Okay.

3 A. That he's basically saying, hey, from
4 this point forward I'm going to use the words
5 "interaction" and "communication" interchangeably.

6 Q. Got it.

7 A. But for a POSITA, "interaction" could be
8 any number of different things, which could
9 include "communication" but it may not include
10 "communication."

11 Q. Okay. But a POSITA would know, at least
12 in this reference, that the terms "interaction"
13 and "communication" generally refer to any
14 realtime or non-realtime interaction that uses any
15 communication channel; right?

16 MR. HERMAN: Objection, form.

17 A. So I see the words that are being used
18 there, and I see that Ramanujaiaha is broadly
19 speaking -- extremely broadly speaking saying
20 that, number one, interaction and communication
21 are interchangeable, that they're synonymous.
22 That is not what I believe a POSITA would agree

1 with, because, again, interaction is orthogonal to
2 communication, it can include communication, but
3 it may be other things.

4 And then the rest of that sentence,
5 generally referring to any realtime or
6 non-realtime interaction that uses any
7 communication channel, whether it's realtime or
8 non-realtime are -- are extremely different.

9 Q. Uh-hmm.

10 A. So glomming those all together, I think
11 a POSITA would not necessarily agree with that. I
12 think it's very context and use-case and
13 technology specific.

14 Case in point, realtime video is very
15 latency dependent. Meaning that if there's too
16 much latency, you're going to have a big problem,
17 which is one of the problems with WebRTC, by the
18 way.

19 Q. Well --

20 A. Whereas, if you're recording a video and
21 then sending it where there can be buffering, that
22 would not be realtime. And you don't have the

1 same issues or concerns, and you don't have the
2 same technology.

3 So a POSITA would read what is written
4 here and take it with a grain of salt.

5 Q. Do you think -- I understand that,
6 Mr. Christensen, but Ramanujaiaha -- they came up
7 with the invention; right?

8 A. Well, of course.

9 Q. Yeah.

10 A. And it's his word, not mine.

11 Q. Right.

12 A. I'm just saying a POSITA, from the
13 perspective of looking at this patent and looking
14 at things like is -- is the '383 anticipated from
15 this or is it obvious from this, no and no, it's
16 not.

17 Q. Oh, no, no.

18 I'm just asking you, Mr. Christensen,
19 what Ramanujaiaha wrote in their patent. Right?
20 Do you understand that?

21 A. I understand that, and I answered that I
22 see it written there.

1 Q. Okay. And Ramanujaiaha, since they are
2 the author of this document, they're the ones who
3 characterize what's in it; right?

4 A. Correct.

5 Q. And so Ramanujaiaha is saying in this
6 patent, the terms "interaction" and
7 "communication" are used interchangeably; right?

8 A. That is apparently what he's saying.

9 Q. Yep.

10 And what he's saying is that any time
11 you see the word "interaction" or "communication,"
12 that generally refers to any realtime and
13 non-realtime interaction that uses any
14 communication channel; right?

15 MR. HERMAN: Objection, form.

16 A. That's what's implied in this particular
17 paragraph of this patent.

18 Q. Right.

19 And when it says "any communication
20 channel," it means, "without limitation, telephone
21 calls."

22 Right?

1 A. Yeah, I see what is written there.

2 Q. Yep.

3 A. And, again, myself being a POSITA or --
4 or greater than a POSITA, that -- I read a patent
5 in totality, and I read the claim information, and
6 I read the disclosure and what is taught in the
7 patent, and I would not take just one paragraph
8 out of context to mean that just because he's --
9 Ramanujaiaha -- Raman -- however you say it.

10 Q. Right.

11 A. -- is equating two things -- two or more
12 things that are not equivalent, just because he's
13 saying they're equivalent doesn't mean that they
14 are, because they could have potentially different
15 meaning, potentially drastically different
16 requirements. And so I don't take just one
17 paragraph out of context to apply the meaning to
18 the -- to any patent.

19 Q. Oh, I'm not asking you to apply it to
20 any patent, Mr. Christensen. I'm just asking you
21 to agree with me that Ramanujaiaha can have their
22 own glossary of terms. Right?

1 A. Sure.

2 Q. And they have -- and they are telling
3 you that when it comes to reading these various
4 embodiments, Ramanujaiaha wants the reader to
5 understand that the terms "interaction" and
6 "communication" are used interchangeably; right?

7 A. I see that.

8 Q. And Ramanujaiaha wants the reader of
9 this patent to understand that the term
10 "interaction" or "communication" can refer to
11 telephone calls; right?

12 MR. HERMAN: Objection, form.

13 A. I see that.

14 Q. Is that right?

15 A. I see -- yeah, I see what's written
16 here.

17 Q. I do, too. But I just want to make sure
18 that we're on the same page.

19 Ramanujaiaha is telling the reader that
20 when you see the word "interaction" or
21 "communication" in this patent, that can refer
22 to -- either one of those can refer to telephone

1 calls; right?

2 MR. HERMAN: Objection, form.

3 A. So, yes, in this paragraph, that's
4 what's being said here.

5 Q. Okay.

6 A. But, again, as a POSITA, or greater than
7 a POSITA, I would read the remainder of the patent
8 and see if any claim or taxonomy that's stated
9 previously is substantiated in what's taught
10 within the patent.

11 Q. Right.

12 A. So taking this paragraph in isolation,
13 out of context, I see that some -- some verbiage
14 is here that -- that's saying that these things
15 are roughly equivalent with one another, and they
16 should be perceived synonymously. But I would, as
17 a POSITA or greater, want to validate that for
18 myself in the remainder of the patent to see if it
19 makes sense or not.

20 Q. Sure.

21 But we don't get to change what -- what
22 Ramanujaiaha teaches, do we?

1 MR. HERMAN: Objection, form.

2 A. We don't get to change what is written
3 in this patent.

4 Q. Correct.

5 It teaches what it teaches; right?

6 MR. HERMAN: Objection, form.

7 A. And -- and my opinion of what it teaches
8 as a POSITA are greater or maybe different than
9 somebody that's not a POSITA.

10 Q. Right.

11 But one thing you cannot do, even if
12 you're greater than a POSITA, is change the fact
13 that Ramanujaiaha says "interaction" and
14 "communication" are used interchangeably and can
15 refer to telephone calls; right?

16 A. What's written there is -- is in the
17 public record now.

18 Q. Yep.

19 And so you can't change that; right?

20 MR. HERMAN: Objection, form.

21 A. I can't change that. I am not aware of
22 anybody that can change that.

1 Q. Right.

2 And you can't change the fact that
3 Ramanujaiaha says that the terms "interaction,"
4 communication" can refer to WebRTC calls; right?

5 MR. HERMAN: Objection, form.

6 A. I can't change it. It's written right
7 there by Ramanujaiaha.

8 Q. Right.

9 So we have to accept that; right?

10 MR. HERMAN: Objection, form.

11 A. I accept what's written in that
12 paragraph that that is something that Ramanujaiaha
13 included in the patent.

14 Q. Okay. And there's no time limitation
15 on -- that you're -- here in paragraph -- I'm
16 sorry, in column 9, line 46 through 53, there's no
17 temporal limitation in this; correct?

18 MR. HERMAN: Objection, form.

19 A. There's most definitely a implicit time
20 limitation, because realtime versus non-realtime,
21 as a POSITA and even less than a POSITA, knows has
22 a time aspect to it.

1 Q. Okay. What do you -- what do you think
2 is the -- there's -- but both are -- are listed
3 here, so what do you think the time aspects are
4 that are being conveyed in column 9, lines 46
5 through -- sorry, 45 through 53?

6 A. We're on a -- we're on a Zoom call right
7 now.

8 Q. Okay.

9 A. This is realtime.

10 Q. Okay.

11 A. And so if my ISP has a problem with
12 jitter, your spoken word is going to be
13 unintelligible, the screen gets poor resolution,
14 et cetera, et cetera.

15 Q. Okay.

16 A. If I am watching Netflix, it's not
17 realtime, it's being buffered. I could have much
18 lower bandwidth and there could be problems with
19 my ISP or whatever, and I wouldn't even know it
20 because it's buffered.

21 Q. Okay. Any other time limitation that
22 you're aware of in column 9 for how these

1 communication channels can be used by

2 Ramanujaiaha?

3 A. Yes.

4 Q. Column 9, line 46 through 53.

5 A. Yes. Absolutely.

6 Because he refers to communication very
7 broadly --

8 Q. Uh-hmm.

9 A. -- without defining what type of
10 communication, and the type of communication can
11 have vast bearing on timing.

12 Q. Okay.

13 A. For example, the form of communication
14 we're having right now, which is highly
15 interactive -- like I said, communication and
16 interaction are related, but they're not the same
17 thing.

18 You and I are interacting with one
19 another. The form of communication we're having
20 right now is video and it's realtime. As opposed
21 to if you were to send me a text, I don't have to
22 look at it right away, and probably I'm not

1 because I'm not looking at my phone. So that very
2 certainly has a time aspect to it and is also a
3 form of communication.

4 So, again, being able to say that these
5 things are synonymous and the fact that they are
6 actually synonymous for a POSITA or greater are
7 two very different things.

8 Q. Okay. So in column -- column 9, line 45
9 through 53, you agree that this is a broad
10 disclosure of multiple different versions of
11 communication channels that can be used; right?

12 A. Which are not necessarily substantiated
13 in what's taught in the patent, correct.

14 Q. Correct.

15 And so there's -- they could be
16 realtime, they could be non-realtime, the
17 interactions and communications disclosed in
18 column 9, line 46 through 53; right?

19 A. That's what Ramanujaiaha has said here,
20 or is implying.

21 Q. Okay. And they could be used for --
22 Ramanujaiaha is saying here, in column 9, line 46

1 through 53, that you can use these communication
2 channels in various embodiments; right?

3 A. What was the very last one you said?
4 You were trailing off there a bit.

5 Q. You can use these communications and
6 interactions in various embodiments; right?

7 A. In various embodiments, that is what he
8 says there, correct.

9 Q. And it doesn't say that you have to use
10 them in any particular order; right?

11 MR. HERMAN: Objection, form.

12 A. I don't see in this paragraph where it
13 says it has to be used in any particular order.

14 Q. And it doesn't say that you have to
15 use -- in this particular paragraph, it doesn't
16 say you have to use -- for example, WebRTC calls
17 before telephone calls; right?

18 A. I don't see that or anything else
19 written there regarding a certain order of things.

20 Q. Okay. And in paragraph -- in column 9,
21 line 45 through 52 [sic], it doesn't say that, you
22 know, these communications have to be used for the

1 initial communications with a call center; right?

2 A. I don't see anything written there in
3 that regard.

4 Q. Okay. And it also doesn't say it has to
5 be -- that this is the way that we first contact a
6 call center, that isn't disclosed in column 9,
7 line 45 through 53; right?

8 A. I don't see that disclosed there.

9 MR. CUTRI: Okay. Okay. Let's do this.
10 We're at two hours and -- sorry. I said
11 two hours and 21 minutes. We're at 2:21 my
12 time. I think it's probably been a little
13 bit more than an hour since we started at
14 1:00 my time. So I'm happy to take a break,
15 if you want to, Mr. Christensen.

16 THE WITNESS: Sure. Sure. When would
17 you like to come back?

18 MR. CUTRI: Oh. You know, my preference
19 is always take slightly longer breaks in the
20 afternoon, but I -- I know you're at a later
21 time frame. So if we can come back at like
22 2:35, that would be great. 2:35 Central.

1 THE WITNESS: Sure.

2 MR. CUTRI: Okay. Let's do that.

3 THE WITNESS: Okay.

4 THE STENOGRAPHER: We're off the record.

5 (Recess in proceedings.)

6 THE STENOGRAPHER: All right. With

7 that, we are on the record.

8 BY MR. HERMAN:

9 Q. So, Mr. Christensen, I'm just checking
10 to see whether the realtime -- okay. Here we go.

11 Okay. Let me reshare Exhibit 10. It's
12 Ramanujaiaha, again.

13 So we were looking at column 5. And do
14 you recall that there was this reference to
15 Ramanujaiaha to many users regularly using two or
16 more communication channels to accomplish their
17 goals, which is at column 5, line 5 and 6?

18 Do you see that?

19 A. I see that.

20 Q. Okay. And it then says, "For example,
21 interactions between" -- oops; let me make sure I
22 have this right -- "interactions between customers

1 and resources (e.g. live agents) and outside
2 entities, (e.g. customers), may be conducted over
3 communication channels."

4 Right?

5 A. I see that.

6 Q. And it also says -- one of those
7 channels can be voice telephony; right?

8 A. I see that.

9 Q. And then it says it could also be video;
10 right?

11 A. I see that.

12 Q. And so telephone calls are audio channel
13 communications; right?

14 A. Telephone calls typically imply audio,
15 yes.

16 Q. And do video channels typically imply
17 visual communication channels?

18 MR. HERMAN: Objection, form.

19 A. Yes. Yes, typically moving images, but
20 it could also be voice only.

21 Q. Okay. So video -- so visual
22 communication channels can include video

1 conferencing; correct?

2 A. Yes.

3 MR. HERMAN: Objection, form.

4 Q. Okay. The -- can it include WebRTC?

5 A. WebRTC being one means of supporting
6 realtime video. I would say that that is a subset
7 of video.

8 Q. Okay. All right. So -- one second.

9 In your declaration -- back to your
10 declaration for a moment, which is Exhibit -- I'm
11 talking about Exhibit Number 1. Let me see if I
12 can share that with you.

13 In your -- do you see your declaration?

14 A. I see it, yeah, on the screen.

15 Q. I'm scrolling through here.

16 Here, I wanted to ask you about this.
17 It says, "I co-founded Zoove" -- is it "Zoove" or
18 "Zoove"?

19 A. Zoove.

20 Q. "Zoove, a mobile marketing company,
21 serving as its CTO for five years."

22 When was that?

1 A. That was from 2005 to 2010.

2 Q. Okay. "I engineered the UI and
3 interoperability for the Zoove's Star/Star service
4 that allowed an end-user to engage in multimodal
5 (voice, text, and data), multi-media experience
6 simply by dialing ** and hitting 'send' from their
7 mobile phone."

8 What did you mean by "multimodal
9 multi-media experience"?

10 A. That there could be one or more modes
11 and/or media used by that.

12 The way the service worked was -- and
13 this predates the preponderance of smartphones, so
14 we -- we thought that this was -- and it was a
15 very innovative approach. We thought it was going
16 to get greater commercial traction, but
17 smartphones kind of took over.

18 The whole idea is that you see or hear
19 an advertisement and this is a new call to action,
20 that you would essentially dial ** and a series of
21 digits -- and this still exists today, by the way.
22 If you dial **NFL, you can experience it for

1 yourself.

2 When you dial, in this example **NFL, it
3 causes a signal to be sent to a back end, and that
4 back end will respond based on what the advertiser
5 wants to do. The advertiser may want to send a
6 text message. The advertiser may want to engage
7 in a WAP push-message to connect the user to a
8 mobile website, et cetera, et cetera. It can be
9 multimodal in the sense that perhaps you are
10 connected to an interactive voice response system,
11 an IVR, where you listen to a message, so that
12 would be an audio component, and then also receive
13 a text message.

14 It's very important to note that these
15 things are all asynchronous. They are not
16 synchronized or orchestrated as per the
17 '383 patent.

18 And also, they are not authenticated.
19 So there's not authentication of the originator or
20 the terminator in any of this. It's just wide
21 open.

22 Q. Okay.

1 A. So...

2 Q. Now, you said that they're not
3 asynchronous; right?

4 The Zoove interactions that the end-user
5 would have with a system were asynchronous; right?

6 A. Yes. That's what I said.

7 Q. Okay. I think earlier today we were
8 talking about the need to synchronize audio and
9 visual channels. Do you remember that?

10 A. Yes, I do remember that.

11 Q. So prior to the '383 patent, was there a
12 need to synchronize audio and video channels in
13 the PSAP context?

14 MR. HERMAN: Objection, form.

15 A. Well, the basis of the question, was
16 there a market need, was there a commercial need,
17 was there a desire on the part of public safety
18 personnel to gather as much information as
19 possible about emergency events, I would say yes.

20 Q. Okay. Why -- why was there a need --
21 prior to the '383 patent, why was there a need to
22 synchronize audio and video channels in the PSAP

1 context?

2 MR. HERMAN: Objection, form.

3 A. Generally speaking, there has been, for
4 a long time, a desire for richer data and content
5 on the part of the PSAP, to know more about the
6 nature of an emergency event, a/k/a is it a brush
7 fire or is the warehouse on fire, that type of
8 thing. So in that regard, public safety answer
9 points are interested in whatever information they
10 can get.

11 However, PSAPs are -- and public safety,
12 in general, are notoriously resource constrained
13 and so they don't have the liberty to sift through
14 a bunch of information before they make a
15 decision. They make -- they need to make a
16 decision immediately. They can't, like,
17 contemplate what's going on. They -- they -- they
18 don't decide whether they're going to send an
19 ambulance or a fire truck. They have to make
20 split-second decisions.

21 So one of the reasons why the
22 '383 patent is innovative is it binds these two

1 things together: One, that a call is invoked over
2 a voice channel with the opportunity to provide
3 richer data by simultaneously having these two
4 channels happen and maintain or orchestrate that
5 so that, number one, the PSAP can trust where the
6 information is coming from in the case of the
7 video; and, number two, bind it specifically to
8 the emergency event and even the person that is
9 involved who's sharing the video, who's very
10 important.

11 Can you just imagine how it would be
12 even worse for a PSAP if they got a bunch of video
13 or images that they could not authenticate? They
14 wouldn't know if it's a bad actor. So it's
15 critically important to have a trusted environment
16 here and also to be able to do it in a way where
17 it's synchronized so that you know that it's Gerry
18 Christensen that called, his telephone number, and
19 he's experiencing in realtime that warehouse fire,
20 it's actually happening; we better send ten fire
21 trucks and not one.

22 Q. Okay. And that -- but that need,

1 just -- I think I -- just so I understand your
2 testimony, that need was present before -- the
3 need to -- let me back up.

4 So I understand your testimony, the need
5 to synchronize audio and video was present before
6 the '383 patent; correct?

7 MR. HERMAN: Objection, form.

8 A. I would say the general need to have as
9 much data as possible has always been there, as I
10 stated. That's exactly what I said just a moment
11 ago.

12 Q. Uh-huh.

13 A. The ability to synchronize it and
14 everything else that I just said just a moment
15 ago -- I can repeat it -- makes it even better.
16 In other words, it's a value add.

17 Which is, again, referring back to what
18 the CEO of CentralSquare probably meant by that
19 quote, that it is highly innovative and provides a
20 much richer experience and more meaningful and
21 valuable than just simply having a repository of a
22 bunch of videos or images that a PSAP could look

1 at, having no idea who they came from or what
2 order they originated.

3 Q. Okay. Do you think that need -- do you
4 think it was known in the prior art -- prior -- do
5 you think it was known, prior to the '383 patent,
6 that there was a need to synchronize audio and
7 video that came in to a PSAP?

8 MR. HERMAN: Objection, form.

9 A. I would say not necessarily. And I'll
10 give you an analogy.

11 In World War II --

12 Q. Well, I -- go ahead.

13 A. In World War --

14 MR. HERMAN: Don't interrupt the
15 witness.

16 A. In World War II, Messerschmitts had
17 fuel-injected motors. They could fly upside down.
18 The Spitfire, which in many respects was superior
19 to the Messerschmitt, but it couldn't fly upside
20 down; the reason being is it had a carburetor. So
21 it was literally life and death at that point
22 where the British pilots realized, oh, we don't

1 have fuel-injected engines, we can't fly upside
2 down when we're fighting the German Luftwaffe. So
3 that would be a critical example of identifying a
4 real life-or-death need.

5 Can I cite a similar example in the
6 emergency services world sitting here today? No.

7 But again, generally speaking, it's been
8 known for a long time that PSAPs would like to
9 have a lot more than just a first-person account
10 of somebody talking in realtime over a voice
11 channel. They -- they've always wanted to have
12 more rich data.

13 How to pull that together and what to do
14 with it is -- is something that people have
15 scratched their heads with for a long time.

16 And I think that the '383 embodies a
17 very innovative approach to doing that in a
18 trusted, authenticated way that enables realtime
19 communication.

20 Q. What do you think is innovative about --
21 about Claim 1 of the '383 patent over the prior
22 art?

1 MR. HERMAN: Objection, form.

2 A. Let's pull it up, if we may, so I can
3 look at it while speaking.

4 Q. Yes. Sure. It is Exhibit 4. And I've
5 got some highlighting on it. And it goes over two
6 pages, but please tell me if you want me to scroll
7 over anything.

8 A. So, first of all, as part of my
9 declaration -- there's only so many things that I
10 considered as part of my declaration.

11 Q. Uh-hmm.

12 A. So I can't say, sitting here, that I
13 looked at all of the potential prior art
14 references that were referred to in the
15 '383 patent.

16 Most notably and -- and you've already
17 brought one of them up already -- there's the '733
18 patent from Ramanujaiah, and there's the '099
19 from Krishnan. So I can speak to things that make
20 it innovative over those, if you'd like to discuss
21 that. But just a very general, open-ended
22 question about what makes it innovative versus

1 prior art, we could spend another five hours
2 talking about that, but I don't think that's your
3 objective.

4 Q. If you think you could tell me something
5 that -- in Claim 1 that is innovative over the
6 prior art, I actually would like to hear.

7 A. So Ramanujaiaha, which we were just
8 talking about, again, tries to equate realtime
9 with non-realtime. And -- and in their own
10 disclosure -- and I'll refer to column 33, refers
11 to some embodiments of their invention. And if
12 you look at every single one of those embodiments
13 listed, I cannot find one that enables the ability
14 to synchronize a first communication event with a
15 second communication event in realtime.

16 For example, at the top of column 33,
17 they refer to a use case in which somebody is
18 talking to customer service and they're in a noisy
19 place, so they send them an SMS so that -- perhaps
20 with the URL, so they can connect them to a
21 website and provide card information. That is
22 asynchronous communication. That is not

1 simultaneous.

2 Could you say that at some point they
3 happen concurrently? Yes, because perhaps, while
4 the person is talking, the text comes in, but
5 they're not happening in realtime simultaneously.

6 That person may or may not put their
7 card information in while they're talking. They
8 may wait an hour later and put their card
9 information in.

10 So all the other examples that are
11 cited -- that are cited there as presumed teaching
12 of something that could be construed as
13 simultaneous realtime communication are lacking in
14 that regard. I did not see anything that taught
15 what is in the '383 patent for -- for what is in
16 Claim 1.

17 Q. Well, we looked at some disclosures of
18 Ramanujaiaha today where there was definitely a
19 disclosure of simultaneous audit and video
20 communications to a call center; right?

21 MR. HERMAN: Objection, form.

22 A. Correct.

1 And the Spitfire and the Messerschmitt
2 are both fighter jets from World War II, but one
3 of them has fuel injection and the other one's got
4 a carburetor.

5 Q. Gotcha.

6 So we also saw in Ramanujaiaha
7 simultaneous telephone and WebRTC communications
8 to a call center; right?

9 MR. HERMAN: Objection, form.

10 A. I believe that's what we saw in writing.

11 Q. Right.

12 And so from that perspective,
13 Ramanujaiaha discloses -- well, let me ask you
14 this. What -- what is it -- yeah.

15 With that in mind, what is it that you
16 think that Claim 1 captures that isn't in
17 Ramanujaiaha?

18 MR. HERMAN: Objection, form.

19 A. I think I answered that already.

20 And I actually think the fighter plane
21 analogy is a good one because it -- it has to do
22 with fitness for use.

1 Can they both fly? Yes. One can fly
2 upside down. The other one can't.

3 So the '383 patent can enable
4 simultaneous communication where voice call occurs
5 over a first communication channel, and then over
6 a second communication channel, video can occur
7 with something like WebRTC due to synchronization
8 with the identity information that we discussed
9 earlier.

10 Q. Oh. So it's the identity information
11 that is the -- that is the advance over
12 Ramanujaiaha in Claim 1 of the '383?

13 MR. HERMAN: Objection, form. It also
14 mischaracterizes the witness's testimony.

15 A. We can go through element by element --

16 Q. Yeah.

17 A. -- if you want, of the claim.

18 Q. No, no, no. I want to know your -- this
19 is your opinion.

20 You said you thought there was -- we
21 established that Ramanujaiaha discloses
22 simultaneous audio and WebRTC communications to a

1 call center. We have the realtime. I can pull it
2 up.

3 MR. HERMAN: Objection, form. Also,
4 grossly mischaracterizes the witness's
5 testimony.

6 MR. CUTRI: Oh. Let's do it. Let's do
7 it. Because Mr. Herman doesn't believe me,
8 so I want to make sure. Yep.

9 Q. You said -- I'm reading:

10 "QUESTION: Well, we looked at some
11 disclosures of Ramanujaiaha today where there
12 was definitely a disclosure of simultaneous
13 audio and video communications to a call
14 center; right?

15 "ANSWER: Correct, and the Spitfire and
16 Messerschmitt are also from World War II, but
17 one of them has something -- has something
18 and the other one has a carburetor.

19 "QUESTION: Gotcha.

20 And we also saw in Ramanujaiaha
21 simultaneously -- simultaneous telephone and
22 WebRTC communications to a call center;

1 right?

2 "MR. HERMAN: Objection, form.

3 "ANSWER: I believe that's what we saw
4 in writing, right."

5 So I'm asking you, Mr. Christensen,
6 given that we agree that that's what's in
7 Ramanujaiaha, show me in Claim 1 what is an
8 advance over that prior art.

9 MR. HERMAN: Objection, form. Also,
10 mischaracterizes the witness's testimony.

11 A. So, first of all, I don't see in
12 Ramanujaiaha that as prior art because, again,
13 they did not teach how those things are going to
14 work such that a first communication instance can
15 occur where voice happens and then a second
16 communication event happens or a video happens
17 such that they occur simultaneously and with
18 orchestration.

19 Myself, as a POSITA or even greater, do
20 not see Ramanujaiaha as teaching how that would
21 actually work.

22 Q. Okay.

1 A. And just taking out of context that one
2 paragraph that you had me agree with you, that I
3 saw the words on there and agree with you, that in
4 Ramanujaiaha's opinion they are equivalent, and I
5 said several times that I don't see them as
6 equivalent, now you're trying to get me to say
7 that Ramanujaiaha is actually teaching how to do
8 this. I am not saying that.

9 Q. Okay. I think I have your position.
10 Great.

11 So let's look at column 23 of
12 Ramanujaiaha.

13 A. Okay. Are you going to share for us?

14 Q. Yeah. I'm trying to. One second.

15 A. Okay.

16 Q. Okay. Ramanujaiaha discloses here --
17 I'm -- I'm in column 23, line 45.

18 It says, as -- this is under Predictive
19 Channel Determination. "As discussed above, in
20 various embodiments of the present invention, the
21 user may interact with one or more contact center
22 resources through multiple mediums

1 concurrently..."

2 Right?

3 A. I see where it says that.

4 Q. And that's a disclosure of -- of
5 multiple mediums being used by a user at the same
6 time; right?

7 MR. HERMAN: Objection, form.

8 A. At the same time but not orchestrated in
9 the sense that there would be -- different mediums
10 or modalities are not necessarily realtime, such
11 as chat, for example. You could -- I could be
12 speaking with you or I could be speaking with
13 someone in customer care interactively like this
14 and also have a chat session and pause the chat
15 session for a period of time while we're speaking
16 and then come back to the chat session later. So
17 it's asynchronous in that regard.

18 Also, there is not a need necessarily to
19 have strong authentication, that the first
20 communication channel is associated with the
21 second communication channel; in other words, it's
22 not necessarily a life-and-a-death kind of a

1 scenario, as it would be the case if you were
2 sharing some kind of information with a PSAP.

3 So that would be an example, once again,
4 where Ramanujaiaha does not teach what is in the
5 '383 patent, in my professional opinion.

6 Q. Okay. But it does teach what it lists
7 here on column 23, line 45 through 48; right?

8 It does say that in the invention, "the
9 user may interact with one or more contact center
10 resources through multiple mediums concurrently."

11 Right?

12 A. It teaches what a POSITA could
13 understand as the possibility for a consumer to be
14 able to interact with customer care over
15 multimedia, multimode, but not necessarily in --
16 in realtime and not necessarily, you know, in a
17 manner in which it would be extremely important to
18 have it synchronized.

19 Q. Okay. Well, it -- we did see before
20 that "medium" can refer to realtime or
21 non-realtime; right?

22 MR. HERMAN: Objection, form.

1 A. I saw that reference in that one
2 paragraph, and I did not see anything in the
3 ensuing teaching within the patent that supported
4 how that would actually work in realtime.

5 Q. Okay. Okay.

6 Is video realtime?

7 A. Video may be realtime, as we've
8 discussed earlier. It may not be realtime.

9 Q. Okay.

10 A. Remember, we talked about what we're
11 doing right now versus Netflix.

12 Q. What is a WebRTC session in the
13 '383 patent?

14 A. Can you repeat that? You're trailing
15 off a little bit.

16 Q. Sorry.

17 What is a WebRTC session in the
18 '383 patent?

19 A. What a WebRTC session is in the
20 '383 patent is one of the methods that could be
21 used to communicate over the second communications
22 channel as a result of the first communication

1 channel happening, such that a PSAP could receive,
2 for example, realtime video about an emergency
3 event.

4 Q. Okay. How does WebRTC work?

5 A. WebRTC typically is browser-based,
6 meaning that you do not have to download or use a
7 specific app like most of us may be familiar with
8 on our smartphones. You have to download a --
9 what they call an OTT, over-the-top app to use
10 your Netflix account on your smartphone. It's
11 browser-based. That comes with certain advantages
12 and disadvantages.

13 Q. When I said, "How did WebRTC work," the
14 explanation that you just gave, was that the same
15 way that WebRTC was known to work to ordinary
16 people skilled in the art prior to the
17 '383 patent?

18 A. Yes.

19 Q. Prior to the '383 patent, how -- how was
20 a WebRTC session started?

21 A. Sitting here right now, I can't think of
22 a specific example to give you. But in its very

1 early stages, there was some testing where you
2 could literally have your browser on your phone,
3 type in a URL because, most likely, somebody
4 wouldn't e-mail one to you or text you one, and
5 instead you would have to know what URL to use to
6 initiate the session.

7 But if you knew that, then you could
8 type it in, hit "send." And then you would engage
9 in some type of multimedia experience which,
10 presumably, could involve moving images, a/k/a
11 video, but it could also be static images or even
12 potentially just voice.

13 But the whole point of it, though, is to
14 have moving images, a/k/a video.

15 Q. Okay. I'm looking at paragraph 27.
16 This is your Understanding Of The Law section of
17 your declaration. I'm in Exhibit 1 of the
18 Christensen declaration, which was Exhibit 2004 in
19 this proceeding.

20 And under Understanding Of The Law, you
21 say that the first -- you provide your
22 understanding of the law with respect to patent

1 validity; right?

2 A. Correct.

3 Q. And in paragraph 26, you say that you
4 understand that "each patent claim is considered
5 separately for purposes of validity."

6 Right?

7 A. Correct.

8 Q. And then you say, "I understand that the
9 first step in comparing an asserted claim to the
10 prior art is for the claim to be properly
11 construed."

12 Right?

13 A. Correct.

14 Q. Does that mean you actually have to look
15 at the claims of the patent that's under
16 consideration before you consider validity?

17 A. Well, I certainly would review the
18 claims before I would consider their merit in any
19 regard, including validity.

20 But validity, of course, requires much
21 more background information, looking at prior art
22 and things like that. But I would also, before I

1 do that, consider the merits of the claims on the
2 basis of how well they are taught within the
3 embodiment of the patent.

4 Q. All right.

5 A. Because a claim without good teaching is
6 not a good claim.

7 Q. Would you consider the objectives of the
8 claims that you were evaluating for validity?

9 MR. HERMAN: Objection, form.

10 A. And can you repeat it?

11 Q. Sorry.

12 A. I think it might be a little hard to
13 hear you when you were --

14 Q. I was mumbling.

15 A. -- when you're -- yeah, you had your
16 face down, so it wasn't projecting well, I don't
17 think.

18 Q. When you were -- sorry.

19 When evaluating the validity of the
20 patents, of the '383 patent, did you consider the
21 objectives of the '383 patent?

22 MR. HERMAN: Objection, form.

1 A. Did I consider the objectives of the
2 '383 patent?

3 Q. Yes.

4 A. Is that what you said?

5 Q. Yes.

6 A. So, in other words, fitness for use, for
7 commercial use? Is that what you mean?

8 Q. Sure.

9 A. Yes.

10 I mean, I do that with any patent, is to
11 see if there's any commercial applicability for
12 them. Theoretically, that doesn't matter, because
13 there could be a patent that is covering something
14 that no one's ever thought of before, so it's hard
15 to even envision potentially commercial
16 applicability.

17 But in this case, I most certainly did.
18 And that was one of the things that I used to come
19 to the conclusion that it is, in fact, not only
20 innovative but also, once I did further
21 investigation, that there is no prior art that
22 could be used to invalidate it.

1 Q. Was -- prior to the patent -- I'm sorry.
2 Prior to the '383 patent, was WebRTC a
3 widely used technology?

4 MR. HERMAN: Objection, form.

5 A. That kind of depends on your definition
6 of -- of "widely used."

7 WebRTC is one of those things where it's
8 really an underlying technology that's used for
9 other things. So most people in the field would
10 talk about it in -- in the sense of it being
11 something that could be used to support a specific
12 solution.

13 Was it widely used in the public safety
14 realm? I don't think so, no.

15 It may be widely used in certain
16 industry verticals that I just don't have a lot of
17 exposure to, possibly. I don't know.

18 Q. Okay. Let's pull up --

19 MR. CUTRI: Actually, let's just go off
20 the record real quick. We'll just do
21 five minutes.

22 THE STENOGRAPHER: We're off the record.

1 (Recess in proceedings.)

2 THE STENOGRAPHER: We're back on the
3 record.

4 BY MR. CUTRI:

5 Q. All right. Mr. Christensen, I'm going
6 to introduce patent owner Exhibit 2009. This is
7 Exhibit 11.

8 (Exhibit 11 was marked for
9 identification and is attached to the
10 transcript.)

11 Q. And let me know when you have it up.

12 A. I've got it.

13 Q. Okay. The name of this article is
14 WebRTC Testing: Challenges and Practical
15 Solutions. The first named author is Garcia, and
16 it is 12 pages long. And it was originally
17 exhibit -- patent owner Exhibit 2009.

18 Is that what you have in front of you as
19 Exhibit 11?

20 A. Yes, it is.

21 Q. Okay. There is a reference in the
22 introduction. The second paragraph says, "The

1 popularization of multimedia technologies" -- let
2 me just share it with you so we're on the same
3 page.

4 Do you see the paragraph that begins,
5 "The popularization of multimedia technologies
6 among Web developers and, very particularly, the
7 emergence of WebRTC as a built-in feature of Web
8 browsers is significantly increasing the
9 complexity of the testing"?

10 Do you see that?

11 A. I see that.

12 Q. Here it says, "A recent report predicts
13 that with Apple and Microsoft supporting WebRTC in
14 the browsers, there might be 7 billion devices
15 compliant with WebRTC by 2020."

16 Do you see that?

17 A. I see that.

18 Q. You'd agree with me that that's a very
19 large number of compatible devices, relative to
20 the population of human beings on Earth?

21 A. A very large number. It presumes that
22 pretty much everybody has got a smartphone.

1 Q. Yeah.

2 And that the smartphone would have --
3 would be able to support WebRTC in their browsers;
4 right?

5 A. Correct.

6 Q. And that makes reference to an item --
7 you see the bracket number 3 at the end of that
8 sentence?

9 A. I see it.

10 Q. Earlier in our deposition you were
11 mentioning that you sometimes like to
12 cross-reference and -- and check things that
13 you're relying on to make sure they're reliable.
14 Do you remember that?

15 A. I do recall that.

16 Q. Well, here is -- there's an article that
17 is by Sale and Rebbeck that says, "Operators need
18 to engage with WebRTC and the opportunities it
19 presents."

20 Do you see that article?

21 A. I see it.

22 Q. All right. Let me pull up that article

1 and mark it as Exhibit 12.

2 (Exhibit 12 was marked for
3 identification and is attached to the
4 transcript.)

5 Q. Let me know when you have that article.

6 A. I've got it.

7 Q. Exhibit 12 should be -- you know what?
8 I apologize. On my end, it's all black. Do you
9 have that?

10 A. No. I can read it.

11 Q. I think my computer might be getting a
12 little -- hold on.

13 Okay. I have it here. And let me share
14 it with you. This is an article from Analysys
15 Mason --

16 A. Uh-huh.

17 Q. -- from October of 2014.

18 Do you see that?

19 A. I see that.

20 Q. Okay. The article begins by saying,
21 "The emergence of app-based services like Skype
22 and WhatsApp in recent years has dramatically

1 changed the way communication services are
2 produced, consumed, and monetized."

3 Do you see that?

4 A. I see that.

5 Q. Are Skype -- and then it says, "Web
6 realtime communications looks to represent the
7 next change of transformation because it embeds
8 realtime communication capabilities into the Web
9 browser, making it dramatically easier to offer
10 and consume communications from any Web page."

11 Do you see that?

12 A. I see that.

13 Q. What, if anything, was the relationship
14 between Skype and Web realtime communications in
15 October of 2014, if you know?

16 A. Well, I can't say that I have
17 investigated that -- certainly not recently, that
18 specific level of integration.

19 But what it could potentially have
20 entailed is using WebRTC as the underlying
21 communications mechanism to support Skype and --
22 and WhatsApp. That's possibly what they could

1 have meant by that.

2 But I -- I'm just guessing because,
3 again, I have not investigated or thought about
4 that level of integration.

5 Q. Okay. It says, in blue, "The number of
6 WebRTC enabled endpoints will be almost 7 billion
7 by 2020."

8 Do you see that?

9 A. I see that, yeah.

10 Q. Okay. So this article is conveying that
11 WebRTC is going to be -- looks to set -- looks set
12 to represent the next stage of transformation;
13 right?

14 A. I see that.

15 Q. And an ordinary -- and a person of
16 ordinary skill in the art would have -- reading
17 this, would have known that; right?

18 A. A person -- a POSITA would have known
19 that as of HTML5, as of the availability of that
20 in browsers, that WebRTC would be available for
21 every smartphone that has an HTML5-capable phone,
22 which I think 7 billion is an exaggeration, but

1 some large number, representing effectively all of
2 the smartphones, which is largely iPhones and --
3 and every Android-enabled device, such as Samsung,
4 would support HTML5 at some point and, so
5 therefore, support WebRTC.

6 Q. Okay. So do you think as of October
7 2014, a person of ordinary skill in the art would
8 know that in relatively short order nearly every
9 smartphone would be able to support WebRTC?

10 MR. HERMAN: Objection, form.

11 A. Not necessarily. In 2014, as I recall,
12 WebRTC was still relatively in its infancy.
13 Arguably, even smartphones themselves. I can't
14 recall what the penetration was by 2014. It was
15 quite high, but I don't think that somebody would
16 immediately come to that conclusion necessarily,
17 that WebRTC would be available virtually to
18 everybody by virtue of virtually everybody having
19 a smartphone. But I don't know. I haven't really
20 thought through that type of thought experiment.

21 Q. Okay. Okay. So you haven't
22 considered -- you didn't consider in your analysis

1 whether or not WebRTC was known by people of
2 ordinary -- by people of ordinary skill in the art
3 to be an emerging technology that was likely to be
4 adopted by essentially all smartphones?

5 MR. HERMAN: Objection, form.

6 A. I did not consider that as part of my
7 analysis, because I thought that there was much
8 more relevant things to consider as part of my
9 analysis.

10 Q. Okay. Let me pause there.

11 MR. CUTRI: I -- we can go off the
12 record really quick.

13 THE STENOGRAPHER: We're off the record.

14 (Recess in proceedings.)

15 THE STENOGRAPHER: We are back on the
16 record.

17 MR. CUTRI: Mr. Christensen, those are
18 the questions I have for you right now.

19 I understand Mr. Herman may have some
20 questions, in which case I might have some
21 more for you after that.

22 ///

1 EXAMINATION

2 BY MR. HERMAN:

3 Q. All right. Mr. Christensen, my first
4 question is: In drafting your IPR declaration,
5 which I believe is Exhibit 2003, did you endeavor
6 to list out all possible ways that a URL link can
7 be associated with the phone number, as required
8 by Claim 1 of the '383 patent?

9 A. No, I did not endeavor to exhaustively
10 identify all the possible ways that could happen.

11 Q. Did you intend to list out every
12 conceivable way to associate a URL link with a
13 phone number during your testimony today?

14 A. No, I did not.

15 Q. If you could get back out Exhibit 1005.
16 That's the Ramanu- -- I'm going to say it like a
17 fourth different way, the Ramanujaiaha reference.
18 If you could get that out for me.

19 I'm just going to refer to it as
20 "Exhibit 1005," just to try to save some time.

21 A. Okay.

22 Q. Now, counsel asked you a series of

1 questions about column 9, lines 46 to 52 of
2 Exhibit 1005. If you could turn to that for me.

3 A. All right. One second. I've got so
4 many PDFs up here, I'm having a hard time finding
5 the correct one, first of all.

6 So you're talking about the Rama
7 patent '733; correct?

8 Q. Yes.

9 A. All right. One second. I don't know
10 why...

11 All right. I got to pull up -- I
12 just got -- I'm going to pull it back up from my
13 downloads. For some reason, it's not where all
14 the other ones were.

15 Okay. Now, which section?

16 Q. So in column 9, there's a paragraph that
17 begins at line 46.

18 A. I am there.

19 Q. And you remember discussing that
20 particular paragraph with counsel today?

21 A. Yes, I do.

22 Q. And that paragraph lists a number of

1 communication methods; correct?

2 A. Yes, it does.

3 Q. Does the paragraph say when any of those
4 communications are occurring?

5 MR. CUTRI: Objection, form.

6 A. It does not say when any of those
7 communications are occurring.

8 Q. Does it say that the communications are
9 occurring simultaneously?

10 A. It does not say that they are occurring
11 simultaneously.

12 Q. Now, if you could turn to column 5 of
13 the same exhibit.

14 A. I'm there.

15 Q. There's a paragraph that begins at
16 line 6. Do you see that?

17 A. I'm there.

18 Q. But you remember discussing that
19 paragraph with counsel today?

20 A. Yes, I do.

21 Q. And there's a sentence starting at about
22 line 9 that begins, "For example..."

1 Do you see that?

2 A. I see that.

3 Q. And there's a number of communication
4 methods that are referenced in that sentence;
5 true?

6 A. True. I see that.

7 Q. And one of those is telephone; correct?

8 A. Correct.

9 Q. And another is video; correct?

10 A. Correct.

11 Q. And there's many other different types
12 of communication methods referenced in that same
13 sentence; correct?

14 A. That is correct.

15 Q. Those are just communication methods
16 that a user may employ; correct?

17 A. That is correct.

18 Q. They're not necessarily occurring at any
19 particular time; true?

20 MR. CUTRI: Objection, form.

21 A. Correct.

22 Q. Now --

1 A. Correct.

2 Q. -- that paragraph concludes with the
3 sentence that notes: "The customer may have
4 access to one or more devices capable of
5 interacting with contact center resources over the
6 different mediums concurrently."

7 Right?

8 A. That is correct. It says that.

9 Q. The word "capable" appears in that
10 sentence; true?

11 MR. CUTRI: Objection, form.

12 A. Correct, it does. I see that.

13 Q. Does the sentence state that the
14 concurrence -- the concurrent interactions are
15 audio and realtime video?

16 A. No, it does not.

17 MR. CUTRI: Objection, form.

18 Q. Now, the sentence also references
19 "contact sensor resources."

20 Right?

21 A. Yes, I see that.

22 Q. Does the sentence say that any

1 concurrently-occurring interactions are
2 necessarily between the same user device and the
3 same recipient?

4 A. No, it does not say that.

5 MR. CUTRI: Objection, form.

6 Q. Is there any reference to WebRTC in this
7 paragraph in column 5 that we've been talking
8 about?

9 MR. CUTRI: Objection, form.

10 A. No, there's no reference in this to
11 WebRTC.

12 Q. Now, if you could get back out your
13 declaration, which -- which is Exhibit 2004.

14 A. Okay.

15 Q. And if you could turn to paragraph 90 of
16 your declaration, which is on page 31.

17 A. Okay.

18 MR. CUTRI: I'm sorry. I'm not --

19 Q. What does --

20 MR. CUTRI: I'm sorry. I'm just
21 catching up to you.

22 Can you just give me the PDF page? That

1 might be --

2 MR. HERMAN: Oh. Page 31. It's
3 page 31.

4 MR. CUTRI: 31, paragraph 90. Okay. Go
5 ahead.

6 Q. What does paragraph 90 state?

7 A. "In my opinion, there is no teaching of
8 simultaneous audio and WebRTC realtime video
9 communications from a user to a recipient during
10 an emergency call in Ramanujaiaha."

11 Q. Is that still your opinion?

12 A. That is, in fact, still my opinion.

13 Q. Now, is there any teaching of
14 simultaneous audio in WebRTC realtime video
15 communications from a user to a recipient during
16 an emergency call in the paragraphs in column 5
17 and the paragraph in column 9 in Exhibit 1005 that
18 we just looked at?

19 MR. CUTRI: Objection, form.

20 A. No, there is not. No, there is not.

21 Q. Is there a teaching of that anywhere
22 else in Exhibit 1005?

1 MR. CUTRI: Objection, form.

2 A. No, there's not.

3 Q. Did you intend to say at any point
4 during the deposition today that there is a
5 teaching of that anywhere in Exhibit 1005?

6 MR. CUTRI: Same objections.

7 A. No, I did not intend to say or imply
8 that.

9 MR. HERMAN: I don't have any further
10 questions.

11 MR. CUTRI: Okay. Thank you both.

12

13

14 AND FURTHER THIS DEPONENT SAITH NOT.

15

16 * * * * *

17

18 (Deposition concluded at 4:55 p.m.)

19

20 * * * * *

21

22

1 STATE OF FLORIDA:

2 COUNTY OF ORANGE:

3 I, April Reid, Registered Professional
4 Reporter, Certified Realtime Reporter and Notary
5 Public in and for the State of Florida,
6 and whose commission expires August 22, 2027,
7 do certify that the aforementioned appeared
8 before me, was sworn by me, and was thereupon
9 examined by counsel; and that the foregoing is a
10 true, correct, and full transcript of the
11 testimony adduced.

12

13 I further certify that the adverse party,
14 CARBYNE, LTD., was represented by counsel at the
15 deposition.

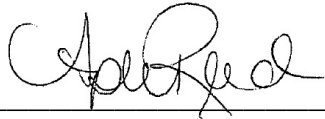
16

17 I further certify that the deposition of
18 GERALD CHRISTENSEN occurred virtually, via
19 Zoom videoconference, on Tuesday, June 2, 2026,
20 commencing at 10:05 a.m. Eastern Time to 4:55 p.m.
21 Eastern time.

22

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

7
8 Given under my hand and notarial seal in
9 Orlando, Florida, this 3rd day of June, 2026.

10
11 
12

13 April Reid, RPR, CRR, Notary Public
14 State of Florida, County of Orange
15 Commission No. 455787/HH 436060
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