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Transcript of Dr. Patrick Traynor

Date: July 9, 2026

Case: Amazon.com Services LLC, et al. -v- Headwater Research LLC (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4
5 AMAZON.COM SERVICES LLC and
6 AMAZON WEB SERVICES, INC.,
7 Petitioners,

8 v.

9 HEADWATER RESEARCH LLC,
10 Patent Owner.

11
12 Case IPR2026-00088
13 Patent 9,615,192
14 Case IPR2026-00106
15 Patent 10,321,320

16 REPORTER'S TRANSCRIPT

17 DEPOSITION OF

18 DR. PATRICK TRAYNOR

19 THURSDAY, JULY 9, 2026

20 Remote Video Teleconference

21 8:00 a.m. PST

22 to

23 11:51 a.m. PST

24 Stenographically Reported by:
25 Shannon Borge, CRR, RPR, CA CSR #9436

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BY MR. MILKEY

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QUESTIONS INSTRUCTED NOT TO ANSWER:
PAGE LINE

(None)

REQUEST FOR PRODUCTION OF DOCUMENTS:
PAGE LINE

(None)

STIPULATIONS:
PAGE LINE

(None)

QUESTIONS MARKED:
PAGE LINE

(None)

REPORTER'S NOTE:

QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT
NECESSARILY REFLECT A DIRECT QUOTE.

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E X H I B I T S

(Referenced but not attached)

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1003	Declaration of Dr. Patrick Traynor	6
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Exhibit 1007	Houghton Reference	43
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1 BE IT REMEMBERED that pursuant to Notice of
2 Taking Deposition, and on THURSDAY, JULY 9, 2026,
3 commencing at 8:00 a.m. PST thereof, via
4 videoconference, before me, SHANNON BORGE, a Certified
5 Realtime Reporter, Registered Professional Reporter, and
6 Certified Shorthand Reporter in and for the State of
7 California, personally appeared

8 DR. PATRICK TRAYNOR,
9 a witness called on behalf of PATENT OWNER, and who was
10 having been first duly sworn by me to testify to the
11 truth, was examined and testified as follows:

12 THE COURT REPORTER: Good morning, my name is
13 Shannon Borge, Certified Shorthand Reporter, License
14 Number 9436.

15 Dr. Traynor, please raise your right hand to be
16 sworn.

17 (Whereupon, the witness was sworn.)

18 THE WITNESS: I do.

19 EXAMINATION

20 MR. MILKEY:

21 Q. Good morning, Dr. Traynor. You understand
22 you're here to testify regarding two separate IPR
23 proceedings on two separate patents?

24 A. Yes, that's correct.

25 Q. And you've submitted a declaration in both

1 proceedings and it's the same declaration in both
2 proceedings; is that correct?

3 A. There's one declaration, yes.

4 Q. Okay. Do you have a copy of -- of your
5 declaration?

6 A. I have an unmarked copy of my declaration on
7 the screen.

8 Q. Okay. Feel free to use unmarked copies of any
9 of the materials in this proceeding.

10 For the benefit of the reporter, I'm going to
11 upload a few documents right now that includes your
12 declaration, which is Exhibit 1003; it includes -- the
13 TS 23.140 reference is Exhibit 1004; and the Houghton
14 reference, Exhibit 1007.

15 So, Dr. Traynor, could you please open your
16 declaration and turn to the cover page of that and let
17 me know when you have it open.

18 A. I'm there.

19 (Exhibit 1003 was previously marked for
20 identification.)

21 BY MR. MILKEY:

22 Q. Okay. And this -- this declaration applies to
23 both IPR2026-00088 and IPR2026-00106; correct?

24 A. Yes, that's correct.

25 Q. Okay. Did you offer any claim construction

1 opinions in either of these proceedings?

2 MR. LEMBO: Objection. Form.

3 THE WITNESS: No, I don't believe that I did.

4 BY MR. MILKEY:

5 Q. You applied the ordinary meaning of all claim
6 terms?

7 A. Yes. That's my -- I believe I relied on the
8 plain and ordinary meaning.

9 Q. Okay. And one of the claim terms that is
10 common to both patents at issue here is the term
11 "message delivery trigger"; correct?

12 A. Yes, I believe so.

13 Q. Okay. What's the ordinary meaning of a
14 "message delivery trigger"?

15 MR. LEMBO: Objection. Form.

16 THE WITNESS: Are you asking for a very broad
17 general definition or something I've talked about in my
18 report?

19 BY MR. MILKEY:

20 Q. Well, you -- you applied a certain
21 interpretation of -- well, strike that.

22 You applied the plain meaning of "message
23 delivery trigger" in forming your opinions in this
24 proceeding; correct?

25 A. Yes, I applied the plain and ordinary meaning

1 of -- of "trigger."

2 Q. Okay. And can you give me a brief description
3 of what that plain meaning is?

4 MR. LEMBO: Objection. Form.

5 THE WITNESS: Counsel, I would take you to
6 paragraph 200 of my declaration, and I would rely on
7 what I've written here to cover the plain and ordinary
8 meaning of what a trigger is.

9 BY MR. MILKEY:

10 Q. Okay. So in -- in paragraph 200, you state,
11 "If the claim trigger must be a condition after which
12 the next step is an attempt to deliver the message," and
13 then you go on to say, "If, however, a trigger can
14 include conditions that starts or restarts an attempted
15 delivery, then you have additional analysis." And then
16 later in that same paragraph, you say, "But if a trigger
17 can include conditions imposed on the messages
18 controlling whether a message will be delivered at all,
19 then you provide additional analysis."

20 So is it your opinion that "message delivery
21 trigger" encompasses all of those definitions or is it
22 limited to one of them?

23 A. My opinion in paragraph 200 is that a trigger
24 encompasses all seven of these items.

25 Q. So in paragraph 200, you state, "If the claimed

1 trigger must be a condition after which the next step is
2 an attempt to deliver the message (e.g., the last
3 traffic light before a destination) TS 23.140 discloses
4 three elements."

5 It's -- it's not your opinion, correct, that
6 the claimed trigger must be a condition after which the
7 next step is an attempt to deliver the message; right?

8 A. So as I say in paragraph 200, the plain and
9 ordinary meaning of "trigger" encompasses all seven of
10 these items. I've merely grouped them together
11 logically, but I believe all seven qualify as triggers.

12 Q. Okay. Could you please turn to Exhibit 1004,
13 which is the TS 23.140 reference and turn to page 29 of
14 that document.

15 A. One moment, please.

16 (Exhibit 1004 was previously marked for
17 identification.)

18 THE WITNESS: I'm on page 29.

19 BY MR. MILKEY:

20 Q. And you see that in page 29, there are a list
21 of bullet points, and right before the -- the bullet
22 points, it states, "Upon retrieval request the recipient
23 MMS Relay/Server shall deliver the MM to the recipient
24 MMS User Agent."

25 Do you see that?

1 A. And just to make sure I'm on the same page,
2 bolded above this is 7.1.3; is that correct?

3 Q. Correct.

4 A. I see that literal text on this page.

5 Q. Okay. Does TS 23.140 state any other
6 conditions in which the MMS Relay/Server shall deliver
7 the MM to the recipient MMS User Agent?

8 MR. LEMBO: Objection. Form.

9 THE WITNESS: Not -- I'm not quite sure what
10 you're asking me here and I haven't quite memorized the
11 document. So is there a specific page or line you'd
12 like me to evaluate?

13 BY MR. MILKEY:

14 Q. No. I'm -- I'm -- and feel free to search or
15 review the -- the reference, but I'm asking if there are
16 any conditions under which there is a mandatory delivery
17 from the MMS Relay/Server to the recipient MMS User
18 Agent other than a retrieval request?

19 MR. LEMBO: Objection. Form.

20 THE WITNESS: Counsel, I don't -- I don't see
21 those words, "mandatory," and so I'm -- I'm not at this
22 very moment finding precisely what you've asked for.

23 Is there another way you might describe it?

24 ///

25 BY MR. MILKEY:

1 Q. Well, I'm using "mandatory" as my -- that's my
2 understanding of what "shall deliver" means, is that
3 it's a mandatory delivery.

4 Is that your understanding?

5 MR. LEMBO: Objection. Form.

6 THE WITNESS: Yeah. So to be clear and -- and
7 consistent, "shall" is generally a requirement in a
8 standards document and so this function needs to be
9 implemented. I, again, don't have the document
10 memorized so I'm not sure if there's another "shall"
11 that, again, meets the exact mandatory language that
12 you're offering.

13 BY MR. MILKEY:

14 Q. Okay. And at the beginning of Section 7.1.3 of
15 TS 23.140 on page 29, the document states that the
16 recipient MMS User Agent shall be able to request
17 retrieval of an MM from the recipient MMS Relay/Server
18 based on the message reference received in a
19 notification.

20 Do you see that?

21 A. I see that literal text, yes.

22 Q. And then the next sentence states, "If MMBoxes
23 are supported, the MMS User Agent shall be able to
24 request retrieval of an MM from the user's MMBox, based
25 on a Message Reference received from a previous MMBox

1 operation."

2 Do you see that?

3 A. I see that literal text, yes.

4 Q. Okay. Other than a Message Reference received
5 in a notification or a Message Reference received from a
6 previous MMBBox operation, are you aware of any other
7 ways that an MMS User Agent can issue a message
8 retrieval request?

9 MR. LEMBO: Objection. Form.

10 THE WITNESS: Again, I haven't memorized the
11 document, but in addition to what you're describing,
12 which I believe is shown in Table 7, I would take you to
13 Table 10 in 23.140. That's on page 69 under subheading
14 8.1.5, and you can see here that without necessarily
15 receiving a notification from the network, the UA or UE
16 can request retrieval of messages.

17 BY MR. MILKEY:

18 Q. Okay. In that portion of the document that
19 you're referencing on page 69, where does that say that
20 the retrieval request does not include a Message
21 Reference received in either a notification or a
22 previous MMBBox operation?

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: So to be clear, I don't think
25 you're asking me to prove a negative, that there has

1 never been any kind of notification message, but I'd
2 point you to this table where MM1_retrieve.REQ is a
3 request and it comes from the MMS UA and goes to the
4 MMS Relay/Server. So I don't see any message having
5 happened above this.

6 BY MR. MILKEY:

7 Q. Okay. And, in your opinion, are you aware of
8 any, quote, "Message Reference" that's received from the
9 MMS User Agent from anything other than a message
10 notification or a previous MMBox notification?

11 MR. LEMBO: Objection. Form.

12 THE WITNESS: Apologize, Counsel. I think I
13 answered your question. I'm pointing on page 69 to
14 MM1_retrieve.REQ so this is the device reaching out to
15 the network. It's different than the table that I have,
16 Table 7, in my report which shows the scenario that --
17 that you've discussed.

18 BY MR. MILKEY:

19 Q. Okay. So I -- I think I understand what you're
20 trying to say.

21 Is it your opinion that on page 69 of TS 23.140
22 that it's possible for the message retrieval request
23 that you're pointing to, to not include a message
24 reference?

25 MR. LEMBO: Objection. Form.

1 THE WITNESS: I'm -- I'm not certain, but,
2 again, I haven't memorized the document. Perhaps there
3 was a previous message that was received and there were
4 reasons that the device, say, fell out of coverage, was
5 trying to recover. It -- it could be periodic polling.
6 So, you know, hard -- hard to know without more
7 information.

8 BY MR. MILKEY:

9 Q. Okay. I'm not asking you about any specific
10 message. I'm asking whether it's possible for the MM
11 retrieval request that you're identifying on page 69,
12 whether it's possible for that request to not include a
13 specific message reference that was previously received
14 in either a notification or an MMBox operation.

15 Do you have an opinion as to that?

16 MR. LEMBO: Objection. Form.

17 THE WITNESS: I -- I don't see any additional
18 information here and so it could be possible. I'm not
19 certain.

20 BY MR. MILKEY:

21 Q. You would agree with me, right, that it's not
22 possible for a message retrieval request to function
23 without a message reference; right?

24 MR. LEMBO: Objection. Form.

25 THE WITNESS: I'm not sure that I do. Again, I

1 can imagine a scenario in which a user's device, the --
2 we'll say UA here, is polling and simply requesting are
3 there any messages. I could imagine a scenario in which
4 the device has become disconnected through normal means
5 and may attempt to retrieve a known message. So I -- I
6 don't think I agree with you.

7 BY MR. MILKEY:

8 Q. Okay. So, in your opinion, a message reference
9 isn't mandatory for the message retrieval request?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: I'm -- I'm not sure what you mean
12 by mandatory. I don't see -- I don't see anything here
13 with the word "mandatory."

14 BY MR. MILKEY:

15 Q. You don't think the message reference would
16 need to be included within a message retrieval request
17 for that message retrieval request to be functional?

18 MR. LEMBO: Objection. Form.

19 THE WITNESS: Yeah. So, again, I -- I believe
20 I have answered this already. I can certainly see
21 scenarios in which a request for a specific message
22 occurs. I can see periodic polling scenarios and
23 requests for which any message in my mailbox, in the
24 buffer, could be requested. So I -- I don't know that
25 it's necessarily mandatory and I don't see the word

1 here.

2 BY MR. MILKEY:

3 Q. Okay. And, in your opinion, in the periodic
4 polling instance, there wouldn't necessarily need to be
5 a message reference included in the message retrieval
6 request; is that fair?

7 MR. LEMBO: Objection. Form.

8 THE WITNESS: To be clear, there could be.
9 Again, my device could be in and out of coverage and
10 could attempt to pull periodically. It may have
11 received a prior notification with a specific message
12 ID. It may not have, but it still might poll.

13 BY MR. MILKEY:

14 Q. Okay. If -- strike that.

15 So you said -- you said that your device could
16 be in and out of coverage and could attempt to poll
17 periodically, what do you mean by that?

18 A. So just at a -- at a high level, cellular
19 coverage is not perfect. There are times when I'm
20 traveling when I may be between towers and so my ability
21 to receive messages is limited. My -- my phone, seeing
22 that, may not be able to get every notification that the
23 network sends out. And so when it gets coverage, it may
24 reach out and say, "If I have anything, send it to me."

25 Q. Okay. And would that be submitted as a message

1 retrieval request?

2 A. It could be.

3 MR. LEMBO: Objection. Form.

4 THE WITNESS: It could be.

5 BY MR. MILKEY:

6 Q. Do you identify any type of message that could
7 be used by an MMS User Agent to implement periodic
8 polling in your declaration other than a message
9 retrieval request?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: Counsel, do you have a particular
12 question about -- I -- I also don't have my report
13 memorized. Is there a particular paragraph you'd like
14 to discuss?

15 BY MR. MILKEY:

16 Q. Yeah. So if you could go to paragraph 245 of
17 your declaration.

18 A. One moment, please, as I read that (reviewing
19 document).

20 So I've read paragraph 245.

21 Q. Okay. Do you explain what the -- the type of
22 message that would be used to implement periodic polling
23 that would be in TS 23.140?

24 MR. LEMBO: Objection. Form.

25 THE WITNESS: Are you asking if I point to it

1 specifically in my report?

2 BY MR. MILKEY:

3 Q. Correct.

4 A. One moment, please.

5 So in this paragraph, 245, I cite to 23.140 at
6 Section 8.3.3, which specifically in the third bullet
7 point on page 91 talks about periodic polling, and so
8 the messages that I discussed with you previously could
9 be used to do that.

10 Q. Okay. And when you say the messages that you
11 discussed with me previously, are you referring to a
12 message retrieval request?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: As a for example, what I talked
15 about in Table 10, a message retrieval could be used.

16 BY MR. MILKEY:

17 Q. Okay. Other than a message retrieval request,
18 do you identify any other type of message in your
19 declaration that could be used in TS 23.140 to implement
20 periodic polling?

21 MR. LEMBO: Objection. Form.

22 THE WITNESS: So just to -- to be consistent,
23 when last we met I also discussed the potential for use
24 of -- of a broadcast mechanism. That would not be in
25 23.140 and so, you know, for completeness, there may be

1 a related mechanism there. But I don't cite that here
2 in my declaration.

3 BY MR. MILKEY:

4 Q. In TS 23.140, how does an MMS User Agent inform
5 an MMS Relay/Server that it has become available?

6 MR. LEMBO: Objection. Form.

7 THE WITNESS: That's a -- quite a -- a broad
8 question. Can you -- can you narrow it for me? I -- I
9 don't necessarily want to talk about -- there are many
10 mechanisms in the network and I'm just trying to figure
11 out exactly what you'd like to talk about.

12 BY MR. MILKEY:

13 Q. Okay. So is a message retrieval request one
14 way in which a MMS User Agent can inform the MMS
15 Relay/Server that it's available to receive messages?

16 A. Yes, with some caveats. So as a note, it's not
17 the only way. It's one direct way. Additionally,
18 sending that message may happen right as I'm passing out
19 of coverage, and so while I may be saying I'm available
20 at this moment, I may become available immediately after
21 it and so it's not a guarantee of availability but
22 perhaps a suggestion.

23 Q. Okay. Is there any way that an MMS User Agent
24 can send a message to the MMS Relay/Server where that
25 message guarantees availability?

1 MR. LEMBO: Objection. Form.

2 THE WITNESS: This is -- again, because it's
3 very broad, I don't know that any message can ensure
4 that the battery doesn't fall out of my phone or that my
5 phone is subsequently destroyed and so I think -- I
6 think that messages like this are a good suggestion.
7 There are other ways, for example, if -- if I send an
8 MMS, then having recently interacted with me, the MMS
9 see -- I'll call it the MMS server, relay server --
10 might then attempt to send me a notification having just
11 received something. If I've recently come back online
12 if my phone was -- was off, which I know is a novel
13 concept these days, I perform a -- what's known as an
14 attach procedure and I perform authentication with the
15 HLR HHS depending on the generation of cellular network
16 we're talking about. And then that would indirectly
17 indicate to the MMSC or MMS Relay/Server that I am
18 online. So there are multiple possible ways.

19 BY MR. MILKEY:

20 Q. Do you recall any of those specific ways being
21 specifically discussed in TS 23.140?

22 MR. LEMBO: Objection. Form.

23 THE WITNESS: Again, I haven't memorized this
24 document. It's important to understand that TS 23.140
25 is one of a large number of standards so an operational

1 network would do all of the things that I talked about.

2 BY MR. MILKEY:

3 Q. Could you please turn to page 87 of your
4 declaration. This is within paragraph 200, but it spans
5 several pages. So I'm directing you to page 87 in
6 particular.

7 A. One moment, please. And can you tell me
8 specifically where you're directing me so I can read it?

9 Q. Yeah. My -- my question's going to focus on
10 the sixth listed element there, which begins "When the
11 MMS Relay/Server receives" --

12 A. One moment, please.

13 Q. -- "the trigger request."

14 A. Thank you. Okay. I see that.

15 Q. Okay. So do you see at the beginning of your
16 numbered Item 6 on page 87 of your declaration states,
17 "When the MMS Relay/Server receives a retrieval request
18 from the recipient User Agent with a request for
19 deferred delivery," and then you go to say additional
20 things after that?

21 A. I see those literal words, yes.

22 Q. Okay. So is -- is your condition 6 here a
23 situation in which a message retrieval request would
24 include a request for deferred delivery?

25 MR. LEMBO: Objection. Form.

1 THE WITNESS: So as I -- I cite here to
2 Section 7.1.2.1 of the 23.140 standard, which is at the
3 bottom of page 28, and that reads, "Retrieve the MM
4 either immediately or at a later time (i.e., defer the
5 MM retrieval)."

6 BY MR. MILKEY:

7 Q. So is it your opinion that this discloses a
8 message retrieval request that includes a request for
9 deferred delivery?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: As I've said in -- in this
12 paragraph, the -- the message from the UA indicates a
13 specified delivery period and so sometime later.

14 BY MR. MILKEY:

15 Q. I'm not sure I understand your answer. Is it
16 your opinion that TS 23.140 discloses that a message
17 retrieval request sent by an MMS User Agent would
18 include a request for deferred delivery?

19 MR. LEMBO: Objection. Form.

20 THE WITNESS: It -- it could include a request
21 for deferred delivery.

22 BY MR. MILKEY:

23 Q. Okay. And then turning back to your
24 declaration on paragraph 200, the first numbered item in
25 that paragraph talks about when the recipient User Agent

1 is configured for manual retrieval. "The User Agent
2 manually issues (trigger) a retrieval request in
3 response to a notification to initiate a delivery
4 attempt."

5 Do you see that?

6 A. I see that literal text, yes.

7 Q. Okay. Is -- in your opinion, is there
8 something in the message retrieval request that
9 indicates whether or not the retrieval request was
10 initiated automatically or manually?

11 MR. LEMBO: Objection. Form.

12 THE WITNESS: I'm -- I'm not aware, but I'm
13 certainly experienced at these different conditions
14 myself, as recently last week. So manual retrieval does
15 exist, both as part of a standard and in -- in my
16 experience.

17 BY MR. MILKEY:

18 Q. Okay. And is it your opinion that the
19 MMS Relay/Server would know whether or not the message
20 retrieval was initiated automatically or manually?

21 MR. LEMBO: Objection. Form.

22 THE WITNESS: It -- it could. I could imagine
23 multiple ways to implement it.

24 ///

25 BY MR. MILKEY:

1 Q. Okay. Do you know in TS 23.140 whether it
2 discloses the MMS Relay/Server knowing whether the
3 message retrieval was initiated automatically or
4 manually?

5 MR. LEMBO: Objection. Form.

6 THE WITNESS: Well, again, as I've said, I
7 haven't memorized TS 23.140. The -- the message might
8 be a hint. You know, there might be additional logic,
9 for example, to look at -- at how often a request is
10 made or if it's in response to a notification or -- or
11 not, but I -- I don't recall that being explicitly
12 included as a shall in -- in 23.140.

13 BY MR. MILKEY:

14 Q. Okay. Turning back to your declaration at
15 paragraph 200, as we've discussed before, you have three
16 different sort of, I'll say, tiered descriptions of what
17 a message retrieval might be interpreted as.

18 And as I understand it, it's your position that
19 a message -- message delivery -- strike that. I -- I
20 used the wrong language.

21 Turning back to your declaration at
22 paragraph 200, as we've discussed, you have three
23 different sort of tiered descriptions of what a message
24 delivery trigger might be understood as, and it's my
25 understanding it's your position that a message delivery

1 trigger encompasses all three of these possibilities; is
2 that correct?

3 MR. LEMBO: Objection. Form.

4 THE WITNESS: As I've said before, my
5 interpretation of a trigger is the plain and ordinary
6 meaning. All I've done here is grouped logically
7 similar triggers together, but it's my belief that all
8 seven of these examples are triggers.

9 BY MR. MILKEY:

10 Q. Okay. So it's not, for example, your opinion
11 that the claimed message delivery trigger is limited to
12 a condition after which the next step is an attempt to
13 deliver the message; right?

14 MR. LEMBO: Objection. Form.

15 THE WITNESS: To be clear, again, I believe all
16 seven of the examples I've provided here are triggers.

17 BY MR. MILKEY:

18 Q. I understand, but I just want to make clear for
19 the record that it's not your opinion that the claimed
20 message delivery trigger is limited to a condition after
21 which the next step is an attempt to deliver the
22 message. Correct?

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: Sorry to repeat myself again.

25 The -- the numbers that I have here, the examples that I

1 have here in paragraph 200, of which there are seven,
2 are -- are just logically grouped, but, you know,
3 trigger can be any of these things, not -- it's not
4 limited to any subset.

5 BY MR. MILKEY:

6 Q. Okay. So turning to page 88 towards the end of
7 your paragraph 200, it's your opinion that a message
8 delivery trigger does encompass conditions imposed on
9 the messages controlling whether a message will be
10 delivered at all; correct?

11 MR. LEMBO: Objection. Form.

12 THE WITNESS: As I said before, I believe all
13 seven examples here are examples of triggers.

14 BY MR. MILKEY:

15 Q. Okay. And I'm not asking about your example
16 seven. I'm asking about your characterization of what a
17 message delivery can include just before example seven.

18 So my specific question is you would agree with
19 me that under the ordinary meaning of "message delivery
20 trigger," such a trigger includes conditions imposed on
21 the messages controlling whether a message will be
22 delivered at all; correct?

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: Again, as I said before, I'm
25 applying the plain and ordinary meaning of the word

1 "trigger," and I believe that all seven of -- of the
2 examples here and from the text surrounding them are
3 just logically grouped. All of these constitute
4 triggers.

5 BY MR. MILKEY:

6 Q. Dr. Traynor, can you provide an opinion today
7 regarding whether the plain meaning of "message delivery
8 trigger" includes conditions imposed on the messages
9 controlling whether a message will be delivered at all?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: Again, the text in 200, I believe
12 all of these constitute triggers.

13 BY MR. MILKEY:

14 Q. Including conditions imposed on the messages
15 controlling whether a message will be delivered at all;
16 correct?

17 MR. LEMBO: Objection. Form.

18 THE WITNESS: I -- I've discussed such
19 conditions in -- in seven as part -- as sum part of 200.

20 BY MR. MILKEY:

21 Q. Okay. And you agree that conditions imposed on
22 the messages controlling whether a message will be
23 delivered at all do constitute message delivery
24 triggers; correct?

25 MR. LEMBO: Objection. Form.

1 THE WITNESS: Again, all of the things I
2 mentioned in 200, I believe, qualify as triggers.

3 BY MR. MILKEY:

4 Q. Thank you.

5 If we could please turn to paragraph 242 of
6 your declaration, and let me know when you're there.

7 A. One moment, please. I'd just like to -- to
8 read that and the paragraphs around it.

9 Q. Okay.

10 A. (Reviewing document.)

11 Okay. I've read that text.

12 Q. Okay. And it's your opinion in paragraph 244
13 that a POSITA would have understood or found it obvious
14 that specifying the desired time of delivery triggers a
15 periodic timer upon the receipt of a message that
16 expires when the delivery timer is reached, which then
17 triggers the delivery of the message.

18 Do you see that?

19 A. Yes, I see that literal text.

20 Q. Would you agree with me that the timer that is
21 triggered upon the receipt of such a message would run
22 exactly once for a single message?

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: So consistent with my prior
25 testimony, "periodic," I believe, means of or related to

1 a time period. In this case, the time period is between
2 the receipt and then the expiration of -- of the message
3 timer. And so, in this case, I believe that this is a
4 periodic timer. It represents the end of this time
5 period.

6 BY MR. MILKEY:

7 Q. Okay. We'll -- we'll get into your
8 interpretation of periodic timer in a second, but before
9 we do that, my specific question was you agree with me
10 that the timer that is triggered upon the receipt of a
11 message that sets a desired time of delivery would run
12 exactly once for a single message; correct?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: It could.

15 BY MR. MILKEY:

16 Q. Do you have any opinions expressed in your
17 declaration where the timer that is triggered by such a
18 message would run multiple times?

19 MR. LEMBO: Objection. Form.

20 THE WITNESS: I haven't covered that in my --
21 my declaration.

22 BY MR. MILKEY:

23 Q. Okay. And you stated just now that consistent
24 with your prior testimony, "periodic," you believe,
25 means of or related to a time period.

1 Do you agree with that?

2 A. I believe that I did state that and that I am
3 consistent, yes.

4 Q. Okay. Can you give me an example of any timer
5 that is not of or related to a time period?

6 MR. LEMBO: Objection. Form.

7 THE WITNESS: Again, the word "periodic" here
8 means of or related to a time period in its plain and
9 ordinary meaning and so, yeah, I just applied the plain
10 and ordinary meaning to the word.

11 BY MR. MILKEY:

12 Q. Right. I -- I understand it's your opinion
13 that "periodic" means of or related to a time period.

14 What I'm asking is are you able, sitting here
15 today, to give me an example of any timer that is not of
16 or relating to a time period?

17 MR. LEMBO: Objection. Form.

18 THE WITNESS: I -- I haven't -- I haven't
19 discussed that in my -- in my declaration, but, again, I
20 believe a periodic timer is one that's related to a time
21 period.

22 BY MR. MILKEY:

23 Q. Okay. And I agree that you haven't discussed
24 whether there are any examples of timers that exist in
25 your declaration that do not relate to a time period.

1 My question is: Sitting here today, can you
2 identify any examples of timers that do not relate to a
3 time period?

4 MR. LEMBO: Objection. Form.

5 THE WITNESS: Again, I haven't offered an
6 example of that in my declaration. You know, perhaps
7 given more time, I might be able to, but I -- I haven't
8 considered that.

9 BY MR. MILKEY:

10 Q. Okay. And sitting here right now, can you give
11 me an example of a timer that is not relating to a time
12 period?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: Yeah. Again, I haven't -- I
15 haven't done so in my declaration. I -- I don't have
16 any examples at the moment off the top of my head.

17 BY MR. MILKEY:

18 Q. Thank you.

19 A. Counsel, if I could ask in the next few
20 minutes -- we're approaching an hour -- when it's
21 convenient to take a break? But, you know, whenever
22 it's convenient.

23 MR. MILKEY: Okay. Let's go off the record.

24 THE COURT REPORTER: We are off the record.

25 (Whereupon, a recess was taken.)

1 THE COURT REPORTER: We are going back on the
2 record. The time is 9:05 a.m., Pacific Time.

3 BY MR. MILKEY:

4 Q. Dr. Traynor, did you speak with your counsel
5 during the break?

6 A. No.

7 Q. Okay. And in paragraph 245 of your
8 declaration, you state that, additionally or
9 alternatively, MMS User Agent uses periodic polling to
10 identify new messages on an external server and
11 subsequently retrieves those messages, which also
12 demonstrates another example a message delivery trigger
13 that is the expiration of a periodic timer as indicated
14 by periodic polling.

15 Do you see that?

16 A. Yes, I see those literal words.

17 Q. So in your opinion, TS 23.140 discloses the
18 MMS User Agent performing the periodic polling?

19 MR. LEMBO: Objection. Form.

20 THE WITNESS: I believe that's one way to
21 implement this, yes.

22 BY MR. MILKEY:

23 Q. I'm asking a slightly more specific question,
24 which is what TS 23.140 discloses, and my specific
25 question is, is it your opinion that TS 23.140 discloses

1 that the MMS User Agent performs the periodic polling?

2 MR. LEMBO: Objection. Form.

3 THE WITNESS: So in paragraph 245, I cite to
4 Section 8.3.3 of 23.140 at which I believe we may have
5 visited earlier but, in particular, the periodic polling
6 for messages on an external server bullet. And so one
7 way to implement that would be to -- from the -- the
8 user equipment or the User Agent.

9 BY MR. MILKEY:

10 Q. Okay. But -- but it's not your opinion that
11 TS 23.140 discloses the MMS User Agent performing the
12 periodic polling; correct?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: I'm -- I guess I'm not quite sure
15 what -- what you mean here. Could you clarify, please?

16 BY MR. MILKEY:

17 Q. Yeah. As I understand your testimony -- and I
18 don't mean to be argumentative, I just mean that -- I
19 don't think I'm getting a clear answer to my question
20 because I'm asking what -- whether TS 23.140 discloses
21 the User Agent performing the periodic polling, and
22 you're -- you're telling me that it's one way that it
23 could be implemented. So as I understand your
24 testimony, you're essentially saying this may be an
25 obvious implementation of how it could be implemented.

1 My specific question is do you have an opinion
2 that TS 23.140 actually discloses that the MMS User
3 Agent performs the periodic polling?

4 A. So to be clear, this is the scalable way to do
5 it. Potentially, the MMS Relay/Server could poll other
6 servers, but that list of servers would be significant.
7 And so the -- as a person of ordinary skill in the art
8 at the time, it would make the most sense the User Agent
9 would know which servers potentially to poll, and so I
10 believe that -- that that's what is suggested in 8.3.3.

11 Q. Okay. Where in your declaration do you address
12 the scalability issue?

13 A. Certainly I touch on performance all
14 throughout. Is there a more specific question?

15 Q. Yeah. So I -- I'm concerned that your answer
16 to my previous question was nonresponsive in that you
17 mentioned that if the MMS Relay/Server was polling other
18 servers, that list of servers would be significant and
19 so it would make the most sense for the User Agent to
20 poll. I didn't see that analysis in your declaration
21 and I was just wondering if I missed something in that
22 regard.

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: So polling by the user device, I
25 believe, as we've discussed, is a common behavior. I

1 earlier pointed you to Table 10 wherein a device can
2 initiate retrieval essentially to query the MMS user
3 server -- I'm sorry -- the MMSC to see if there are
4 messages available. This is a standard behavior in
5 cellular networks wherein devices check every so often
6 to see if there are messages or notifications or traffic
7 waiting for them.

8 BY MR. MILKEY:

9 Q. Okay. I'll object, again, as nonresponsive on
10 the -- my specific question was whether you provided any
11 analysis in your declaration as to whether polling by
12 the MMS Relay/Server itself would be inefficient and so
13 it would make the most sense for the User Agent to do
14 the polling?

15 A. I don't believe I have any text on that
16 exactly. But, again, I'm relying on my experience as a
17 person of ordinary skill in the art at the time with a
18 deep understanding of how these networks work, with an
19 understanding that periodic polling is a very common
20 behavior for mobile devices. So, yeah, these are sort
21 of basics of cellular networks.

22 Q. In your opinion, would the MMS Relay/Server
23 know whether a given message retrieval request was the
24 result of periodic polling or not?

25 MR. LEMBO: Object to form.

1 THE WITNESS: Yeah. Sorry. Not trying to be
2 pedantic, but what do you mean by "would it know"?

3 BY MR. MILKEY:

4 Q. No. That's actually a fair point.

5 In your opinion, would the MMS Relay/Server
6 receive information from which it could determine
7 whether or not a given message retrieval request was
8 initiated as a result of periodic polling?

9 MR. LEMBO: Objection. Form.

10 THE WITNESS: I don't think that I've offered
11 an opinion on that in my -- my declaration. There are
12 certainly ways in which, for example, if -- if the logs
13 were analyzed, regular requests, you know, within some
14 tolerance could be potentially tagged as -- as such.

15 BY MR. MILKEY:

16 Q. Does TS 23.140 disclose any logic to determine
17 whether or not a given message retrieval request was the
18 result of periodic polling?

19 MR. LEMBO: Objection. Form.

20 THE WITNESS: Again, I haven't memorized the --
21 the document, but I -- I'm not aware off the top of my
22 head. If there's something you would like me to
23 discuss, I'm happy to have -- be pointed to it.

24 ///

25 BY MR. MILKEY:

1 Q. Okay. Could you please turn to paragraph 315
2 of your declaration, which is on page 131.

3 A. One moment, if you'll allow me to read the
4 text.

5 Q. Absolutely.

6 A. (Reviewing document.)

7 Okay.

8 Q. And you see that paragraph 315 is the beginning
9 of your analysis with respect to your combination of
10 TS 23.140 and the Adamczyk reference? I'm probably
11 mispronouncing that, but do you see that?

12 A. Yes, I do, and I'll probably mispronounce it as
13 well as Adamczyk.

14 Q. Yours sounds better so we'll go with that.

15 A. No problem.

16 Q. Or at least I'll try to.

17 And so what I'm -- what I want to ask about is
18 what your proposal with -- what your proposed
19 combination of TS 23.140 with Adamczyk actually
20 involves, and I'll direct you to -- I'm -- I'm not
21 trying to limit your analysis. I'm really just sort of
22 in exploration mode and I just want to understand what
23 the combination entails.

24 I'm going to quote from sort of the middle of
25 paragraph 318. You state that a POSITA would have been

1 motivated to implement a periodic timer like Adamczyk's
2 to have the MMS Relay/Server issue notifications at
3 predetermined intervals will all messages received
4 during that interval" -- and I -- I assume you meant to
5 say "with all messages received during that interval";
6 is that correct?

7 A. One moment, please. Let me just read that.

8 Q. Yep, absolutely.

9 A. So, first, yes, I believe that "will" should be
10 "with," and, second, I've read the text.

11 Q. Okay. And so is your proposed combination with
12 TS 23.140 and Adamczyk that the periodic timer would
13 cause notifications to be sent from the MMS Relay/Server
14 to the MMS User Agent at periodic intervals or are you
15 proposing that the periodic timer would have some other
16 functionality?

17 MR. LEMBO: Objection. Form.

18 THE WITNESS: Can you -- can you repeat the
19 question? I'm not sure I -- I follow.

20 BY MR. MILKEY:

21 Q. Yeah. So in your proposed combination of
22 TS 23.140 with Adamczyk, what does the expiration of the
23 periodic timer cause to happen?

24 MR. LEMBO: Objection. Form.

25 THE WITNESS: So, again, I'm relying on the

1 teachings of Adamczyk to talk about moving information
2 potentially from the MMS server to the -- to the User
3 Agent. So I could be specifying a time when I want a
4 burst of things or notifications. It could be
5 application data, lots -- lots of different things.

6 Q. Okay. So the expiration of the periodic timer
7 would cause the MMS Relay/Server to convey certain
8 information like a notification to the MMS User Agent;
9 is that correct?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: So an example that I give in
12 paragraph 318 is the sentence that you -- that you
13 previously read for the MMS Relay/Server to issue
14 notifications at predetermined intervals with all
15 messages. So things that happen to be buffered at that
16 period of time, you could do an alert notification for
17 them.

18 BY MR. MILKEY:

19 Q. Okay. In paragraphs 315 to 320 of your
20 declaration, do you propose that the expiration of the
21 periodic timer would immediately cause the
22 MMS Relay/Server to transfer the actual message itself
23 to the MMS User Agent?

24 MR. LEMBO: Objection. Form.

25 THE WITNESS: Can you tell me a little bit more

1 about what you mean by that?

2 BY MR. MILKEY:

3 Q. Yeah. So, again, looking at paragraph 318 --
4 and, again, I'm not -- I'm certainly not trying to limit
5 the disclosure to paragraph 318, but this is just the
6 most direct thing I'm seeing in your declaration at this
7 point.

8 You state that the expiration of the periodic
9 timer would have the MMS Relay/Server issue
10 notifications at predetermined intervals, and I guess my
11 question is what do you mean by "notifications"? Are
12 you saying that the message itself that -- you know, the
13 message for the application itself would be transmitted
14 at -- at predetermined intervals or would it be a
15 notification that the message exists would be
16 transmitted at predetermined intervals?

17 A. So I think, as we've discussed, you know, the
18 MMS server, the MMSC, is not necessarily located
19 anywhere near the User Agent, and so the way that it
20 communicates is by first sending a notification. That
21 timer could go off and the device may -- the User Agent
22 may not be available. And so I've spoken broadly about
23 this in my triggers discussion in paragraph 200 and so
24 that's sending a notification as part of beginning the
25 process of -- well, one process of delivering the

1 message, but I would imagine if the device was
2 available, if it had, you know, coverage, it had
3 available storage, that it would respond requesting the
4 messages.

5 Q. Okay. So is it your opinion that on expiration
6 of the periodic timer, the MMS Relay/Server would issue
7 a notification to the User Agent that a message is
8 available and then, in response to that notification,
9 the User Agent could request delivery of that message?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: Again, on expiration of the timer
12 at the MMS server, it -- a notification that messages
13 were available would be sent. If the device on which
14 the User Agent was running was available, you know, met
15 a number of criteria and, you know, including things
16 like had sufficient storage for the messages, it then
17 might request to receive them.

18 BY MR. MILKEY:

19 Q. Okay. In your proposed combination of
20 TS 23.140 with Adamczyk, do you propose that the
21 MMS Relay/Server would be configured to just immediately
22 deliver application messages to the MMS User Agent
23 without first waiting for a message retrieval request?

24 MR. LEMBO: Objection. Form.

25 THE WITNESS: So just to be clear, in this

1 case, the -- the timer expiration triggers a series of
2 -- of events, a series of messages back and forth such
3 that the device could potentially receive the messages
4 that are being stored.

5 BY MR. MILKEY:

6 Q. Right. And so my question is -- is -- I
7 believe TS 23.140 discloses there are a number of
8 messages exchanged before the messages actually deliver.
9 There's a notification there's a message retrieval
10 request and then there's the attempted delivery.

11 My question is, is your proposed combination
12 with TS 23.140 changing the operation of TS 23.140 such
13 that upon expiration of the periodic timer, the MMS
14 Relay/Server would just transfer the application message
15 to the User Agent without first waiting for a retrieval
16 request?

17 A. I -- I don't believe that I'm suggesting that.
18 I'm saying that the expiration of a timer triggers a
19 series of additional events, each of which could
20 potentially stop the delivery. So if a notification was
21 sent to the User Agent and it didn't respond, that --
22 those messages would not be delivered. So I'm just
23 saying that there's a -- a trigger that's happening at
24 the MMS server.

25 Q. Okay. Could you please open up Exhibit 1007,

1 just the Houghton reference.

2 (Exhibit 1007 was previously marked for
3 identification.)

4 THE WITNESS: I have it open. Is there a
5 particular place I should open it to?

6 BY MR. MILKEY:

7 Q. Yeah. If you could go to page 3 of that
8 reference -- it's PDF page 5 if you're on PDF -- and on
9 page 3 of Houghton, there's a paragraph that begins
10 "Push technology is characterized by," and that's what
11 I'm going to be asking about.

12 A. I see that. If you'll just give me a moment to
13 read.

14 Q. Uh-huh.

15 A. Okay. I've read that paragraph.

16 Q. And do you see that in that paragraph -- I
17 believe it's the third sentence of that paragraph says,
18 "SMS and MMS (Multi-media Messaging Service) are the
19 most common forms of 'push' messaging in the mobile
20 industry."

21 A. I see that literal text, yes.

22 Q. Okay. And then skipping a sentence, but I
23 believe this last sentence is still addressing SMS and
24 MMS. That last sentence says, "These signaling networks
25 are closed; they are not part of the Internet. Each

1 operator controls and encrypts this traffic, charging
2 high prices for their use and limiting their use and
3 usefulness."

4 Do you see that?

5 A. I see that literal text, yes.

6 Q. Is that description, in your opinion, a
7 description in Houghton of SMS and MMS messaging?

8 MR. LEMBO: Objection. Form.

9 THE WITNESS: Sorry. Can you be a bit more
10 specific?

11 BY MR. MILKEY:

12 Q. Yeah. When -- when Houghton says, "These
13 signaling networks are closed; they're not part of the
14 Internet. Each operator controls and encrypts this
15 traffic, charging high prices for their use and limiting
16 their use and usefulness," are those descriptions
17 Houghton's characterization of networks for implementing
18 SMS and MMS messaging?

19 A. I -- I think that this reflects a common
20 opinion, but it's not necessarily precise.

21 Q. Is this Houghton's view of networks for SMS and
22 MMS messaging?

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: To be clear, I've -- I've never
25 met Houghton and so I can only read what they have

1 written here.

2 BY MR. MILKEY:

3 Q. And that -- that's a fair point. My -- I think
4 we're all -- you know, with the benefit of hindsight,
5 we're still limited to what's actually written. So when
6 I'm referring to Houghton, I'm referring to the Houghton
7 reference, not the individual Houghton. You know, who
8 knows what may be in his or her head.

9 But is -- in your opinion, when the Houghton
10 reference states, "These signaling messages are closed;
11 they are not part of the Internet. Each operator
12 controls and encrypts this traffic, charging high prices
13 for their use limiting their use and usefulness," is
14 this the Houghton's Reference's description for networks
15 providing SMS and MMS messaging?

16 A. Again, this is the literal text in the
17 reference, but I want to note that it's not precise.
18 The word "closed" comes with a lot of context. "Not
19 part of the Internet comes with a lot of context." And
20 so these -- these seem like simple fixes, but -- useful
21 ones at a high level, but they're not precise.

22 Q. Okay. And I -- I understand this may not be
23 your view and I'm not asking you to adopt this view.
24 I'm just asking is this a discussion in Houghton that
25 you understand Houghton is describing is applicable to

1 networks for SMS and MMS messaging?

2 A. Again, I think that this is just a -- sort of a
3 short high-level description. Certainly, at the time
4 different providers could interoperate with each other
5 and so text messages can go from one provider to
6 another, as could MMS. Actually, as part of my
7 dissertation work, I showed that these networks were
8 connected to the internet and that you could inject
9 these kinds of messages from the internet to them.

10 That said, this sort of classic view -- and I
11 think the sentence before directly informs -- the
12 ability of the general public to inject specifically
13 SS7 or Signaling System No. 7 messages from the internet
14 was extremely limited and so it was closed in that
15 fashion.

16 Does that help provide some context?

17 Q. It -- it does and I -- I understand that you're
18 -- you're saying that these sentences may need more
19 context to be appropriately understood.

20 My question -- and I -- I believe that's clear
21 on the record as well.

22 My question, though, is whether when Houghton
23 says, "These signaling networks are closed; they are not
24 part of the Internet. Each operator controls and
25 encrypts this traffic, charging high prices for their

1 use in limiting their use and usefulness," whether those
2 sentences are Houghton describing the networks that
3 provide MMS and SMS messaging or whether Houghton is
4 characterizing something else in those sentences?

5 A. That, again, I think this is a very high-level
6 description with all of the caveats that I've already
7 provided.

8 Q. Okay. And you agree, right, that at the very
9 high-level description, with all the caveats you've
10 already provided, specifically for networks providing
11 SMS and MMS messaging; correct?

12 A. Again, to be clear, I'm really focusing on the
13 ability of nontelephony networks to inject SS7 traffic
14 into cellular cores. I think that that's what Houghton
15 is referring to, but I can and, in fact, do teach an
16 entire course around this topic. And so if you have a
17 semester, I'd be happy to go into even more detail.

18 Q. I -- I guess my question is -- is the last two
19 sentences of this paragraph we've been discussing in
20 Houghton on page 3, are those two sentences referring to
21 networks for providing MMS and SMS messaging or are they
22 referring to something else?

23 A. They appear to be referring to SS7, again,
24 Signaling System No. 7 networks, which are traditionally
25 closed, but, again, in 2006, you could -- these networks

1 were connected to the internet. You could, you know,
2 check your email. You could, through web pages, send
3 SMS and MMS and a variety of other interfaces into these
4 networks. So the characteration [sic] --
5 characterization rather -- apologies -- is not -- not
6 precise here.

7 Q. Okay. And SS7 networks are networks for
8 providing SMS and MMS messaging; correct?

9 A. SS7 networks are one of a series of a
10 generations of core cellular networks. They've been,
11 you know, replaced with things like IMS and so they're
12 just referring to the technology that was common in the
13 core of cellular networks at the time. But certainly
14 IMS, the IP multi-media subsystem, was becoming
15 available at this time and that also provided SMS and
16 MMS services. So, yeah, I'm -- I'm not sure what else I
17 can describe for you here. MMS and SMS are not limited
18 strictly to SS7. That's where they originated and these
19 networks certainly weren't completely detached from the
20 internet.

21 Q. Okay. When -- when Houghton says, "These
22 signaling networks are closed; they are not part of the
23 Internet," what signaling networks is Houghton referring
24 to in that sentence?

25 A. Again, he's referring to networks like SS7.

1 These are core operator -- cellular operator networks
2 for which the standards were not necessarily open. And
3 so for context, the internet that we all use and rely on
4 relies on things like IP networking. Those standards
5 are open and available to everybody to read and see.
6 Not all of SS7 was that way. Providers generally only
7 connected to other providers and so there was a small
8 community of folks who were running these networks.
9 That was prior to the deregulation in the 90's in
10 particular, and so he's referring to the classic
11 cellular core technologies that were run at this time
12 and before.

13 Q. Okay. And you see in that same paragraph
14 Houghton has a sentence that begins with, quote, "These
15 store and forward messaging systems," unquote?

16 A. Yes, ending in the reference to SS7 that I
17 previously mentioned.

18 Q. Correct. And is it your understanding that
19 when Houghton is talking about, quote, "These store and
20 forward messaging systems," unquote, Houghton is
21 referring to SMS and MMS messaging systems?

22 A. Yes, that's my understanding.

23 Q. Okay. And do you -- if you could turn to
24 page 5 of Houghton, PDF page 7. Let me know when you're
25 there.

1 A. I'm -- I'm there.

2 Q. Okay. And do you see that the last sentence of
3 the second-to-last paragraph of Houghton reads: "Also
4 due to the low speed of SMS delivery as a
5 store-and-forward messaging system, it can take a long
6 time for the application to launch to a known state
7 based on a remote command thus making this unsuitable
8 for any use in any real time or time critical
9 situations"?

10 A. I see that literal text, yes.

11 Q. In your opinion, does Houghton view the
12 store-and-forward aspect of SMS messaging to be a
13 drawback or a positive?

14 MR. LEMBO: Objection. Form.

15 THE WITNESS: Again, I don't know Houghton. I
16 haven't spoken to him or -- or her. In this particular
17 sentence, they -- you know, they certainly use the words
18 "low speed of SMS," which doesn't sound like a positive,
19 but I'll also note that for historical context at the
20 time -- and I'll date myself here -- pagers or beepers
21 were -- were still a big market and that set of products
22 were trying to differentiate themselves as faster than
23 SMS. The reality is that those services died out
24 because SMS ended up being fast enough. So this is
25 certainly an opinion statement and one that would be

1 hotly debated at the time.

2 BY MR. MILKEY:

3 Q. Okay. And then if you could turn to page 13 of
4 Houghton, PDF page 15.

5 A. I'm there.

6 Q. And do you see the first sentence on that page
7 says, "IP push messages utilizing the principles of the
8 invention are delivered rapidly, bypassing the public
9 and often crowded SMS, MMS, WAP Push and email
10 store-and-forward mechanism within an operator and
11 between operators"?

12 A. I do see that literal text, yes.

13 Q. And do you see that the next sentence states
14 that this invention allows for a guarantee of very rapid
15 event pushes and provides usability benefits to users?

16 A. I do see that literal text, but I take some
17 issue with what the guarantee is.

18 Q. Could you please turn to paragraph 333 of your
19 declaration.

20 A. I'm there. If you'll just give me one moment
21 to read (reviewing document).

22 Okay. I've read it.

23 Q. And so in your combination with Houghton and
24 Munson, it's your opinion that a POSITA would have found
25 it obvious to incorporate Munson's store-and-forward

1 functionality into Houghton's push messaging system;
2 correct?

3 A. Yes, that's correct.

4 Q. Okay. And in your proposed combination of
5 Houghton with Munson, ultimately a message will arrive
6 at the push server which is received from an application
7 server; correct?

8 A. Yes, at a high level a message will arrive at
9 the push server.

10 Q. Okay. What -- what happens after the message
11 arrives at the push server? Is it -- is it buffered at
12 that point?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: Sorry. Are you talking about in
15 -- in Houghton or the combination?

16 BY MR. MILKEY:

17 Q. Sorry. Yeah. Thank you for the clarification.

18 In your proposed combination of Houghton with
19 Munson, what happens to the message after it's reached
20 -- after it's received at the push server? Is that
21 message buffered or immediately transmitted?

22 A. Well, again -- and I'm looking at paragraph 335
23 and Houghton alone considers the -- the need for this,
24 but the message would be buffered because at least a
25 copy would be kept because the availability of the User

1 Agent may not be known. And so if it was simply sent
2 and not -- a copy not kept, then it wouldn't arrive at
3 the User Agent.

4 Q. Okay. So I understand that if it's sent
5 without retaining a copy, it's your opinion that that
6 would be problematic.

7 My question is when, in your proposed
8 combination, the push server receives a message, is it
9 buffered until some additional trigger occurs or is it
10 immediately sent on message reception with a copy being
11 stored on the push server?

12 MR. LEMBO: Objection. Form.

13 THE WITNESS: I -- I'd point you to 336 and --
14 and note that in the base case, an incoming message
15 could be received, a copy sent immediately, or it could
16 be as the result of some triggered event, including an
17 alarm notification, measurement result, any of those
18 things.

19 BY MR. MILKEY:

20 Q. Okay. Could we please turn to page 21 of
21 Houghton.

22 A. I'm there. Can you point me to something
23 specific, please?

24 Q. Yeah. In the second-to-last paragraph, the
25 last full paragraph of Houghton, the second sentence

1 states that the trigger may, among others, include an
2 alarm notification, or measurement result received to
3 the push server 401 from another device or system.

4 Do you see that?

5 A. I see that literal text, yes.

6 Q. Is that what you're relying on for your message
7 deliver trigger or something else in Houghton?

8 Strike that. I'll ask a slightly more precise
9 question.

10 Is that disclosure in that sentence what you're
11 relying on for the plurality of message delivery
12 triggers or are you referring to something else?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: As you can see in 336, I have
15 multiple citations, that -- that being one of them.

16 BY MR. MILKEY:

17 Q. And what are you relying on other than a
18 trigger such as an alarm notification or measurement
19 result received to the push server 401 from another
20 device or system?

21 MR. LEMBO: Objection. Form.

22 THE WITNESS: So in paragraph 336, after citing
23 to page 21, I cite pages 14, 21 through 22, 25 through
24 28.

25 BY MR. MILKEY:

1 Q. Okay. And I see that you have citations there.
2 I guess my question is what specific things are you
3 alleging in those citations to constitute the plurality
4 of message delivery triggers as claimed?

5 MR. LEMBO: Objection. Form.

6 THE WITNESS: So just as an example on page 26,
7 the second half of the first sentence of the first
8 paragraph, the push client may send a periodic message.
9 So I'm using the teachings of -- of Houghton to speak
10 generally about triggers and a range of them are
11 discussed throughout here.

12 BY MR. MILKEY:

13 Q. Okay. And it's your opinion that this periodic
14 message discussed in the second half of the first
15 sentence of the first paragraph of page 26 of Houghton
16 constitutes a message delivery trigger?

17 A. Of the expiration of the timer that would be
18 associated with that periodic message, yeah.

19 Q. And is the paragraph you're referring to the
20 paragraph that begins referring to step 620 and 621?

21 A. Yes. Apologies for the confusion. Yes, that's
22 correct. It's on page PDF 28, but page 6 is listed at
23 the top.

24 Q. Okay. And so, in your opinion, the -- the
25 periodic message discussed in that paragraph is a

1 message delivery trigger; correct?

2 A. I would say that the -- the timer associated
3 with the periodic message could be a trigger. The
4 message itself might trigger -- might serve as a trigger
5 to the actual device. So there are multiple ways in
6 which it could be a trigger.

7 Q. Where in this paragraph does Houghton disclose
8 that the expiration of the periodic timer triggers the
9 delivery of any message to the user device?

10 A. That's one possible embodiment that may send a
11 periodic message. As a person of ordinary skill in the
12 art, I could understand that that might be as the result
13 of a timer. It could truly be periodically, a message
14 sent on occasion asynchronously. It could be embodied
15 multiple ways.

16 Q. Understanding that it -- it could potentially
17 be embodied in multiple ways, I'm more specifically
18 asking where does Houghton disclose that the expiration
19 of a periodic timer deliver -- triggers the delivery of
20 an application message to the user device?

21 MR. LEMBO: Objection. Form.

22 THE WITNESS: I -- I believe that it says so in
23 this paragraph. Further down, "The period of time
24 measured in seconds, minutes, or hours between such
25 periodic messages," so it's talking about, in this case,

1 a recurring periodic event. One way to implement that
2 would be through a timer.

3 BY MR. MILKEY:

4 Q. Okay. So on the expiration of a timer, any
5 application messages intended for a particular device
6 would be sent to the device on expiration of that timer?
7 Is that your opinion?

8 A. Possibly.

9 Q. And does Houghton disclose that?

10 A. As I said before, I -- I believe so.

11 Q. And it's your opinion Houghton discloses such a
12 teaching in this first full paragraph on page 26?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: I believe so.

15 Counsel, I'll note that we've been going for
16 over an hour now, so when it is convenient -- I
17 appreciate you may be in the middle of a line of
18 questioning, but when it is convenient, if we can take a
19 break?

20 MR. MILKEY: Okay. Let's go off the record.

21 THE COURT REPORTER: We are going off the
22 record. The time is 10:07 a.m.

23 (Whereupon, a lunch recess was taken.)

24 THE COURT REPORTER: We are back on the record.
25 The time is 10:41 a.m. Pacific Time.

1 BY MR. MILKEY:

2 Q. Welcome back, Dr. Traynor.

3 Did you discuss anything with your counsel over
4 the break?

5 A. No. We've not spoken.

6 Q. Okay. Would you please turn to page 21 of
7 Houghton, Exhibit 1007.

8 A. I'm there. Where should I look?

9 Q. The first sentence of the first full paragraph
10 is what I'll ask about.

11 A. Okay. I've read the first sentence.

12 Q. Okay. So the first sentence of the paragraph
13 on page 21 of Houghton states, "In the preferred
14 embodiment of the invention, the most basic message
15 pushed from the server 401 to the client 405 is a data
16 packet containing no information."

17 Do you see that?

18 A. Yes, I do.

19 Q. And is that describing a message that the push
20 server sends to the client on the user device?

21 A. Yes, that's what it appears to be.

22 Q. And then the next sentence of Houghton states
23 that additional binary or text information specifying
24 which mobile application 406 from a plurality of such
25 applications may optionally be included.

1 Do you see that?

2 A. Yes, I do.

3 Q. So this application identifying information in
4 the message sent from the push server to the user device
5 is optional; right?

6 MR. LEMBO: Object to form.

7 THE WITNESS: What do you mean?

8 BY MR. MILKEY:

9 Q. I'm -- I'm asking if the information specifying
10 which mobile application 406 from a plurality of such
11 applications is an optional component of Houghton's
12 disclosure or not?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: So I -- I see -- I see the
15 literal words, but I would -- I would bring up the word
16 "plurality," and in cases where there are multiple
17 applications, I'm not sure how such information couldn't
18 be included. I look to things like Fig. 8 on PDF
19 page 48 wherein information is delivered to a mobile
20 application. And without that information, again,
21 unless there's maybe just one application on the phone,
22 but even then I -- I struggle to think of real scenarios
23 in which it would not be included.

24 ///

25 BY MR. MILKEY:

1 Q. Okay. I don't think that I had previously
2 uploaded Exhibit 1017, which is the Munson Reference.

3 Again, Dr. Traynor, feel free to refer to your
4 own copy of anything as long as it's clean, but I've
5 uploaded that to the chat.

6 (Exhibit 1017 was previously marked for
7 identification.)

8 THE WITNESS: I've opened your copy.

9 BY MR. MILKEY:

10 Q. Okay. If we go to paragraph 40 of Munson,
11 Exhibit 1017, and let me know when you're there.

12 A. I'm there. I'm just reading, if you'll give me
13 a moment.

14 Q. Uh-huh.

15 A. Okay. I've read paragraph 40.

16 Q. Okay. So the first sentence of paragraph 40
17 begins by saying, "The present invention guarantees
18 reliable and asynchronous content push (i.e., pushing a
19 content) to clients on diverse wireless networks."

20 And my question is what does Munson mean by,
21 quote, "asynchronous content push" in this context?

22 A. So as we've discussed before, wireless networks
23 are unpredictable places. Mine may pass in and out of
24 coverage. My device -- my radio might be asleep. And
25 the problem with traditional push is that if I -- if I

1 miss that push, the data might be lost. And so what's
2 being proposed here is essentially a buffer that holds
3 onto content that's pushed, and as is said, at the
4 bottom of -- or later in the paragraph, that simplifies
5 things for application developers. They -- they push
6 to, essentially, the buffer and it gets delivered
7 whenever it can.

8 Q. Could you please turn to paragraph 422 of your
9 declaration.

10 A. I'm there. If you could just give me a moment
11 to read (reviewing document).

12 Okay. I've read.

13 Q. And then in paragraph 422 of your declaration,
14 you state that Houghton discloses or renders obvious
15 that the message delivery triggers include an occurrence
16 of an asynchronous event with time-critical messaging
17 needs, and then in paragraph 423, you state that the
18 trigger event can be an alarm or notification received
19 from another device.

20 And my question is where does Houghton disclose
21 that an alarm or a notification received for another
22 device is an event with time-critical messaging needs?

23 A. So I'm looking at page 21 of -- of Houghton,
24 which we discussed earlier, "The trigger may, among
25 others, include an alarm, notification, or measurement

1 result." I received the push server and so it could be
2 -- this could be the embodiment.

3 Q. Yeah, I understand that an alarm or
4 notification measurement result may trigger message
5 delivery.

6 My more specific question is where does
7 Houghton disclose that an alarm notification or
8 measurement result is an event with time-critical
9 messaging needs?

10 MR. LEMBO: Objection. Form.

11 THE WITNESS: Again, I would -- I would note
12 that depending on -- sorry. Give me one moment.

13 Would you do me a favor and just repeat your
14 question for me before I answer?

15 BY MR. MILKEY:

16 Q. Where does Houghton disclose that an alarm
17 notification or measurement result is an event with time
18 critical messaging needs?

19 MR. LEMBO: Object to form.

20 THE WITNESS: Excuse me. As I mentioned in
21 paragraph 424, Houghton talks about time critical and
22 non-time critical. On pages 20 and 21, there's a
23 discussion of high priority versus low priority, and so
24 certainly a notification, as one example, could be for a
25 high-priority event, high-priority traffic, and so that

1 would qualify.

2 BY MR. MILKEY:

3 Q. Okay. So is it -- is it your opinion that if a
4 message is delivered using a high-priority traffic
5 channel, that that message was triggered by an event
6 with time critical messaging needs?

7 MR. LEMBO: Object to form.

8 THE WITNESS: It -- it could be.

9 BY MR. MILKEY:

10 Q. It's not necessarily a message triggered by an
11 event with time-critical messaging needs just because
12 it's delivered using a high-priority traffic channel;
13 right?

14 A. So as a person of ordinary skill in the art at
15 the time, I suppose it would be technically possible but
16 would result in a bad system if I encountered to what
17 these inventions are trying to do, to tag all traffic as
18 high priority, but assuming that appropriate
19 applications were tagged with the right priority, I
20 would expect that this would carry that meaning.

21 Q. If we look at page 21 of Houghton,
22 Exhibit 1007, and it's -- I'm going to direct your
23 attention to the last sentence of the first paragraph of
24 Houghton. It's -- that paragraph continues from the
25 previous page. So it's the sentence beginning with "The

1 sending of such a return message," and if you can just
2 let me know when you are there.

3 A. I apologize. Would you describe the location
4 again.

5 Q. Yeah. It's the top of page 21 of Houghton, and
6 it's the -- the sentence that -- that is just before the
7 first full paragraph which begins with, quote, "The
8 sending of such a return message."

9 A. I see. One moment, please (reviewing
10 document).

11 Yes, I've read that.

12 Q. What is Houghton referring to by, quote, "such
13 a return message" in this sentence?

14 A. Specifically, the paragraph begins a discussion
15 about UDP, which is an action list protocol, and the
16 idea here is that UDP is often used for time-critical
17 media, for example, audio and video or a conversation.
18 These might be higher priority than -- pardon me -- than
19 something like email because the loss of those messages
20 would directly impact the understanding of the
21 conversation. And so in this particular case, Houghton
22 is discussing that one could assign them as high
23 priority.

24 Q. Would you please turn to paragraph 728 of your
25 declaration and let me know when you're there.

1 A. I'm there. If you'll give me just one moment
2 to read (reviewing document).

3 Okay. I've read.

4 Q. And paragraph 728 of your deposition is the
5 beginning of your analysis with respect to the
6 culmination of TS 23.140 and Pazhyannur; is that
7 correct? Setting aside pronunciation.

8 A. And I will also defer with a similarly wrong
9 pronunciation of Pazhyannur.

10 Q. Okay.

11 A. Yes, I believe -- I believe that we're in the
12 same place.

13 Q. Okay. So my question relates to the secure
14 authorization list indicating the authorized software
15 components that is recited in Claim 8 with respect to
16 this combination and, specifically, in your proposed
17 combination where that secure authorization list would
18 be stored in your proposal.

19 A. So give me a moment just to pick the right --
20 the right figure, but I'm looking at Pazhyannur at
21 Fig. 1, and then I'm just going to TS 23.140 to
22 illustrate. One moment, please.

23 Q. Okay.

24 A. So Pazhyannur uses the -- the user database 116
25 subscriber profile database.

1 What you're seeing in Fig. 1 of this reference
2 is -- I actually referred to this a little before. This
3 is a -- an IMS, IP multi-media subsystem network core,
4 and so the acronyms here are specific to that generation
5 of network, but they have equivalent network elements in
6 the SS7 or, you know, previous generations of networks.

7 So if you go to page 17 of -- of 23.140, you'll
8 see Fig. 2 and you'll see a device. It's the user
9 database profile subscription. It's known as the HLR,
10 alternatively known as an HSS, and so that's where that
11 information would be stored.

12 Q. Okay. And then how does the system communicate
13 the list of authorized software components to the
14 MMS User Agent in your proposed combination?

15 A. So -- I'm sorry.

16 MR. LEMBO: Objection. Form.

17 Go ahead.

18 THE WITNESS: Yeah. So there are -- I'm taking
19 a step back and giving a high architectural view. This
20 HLR is arguably the most important device in a cellular
21 network. As it stands, it already stores user profile
22 information. It stores things like cryptographic keys
23 that are used for authentication. At a -- at a high
24 granularity level, it stores your current location
25 information, services that you're subscribed --

1 subscribed to and -- and can use, and so it's already
2 the central place in the network by which this kind of
3 information is -- is stored for you. And so I'm just
4 relying on this being the central and definitive point
5 for user profile storage in a cellular network and the
6 combination.

7 BY MR. MILKEY:

8 Q. Understood. My question, I guess, is more
9 specific as to how any of the authorized software
10 components identified in the HLR is then communicated to
11 the client device in your proposed combination?

12 A. So, yeah, again, the HLR speaks with virtually
13 every network element at some point. There's parallel
14 standards for this. The HLR and information in it, you
15 know, could be sent to some intermediary and then
16 downloaded. There are many, many ways and, in fact,
17 separate standards documents. But, again, the HLR is
18 the most important device arguably in the network and
19 its storage of user profile information is a core
20 functionality.

21 Q. Does the MMS User Agent have access to the
22 information contained in the HLR?

23 MR. LEMBO: Objection. Form.

24 THE WITNESS: Some certainly. Again, what can
25 be stored in the HLR, this is a large user profile

1 database. Some information as basic as the phone number
2 would be stored in the HLR and I imagine that the
3 MMS User Agent would have access to that as well. And
4 so in that base case, yes, absolutely. There may be
5 some protections against, you know, access to all
6 information -- for example, cryptographic keys stored in
7 the HLR should not be exposed to something like the
8 UA -- but, yes, some information would be.

9 BY MR. MILKEY:

10 Q. In your proposed combination of TS 23.140 with
11 Pazhyannur, what information in the HLR would the
12 MMS User Agent have access to?

13 MR. LEMBO: Objection. Form.

14 THE WITNESS: In -- in this case, secure
15 authorization list.

16 BY MR. MILKEY:

17 Q. And what do you mean by a "secure authorization
18 list"?

19 A. Well, as they say in 732, it could be the
20 identifiers for registered applications, information
21 like that.

22 Q. Why does the MMS User Agent need to know which
23 applications are registered in the HLR?

24 A. So this is a hypothetical question. There are
25 lots of reasons why that may be the case. One is just

1 about device management and so if I -- and, again, I
2 appreciate this is not common now but certainly was at
3 the time. If I was issued a corporate phone, that
4 corporate phone might have a -- a limited list of
5 applications that are allowed to run and receive
6 messages that are potentially relevant to the business
7 and this is one way one could do that. But, again, it's
8 -- it's hypothetical. I can't imagine all potential
9 reasons or ways.

10 Q. Do you discuss in your analysis of your
11 combination of TS 23.140 and Pazhyannur the reasons why
12 you believe an MMS User Agent would need access to the
13 application to register it in the HLR?

14 MR. LEMBO: Objection. Form.

15 THE WITNESS: I believe I do -- do so -- pardon
16 me -- in paragraph 731. As another example, I might
17 have more than one device and perhaps I want, you know,
18 consistent list of permissions across those devices so
19 that's another reason.

20 BY MR. MILKEY:

21 Q. Can you give me an example of what you mean by
22 "consistent list of permissions across multiple
23 devices"?

24 A. I may have a preferred application that I want
25 to receive, you know, messages and so I want that to be

1 potentially consistent across devices. If I install
2 some other application on the second device, I wouldn't
3 necessarily want that to -- to override settings on the
4 first.

5 Q. Why would installing a -- an application
6 override settings on another application?

7 MR. LEMBO: Objection. Form.

8 THE WITNESS: If I, again, hypothetically had
9 two applications that were trying to consume information
10 from the National Weather Service, I might want to be
11 specific about my -- my default. Again, hypothetically.
12 BY MR. MILKEY:

13 Q. I thought that messages intended for
14 applications, in your understanding, of TS 23.140
15 already disclose which applications that should receive
16 the message. Is that correct?

17 A. Yes, I understand that and that's my opinion,
18 but I'd push you back to, again, art at the time.
19 Simbian, as a mobile OS architecture, was trying to deal
20 with many of these same issues with multiple
21 applications trying to masquerade as others, trying to
22 capture the messages of others, and so this is yet
23 another way to try and make sure that the application
24 that's intended consistently receives that information
25 across devices.

1 Q. If a message directed to a push client -- or
2 the MMS agent, rather, uniquely identifies what
3 application that message will be directed to, is there
4 any reason why that application would not receive the
5 message?

6 MR. LEMBO: Objection. Form.

7 THE WITNESS: Again, I, you know, need to take
8 you back into the early mid-2000s. The application
9 stores that we all take for granted now for our phones
10 didn't really exist in the same way and -- and so you
11 might load applets and other things onto your phones
12 from a variety of sources on the internet. So you could
13 potentially have malicious applications that were
14 attempting to do this, and this is just one way of --
15 you know, from a provider's perspective of keeping a
16 list of what should and shouldn't be there and making
17 sure that messages make it to the approved applications.

18 BY MR. MILKEY:

19 Q. Would you please turn to paragraph 295 of your
20 declaration and let me know when you're there.

21 A. I'm there if you'll give me a moment to read.

22 Q. Absolutely.

23 A. Okay. I've read.

24 Q. And how are you proposing the teachings of the
25 Rakich reference -- again, setting aside

1 pronunciation -- would modify the operation of TS 23.140
2 in your proposed combination?

3 A. Of course --

4 MR. LEMBO: Objection. Form.

5 THE WITNESS: Go ahead.

6 MR. LEMBO: Objection. Form.

7 THE WITNESS: So, of course, first I have a
8 different pronunciation. Equally as wrong. I've been
9 going with Rakich, but I mean the same thing.

10 And so do you have a more specific question
11 about what I've written? I'm not exactly sure how to
12 respond.

13 BY MR. MILKEY:

14 Q. I guess my question relates a little bit to are
15 you actually proposing the operation of TS 23.140 would
16 be changed in any way based on Rakich or is it -- is it
17 your opinion that TS 23.140 operates essentially the
18 same way and Rakich just confirms sort of how TS 23.140
19 would operate?

20 MR. LEMBO: Objection. Form.

21 THE WITNESS: Sorry. Can you help me
22 differentiate between those two things further?

23 BY MR. MILKEY:

24 Q. Yeah. Are you proposing any manner of
25 operation disclosed by TS 23.140 would be changed based

1 off of your proposed combination with Rakich?

2 A. So to be clear, 23.140 and standards in general
3 often tell us the base set of things that must be
4 implemented in order to implement a system, but they
5 leave a lot of room for additional mechanisms.

6 And so Rakich could be one of those mechanisms
7 and it could be used as, yet again, another way to deal
8 with the issue we just discussed. We've got an unknown
9 application potentially and Rakich helps us
10 cryptographically reason about what should be running
11 on -- on the device.

12 Q. Could you please open up Exhibit 1004 again,
13 the TS 23.140 reference, and go to page 71 of that
14 document.

15 A. One moment, please. When you say 70- -- I
16 think it's consistently numbered. Never mind. Okay.
17 I'm there.

18 Q. Do you see at the bottom of page 71, there's a
19 Table 11 that states, "Information Elements in the MM1
20 Retrieve Request"?

21 A. Yes, I do.

22 Q. And that table spans from pages 71 to -- oh,
23 strike that.

24 It's a little strange because there's Table 12
25 that also has the same heading, right, "Information

1 Elements Retrieval" -- oh, that's the retrieve response.
2 Sorry.

3 So Table 11 is the elements in the MM1 retrieve
4 request. Do you see that? And that's just on page 71?

5 A. I see that, yes.

6 Q. Okay. And how many elements are listed in the
7 elements in -- strike that.

8 How many elements are listed in Table 11?

9 A. So to be clear, this is a single mandatory
10 element, but it doesn't mean that there can't be more
11 information.

12 Q. Okay. So this wouldn't -- this Table 11
13 wouldn't show, for example, optional or conditional
14 elements?

15 A. Well, to be clear, again, this only goes as far
16 as the standard. This doesn't necessarily show the
17 overall packet structure, and so without that, I -- I
18 can't say that it's necessarily limited or would prevent
19 additional information from being included.

20 Q. Okay. So understanding that the disclosures of
21 TS 23.140 could be modified or expanded to include
22 additional elements, but setting that aside, if some
23 element of the MM1 retrieve request was optional and
24 called for by the TS 23.140 specification, would you
25 expect that optional element to be included in Table 11?

1 MR. LEMBO: Objection. Form.

2 THE WITNESS: Again, hard to speculate. It
3 could be, but to be clear, this is not a precise
4 necessarily definition. It doesn't show the full packet
5 structure. It doesn't tell me how many bytes this is
6 and what other information is here. It's merely
7 describing one field. So this is mandatory so I'd
8 expect that this would be included, but I don't think
9 that that means that everything else is explicitly
10 excluded.

11 BY MR. MILKEY:

12 Q. Okay. And then if we look at Table 12, which
13 is "Information Elements in the MM1 Retriever Response,"
14 you see that that has quite a large number of elements
15 listed in Table 12; right?

16 A. I see multiple elements, yes, in Table 12.

17 Q. And many of those elements are not mandatory
18 but are, instead, conditional or optional; correct?

19 A. I do see conditional and optional, and I
20 imagine that these things are discussed directly in the
21 standard. But, again, this does not necessarily
22 preclude other information from being included.

23 Q. Do you have any idea why the only information
24 element listed in Table 11 is the mandatory message
25 reference element in contrast to Table 12, which

1 includes numerous mandatory conditional and optional
2 information elements?

3 MR. LEMBO: Objection. Form.

4 THE WITNESS: To be clear, I -- I wasn't in
5 attendance the day that this standard was written. So I
6 -- I wasn't in the room. But, again, it's just trying
7 to characterize the information that is discussed in the
8 standard.

9 I don't believe that anywhere in the standard
10 says, "No other information shall be included," so...

11 BY MR. MILKEY:

12 Q. Based on your review of Table 11, do you
13 believe that an MM1 retrieve request would be properly
14 submitted if it did not include the message reference
15 information element?

16 MR. LEMBO: Objection. Form.

17 THE WITNESS: Sorry. What does it mean to
18 include it?

19 BY MR. MILKEY:

20 Q. Is it possible for an MMS User Agent to submit
21 an MM1 retrieve request that does not specify a message
22 reference in that retrieve request and have that be a
23 valid retrieval request?

24 A. So I -- I don't believe that the standard can
25 tell us that, and I'm -- as a hypothetical, you know,

1 these conditions often allow for no specific message.
2 So if I were to put something -- and, again, this is a
3 hypothetical. I haven't looked at an implementation,
4 but if the message reference were to be something like
5 zero or some sentinel value or key value, like say
6 anything, that would be a well-formatted reference --
7 well-formatted message. It would have something entered
8 into the message reference information element, but it
9 may not refer to one specific message. It could refer
10 to any.

11 Q. Okay. Are you aware of any disclosure in
12 TS 23.140 of that message reference information element
13 not referring to a specific message?

14 MR. LEMBO: Objection. Form.

15 THE WITNESS: I -- I, again, haven't memorized
16 the document. This would be implementation specific in
17 my mind and I don't see any reference to what this has
18 to look like either.

19 BY MR. MILKEY:

20 Q. Okay. Can I direct you to page 80 of
21 TS 23.140 and let me know when you're there.

22 A. I'm there. Just one moment, please. Okay.

23 Q. Strike that. If you could actually go to
24 page 69 of TS 23.140, and that includes Section 8.1.5.3.
25 If you could let me know when you're there.

1 A. I'm there.

2 Q. And do you see that this states, "Message
3 Reference: The recipient MMS User Agent shall provide a
4 reference, e.g., url URL, for the MM in the
5 MM1_retrieve.REQ"?

6 A. Just to be clear, it says, "URI," which is
7 functionally the same thing, but I want to make sure
8 we're looking at the same. Do you see "URI"?

9 Q. Yes. Thank you. That's -- that's my mistake.

10 A. I see that literal text.

11 Q. Okay. And then you see that it goes on to say,
12 "This reference was previously disclosed to the MMS User
13 Agent from MM1_notification.REQ, MM1_submit.RES,
14 MM1_forward.RES, MM1_mmbox_view.RES,
15 MM1_mmbox_upload.RES, or MM1_mmbox_store.RES?"

16 A. I do see --

17 MR. LEMBO: Objection. Form.

18 THE WITNESS: I do see that literal text.

19 BY MR. MILKEY:

20 Q. Do you have any disagreement with this
21 disclosure of TS 23.241?

22 A. Again, what do you mean by do I have any
23 disagreements?

24 Q. Do you have any disagreement that in the
25 retrieval of a multimedia message as described here, the

1 recipient MMS User Agent shall provide a reference which
2 was previously disclosed -- which was previously
3 delivered to the MMS User Agent in those listed ways?

4 MR. LEMBO: Objection. Form.

5 THE WITNESS: Again, consistent with my
6 previous testimony, I agree that it -- it could happen
7 in these ways, but there could be other potential values
8 to indicate -- to send all messages.

9 BY MR. MILKEY:

10 Q. Okay. Under- -- understood that it could
11 happen in this way, do you agree that it shall happen in
12 that way?

13 A. It could happen in this way.

14 Q. But it's your opinion that TS 23.140 does not
15 require that it shall happen in that way; correct?

16 MR. LEMBO: Objection. Form.

17 THE WITNESS: Again, I see lots of different
18 options here. I've -- I've talked about the possibility
19 of another option and so I'm -- I just reconfirmed my
20 previous answer.

21 When you do have a convenient moment for a
22 break in the next few minutes, if you'd let me know as
23 well.

24 ///

25 BY MR. MILKEY:

1 Q. Okay. So is it your opinion that because you
2 could think of other options to implement TS 23.140 that
3 the recipient MMS User Agent need not provide a
4 reference of the type disclosed on page 69 of TS 23.140?

5 MR. LEMBO: Objection. Form.

6 THE WITNESS: Yeah. Again, just to be
7 consistent, that's not quite what I said. Again, a
8 generic value, a signal value, something to indicate
9 that I'm looking -- I, as the User Agent, am looking for
10 any and all messages to be delivered to me. It's
11 certainly a possibility any one of these fields, you
12 know, could serve as such.

13 MR. MILKEY: All right. I'll pass the witness.

14 MR. LEMBO: Let's take a short break.

15 THE COURT REPORTER: We're off the record.

16 (Whereupon, a recess was taken.)

17 THE COURT REPORTER: Back on the record. The
18 time is 11:51 a.m.

19 MR. LEMBO: All right. We don't have any
20 questions for Dr. Traynor so we can close.

21 MR. MILKEY: All right. Thank you.

22 (Whereupon, proceedings were adjourned
23 at 11:51 a.m. PST.)

24 ---oOo---

25

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2

3 STATE OF CALIFORNIA)
4) ss.
COUNTY OF SACRAMENTO)

5

6 I, SHANNON BORGE, RPR, CSR No. 9436, Certified
7 Shorthand Reporter, do hereby certify:

8 That prior to being examined, the witness in
9 the foregoing proceedings was by me duly sworn to
10 testify to the truth, the whole truth, and nothing but
11 the truth;

12 That said proceedings were taken by me in
13 shorthand and thereafter transcribed into typewriting
14 under my direction and supervision;

15 I further certify that the adverse party,
16 AMAZON, was represented by counsel at the
17 deposition;

18 I further certify that the deposition of
19 DR. PATRICK TRAYNOR, occurred via Remote Video
20 Teleconference on THURSDAY, JULY 9, 2026, commencing at
21 8:00 a.m. to 11:51 a.m.;

22 That I am neither counsel for, nor related to,
23 any party to said proceedings, nor in any way interested
24 in the outcome thereof.

25 I further certify that I am not a party to any

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1 stipulation, if made, that would waive my duties
2 mandated by Court Reporters Board of California.

3 In witness whereof, I have hereunto subscribed
4 my name.

5 Dated: Tuesday, July 14, 2026

6

7

8

Shannon Borge

9

Shannon Borge, CRR, RPR, CSR
Certificate No. 9436

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