

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ALFONSO CIOFFI, et)
al.,)
)
Plaintiffs,)
) Civil Action No.
vs.) 2:13-cv-103-JRG-
) RSP
GOOGLE INC.,)
)
Defendant.)

CONFIDENTIAL ATTORNEYS' EYES ONLY

The videotaped deposition of HUBERT E.
(BUSTER) DUNSMORE, called by the Defendant for
examination, pursuant to Notice, and pursuant to the
Rules of Civil Procedure for the United States
District Courts, taken before Sandra L. Rocca, CSR,
CRR, at One North Franklin Street, Chicago,
Illinois, on the 10th of October, 2016, at the hour
of 9:01 a.m.

Job No.: 2446819

1 any that existed before this patent. 09:49:37

2 Q Do you believe that the asserted patents 09:49:39

3 invented the idea of a multi-process browser? 09:49:41

4 A They could have. 09:49:44

5 Q When did you first personally learn of 09:49:48

6 multi-process web browsers? 09:49:52

7 A Well, I knew about them before working on 09:49:56

8 this case, but of course I didn't start working on 09:49:59

9 this case until 2014. 09:50:02

10 Q When did you first personally learn of 09:50:05

11 multi-process browsers? 09:50:07

12 A It would have been a discussion of Google 09:50:09

13 Chrome, in fact, and I can't remember when that was, 09:50:14

14 but I'm pretty sure that it predates 2014. 09:50:18

15 Q Same question I asked about sandboxing, who 09:50:23

16 do you consider to have invented multi-process 09:50:26

17 browsers? 09:50:30

18 A I don't know. 09:50:30

19 Q The asserted patents did not invent the idea 09:50:31

20 of using sandboxing in web browsers, correct? 09:50:35

21 MR. BENISEK: Object to form. 09:50:39

22 THE WITNESS: Your question is that the 09:50:40

23 asserted patents did not invent the idea of using 09:50:50

24 sandboxing with web browsers. Again, I'm not aware 09:50:54

25 of any browsers before this patent that used the

1	sandboxing concept, so perhaps they did invent it.	09:51:03
2	Q What is process isolation?	09:51:08
3	A The idea there is that a process is	09:51:11
4	typically running in a memory space and unable to	09:51:19
5	communicate with -- in the extreme, unable to	09:51:23
6	communicate with anything else or a process can be	09:51:28
7	isolated from certain other processes and other	09:51:31
8	things. So it depends upon the context as to what	09:51:35
9	it's isolated from. In its extreme, it would mean	09:51:41
10	isolated from everything else.	09:51:45
11	Q When did you first learn of process	09:51:46
12	isolation?	09:51:50
13	A Probably -- in talking about operating	09:51:50
14	systems, probably around 2010 or so, something like	09:51:58
15	that.	09:52:02
16	Q The asserted patents did not invent the idea	09:52:02
17	of process isolation, correct?	09:52:06
18	A No.	09:52:08
19	Q The asserted patents did not invent the idea	09:52:08
20	of graphic processors, correct?	09:52:13
21	A That is correct.	09:52:14
22	Q The asserted patents did not invent the idea	09:52:16
23	of video processors, correct?	09:52:18
24	A That is correct.	09:52:20
25	Q The asserted patents did not invent the idea	

1	of multi-core processors, correct?	09:52:24
2	A That is correct.	09:52:26
3	Q The asserted patents did not invent the idea	09:52:27
4	of a multi-processor system, correct?	09:52:29
5	A That is correct.	09:52:32
6	Q The asserted patents did not invent the idea	09:52:33
7	of pinning processes to certain processors, correct?	09:52:36
8	A That is correct.	09:52:41
9	Q The asserted patents did not invent the idea	09:52:42
10	of pinning processors to different processor cores	09:52:45
11	of the multi-core processor, correct?	09:52:49
12	A Would you repeat that question?	09:52:51
13	Q The asserted patents did not invent the idea	09:52:53
14	of pinning different processors to different cores	09:52:55
15	in a multi-core processor, correct?	09:52:58
16	A Of pinning processors --	09:53:00
17	Q So my earlier question was about pinning	09:53:06
18	processes to different processors.	09:53:09
19	A Right.	09:53:12
20	Q Now my question is about pinning processes	09:53:12
21	to different cores of the multi-core processor. The	09:53:16
22	asserted patents did not invent that, right?	09:53:18
23	A They did not.	09:53:20
24	Q The asserted patents did not invent the idea	09:53:21
25	of a portable communication device, correct?	

1	A That is correct.	09:53:27
2	Q The asserted patents did not invent the idea	09:53:27
3	of operating systems, correct?	09:53:30
4	A That is correct.	09:53:31
5	Q The asserted patents did not invent the idea	09:53:32
6	of operating systems with multi-threading, correct?	09:53:34
7	A That's correct.	09:53:37
8	Q The asserted patents did not invent the idea	09:53:37
9	of multi-tasking, correct?	09:53:40
10	A That is correct.	09:53:42
11	Q The asserted patents did not invent the idea	09:53:42
12	of web browsers, correct?	09:53:45
13	A That is also correct.	09:53:47
14	Q The asserted patents did not invent the idea	09:53:48
15	of using a common operating system of four different	09:53:51
16	processes?	09:53:57
17	A That is correct.	09:53:58
18	Q The asserted patents did not invent the idea	09:53:58
19	of a portable communication device that had a common	09:54:00
20	operating system, correct?	09:54:04
21	A That is correct.	09:54:05
22	Q The asserted patents did not invent the idea	09:54:07
23	of network interface devices, correct?	09:54:10
24	A That is correct.	09:54:13
25	Q The asserted patents did not invent the idea	

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