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

ALFONSO CIOFFI, an individual,)
MELANIE ROZMAN, an individual,)
MEGAN ROZMAN, an individual, and)
MORGAN ROZMAN, an individual,)
Plaintiffs,)
v.) No. 2:13-cv-103
GOOGLE, INC.,) VOLUME II
Defendants.)
_____

Continued Videotaped Deposition of ALFONSO CIOFFI, taken at 5956 Sherry Lane, Suite 1000, Dallas, Texas, commencing at 9:08 a.m., Friday, November 7, 2014, before James M. Shaw, RMR, CSR No. 1694.

JOB No. 1956298
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A. Okay. 10:10
Q. So I'm looking at your Figure 1, and I'm going 10:10
to just go through these piece by piece. So the 10:11
network, that wasn't new. You didn't invent a network, 10:11
that's 195; correct? 10:11
A. No, we -- 10:11
Q. Correct, you did not invent that? 10:11
A. Correct, we did not invent a network. 10:11
Q. Okay. And 190, that's a network interface. 10:11
You didn't invent a network interface; is that correct? 10:11
A. No. 10:11
Q. Okay. And then 180 is a video display? 10:11
A. Yes. 10:11
Q. You didn't invent a video display; correct? 10:11
A. No, we did not. 10:11
Q. Okay. And 170 is a video processor. You 10:11
didn't invent a video processor; correct? 10:11
A. No, we did not. 10:11
Q. Okay. And 150 is a user interface. You 10:11
didn't invent a user interface; correct? 10:11
A. No, we -- no, we did not. 10:11
Q. Okay. And 120, a first processor, you didn't 10:11
invent a processor, did you? 10:11
A. No. 10:11
Q. Okay. And 110 is a first memory data storage 10:11

1 area. You didn't invent a memory storage area? 10:11
2 A. No. 10:11
3 Q. Okay. And 130 is a second memory data storage 10:11
4 area. Again, you didn't invent a memory storage area? 10:12
5 A. We did not invent a memory storage area, no, 10:12
6 we did not. 10:12
7 Q. Okay. And did you invent the idea of having 10:12
8 more than one memory storage area in a computer system? 10:12
9 A. No, we did not. 10:12
10 Q. Okay. And 140 is a second processor. You 10:12
11 didn't invent a processor? 10:12
12 A. No, we did not. 10:12
13 Q. Did you invent the idea of having more than 10:12
14 one processor in a system -- computer system 10:12
15 architecture? 10:12
16 A. No, we did not. 10:12
17 Q. Okay. So none of these individual elements 10:12
18 you invented? 10:12
19 A. No. 10:12
20 Q. What about this configuration, Figure 1, was 10:12
21 new or novel, in your mind? 10:12
22 A. 100. 10:12
23 Q. Was it the way it was organized? 10:12
24 A. 100, the entire system. The way in which it 10:12
25 was organized, the way in which we specified that these 10:12

1 combinations of elements were to operate -- were to 10:12
2 interoperate. 10:12
3 Q. Okay. So was the way -- 10:12
4 A. And that's what's -- I'm sorry, but that's 10:12
5 what's contained in the specification and in the -- and 10:12
6 in the claims. I believe it's very clear. 10:12
7 Q. Okay. So what you understood to be new and 10:13
8 novel was the way this whole piece was organized 10:13
9 together? 10:13
10 A. That -- that is a way of -- That's a layman's 10:13
11 way of characterizing, yes. 10:13
12 Q. Okay. So let's talk about how some of the 10:13
13 things are connected. Again, 195 to 190, you didn't 10:13
14 create the -- the idea of connecting a network interface 10:13
15 device to a network? 10:13
16 A. Certainly not. 10:13
17 Q. Okay. And, again, the video display to the 10:13
18 video processor, 180 to 170, you didn't create that 10:13
19 configuration? 10:13
20 A. Certainly not. 10:13
21 Q. Okay. And the user using the user interface, 10:13
22 150, you didn't create that connection? 10:13
23 A. Certainly not. 10:13
24 Q. Okay. And you didn't also invent the user 10:13
25 interface interfacing with 120, a processor -- a first 10:13

1 processor? 10:13
2 A. No, no. 10:13
3 Q. You didn't create the idea of a first 10:13
4 processor, 120, interfacing with a first memory storage 10:13
5 area; correct? 10:13
6 A. No. 10:13
7 Q. Okay. And did you create the idea of the 10:13
8 first processor and a second processor working together 10:14
9 to create a video display on a video processor, 170? 10:14
10 A. Generally, no. 10:14
11 Q. Okay. Did you create the idea or did you 10:14
12 invent the idea of a second processor, 140, having its 10:14
13 own memory storage area, 130? 10:14
14 A. That is an element of what we invented, yes. 10:14
15 Q. Okay. So you think -- 10:14
16 A. When taken into context of the way the 10:14
17 entire -- all of the pieces operate together, all the 10:14
18 communication links, all of the data flows, all of the 10:14
19 operation of the various system elements taken together, 10:14
20 yeah, certainly that is an element of it. 10:14
21 Q. So an element of what you invented is a second 10:14
22 processor having its own memory storage area? 10:14
23 A. Much more than that. I mean, certainly, 10:14
24 second processors having their own storage areas 10:14
25 certainly existed. How they are configured and how they 10:14

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