

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

3 \_\_\_\_\_  
4 :  
5 FACEBOOK, INC., LINKEDIN :  
6 CORP., and TWITTER, INC., :  
7 :  
8 Petitioners : Case  
9 : Nos. IPR2013-00478  
10 v. : IPR2013-00479  
11 : IPR2013-00480  
12 : IPR2013-00481  
13 SOFTWARE RIGHTS ARCHIVE, :  
14 LLC, :  
15 Patent Owner :  
16 \_\_\_\_\_  
17 :

18 Volume 2 of 2

19 VIDEOTAPE DEPOSITION of PAUL S. JACOBS,  
20 Ph.D., taken before Ryan K. Black, RPR, CLR  
21 Notary Public, in and for the District of  
22 Columbia, at the offices of Rothwell, Figg,  
23 Ernst & Manbeck, P.C., 607 14th Street, N.W.,  
24 Washington, D.C., on Wednesday, August 6, 2014,  
25 commencing at 9:06 a.m.

Veritext Legal Solutions  
Mid-Atlantic Region  
1250 Eye Street, NW - Suite 1201  
Washington, D.C. 20005

1           A P P E A R A N C E S:

2  
3           ROTHWELL, FIGG, ERNST & MANBECK, P.C.

4           By: MARTIN ZOLTICK, ESQ.

          MICHAEL JONES, ESQ.

          607 14th Street, N.W., Suite 800

5           Washington, D.C. 20005

          202.783.6040

6           Representing - Software Rights Archive, LLC

7  
8           DINOVO PRICE ELLWANGER & HARDY LLP

          By: VICTOR G. HARDY, ESQ.

          MITCH YANG, ESQ.

9           7000 North MoPac Expressway, Suite 350

          Austin, Texas 78731

10          512.539.2626

          Representing - Software Rights Archive, LLC

11  
12          KEKER & VAN NEST

          By: DAVID J. SILBERT, ESQ.

13          633 Battery Street

          San Francisco, California 94111

14          415.676.2261

          Representing - LinkedIn Corp. & Twitter, Inc.

15  
16          COOLEY LLP

          By: LOWELL MEAD, ESQ.

17          3175 Hanover Street

          Palo Alto, California 94304

18          650.849.5734

          Representing - Facebook, Inc.

19  
20           ALSO PRESENT:

21           Edward A. Fox, Ph.D

22           Amy Langville, Ph.D.

          Jason Levin, Legal Videographer

23

24

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

TESTIMONY OF: PAUL S. JACOBS, Ph.D

BY MR. SILBERT.....257

BY MR. MEAD.....293

BY MR. HARDY.....389

- - -

E X H I B I T S

- - -

NUMBER	DESCRIPTION	MARKED
Petitioner		
No. 1036	a document titled Text-based Intelligence Systems.....	257
Ptnt Owner		
No. 2116	an uncertified rough draft Transcript of Dr. Jacobs' deposition testimony given on August 5, 2014, morning session...	388
Ptnt Owner		
No. 2117	an uncertified rough draft transcript of Dr. Jacobs' deposition testimony given on August 5, 2014.....	403

1 THE VIDEOGRAPHER: This begins Volume  
2 2 in the deposition of Paul Jacobs. The witness  
3 has been previously sworn in. We're going on  
4 record at 9:06 a.m.

5 CROSS EXAMINATION (Cont'd)

6 BY MR. SILBERT:

7 Q. Good morning, Dr. Jacobs.

8 MR. SILBERT: I'm going to ask the  
9 court reporter to mark this document as Exhibit  
10 1036.

11 (Petitioner's Deposition Exhibit No.  
12 1036, a document titled Text-Based Intelligence  
13 Systems, was marked.)

14 BY MR. SILBERT:

15 Q. And, Dr. Jacobs, please review Exhibit  
16 1036 as much as you'd like, but my question,  
17 when you're through reviewing it is, do you  
18 recognize this exhibit as a copy of the book  
19 that you edited, titled Text-Based Intelligence  
20 Systems? And then the subtitle is, Current  
21 Research and Practice in Information Extraction  
22 and Retrieval.

23 A. Yes. I haven't reviewed the whole  
24 thing, but -- but, yes, I recognize it.

25 Q. Okay. Could I ask you to please

1 -- well, strike that.

2 This book was published in 1992,  
3 correct?

4 A. That's the -- that's the copyright  
5 date on the copyright page. I'm not sure if  
6 that actually means, necessarily, that it was  
7 published in that year, but -- but that's the  
8 copyright date.

9 Q. Do you know when it was published?

10 A. No. I'm not certain. And the reason  
11 I'm not certain whether it's 1991 or 1992 is,  
12 it's possible that it actually went to press in  
13 1991, with a 1992 copyright date.

14 Q. If it was -- if it went to press in  
15 1992, do you know the month in 1992 that it went  
16 to press?

17 A. I -- I don't recall. That was 22  
18 years ago, and I really don't recall exactly  
19 which month it would have been.

20 Q. The book collects papers that were  
21 presented at a symposium in 1990; is that  
22 correct?

23 A. I recall that this book was based  
24 on a AAAI symposium that I chaired, that I  
25 believe was in the AAAI spring symposium series.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.