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

GOOGLE INC.
Petitioner,
v.
B.E. TECHNOLOGY, L.L.C.                     DEPOSITION OF
Patent Owner,                                CORY PLOCK
                                          (FOLEY REFERENCE)
_____
Case IPR2014-00033
Patent 6,771,290 B1
_____

          T R A N S C R I P T of the stenographic

notes of THERESA L. TIERNAN, a Certified Court Reporter

and Notary Public of the State of New Jersey, taken at

the offices of GREENBERG TRAURIG, METLIFE BUILDING, 200

PARK AVENUE, NEW YORK, NEW YORK, on WEDNESDAY, AUGUST

20, 2014, commencing at 1:31 p.m.

_____

GSI GLOBAL DEPOSITION SERVICES

```
 1

 2    A P P E A R A N C E S:

 3

 4         MAYER BROWN, LLP
           BY:  BRIAN A. ROSENTHAL, ESQ.,
 5         and JOHN X. ZHU, ESQ.,
           1675 BROADWAY
 6         NEW YORK, NEW YORK  10019-5820
           BROSENTHAL@MAYERBROWN.COM
 7         JZHU@MAYORBROWN.COM
           (212) 560-2754
 8         Attorneys for Google Inc.

 9

10
           FREITAS, ANGELL & WEINBERG, LLP
11         BY:  DANIEL J. WEINBERG, ESQ.,
           350 MARINE PARKWAY
12         SUITE 200
           REDWOOD SHORES, CALIFORNIA  94085
13         DWEINBERG@FAWLAW.COM
           (650) 730-5501
14         Attorneys for B.E. Technology, LLC.

15

16

17

18

19

20

21

22

23

24

25
```

**CORY PLOCK (FOLEY REFERENCE)**
**August 20, 2014**

```
  1
                      I N D E X
  2
       WITNESS               DIR    CRS    RED    REC
  3
       CORY PLOCK
  4
       BY:  MR. ROSENTHAL     4
  5
  6                    E X H I B I T S
  7   NUMBER      DESCRIPTION                  IDENT
  8      NO EXHIBITS MARKED DURING DEPOSITION.
                ALL EXHIBITS PREMARKED.
  9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
```

```
 1    C O R Y   P L O C K, 1603 EATON COURT, DANBURY,

 2    CONNECTICUT, 06811, being first duly sworn by the

 3    Notary, testifies as follows:

 4    DIRECT EXAMINATION BY MR. ROSENTHAL:

 5         Q      Good afternoon, Dr. Plock.

 6              MR. WEINBERG:  State our appearances?

 7              MR. ROSENTHAL:  Brian Rosenthal for

 8    Google from Mayer Brown.

 9              MR. ZHU:  John Zhu from Mayer Brown,

10    also for Google.

11              MR. WEINBERG:  Dan Weinberg from

12    Freitas, Angell and Weinberg for B.E. Technology,

13    LLC.

14         Q      So this deposition is going to focus on

15    the Foley reference, and the petition related to the

16    Foley reference, and I'd like to start just by

17    asking you what you understood the scope of your

18    work to be in preparing the declaration that you

19    submitted in the Foley petition?

20    A       So my scope of work included reviewing a

21    number of documents; of course, including Foley; of

22    course, the '290 patent.  I reviewed, you know,

23    transcripts of depositions, and I was asked to

24    answer several questions that ultimately, you know,

25    were answered in my report.
```

```
 1        Q      Okay.  And your report which is --
 2               MR. WEINBERG:  For the record, it's a
 3   declaration rather than a report.
 4               MR. ROSENTHAL:  Excuse me.
 5        Q      Your declaration, which is Exhibit 2001
 6   in proceeding 0033, sets forth the opinions that
 7   you've reached in this proceeding, correct?
 8   A      That's correct.
 9        Q      Okay.  And have you reached any other
10   opinions or conclusions that aren't set forth in
11   this declaration?
12   A      Well, there's none that come to mind.
13        Q      Are you aware of any errors or
14   corrections that you need to make to this
15   declaration sitting here?
16   A      Sitting here today, I think I may have
17   spotted a grammatical error or two that not would
18   not affect the substance of my declaration.  I'm not
19   aware of any error sitting here today.
20        Q      Okay.  Thank you.
21               So if you could turn in your
22   declaration to paragraph 20.  Here you say that you
23   "understand that the Patent Trial and Appeal Board
24   has defined certain terms of the '290 patent.  I
25   have been asked to assume that a 'user profile' is
```

# DOCKET ALARM

# 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.

fastcase
Smarter legal research.