

CORY PLOCK (FOLEY REFERENCE)
August 20, 2014

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

GOOGLE INC.
Petitioner,

v.

B.E. TECHNOLOGY, L.L.C.
Patent Owner,

DEPOSITION OF
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.

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

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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.

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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

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