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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DELL INC.; RIVERBED TECHNOLOGY, INC.;

HEWLETT-PACKARD ENTERPRISE CO.; HP ENTERPRISE

SERVICES, LLC; TERADATA OPERATIONS, INC.; ECHOSTAR

CORPORATION; and HUGHES NETWORK SYSTEMS, LLC,

Petitioner

v.

REALTIME DATA LLC,

Patent Owner

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Case IPR2016-00972

Patent No. 7,415,530

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DEPOSITION OF KENNETH A. ZEGER, PH.D., taken

on behalf of the Petitioner, at 12390 El Camino

Real, San Diego, California, commencing at 9:14

a.m. and ending at 2:38 p.m., Monday, April 10,

2017.

Reported by:
Audrey L. Ricks
CSR No. 12098, CCR, RPR, CLR

Henderson Legal Services, Inc.

1   Q   Is lossy versus lossless a data type?

2   A   Let me retract that. I meant -- data type

3   with reference to the compressor, so I will take

4   that back.

5   Let's talk about image data versus speech

6   data.

7   Q   Okay. Are there other types of data other

8   than image and speech?

9   A   Yes.

10   Q   What other types of data are there?

11   A   There's video, for example.

12   Q   Is video different than image data?

13   A   Yes.

14   Q   Is image data typically encoded using

15   lossy compression?

16   MR. NOROOZI: Objection. Form.

17   THE WITNESS: Typically, but not always.

18   And, by the way, when I say "image," I

19   mean still image.

20   BY MR. SOMMER:

21   Q   Something that would be compressed maybe,

22   for example, using jpeg?

23   A   That's an example, yes.

24   Q   Was jpeg available in 1998?

25   A   Yes.

1   Q   So if somebody of ordinary skill in the

2   art saw the compression of image data, they might

3   understand that to be compressed using jpeg in 1998;

4   correct?

5   MR. NOROOZI: Objection. Form.

6   THE WITNESS: Well, they might learn that

7   it either was or was not.

8   BY MR. SOMMER:

9   Q   What other types of data are there?

10   **A   There's -- there's text data from, like,**

11 **Word documents. There's e-mail. There's all sorts**

12 **of stuff.**

13   Q   How many different type -- using this

14 understanding of data type that we've been using in

15 these questions and answers here, how many different

16 types of data are there as of 1998?

17   **A   Probably an enormous number. I don't know**

18 **if it's infinite or not, but it could be almost any**

19 **number.**

20   Q   Very large number; correct?

21   **A   Yes.**

22   Q   Is Claim Number 1 of the '530 patent

23 limited to the use of any particular data type for

24 the first data block?

25   MR. NOROOZI: Objection. Form.

1   THE WITNESS: I didn't specifically study

2   whether there's a limitation. I didn't need to do

3   that to analyze the -- the opinions of Dr. Creusere.

4   I don't know offhand of any particular

5   limitations. I do know that -- I think the claim is

6   directed towards lossy -- I'm sorry -- lossless

7   coding. So I think that would naturally incur

8   certain types of data to not be used.

9   Whether they are, you know, excluded or

10   limited in the claim, that's another question I just

11   didn't study. I would have to go back and think

12   about that.

13   BY MR. SOMMER:

14   Q   As you sit here today, you can't say that

15   the first data block must be of a specific type of

16   data; correct?

17   MR. NOROOZI: Objection. Form.

18   THE WITNESS: Without further study, I

19   don't think I would feel comfortable saying it's

20   limited to a particular type of data right now

21   unless, I mean, maybe it's in my report and I'm

22   forgetting it.

23   But offhand, I don't see a particular

24   limitation. There could be. I just would have to

25   study it in more detail or be reminded and refresh