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1
                    UNITED STATES DISTRICT COURT
 2
              FOR THE CENTRAL DISTRICT OF CALIFORNIA
 3
     BLACKBERRY LIMITED, a ) Case No.
 4
     Canadian corporation, ) 2:18-cv-01844-GW-KS
 5
 6
                Plaintiff, ) Lead Consolidating Case
 7
                                 ) Related Case:
             vs.
 8
     FACEBOOK, INC., a Delaware ) 2:18-cv-02693-GW-KS
 9
     corporation, WHATSAPP INC., a )
     Delaware corporation, and )
10
11
     INSTAGRAM, INC., a Delaware )
12
     corporation, and INSTAGRAM, )
13
     LLC, a Delaware limited
     liability company,
14
15
                Defendants.
16
17
18
           VIDEOTAPED DEPOSITION OF DAN SCHONFELD, PH.D.
19
                     San Francisco, California
20
                      Tuesday, July 30, 2019
21
22
     Reported by:
23
     ASHALA TYLOR, CSR #2436, CLR, CRR, RPR
24
     JOB NO. 3476210
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8 FACEBOOK, INC., a Delaware ) 2:18-cv-02693-GW-KS	
9 corporation, WHATSAPP INC., a)	9 Exhibit 1 Declaration of Dan Schonfeld, Ph.D. 10
10 Delaware corporation, and )	10 Exhibit 2 Patent No.: US 8,677,250 B2, 10
11 INSTAGRAM, INC., a Delaware )	11 BB_Facebook00031819 - 838
12 corporation, and INSTAGRAM, )	12 Exhibit 3 Patent No.: US 8,279,173 B2, 10
13 LLC, a Delaware limited )	13 BB_Facebook00031721 - 737
14 liability company, )	14 Exhibit 4 Blackberry's Notice of Motion and 133
	15 Motion for Partial Summary Judgment
15 Defendants. )	of Infringement of U.S. Patent Nos.
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17	17 8,677,250, 8,279,173 and 9,349,120
18 Videotaped deposition of DAN SCHONFELD, PH.D.,	18 Exhibit 5 Deposition of Kun Chen, 6-26-19 142
19 taken at Quinn Emanuel Urquhart & Sullivan, LLP,	19
20 50 California Street, San Francisco, California,	20
21 commencing at 9:35 a.m. and ending at 3:42 p.m., on	21
22 Tuesday, July 30, 2019, before Ashala Tylor, CSR No.	22
23 2436, RPR, CRR, CLR.	23
24	24
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1 4gc 2	1.191.1
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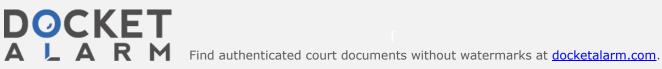
	California 94111. 09:36	1 Q. You haven't been deposed in this case, 09:38
2	My name is Brandon Miller with the firm 09:36	2 have you? 09:38
3	Veritext Legal Solutions, and I'm the videographer. 09:36	3 A. No. 09:38
4	The court reporter is Ashala Tylor for the firm 09:36	4 Q. So I'm going to give you the speech that 09:38
5	Veritext Legal Solutions. 09:36	5 basically every deposition in the United States has 09:38
6	I'm not related to any party in this 09:36	6 ever begun within the last 50 nears. I'm sure you 09:38
7	action, nor am I financially interested in the 09:36	7 know everything, but we have to have it on the 09:38
8	outcome. 09:36	8 record. 09:38
9	Counsel and all present in the room will 09:36	9 This deposition and everything you say is 09:38
10	now say their appearances and affiliations for the 09:36	10 under oath. It has the same force and effect as if 09:38
11	record. 09:36	11 we were in open court. 09:38
12	MR. WEINSTEIN: Mark Weinstein of Cooley 09:36	You understand that, correct? 09:38
13	LLP, representing the defendants. And with me is 09:36	13 A. I do. 09:38
14	Heidi Keefe, also from Cooley LLP, also representing 09:36	14 Q. If at any time during the deposition you 09:38
15	the defendants. 09:37	15 don't understand a question I'm asking, feel free to 09:38
16	MR. SCHMIDT: Good morning. Patrick 09:37	16 ask me to clarify; otherwise I have no choice but to 09:38
17	Schmidt from Quinn Emanuel on behalf of the 09:37	17 assume that you understood my question. Agreed? 09:38
18	plaintiff Blackberry. 09:37	18 A. I will do so to the best to the extent 09:38
19	THE VIDEOGRAPHER: Thank you. You may now 09:37	19 that I misunderstand the question. 09:38
20	swear the witness. 09:37	20 Q. Thank you so much. 09:38
21	DAN SCHONFELD, Ph.D., 09:37	The court reporter next to us is going to 09:38
22	being first duly sworn or affirmed to testify 09:37	22 take down everything you and I say, so there's a 09:38
23	to the truth, the whole truth, and nothing but 09:37	23 reciprocal rule that we both have to follow based on 09:38
24	the truth, was examined and testified as follows: 09:37	24 the fact that the court reporter can only take down 09:38
25		25 one person speaking at a time, which is that I would 09:38
	Page 6	Page 8
1	EXAMINATION 09:37	1 ask that you wait for me to finish the question 09:38
	EXAMINATION 09:37 BY MR. WEINSTEIN: 09:37	1 ask that you wait for me to finish the question 09:38 2 before providing an answer, and I, in turn, will 09:39
	BY MR. WEINSTEIN: 09:37	•
2	BY MR. WEINSTEIN: 09:37 Q. Good morning, sir. 09:37	2 before providing an answer, and I, in turn, will 09:39
2	BY MR. WEINSTEIN: 09:37 Q. Good morning, sir. 09:37 A. Good morning. 09:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39
2 3 4	BY MR. WEINSTEIN: 09:37  Q. Good morning, sir. 09:37  A. Good morning. 09:37  Q. Would you state your name for the record? 09:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39
2 3 4 5	BY MR. WEINSTEIN: 09:37  Q. Good morning, sir. 09:37  A. Good morning. 09:37  Q. Would you state your name for the record? 09:37  A. Yeah, it's Dan Schonfeld. 09:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39
2 3 4 5 6 7	BY MR. WEINSTEIN: 09:37  Q. Good morning, sir. 09:37  A. Good morning. 09:37  Q. Would you state your name for the record? 09:37  A. Yeah, it's Dan Schonfeld. 09:37  Q. Okay. And for ease of reference, do you 09:37  prefer Dr. Schonfeld or Mr. Schonfeld? 09:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39
2 3 4 5 6 7	BY MR. WEINSTEIN: 09:37  Q. Good morning, sir. 09:37  A. Good morning. 09:37  Q. Would you state your name for the record? 09:37  A. Yeah, it's Dan Schonfeld. 09:37  Q. Okay. And for ease of reference, do you 09:37  prefer Dr. Schonfeld or Mr. Schonfeld? 09:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39
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2 3 4 5 6 7 8 9 10 11 12	BY MR. WEINSTEIN: 09:37  Q. Good morning, sir. 09:37  A. Good morning. 09:37  Q. Would you state your name for the record? 09:37  A. Yeah, it's Dan Schonfeld. 09:37  Q. Okay. And for ease of reference, do you 09:37  prefer Dr. Schonfeld or Mr. Schonfeld? 09:37  A. Dr. Schonfeld is fine. 09:37  Q. Okay. Thank you. 09:37  A. Any which way you prefer is fine. 09:37  Q. Thank you, Dr. Schonfeld. You're 09:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	BY MR. WEINSTEIN:  Q. Good morning, sir.  A. Good morning.  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. Thank you.  Q. Okay. Thank you.  Q. Okay. Thank you prefer is fine.  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Who is your current employer?  Q. Who is your current employer?  Q. Do you have any residences in California?  Q. Obesa.	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39 13 accurate testimony here today? 09:39 14 A. Not that I'm aware of, no. 09:39 15 Q. Okay. Thank you, sir. 09:39 16 So you have been retained by the plaintiff 09:39 17 BlackBerry in this case, correct? 09:39 18 A. Yes. 09:39
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	BY MR. WEINSTEIN:  Q. Good morning, sir.  A. Good morning.  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Osay. Thank you.  Q. Osay. Thank you.  Q. Osay. Thank you prefer is fine.  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Who is your current employer?  Q. Who is your current employer?  Q. Do you have any residences in California?  Q. Osay. Have you had your deposition taken  Q. Osay. Have you had your deposition taken	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39 13 accurate testimony here today? 09:39 14 A. Not that I'm aware of, no. 09:39 15 Q. Okay. Thank you, sir. 09:39 16 So you have been retained by the plaintiff 09:39 17 BlackBerry in this case, correct? 09:39 18 A. Yes. 09:39 19 Q. Approximately when were you retained in 09:39 20 this action? 09:39
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	BY MR. WEINSTEIN:  Q. Good morning, sir.  Q. Good morning.  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. Thank you.  Q. Okay. Thank you.  Q. Okay. Thank you prefer is fine.  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Oy:37  A. I am.  Q. Who is your current employer?  Q. Who is your current employer?  Q. Do you have any residences in California?  Q. Do you have you had your deposition taken  Q. Okay. Have you had your deposition taken  Q. Oy:37  A. Yes.  Q. Approximately how many times?  Q. O9:37  Q. Op:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39 13 accurate testimony here today? 09:39 14 A. Not that I'm aware of, no. 09:39 15 Q. Okay. Thank you, sir. 09:39 16 So you have been retained by the plaintiff 09:39 17 BlackBerry in this case, correct? 09:39 18 A. Yes. 09:39 19 Q. Approximately when were you retained in 09:39 20 this action? 09:39 21 A. I am I believe it was in or around 09:39 22 April 2018. 09:39
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	BY MR. WEINSTEIN:  Q. Good morning, sir.  Q. Good morning.  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. Thank you.  Q. Okay. Thank you.  Q. Okay. Thank you.  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Oy:37  A. I am.  Q. Who is your current employer?  Q. Who is your current employer?  Q. Do you have any residences in California?  Q. Do you have any residences in California?  Q. Okay. Have you had your deposition taken  Q. Oy:37  A. Yes.  Q. Approximately how many times?  Q. Approximately how many times?  Q. Oy:37  Q. Approximately how many times?  Q. Oy:37  Q. Approximately how many times?  Q. Oy:37  Q. Oy:37  Q. Approximately how many times?  Q. Oy:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39 13 accurate testimony here today? 09:39 14 A. Not that I'm aware of, no. 09:39 15 Q. Okay. Thank you, sir. 09:39 16 So you have been retained by the plaintiff 09:39 17 BlackBerry in this case, correct? 09:39 18 A. Yes. 09:39 19 Q. Approximately when were you retained in 09:39 20 this action? 09:39 21 A. I am I believe it was in or around 09:39 22 April 2018. 09:39 23 Q. Okay. So right around the time this 09:39
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Good morning, sir. 09:37 A. Good morning. 09:37 Q. Would you state your name for the record? 09:37 A. Yeah, it's Dan Schonfeld. 09:37 Q. Okay. And for ease of reference, do you 09:37 prefer Dr. Schonfeld or Mr. Schonfeld? 09:37 A. Dr. Schonfeld is fine. 09:37 Q. Okay. Thank you. 09:37 A. Any which way you prefer is fine. 09:37 Q. Thank you, Dr. Schonfeld. You're 09:37 Q. Thank you, Dr. Schonfeld. You're 09:37 A. I am. 09:37 A. I am. 09:37 A. I am. 09:37 Q. Who is your current employer? 09:37 A. The University of Illinois in Chicago. 09:37 Q. Do you have any residences in California? 09:37 A. No. 09:37 Q. Okay. Have you had your deposition taken 09:37 before? 09:37 A. Yes. 09:37 Q. Approximately how many times? 09:37 A. It depends on how you count, but I would 09:37 say somewhere around probably slightly higher than 09:38	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39 13 accurate testimony here today? 09:39 14 A. Not that I'm aware of, no. 09:39 15 Q. Okay. Thank you, sir. 09:39 16 So you have been retained by the plaintiff 09:39 17 BlackBerry in this case, correct? 09:39 18 A. Yes. 09:39 19 Q. Approximately when were you retained in 09:39 20 this action? 09:39 21 A. I am I believe it was in or around 09:39 22 April 2018. 09:39 23 Q. Okay. So right around the time this 09:39 24 litigation got started? 09:39
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	BY MR. WEINSTEIN:  Q. Good morning, sir.  Q. Good morning.  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Would you state your name for the record?  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. And for ease of reference, do you  Q. Okay. Thank you.  Q. Okay. Thank you.  Q. Okay. Thank you.  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Thank you, Dr. Schonfeld. You're  Q. Oy:37  A. I am.  Q. Who is your current employer?  Q. Who is your current employer?  Q. Do you have any residences in California?  Q. Do you have any residences in California?  Q. Okay. Have you had your deposition taken  Q. Oy:37  A. Yes.  Q. Approximately how many times?  Q. Approximately how many times?  Q. Oy:37  Q. Approximately how many times?  Q. Oy:37  Q. Approximately how many times?  Q. Oy:37  Q. Oy:37  Q. Approximately how many times?  Q. Oy:37	2 before providing an answer, and I, in turn, will 09:39 3 endeavor to wait for you to finish your answer until 09:39 4 proceeding to the next question. 09:39 5 Sounds reasonable? 09:39 6 A. Yes. 09:39 7 Q. Okay. Are you taking any medication, 09:39 8 Dr. Schonfeld, that could affect the testimony that 09:39 9 you are giving here today? 09:39 10 A. Not that I'm aware of, no. 09:39 11 Q. Are there any reasons that you can 09:39 12 identify that you can't give your best and most 09:39 13 accurate testimony here today? 09:39 14 A. Not that I'm aware of, no. 09:39 15 Q. Okay. Thank you, sir. 09:39 16 So you have been retained by the plaintiff 09:39 17 BlackBerry in this case, correct? 09:39 18 A. Yes. 09:39 19 Q. Approximately when were you retained in 09:39 20 this action? 09:39 21 A. I am I believe it was in or around 09:39 22 April 2018. 09:39 23 Q. Okay. So right around the time this 09:39



1	Q. But as far as the actual displaying of the 01:41	1 If I could direct you to a passage in 01:45	
2	tag list, that code is the JavaScript code running 01:41	2 column 5. It starts on line 39 through 47. I'll 01:45	
3	on the browser, correct? 01:41	3 read it into the record. 01:45	
4	A. At least in part. Again, I don't want to 01:41	4 "In an embodiment, as the user begins to 01:45	
5	limit myself to saying all of it is a JavaScript 01:41	5 type, photo tag selection module 148B may be 01:45	
	code. 01:41	6 configured to search one or more selected 'tag 01:45	
7	Q. Okay. I'm just because maybe this 01:41	7 sources' for tags that match the currently entered 01:45	
8	is more a semantic issue. 01:41	8 text." 01:45	
9	The claim calls for displaying a tag list, 01:41	9 And then it goes on from there. Do you 01:45	
	including tags from one or more tag sources, and 01:41	10 see that? 01:45	
	matching a search string. So the claim actually 01:41	11 A. I do. 01:45	
	doesn't require that a search be run, correct? 01:41	12 Q. We'll stop there. So when you read the 01:45	
13	MR. SCHMIDT: Objection. Calls for a 01:42	13 claim, do you think that the claim requires that the 01:45	
	legal conclusion. 01:42	14 system search one or more tag sources in order to 01:45	
15	THE WITNESS: Well, I think it says 01:43	15 generate the tag list? 01:46	
	matching a search string. And under your 01:43	16 MR. SCHMIDT: Objection to the extent it 01:46	
	interpretation of the limitation, matching a search 01:43	17 calls for a legal conclusion. 01:46	
	string would be true whether or not the actual 01:43	18 THE WITNESS: So when I read the 01:46	
	matching is performed. And that's not how I read 01:43	19 limitation in Claim 13, limitation A that we are 01:46	
	it. I actually viewed the matching as being 01:43	20 talking about, reading it in light of the 01:46	
	something that needs to take place. 01:43	21 specification, I do not impose anything beyond what 01:47	
	BY MR. WEINSTEIN: 01:43	22 the claim limitation requires. And the claim 01:47	
23	Q. Okay. It 01:43	23 limitation does not explicitly require what's in 01:47	
24	A. And 01:43	24 column 5. 01:47	
25	Q. Go ahead. I'm sorry. 01:43	25	
23	Page 106	Page 1	08
	A A 17 11 11 11 11 11 11 01 12	1 DV MD WEINGTEIN 01 47	
1	A. And I would say that the claim asserted in 01:43	1 BY MR. WEINSTEIN: 01:47	
2	this case is Claim 14. And from Claim 14, the code 01:43	Q. So it does not require that what is 01:47	
2	this case is Claim 14. And from Claim 14, the code 01:43 is for providing a tag entry field for entering the 01:43	<ul> <li>Q. So it does not require that what is 01:47</li> <li>3 searched be one or more tag sources. Is that what 01:47</li> </ul>	
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1 Q. Okay. Now, I'll represent to you that I 01:49	1 and the patent specification gives some examples. 01:53
2 do not believe that any terms from the '173 patent 01:49	2 Once again, if you look at paragraph 82 of my 01:53
3 were construed by the court in connection with this 01:49	3 declaration, I cite to the patent for example, to 01:53
4 case; but in order to form an opinion of 01:49	4 column 6, lines 5 through 9 where the patent 01:53
5 infringement, you formed an understanding of what 01:49	5 talks about a user's Facebook friends. Facebook 01:53
6 the claims actually require, correct? 01:49	6 friends is one example, and I also cite to column 5, 01:53
7 A. I understood the claims and what they 01:49	7 line 43 through 47. And I think generally the 01:53
8 meant to me. 01:49	8 patent specification talks about other examples of 01:53
9 Q. Okay. So so in your own words, can you 01:49	9 sources such as locations. 01:53
10 describe for me what the word "tag sources" means in 01:49	10 Claim 18, for example, talks about a tag 01:53
11 the context of the '173 patent? 01:49	11 source as having one or more of an online network 01:53
MR. SCHMIDT: Objection to the extent it 01:49	12 profile, an address book, browser bookmarks, 01:54
13 calls for a legal conclusion. 01:49	13 landmark tears tags, sorry, and free form text. 01:54
14 THE WITNESS: I simply adopted the 01:49	14 And so it gives a whole array of examples both in 01:54
15 understanding that well, just the plain meaning. 01:49	15 the claims as well as the specification, and it's 01:54
16 And I think plain meaning is something that in this 01:49	16 scattered throughout. 01:54
17 case, and not only a person of ordinary skill but 01:50	17 BY MR. WEINSTEIN: 01:54
18 any person would understand, and this is just a 01:50	18 Q. But a tag source identifies where tags 01:54
19 tag is a it's just a source of tags. 01:50	19 come from, correct? 01:54
20 BY MR. WEINSTEIN: 01:50	20 MR. SCHMIDT: Objection to the extent it 01:54
21 Q. Okay. And then a search string, what is 01:50	21 calls for a legal conclusion. 01:54
22 your understanding, as a person of skill in the art,	22 THE WITNESS: I don't necessarily view it 01:54
23 of what a search string is when you were looking for	23 as as limited to to determining where it comes 01:54
24 infringement of the '173 patent?	24 from; but it does provide a distinction between 01:54
25 MR. SCHMIDT: Objection to the extent it 01:50	25 between between the different objects or the 01:54
Page 110	Page 112
1 calls for a legal conclusion. 01:50	1 different tags, I should say. 01:54
1 calls for a legal conclusion. 01:50 2 THE WITNESS: So I think the easiest for 01:51	1 different tags, I should say. 01:54 2 BY MR. WEINSTEIN: 01:54
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