

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

- - - - - x
 CODE200, UAB; TESO LT, UAB; :
 METACLUSTER LT, UAB; :
 OXYSALES, UAB; AND CORETECH : CASE
 LT, UAB, : IPR2022-00861
 Petitioners, :
 v. : PATENT NO.
 BRIGHT DATA LTD., : 10,257,319
 Patent Owner. :
 - - - - - x

Zoom Videotaped Deposition of KEITH TERUYA
 Thursday, December 15, 2022
 12:05 p.m.

JOB NO. SY006106
 Pages 1 Through 128
 Reported By: Cassandra E. Ellis, CSR-CA
 #14448, CCR-WA #3484, CSR-HI #475, RPR
 #823848, CRR, Realtime Systems
 Administrator

1 Deposition of KEITH TERUYA,
2 held pursuant to agreement, before
3 Cassandra E. Ellis, Certified
4 Shorthand Reporter - California -
5 #14448, Certified Shorthand Reporter
6 - Hawaii #475, Certified Court
7 Reporter - Washington #3484,
8 Registered Professional Reporter
9 #823848, Certified Realtime Reporter,
10 Realtime Systems Administrator.

11
12
13
14
15
16
17
18
19
20
21
22
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

A P P E A R A N C E S

ON BEHALF OF PETITIONERS CODE200:

CRAIG TOLLIVER, ESQUIRE
CHARHON CALLAHAN ROBSON &
GARZA, PLLC
3333 Lee Parkway, Suite 460
Dallas, Texas 7521
(469) 587-7263
Ctolliver@ccrqlaw.com

ON BEHALF OF PETITIONERS MAJOR DATA:

JASON BARTLETT, ESQUIRE
MAURIEL KAPOUYTIAN WOODS LLP
15 W. 26th Street, 7th Floor
New York, New York 10010
(415) 738-6334
JBartlett@mkwllp.com

1 A P P E A R A N C E S C O N T I N U E D
2 O N B E H A L F O F P A T E N T O W N E R :
3 T H O M A S M . D U N H A M , E S Q U I R E
4 E L I Z A B E T H O ' B R I E N , E S Q U I R E
5 C H E R I A N L L P
6 1 9 0 1 L S t r e e t , N o r t h w e s t , S u i t e 7 0 0
7 W a s h i n g t o n , D . C . 2 0 0 3 6
8 (2 0 2) 8 3 8 - 1 5 6 7
9 T o m d @ c h e r i a n l l p . c o m
10 E l i z a b e t h o @ c h e r i a n l l p . c o m

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ALSO PRESENT: Joseph E. Ellis, CLVS

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

C O N T E N T S

EXAMINATION OF KEITH TERUYA	PAGE
By Mr. Dunham	9

E X H I B I T S

(Attached to the Transcript)

KEITH TERUYA	DESCRIPTION	PAGE
Exhibit 1001	US Patent 10,257,319 B2	62
Exhibit 1005	Expert Declaration of Keith J. Teruya in the '319 Patent	20
Exhibit 1005	Expert Declaration of Keith J. Teruya in the '510 Patent	51
Exhibit 1006	Crowds: Anonymity for Web Transactions Article	1003
Exhibit 1008	MorphMix Research Collection	71

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good

3 morning. This is the beginning of
4 the media in the deposition of Keith
5 J. Teruya, taken in the matter of --
6 before the Patent Trial and Appeal
7 Board, in re: Code200 UAB; TESA
8 Limited, UAB; Metacluster Limited,
9 UAB; Oxysales, UAB; and Coretech
10 Limited UAB, petitioners, versus
11 Bright Data Limited, patent owner,
12 with Case Number IPR2022-00861,
13 Patent Number 10,257,319, held before
14 the Patent Trial and Appeal Board in
15 the United States Patent and
16 Trademark Office.

17 Today's date is December 15th,
18 2022, and the time on the monitor is
19 approximately 12:05 p.m. My name is
20 Joseph Ellis, I'm the certified legal
21 videographer, the court reporter is
22 Cassandra Ellis, and we are here
23 representing Transperfect Legal
24 Solutions.

25 Counsel appearances will be

1 noted on the stenographic record
2 only.

3 Will the court reporter please
4 swear in the witness, then you may
5 proceed.

6 (WITNESS HAS BEEN SWORN).

7 MR. DUNHAM: Okay. We can stop
8 the video recording, now, if it was
9 started, and we'll just proceed with
10 audio recording and the stenographer,
11 please.

12 MR. TOLLIVER: And -- and
13 Mister -- Mr. Dunham, before we get
14 started, just a housekeeping matter,
15 I don't know whether you're planning
16 on using Agile Law? Last time I
17 tried to -- to log in it, I don't
18 know, about 10 or 15 minutes ago,
19 it -- it said it was -- the
20 deposition was not live. I don't
21 know if it's currently working or
22 not.

23 THE WITNESS: I just tried it,
24 and it's not.

25 MR. TOLLIVER: Okay.

1 MR. DUNHAM: If -- if we need
2 it, we will enable it -- for it to be
3 live. I don't -- I don't anticipate
4 needing it, but you never know how
5 things will go.

6 MR. TOLLIVER: Okay.

7 MR. BARTLETT: And shall we
8 also state, on the record, that by
9 stipulation of counsel this
10 deposition is also being taken in
11 IPR2022-915 and 916?

12 MR. DUNHAM: Absolutely, and I
13 was just going to do that, so thank
14 you for the house -- housekeep --

15 MR. BARTLETT: Okay. Great.

16 MR. DUNHAM: I was going to say
17 that this, by agreement of the
18 parties, is the deposition of
19 Mr. Teruya that's covering,
20 potentially, up to six IPR numbers,
21 the 861 and 862, as the court
22 reporter announced, the 915 and 916,
23 and also the 1492, 1493 to -- to
24 whatever in- -- incarnation these end
25 up as, but if -- can I have a verbal

1 agreement, from counsel, that
2 we're -- we're taking this to cover
3 all of those today?

4 MR. TOLLIVER: Yes, agreed.

5 MR. BARTLETT: Yes. Yes,
6 agreed.

7 MR. DUNHAM: Great. Thank you,
8 gentlemen.

9 KEITH TERUYA

10 having been sworn, testified as follows:

11 EXAMINATION

12 BY MR. DUNHAM:

13 Q Mr. Teruya, good morning.

14 A Good morning.

15 Q Can I ask where you are today?

16 A I'm in McMinnville, Oregon.

17 Q Okay. And I ask just because I
18 want to try to keep an eye on the time,
19 to be sensitive to when it might be your
20 lunchtime and things, because we're in
21 quite a few different time zones.

22 A I'm on the left coast.

23 Q You're almost on the left
24 coast, as we say from Alaska.

25 A Oh, yes, that's true. Okay.

1 Q Okay. Thank you, sir.

2 Good morning, sir, and thank
3 you again. I know we have engaged
4 before, in this same format of a
5 deposition, so I will just remind you the
6 basic rules. I will be asking a series
7 of questions, I will do my best to make
8 those questions clear and understandable.

9 If you have any questions about
10 anything I've said, please don't hesitate
11 to ask and I'll -- I will do my best to
12 either rephrase or clarify my question;
13 can we agree on that?

14 A Yes.

15 Q Thank you. And from time to
16 time, your counsel may object. And
17 unless you are instructed not to answer,
18 even if there's been an objection, you
19 need to answer each question; do you
20 understand that, as well?

21 A Yes.

22 Q Okay. As a little bit of
23 background, here, do you recall being
24 retained as the testifying expert,
25 originally by NetNut Limited, in

1 connection with the US patent numbers
2 10,257,319 and 10,484,510?

3 A Before I answer that question,
4 may I remind you, in my previous
5 depositions with you, that I'm severely
6 dyslexic. So if you give me something to
7 read, you have to allow me sufficient
8 time to review, as well as I have
9 difficulty with context, so you need
10 to -- you know, I may ask the question
11 more than once, in order that I assemble
12 the right context for myself.

13 The answer to your question is,
14 yes.

15 Q And yes -- and I -- I do
16 remember our discussion about the -- the
17 most effective way for us to have this
18 deposition, and I will do my best to work
19 with you on that.

20 If -- can we agree to refer
21 to the two patents at issue just by
22 the last three digits, the '319 and
23 the '510 patents?

24 A Yes.

25 Q Okay. Do you recall submitting

1 a declaration in support of a petition in
2 the IPR that ends in the number 1492?

3 A Not off the top of my head, but
4 if you show it to me for review I -- I
5 can -- I can comment.

6 Q Okay. Do you remember
7 submitting declarations on behalf of
8 NetNut?

9 A Yes.

10 Q Okay. Do you also remember
11 submitting declarations on behalf of
12 Major Data?

13 A Yes.

14 Q Okay. Do you recall when Major
15 Data first contacted you to become
16 involved in the declarations for them?

17 A I believe it was at the
18 beginning of April. I -- I can -- if
19 need be, I -- I -- I can -- I can check
20 that date by my earliest correspondence
21 with them.

22 Q Okay. And then, would that be
23 April of 2022?

24 A Yes.

25 Q Okay. And do you remember

1 submitting declarations for these two
2 patents on behalf of Code200?

3 A I don't believe so.

4 Q Okay. So who engaged you,
5 other than Major Data and NetNut, if
6 anyone, for declarations in connection
7 with these two patents?

8 MR. TOLLIVER: Objection, form.

9 A I'm -- I don't -- I don't know
10 that I was engaged with any particular
11 objective. I -- I was engaged by all
12 three parties.

13 Q Sure.

14 A And that --

15 Q Go ahead, I'm sorry.

16 A I -- you know, I have -- I have
17 engagement agreements with them all, and
18 I've reviewed things, you know, for them
19 as far back as -- as that date of
20 engagement.

21 Q Okay.

22 A You know, I would say to NetNut
23 much earlier.

24 Q Do you recall the names of the
25 three parties that engaged you in

1 connection with the declarations for
2 these two patents?

3 A I will -- I would have to
4 review my correspondence to get the
5 names, because I've interacted with so
6 many people and in various firms.

7 Q And I'm not asking the names of
8 the lawyers, I'm asking the names of the
9 parties. So you've mentioned NetNut, and
10 we've mentioned Major Data, what other
11 party, if any, engaged you to assist with
12 the IPRs for these two patents?

13 A I -- I was engaged by the
14 attorneys so, you know, these -- these
15 filings have multiple listings on them,
16 so I -- I don't know which specific one
17 you're referring to.

18 Q Do -- do you have an
19 understanding -- and this is a yes or no
20 question -- do you have an understanding
21 if you've been engaged on behalf of
22 Code200 to provide declarations relating
23 to these two patents?

24 A Yes.

25 Q And what is that understanding?

1 A Well, that my -- my declaration
2 is being used in its IPR filings.
3 It's -- it's virtually the same -- it is
4 essentially the same declaration that I
5 filed under NetNut.

6 Q Okay. Do you recall when you
7 were first contacted by anyone on behalf
8 of Code200 to provide a declaration
9 relating to these patents?

10 A I -- I believe it was around
11 this -- April of this year.

12 Q So would that be April of 2022,
13 just for clarity?

14 A Yes.

15 Q Thank you.

16 A Yes.

17 Q And you just mentioned the
18 similarity of the declarations, other
19 than identifying the party who engaged
20 you, and perhaps the date of the
21 declaration, are there any differences
22 between the declarations that you've
23 submitted on behalf of NetNut, Major
24 Data, and Code200 pertaining to these two
25 patents?

1 A Not that I'm aware of.

2 Q And I always ask this, I -- I
3 hope to always remember to ask this,
4 sitting here today, before we dig in, are
5 there any corrections, that you are aware
6 of, that you need to make to any of your
7 declarations?

8 A Nothing substantive.

9 Q Are there any corrections, at
10 all, that you have in mind?

11 A Well, for instance, in, you
12 know, the CV block there was a letter
13 dropped in, you know, one of the -- one
14 of the references of my history that I
15 was involved in.

16 Q Okay. And how about within
17 the -- the substance of the declarations,
18 themselves --

19 A No.

20 Q -- are there any corrections
21 you wish to make today, before we get
22 started?

23 A No.

24 Q Okay. Thank you. Can -- can
25 you tell me how you prepared for your

1 deposition today?

2 A I reviewed my declaration, and
3 I reviewed the references that were used
4 in my declaration.

5 Q About how many hours did you
6 spend preparing for the deposition today?

7 A I -- I don't know. I haven't
8 added it up.

9 Q As you sit here --

10 A You know, I would say -- you
11 know, I did it over several days, so I
12 would do -- you know, I have reading
13 difficulties, so I -- I would do small
14 blocks of time and, you know, oftentimes
15 I would use a reader. So, you know,
16 readers take a lot longer than if you,
17 you know, read it, because I -- I do it
18 both by audio and -- and visual, in order
19 to read the documents properly, to make
20 sure I have the right context.

21 Q In addition to reviewing your
22 declarations, and the cited references,
23 did you have any discussions or meetings
24 with counsel to prepare for the
25 deposition today?

1 A Yes.

2 Q And can you tell me about those
3 meetings or discussions, what you had in
4 connection with the preparation for
5 today?

6 A Well, they -- they wanted to
7 make sure that I had all the materials
8 necessary to do this deposition, and
9 review my declaration, and my meetings
10 with them were pretty much restricted to
11 them asking me if I needed anything.

12 Q Okay. Do you recall which
13 attorneys you spoke with in connection
14 with preparation -- preparing for your
15 deposition?

16 A Mainly Mr. Tolliver and
17 Mr. Bartlett, Mr. Huang was on a few
18 calls, I don't recall the others, but my
19 interaction, it was mainly with
20 Mr. Tolliver.

21 Q Okay. Are you aware of any
22 relationship between the petitioners,
23 Code200 and Major Data?

24 A In what way?

25 Q In any -- any relationship

1 between those particular entities?

2 MR. TOLLIVER: Objection, form.

3 A In -- in -- can you provide me
4 some context of the question? I mean,
5 they're both involved in this action,
6 right?

7 Q Sure. So let -- let me state
8 this --

9 A So -- all right -- so you know,
10 in -- in that form, is -- is that the
11 relationship we're talking about?

12 Q Okay. Sure. No, it's a fair
13 question.

14 So other than the fact that
15 both Code200 and Major Data are
16 involved in these IPRs, are you aware
17 of any connection or relationship
18 between those entities?

19 A No.

20 Q I know we've provided you a
21 link, to your counsel, with documents
22 that we want to use. I wanted to start
23 talking a little bit about your
24 declarations.

25 So do you have any materials in

1 front of you, in hard copy, or are you
2 going to be working off the electronic
3 copies today?

4 A I -- I will look at the
5 electronic copy.

6 (Exhibit No. 1005 re the '319
7 patent was identified for the
8 record.)

9 BY MR. DUNHAM:

10 Q Okay. I'd like you to open up
11 from the 1492 IPR, Exhibit 1005, and
12 that's going to be your declaration
13 pertaining to the '319 patent.

14 A All right. I have it open.

15 MR. TOLLIVER: Tom -- Tom, I'm
16 sorry, which -- which -- Exhibit
17 1005, which IPR number are -- are we
18 in right now?

19 MR. DUNHAM: I was using the
20 1492, but they're still the same,
21 obviously.

22 MR. TOLLIVER: Okay. Thank
23 you.

24 MR. DUNHAM: Sure.

25 ///

1 BY MR. DUNHAM:

2 Q And I'm sorry, Mr. Teruya, do
3 you have Exhibit 1005, your declaration
4 on the '319 patent; do you have that
5 open?

6 A Yes.

7 Q Great. Could you please turn
8 to paragraph number 27.

9 A Okay.

10 Q I know from our prior
11 deposition and your -- and your earlier
12 statements sometimes it's helpful for you
13 to take a look at things before we
14 discuss them. Do you need a minute to
15 review this paragraph? I do have some
16 questions about it.

17 A I -- I -- I -- if I can refer
18 back to it, after you ask me the
19 question, you know, I -- I know the --
20 the basics of the paragraph, so --

21 Q Okay. Perfect. Why don't you
22 just --

23 A -- I wouldn't just -- so the --
24 you know, question.

25 Q Sure. Sure. I just wanted to

1 make sure I was trying to accommodate
2 your request.

3 So do you understand, in
4 paragraph 27, you've set forth the
5 qualifications of a person skilled in the
6 art that you believe are appropriate for
7 the particular technology at issue in
8 these patents as of the date of
9 invention?

10 A Yes.

11 Q Can we call this definition of
12 a POSITA, are you comfortable with that?

13 A Yeah. Yes. Yes.

14 Q Great. So is the definition of
15 a POSITA, set forth in paragraph 27,
16 something that you came up with or is
17 this something that the lawyers presented
18 to you?

19 A It is something -- you -- you
20 mean relative to this declaration?

21 Q Yes.

22 A I'm familiar with the term,
23 because of my involvement in other patent
24 cases. So, you know, I -- when I came to
25 this declaration, it -- it was common

1 knowledge to me, because of my
2 involvement, over the years, in -- in
3 different patent cases.

4 Q Sure. And I'm -- I'm sorry,
5 let me ask a better question. I was not
6 focusing on the word POSITA. What I'm
7 particularly interested in is in
8 paragraph 27 of your declaration you
9 provide what you think are the
10 appropriate qualifications that a POSITA
11 would have had in connection with these
12 IPRs.

13 And my question is: Did you
14 come up with those particular
15 qualifications that are listed here or
16 did the attorneys present them to you?

17 A I mean, you know, it's a block
18 that I've used in declarations, you know,
19 in prior declarations, to explain, you
20 know, a position, you know, a person
21 skilled in the arts. I mean, this --
22 it's -- it's not new to me, I've -- I've
23 done these technical declarations before,
24 so it's to -- you know, it really is kind
25 of boilerplate.

1 Q Sure. So let -- let me focus
2 you to the two different qualifications
3 that you've recited.

4 A Okay.

5 Q Do you see -- do you see in
6 paragraph 27 that you offer two
7 alternatives, and they're numbered either
8 one or two as the qualifications and
9 experience that a POSITA would have in
10 connection with these patents; do you see
11 those two alternatives?

12 A Yes.

13 Q And that's what I'm interested
14 in, specifically. Did you come up with
15 the particulars of the two alternatives,
16 numbered one and two in paragraph 27, or
17 did the lawyers present those particular
18 qualifications to you?

19 A No, I was asked what I thought,
20 you know, a -- a person in the -- skilled
21 in the art would need to have at the time
22 of the patent in 2009.

23 Q Okay.

24 A And that was what I said, off
25 the top of my head, but it's a pretty

1 standard answer. Most of these
2 network-related, you know, cases that
3 come up, you know, if you ask me about
4 cases earlier in the 2000s, I would have
5 it -- a different answer for, you know,
6 what the person would have, skill-wise,
7 because, you know, things change over
8 time.

9 Q Okay. If we look at the first
10 alternative that's presented in paragraph
11 27, and that's the one that starts with a
12 Bachelor's degree or equivalent in a
13 particular field, plus two or more years
14 of practical, academic or industry
15 experience, do you see that particular
16 alternative?

17 A Yes.

18 Q Would you agree that -- that
19 the Bachelor's degree in those fields
20 listed here, plus two or more years of
21 practical experience would -- would mean
22 the person has approximately six years
23 total of educational and academic
24 experience -- I'm sorry -- of academic
25 and industry experience?

1 A Yes.

2 Q Okay. And I --

3 A On its face, more or less, yes.

4 Q Sure.

5 A You know, the -- the reality is
6 you don't go to college and start a
7 technical field, you know? You started
8 before that.

9 Q Okay. I'd like you to look at
10 the second alternative, now.

11 A Yes.

12 Q That's in paragraph 27, which
13 is at least three years full-time
14 technical experience or an equivalent
15 combination of academic study and work;
16 do you see that alternative?

17 A Yes.

18 Q So would you agree that that,
19 as it says, is approximately three years
20 of full-time experience as -- as listed
21 in the particular field?

22 A Yes.

23 Q When you analyzed the prior art
24 and the patents in suit in this case, did
25 you -- did your opinions change whether

1 you were looking at this from the
2 perspective of a POSITA having the
3 experience under the first alternative in
4 paragraph 27, as compared to a person
5 having experience under the second
6 alternative?

7 A Can -- can you -- can you ask
8 me that again? And I'm -- I'm trying
9 to -- I'm trying to get the context of
10 what you're looking for.

11 Q Sure. So if we -- if -- as
12 we've discussed, under the first
13 alternative, the person has approximately
14 six years of academic and industry
15 experience, whereas, under the second
16 alternative, the person has at least
17 three years of technical experience.

18 And my question is: Because of
19 the difference in the total amount of
20 experience, did that in any way affect
21 your analysis of either the patents at
22 issue or the prior art references that
23 you reviewed?

24 MR. TOLLIVER: Objection, form.

25 A No, in -- in that -- in that

1 context I -- I -- I don't believe so. I
2 think that you had to have a certain
3 level of fundamental understanding in
4 order to, you know, understand the
5 prior -- the -- the application and prior
6 art. As well as, you know, the
7 evaluation at hand.

8 I think number two has a faster
9 track than number one, mainly because of
10 what's taught in academia, always lags
11 what is happening day-to-day in the
12 industry. So you know, I -- I think
13 they're equivalent.

14 I think if you take number one
15 and, in some cases, depending on, you
16 know, timelines of evaluation, it may --
17 may take somebody in number one longer
18 than somebody in number two.

19 Q Now, at the time that you
20 prepared your declaration, do you believe
21 that you had more experience than the
22 POSITA that you've listed here as either
23 under option one or option two?

24 A Yes, I mean, just
25 chronologically, yes.

1 Q Sure. But -- and so in
2 connection with the analysis that you
3 performed, did you rely on the experience
4 that you have as of the time that you
5 prepared your declaration?

6 A Only to the extent that I was
7 given the directive to make the analysis
8 based on the level of experience of the
9 POSITA, and that I needed to evaluate
10 as -- as I investigated what I was being
11 asked to do, and the fact is that you
12 can't make that evaluation unless you
13 know more than what the POSITA is
14 supposed to -- to know in order to -- to
15 make that evaluation.

16 Q And why is it that you could
17 not make that evaluation unless you, as
18 you said, know more than what a POSITA
19 would have known?

20 A Because you wouldn't understand
21 the limitations. You would not
22 understand what that person would need to
23 know if you didn't need -- know more than
24 the -- than that individual. It would be
25 like a manager in a company trying to

1 hire an IT individual and he has no IT
2 experience. You know, it just doesn't
3 work.

4 Q Now, what if the manager in the
5 company, as you hypothesized, had the
6 same level of experience in IT as the
7 person that that manager was seeking to
8 hire, is it your position that that
9 wouldn't work?

10 A Well, I think you would have
11 great difficulty, because as things
12 progress the limitations of that pairing
13 would move more slowly than if you had
14 somebody of more experience that would
15 evaluate the necessity, perhaps, to hire
16 somebody of greater skill.

17 How would he know that he
18 needed to do that if he didn't know more?
19 He would move -- he would move in
20 parallel with that individual that was
21 his peer in knowledge.

22 So it's always better in -- in
23 a technical capacity, to have somebody
24 with more experience that could provide
25 that guidance, mentorship, and evaluation

1 for a given situation.

2 Q Did the fact that you
3 personally have more experience than a
4 POSITA, as recited in paragraph 27, did
5 that fact help you in terms of your
6 analysis of the two patents at issue in
7 the prior art references?

8 A I don't think so.

9 Q Did you rely -- in connection
10 with your analysis, did you rely on any
11 of the additional experience that you
12 have, over and above the experience of a
13 POSITA, as recited in paragraph 27?

14 A No.

15 Q I have some questions now about
16 how you analyzed the prior art references
17 in this case, and we will get to the
18 specific references in due course.

19 So in connection with
20 performing your analysis, did you
21 start by looking at the claims in the
22 '319 and '510 patent and then going
23 into any particular piece of prior art
24 and looking to see if you could find
25 those claim limitations in the prior

1 art?

2 A I had a list of the claims, and
3 I had a list of reference materials, and
4 I went into the various references to see
5 how applicable they were in order to
6 determine how those claims applied.

7 Q And -- and how did you do that,
8 did you take the list of claims and --
9 let -- let's take an example, did you
10 take, like, claim one of the '319 patent
11 and then one of the references, let's say
12 Crowds, and did you look at the claim
13 limitations in claim one of the '319 and
14 try to see if you could find those same
15 disclosures in Crowds?

16 MR. TOLLIVER: Objection, form.

17 A Not exactly. I had a list of
18 the claims, I had a general understanding
19 of what was being sought, you know, as
20 how the -- the claims would relate to any
21 prior art, and then I -- I would -- I
22 went through each reference to find which
23 were more relevant than others to use as
24 reference. And then I -- then I went
25 back and did an analysis to -- to see

1 step-by-step how -- how, you know, it
2 would match up with claim -- with the
3 claims.

4 Q So these are method claims that
5 we're dealing with; correct?

6 A Yes.

7 Q So like, for example, did you
8 take the steps of claim one of the '319
9 patent and for each step would you go to
10 a particular prior art reference, such as
11 Crowds, and look to see if that step was
12 present; is that how you performed your
13 analysis?

14 MR. TOLLIVER: Objection.

15 Objection, form. Sorry.

16 A No, I -- I -- I had a general
17 understanding of flow, and I would take
18 that flow to see if that flow was
19 consistent with the mech- -- mechanics of
20 flow in the references.

21 Q And by general understanding of
22 flow, are you referring to the flow
23 recited in the method steps of the claims
24 that you were reviewing?

25 A No, it was more in -- it was

1 more in the sense of the data interaction
2 of how -- how something got from point A
3 to point B, and what all the interactive
4 points were in between. And that's how I
5 determined whether or not something is
6 applicable or not.

7 Q And wouldn't you --

8 A And -- and to, you know, come
9 down to, you know, this -- this
10 particular technology is -- you know,
11 it's -- it's pretty common and it's
12 pretty old.

13 Q When you say: To determine if
14 something was applicable, tell me what
15 you mean by that.

16 A Well, whether or not they
17 were -- the -- their flows were similar
18 enough to where it would warrant my
19 investigation of that particular
20 reference to look at, you know, how
21 the -- the claim elements would match up
22 with what was going on in the prior art.

23 Q So once you determined that a
24 particular piece of prior art, to use
25 your phrase, was applicable, how did you

1 go about comparing the claim limitations
2 that you were looking at with that
3 particular piece of prior art?

4 A I would look at the claim in a
5 patent and I would see if the description
6 of that particular claim could be --
7 could be -- could exist in the prior art.

8 Q So -- so -- and I -- I'm just
9 trying to make sure I understand your
10 analysis. So would you take, for
11 example, a look at the first step of the
12 claim and then go look in the prior art
13 reference to see if that step was
14 present?

15 MR. TOLLIVER: Objection, form.

16 A Not exactly. Not exactly,
17 because I would have already made a
18 determination that the steps in the
19 patent describe its flow. And since I
20 already made a determination that the
21 flow is applicable, I just made sure that
22 those elements were consistent in --
23 in -- in the comparison.

24 Q And that's what I'm trying to
25 understand, is that when you were trying

1 to make sure the elements were consistent
2 in the comparison did you take a look at
3 the particulars of each step of a claim
4 and then compare those particulars from
5 the claim to the disclosure of a
6 particular piece of prior art?

7 MR. TOLLIVER: Objection, form.

8 A I'm not getting the context,
9 because, you know, this is pretty
10 obvious. If you compare one thing to
11 another you're making a determination
12 whether they -- that -- that process, you
13 know, exists in both places.

14 Now, you know, I -- I don't
15 know how to answer your question,
16 other than that.

17 Q Well, sure, I'm trying to
18 understand, for example, when -- when a
19 par- -- when a claim element recites
20 something very particular, how do you go
21 about determining if what that claim
22 element recited was in a particular piece
23 of prior art?

24 A By definition or by function?

25 Q What do you mean by definition

1 or by function?

2 A Well, are -- are -- are you
3 asking me by definition or asking me its
4 existence by function?

5 Q Well, I'm asking how you
6 performed your analysis.

7 A Well, I'm -- I'm asking you to
8 give me some context of it, because those
9 two things are completely different.

10 Q Well, then, tell me what you
11 mean if it was by definition.

12 A Well, I'm not understanding
13 what you're asking me, in the first
14 place, so how can I do that?

15 Q Well, you've said: Am I asking
16 you by definition or by function, so I --

17 A That's right, but you're --
18 you're not -- you're not telling me one
19 way or the other.

20 Q Well, I'm asking you, now, by
21 definition.

22 A By definition, I would see if
23 the definitions are compatible.

24 Q Okay. And how about by
25 function?

1 A I would see if that function
2 exists.

3 Q So again, let's say if you were
4 looking to see if the function exists,
5 did you look at the claim limitations,
6 see what the functions were, and then go
7 to a particular piece of prior art to see
8 if those functions were present?

9 MR. TOLLIVER: Objection, form.

10 A Well, if I'm in the comparison
11 I'm looking at it. But as I said, I look
12 at the flow, to begin with, and I made a
13 selection of the reference, because my
14 understanding told me that I -- I believe
15 that it was a viable reference to be
16 used.

17 Q Sure. So I want to go to the
18 next step of your analysis now. Let's
19 say you've decided that a particular
20 reference is a viable reference to be
21 used; do you understand where we are
22 in -- in this context?

23 A Okay.

24 Q So then how did you, once
25 you've determined that a particular

1 reference is a viable reference to be
2 used, how did you go about determining if
3 each of the particulars recited in the
4 steps of the claim was or was not
5 disclosed in that particular reference?

6 A I first took a 30,000 foot
7 view, and I went through the claims, and
8 then I reviewed the reference material,
9 and then more carefully refined my
10 selection of the, say, top five
11 references that I picked to see which
12 ones I believed might give me the
13 opportunity to match up the best in the
14 least amount of time.

15 Q Okay. And when you were
16 actually trying to do that comparison to
17 match them up, as you said, did you look
18 at the claim limitations and then try to
19 find disclosure in a particular reference
20 that you would match up?

21 A Only at --

22 MR. TOLLIVER: Objection to
23 form.

24 A Only at the end.

25 Q And tell me what you mean:

1 Only at the end?

2 A Well, you drill down. You
3 drill down by -- in the selection
4 process. And when it's time to actually
5 document all the steps con- -- contained
6 in the claim on -- on its progression of
7 what is being, you know, stated, that's
8 the point at which I start looking at,
9 you know, all the nuts and bolts, you
10 know, how -- how carefully do they match
11 up with one another. Do they even exist?
12 Do they not exist? You know, I -- that's
13 my process. It's a process for me.

14 Q And in your process of
15 comparing the nuts and bolts, as you say,
16 did you read the claim to see what the
17 particular nuts and bolts were and then
18 go look at the reference to see if those
19 same nuts and bolts were present?

20 A Of -- of course, otherwise how
21 would I have been able to make a
22 selection of the references? I had to
23 have a basic understanding of, you know,
24 what the invention was and what it's
25 claiming in order to -- to pick the

1 appropriate references.

2 Q Okay. Could you please turn to
3 paragraph 13 in your declaration and let
4 me know when you are there?

5 A Okay.

6 Q So in performing your analysis,
7 in connection with the -- the
8 declarations here, did you give all of
9 the claim terms their ordinary and
10 customary -- customary meaning, in light
11 of the specification?

12 A I -- I don't know what --
13 what -- what do you mean by that?

14 Q Well --

15 A Most of these terms are very
16 ordinary and, you know, I mean, you know,
17 a web server is a web server, right? Is
18 that what you're talking about?

19 Q So you're telling me -- let
20 me -- I'm sorry, hold on.

21 You're telling me a web server
22 is a web server, is that what you said?

23 A Well, if I read something as a
24 web server, my understanding is that it's
25 a web server.

1 Q So you're -- so I -- thank you.

2 So my question for you, then,
3 sir, would be: So what's a web server?
4 What was your understanding of a web
5 server when you analyze these particular
6 patents?

7 A Really? Are you really asking
8 me this?

9 Q Sir, it's very serious today.
10 This is an important proceeding. Yes.

11 A Okay. Web server is something
12 that serves HTML pages, media data, sits
13 on the internet, is -- conforms to the
14 standard of providing, you know, browser
15 based content, you know, provides a -- a
16 response to requests by clients to
17 provide HTTP conforming data.

18 Q Okay. And how did you come to
19 the understanding of what you were
20 looking for when you saw the phrase web
21 server in the claims, how did you form
22 that understanding you just articulated
23 to me?

24 A How did I form my understanding
25 of a web server?

1 Q Yeah, as that term is used in
2 these patents?

3 A I -- I -- I take that term of a
4 web server as a term of understanding
5 that I know what a web -- web server is,
6 and a web server is pretty common
7 knowledge.

8 Q Was -- has a web server changed
9 from 2005 to 2015?

10 A Not really. Not substantively.

11 Q Okay. In connection with your
12 analysis, did you apply a specific
13 construction for the claim term: First
14 client device?

15 A Could you -- can you ask me
16 that again?

17 Q Certainly. So we -- we talked
18 about the definition you used for a web
19 server in performing your analysis, and
20 I'd like to know what was the definition
21 that you used for the -- the phrase:
22 First client device, as that phrase is
23 used, for example, in claim one of the
24 '319 patent?

25 A I viewed it as a -- a -- a

1 device that functions in the role of a
2 client.

3 Q Okay. And what definition, if
4 any, did you apply for the term: Second
5 server, as used in claim one of the '319
6 patent?

7 A I -- I really viewed it as a --
8 as a device that -- that is operating in
9 the role of the server.

10 Q And could that be any kind of
11 device that's operating in the role of a
12 server or did you have an understanding
13 it had to be some particular type of
14 device?

15 A In -- in what -- what context
16 are you asking me that?

17 Q In terms of your understanding
18 of the -- of the term "second server," as
19 used in claim one of the '319 patent?

20 A You know, a -- a -- a device,
21 meaning -- you know, I -- I define it
22 more of a role than a device. A device
23 is generally a reference to a -- some
24 kind of entity, right, either some
25 physical manifestation or a virtual

1 manifestation of a -- of an entity,
2 whereas, the definitions of -- of client
3 or server, really, functional definitions
4 role.

5 Q So in performing the analysis
6 that you did, in connection with the '319
7 and '510 patents, for both the servers
8 and clients that were recited in the
9 claims, were you really applying a -- a
10 definition that was functional and
11 looking at just the role that a device
12 performs, as distinct from looking at the
13 characteristics of a device, itself?

14 MR. TOLLIVER: Objection, form.

15 A Can you provide me some context
16 of what you're asking me of -- you know,
17 like, am I looking for a specific piece
18 of hardware or what -- what are we
19 talking about?

20 Q Well, I'm asking you to
21 explain -- help me understand the
22 definition that you used for, say, second
23 server, when you did your analysis of the
24 case?

25 A Okay. Yeah --

1 Q Sir, I'm sorry, please let me
2 finish my questions --

3 A Okay.

4 Q -- so we have a clear record.
5 So let me ask again.

6 What I'm trying to
7 understand is what was the definition
8 that you applied to the term "second
9 server," as used in the claims of the
10 '319 and '510 patents in connection
11 with the analysis that you performed?

12 MR. TOLLIVER: Objection, form.

13 THE WITNESS: Can you ask me
14 that again?

15 MR. DUNHAM: Sure.

16 BY MR. DUNHAM:

17 Q Let me give you a little more
18 context, then.

19 A Okay.

20 Q You earlier testified -- and --
21 and -- and you can correct me if I
22 misquote you -- but I believe earlier you
23 testified that your understanding of
24 second server was a device that is
25 operating in the role of a server.

1 And my question is: In
2 connection with performing your analysis,
3 were you looking for any particular type
4 of device or was your focus when you
5 reviewed these claims that you're just
6 looking for any device that is operating
7 in the role of a server?

8 MR. TOLLIVER: Objection, form.

9 A The -- you know, the -- the
10 term of server and client, to me, are,
11 you know, role-based definitions.
12 They're not -- they're not, you know --
13 they're not necessarily tagged to a
14 device.

15 A device can be a client
16 device, if that clients device has a
17 client function. But, you know, the
18 example is you could take a computer and
19 you can function in the role of a client
20 device and have a -- another service
21 available when -- in -- in that stack of
22 the device that is functioning as a
23 server in that same physical device, you
24 know, as long as it's communicating on a
25 network it can -- can serve multiple

1 functions based on the role that has been
2 given and installed in that particular
3 devi- -- device.

4 And it's generally by, you
5 know, what software packages are -- are
6 put in it, for instance, if you take a
7 Windows server 2000 -- or I mean 20 --
8 like 2012, 2019, you know, even going
9 back to, you know, server 2003, there's a
10 menu in there, and you can install
11 different roles.

12 It automatically functions
13 as a client because it's Windows, but
14 you can install roles and give that
15 device multiple roles, it can be a web
16 server, a DNS server, an FTP server,
17 proxy server, even a -- a common
18 Windows device can be a server and a
19 client at the same time. People, you
20 know, very commonly use ICS. ICS
21 makes their server.

22 Q So under the understanding that
23 you applied for the terms first client
24 device and second server, from the claims
25 of the '319 and '510 patents, was it your

1 understanding that a single device could
2 perform both in the role of a client and
3 in the role of a server at the same time?

4 A Yes.

5 MR. TOLLIVER: Objection.

6 Objection, form.

7 BY MR. DUNHAM:

8 Q And I'm sorry, what was your
9 answer, sir?

10 A Yes.

11 Q Okay. Could you look at --
12 turn to -- I'm sorry, paragraph 37 of
13 your declaration?

14 A Okay.

15 Q And I just want to confirm, is
16 it -- is it your opinion, sitting here
17 today, that claim one of the '319 patent
18 recites, quote, little more than the
19 basic functionality of a proxy server,
20 which was well known to a POSITA well
21 before 2009, close quote?

22 A It is -- you mean is that what
23 I wrote there?

24 Q I'm asking if that's still your
25 opinion today.

1 A Yeah, yeah, it's my opinion.

2 Q So is -- is your understanding
3 that claim one, in terms of your analysis
4 of it, what you were looking for was
5 prior art, art that showed the basic
6 functionality of a proxy server, is that
7 how you analyzed claim one?

8 MR. TOLLIVER: Objection, form.

9 A No. My analysis of claim one
10 that -- and, I mean, before I even
11 started to delve into the specifics of,
12 you know, the objective, my objective was
13 it was -- it was pretty clear that this
14 was a, you know, a proxy type service. I
15 mean, proxies are very common.

16 Q So what did you mean then, sir,
17 referring again to paragraph 37 of your
18 declaration, what did you mean when -- when
19 you said claim one recites little more
20 than the basic functionality of a proxy
21 server?

22 A What did I mean? I -- well,
23 you know, it's -- to be -- to be honest,
24 I -- I thought that, you know, you're
25 picking words to -- to change up, to --

1 so that you're not describing a proxy
2 server, but, really, it's a proxy server.

3 Q Okay. So -- so in your view,
4 then, claim one really recites a proxy
5 server but they're just in different
6 words, is that what you're saying?

7 A Yeah, for the most part.

8 Q Okay. Would you agree that as
9 of 2009 that a POSITA would also know
10 that a proxy server could be placed
11 between a requesting client device and a
12 web server?

13 A Yes.

14 Q I'm going to want to come back
15 to the declaration that we've just been
16 looking at on the '319, but I would ask
17 you to take out your declaration now for
18 the '510 patent, which would be from the
19 1493 IPR, same exhibit number, 1005, and
20 I am going to want to go back and forth
21 between them a bit, sir. So this would
22 be the 1493 IPR, Exhibit 1005, again,
23 which is your declaration on the '510
24 patent.

25 (Exhibit No. 1005 re the '510

1 patent was identified for the
2 record.)

3 THE WITNESS: Okay.

4 MR. DUNHAM: And Craig, do you
5 have it, too?

6 MR. TOLLIVER: Almost.

7 MR. DUNHAM: Okay. Let me know
8 when you've got it up. It looked
9 like you were still looking for it,
10 so I was holding off.

11 MR. TOLLIVER: Yeah, I know,
12 my -- my screen did something I don't
13 think it was supposed to do. So --
14 okay. Go ahead. I have it. Thank
15 you.

16 BY MR. DUNHAM:

17 Q Sure. If we can turn to
18 paragraph 13 of your declaration for the
19 '510 patent, and please let me know when
20 you're there.

21 A Okay.

22 Q And for context, I'm just
23 trying to make sure I have a complete
24 record, here, sir.

25 So I just want to understand:

1 Did you use the same understanding for
2 first client device and second server
3 when you analyzed the '510 patent claims
4 did you use the same understanding that
5 you used and just testified about that
6 you applied when you analyzed the '319
7 patent claims?

8 A Yes.

9 Q Were there any differences in
10 your understanding of first client device
11 or second server in the '510 patent
12 that -- that you utilized in that
13 analysis as compared to the analysis you
14 did for the '319 patent?

15 A Not that I recall, off the top
16 of my head.

17 Q And if you could turn to
18 paragraph 37 of your declaration in the
19 '510 patent. Please let me know when
20 you're there?

21 A I'm there.

22 Q Great. And I have, really, the
23 same question I asked you before: Is
24 your understanding of the invention of
25 claim one of the '510 patent essentially

1 the same as your understanding of the
2 invention of claim one in the '319
3 patent, in that, as you say in your
4 declaration, claim one recites little
5 more than the basic functionality of a
6 proxy server?

7 MR. TOLLIVER: Objection, form.

8 A I -- I believe so.

9 Q And again, I appreciate you
10 working with me on that, because, again,
11 it's just trying to have a complete
12 record.

13 I would like now to go back to
14 your declaration for the '319 patent, so
15 Exhibit 1005 from the 1492 IPR.

16 A Okay.

17 MR. DUNHAM: Okay. And
18 Mr. Teruya, we've been going about an
19 hour, and I am always one, as you
20 know from prior experience, I like to
21 give the witness a break regularly.
22 I'm about to start a lengthy line of
23 questions, would you like to take a
24 short break now?

25 THE WITNESS: Okay.

1 MR. DUNHAM: Okay. Okay. Why
2 don't we take a 10-minute break,
3 then.

4 THE WITNESS: All right.

5 THE VIDEOGRAPHER: The time is
6 12:59 p.m. We are off the record.

7 (Recess.)

8 THE VIDEOGRAPHER: The time is
9 1:11 p.m. We are back on the record.
10 Please proceed.

11 BY MR. DUNHAM:

12 Q Mr. Teruya, right before the
13 break I asked you to take out your
14 declaration in connection with the '319
15 patent and turn to paragraph 165; are you
16 there now, sir?

17 A Sorry, I didn't hear the
18 paragraph, 165?

19 Q Oh, yes, sir, could you please
20 then turn to paragraph 165 of your '319
21 declaration and let me know when you are
22 there.

23 A Okay.

24 Q Okay, I'd like to focus your
25 attention on the -- the second sentence

1 in paragraph 165, and I'll read it for
2 you, it says, quote, that a node can act
3 as a client in one relation and as the
4 server in another, is consistent with the
5 meanings of, quote, client and, quote,
6 server as a POSITA knows; do you see that
7 sentence, sir?

8 A Yes.

9 Q What did you mean when you said
10 that a node can act as a client in one
11 relation, what did you mean by that?

12 A In -- in the -- in the act of
13 responding and providing information, for
14 requesting and receiving information in
15 the case of the client.

16 Q So what did the word -- you
17 mean by the word relation?

18 A That the relation as in the
19 relationship of the connection, because
20 we were talking --

21 Q Okay. So --

22 A -- about circuits here, right?

23 Q So let me -- let me ask you a
24 hypothetical, then: If -- if we have
25 three nodes in a row, and we'll call

1 those nodes node A, node B, and node C,
2 does B's relationship relative to C
3 dictate whether B would be a client or a
4 server?

5 MR. TOLLIVER: Objection, form.

6 A Well, there's a lot of
7 specificity that needs to be provided in
8 order to make that determination.
9 What -- what is the path of the
10 information? What is the objective of --
11 of, you know, that architecture? Can you
12 describe the architecture and the
13 objective of the connectivity?

14 Q Sure. Let me ask you this
15 way -- and if it's helpful, feel free to
16 refer to paragraph 166, as well.

17 Is it your opinion that within
18 the meaning of the '319 and '510 patents
19 that a node that is sending a request is
20 a client?

21 MR. TOLLIVER: Objection, form.

22 A I would say that that's -- that
23 could be -- that could be the case in
24 a -- in a specific context, yes.

25 Q Okay. And if a particular --

1 A But not the -- but not the only
2 one, of course.

3 Q Well, of course. And I -- and
4 I'm asking for your understanding of
5 client and server as they're used in the
6 '319 and '510 patents.

7 So let me ask you this: If --
8 if a node -- if a first node sends a
9 request to a second node, does the fact
10 that the second node receives that
11 request from the first node make that
12 second node a server, within your
13 understanding of the -- the terms as
14 they're used in the '319 and '510
15 patents?

16 MR. TOLLIVER: Objection to
17 form. Objection, foundation.

18 A Can you provide more context to
19 that question? And what is the
20 architecture?

21 Q Sure. If I've got a -- a first
22 node that is sending a request to a
23 second node, is that first node, under
24 your understanding, a client as that term
25 is used in the '319 and '510?

1 MR. TOLLIVER: Objection, form.

2 Objection, foundation.

3 A I -- I -- I need more
4 specificity of what the request is,
5 what -- what is the software stacks we're
6 talking about, and what is the -- what --
7 what is the architecture? Is it a -- is
8 it a connection? You know, is it a
9 connection between the two? Is it
10 connection lists? Is it a datagram? Is
11 it a -- are we talking TCPIP? What
12 layer? What -- what are we talking
13 about?

14 Q So in -- in your understanding
15 of the term "first client device" used in
16 the '319 patent, does it --

17 A Okay.

18 Q -- matter if the first client
19 device has either a connection or if
20 there's a connectionless route that
21 messages are coming out of that first
22 client device?

23 A Well, by the specification of
24 the patent we're talking about TCPIP.

25 TCPIP is not a connectionless protocol,

1 so yes, there is a connection that had to
2 have been established in the first place.

3 Q Okay. So -- so let me ask you
4 this way: If we have a first node that
5 has a TCPIP connection to a second node,
6 and that first node sends a request for
7 content to the second node, is it your
8 understanding that that first node would
9 be a client device within the meaning of
10 the '319 and '510 patent claims?

11 MR. TOLLIVER: Objection, form.
12 Objection, foundation.

13 A It could be.

14 Q Under what circumstances would
15 you agree that the first node is a
16 client?

17 A By -- by function.

18 Q Okay. So purely by function
19 you would be able to make that
20 determination; correct?

21 A Well, it -- it would have to
22 have a defined function. Defined
23 function is generally, you know, derived
24 by -- you know, what -- what software and
25 process has been loaded to give it that

1 definition of role.

2 Q Okay. But -- so it would be
3 the definition of role that would allow
4 you to determine if that first node met
5 the phrase client device as used in '319
6 and '510; is that correct?

7 A Well, it --

8 MR. TOLLIVER: Objection, form.
9 Objection, foundation. Go ahead.

10 A In -- in -- in -- in the
11 appropriate context, if you want to, you
12 know, provide more context, if it has
13 been assigned to be a client then it
14 will -- it would have the requisite
15 software and definition of functionality
16 to act as a client. And, therefore, that
17 role of a client would be assumed in that
18 case.

19 Q I'll ask you to take out or
20 open up a copy of the '319 patent,
21 please.

22 A Okay.

23 Q And please let me know when you
24 have that available?

25 A Well, is it numbered in your

1 exhibit list here?

2 (Exhibit No. 1001 was
3 identified for the record.)

4 BY MR. DUNHAM:

5 Q It should be Exhibit 1001. It
6 should be the very first exhibit.

7 A No, the very first exhibit is
8 1010.

9 Q I'm not sure how you've sorted
10 your exhibits, but it's --

11 A I haven't, I just opened what
12 was sent to me in Box.

13 Q Sure. So it's the 1492 IPR,
14 Exhibit 1001. And that would be the '319
15 patent.

16 MR. TOLLIVER: And if I -- if I
17 can help, because I have not sorted
18 my exhibits, either, on my screen
19 it's towards the end of page 1, looks
20 like the third from the bottom.

21 THE WITNESS: Oh, I see.
22 It's -- it's got Shribman next to it.
23 Okay.

24 BY MR. DUNHAM:

25 Q Okay. Do you have the '319

1 patent available, sir?

2 A Yeah, it's loading now, yes.

3 Q In performing the analysis that
4 you've done, did you review the '319
5 patent in its entirety?

6 A Yes.

7 Q And did you review each of the
8 figures of the '319 patent?

9 A Yes, I probably did.

10 Q I'm sorry, you did or you
11 probably did?

12 A I -- I -- I'm sure I did. I'm
13 sure I did.

14 Q Okay. Just for housekeeping,
15 when you reviewed the '510 patent, did
16 you review that patent in its entirety?

17 A Yes.

18 Q And did you review each of the
19 figures in the '510 patent?

20 A I'm sure I did.

21 Q I'd like you to turn to Figure
22 1 of the '319 patent, please.

23 A Okay.

24 Q Okay. I'd like you to focus on
25 the portion of Figure 1 that shows proxy

1 server six, between client device 14 and
2 client device 16, on the one hand, and
3 web server 32 on the other hand; do you
4 see that portion of Figure 1?

5 A Yes.

6 Q According to the '319 patent,
7 is it your understanding that client 14
8 can send requests for content to proxy
9 server six?

10 MR. TOLLIVER: Objection, form.

11 A I don't recall that terminology
12 being used in the claim proxy server.

13 Q I'm asking about Figure 1, sir,
14 to be clear. So my question is: Do you
15 understand -- is it -- strike that.

16 With res- -- with reference to
17 Figure 1, is it your understanding that a
18 POSITA would understand that client
19 device 14 can send requests for content
20 to proxy server six?

21 MR. TOLLIVER: Objection, form.

22 A I -- I -- I -- I think it would
23 depend on what -- what the structure was
24 of that proxy server.

25 Q Do you understand -- strike

1 that.

2 What is your understanding of
3 the lines drawn between client device 14
4 and proxy server six?

5 A That there's a connection that
6 exists between proxy server and -- and
7 what's -- what is defined to be the
8 client device 14 there.

9 Q And do you have an
10 understanding that client device 14 can
11 send requests ultimately directed to web
12 server 32, client device 14 can send
13 those requests first to proxy server six?

14 MR. TOLLIVER: Objection, form.

15 A What I'm saying, that -- that
16 could be a -- a setup there, we -- we
17 don't really have the particulars of the
18 specification or what all those
19 connections are, proxy server could
20 contain a firewall that doesn't allow
21 them to do that.

22 Q So --

23 A Many proxy servers were
24 installed in companies so that people
25 couldn't get out on the internet.

1 Q So --

2 A So I -- I don't really know
3 what the structure of that particular
4 proxy server is.

5 Q Sir, what is your understanding
6 of the line that is on the right-hand
7 side of proxy server six that extends out
8 of the proxy server six and into the
9 internet cloud as shown?

10 A It looks like there's a
11 connection out to the internet, but we
12 don't have any specification as to the
13 open courts, what's allowed, what's not
14 allowed, we don't -- we don't know.

15 Q So sitting here today, is it
16 your sworn testimony that you don't
17 understand whether client device 14, as
18 shown in Figure 1, can send a request to
19 web server 32 through proxy server six?

20 MR. TOLLIVER: Objection, form.

21 A That -- that's not what I said.
22 I said that it could, but we need more
23 specifics as to what is installed in
24 those devices and what is the permission
25 profile that has been defined for that

1 architecture.

2 Q So I'd like you to assume that
3 the permission profiles and
4 configurations of the device -- client
5 device 14, proxy server six, and web
6 server 32, shown in Figure 1, are such
7 that client device 14 can send requests
8 for content to web server 32 through
9 proxy server six; do you understand that?

10 A Yes.

11 Q Okay. At the point in time,
12 with that understanding, at the point in
13 time when client device 14 sends a
14 request to proxy server six, is client
15 device 14 operating in the role of a
16 client under your understanding of the
17 terms of the '319 patent?

18 MR. TOLLIVER: Objection, form.
19 Objection, foundation.

20 A Can you give me more context of
21 client device 14? Is client device 14
22 defined in the role of a -- of a client
23 only device?

24 Q I'm asking you in the context
25 of client device 14, sending a request

1 for content to web server 32, where
2 client device 14 sends that request to
3 proxy server six, and my question is: In
4 that transaction of client device 14,
5 sending a request for content that goes
6 to proxy server six, is client device 14
7 operating in the role of a client the way
8 you have understood the terms and the
9 '319 and '510 patents?

10 MR. TOLLIVER: Objection, form.
11 Objection foundation.

12 A If -- if client device 14
13 has -- has been designated to be a -- to
14 function in the role of the client, and
15 sends the request to the proxy server,
16 yes, it is functioning as a client.

17 Q Well, sir, in your answer I
18 believe you testified that you said: If
19 client device 14 is operating in the role
20 of a client; is that correct?

21 A Yes.

22 Q So does the fact that client
23 device 14 sends a request for proxy --
24 request for content to proxy server six,
25 is that part of determining whether

1 client device 14 is a client device, or
2 are you saying that client device 14 just
3 has to be configured to be a client
4 device?

5 A Can you run that by me again?

6 Q Sure. I'm trying to
7 understand, is it your testimony that
8 client device 14 is or is not a client
9 device based on the way it is
10 configured --

11 A Okay.

12 Q -- or -- or do we need to look
13 at what client device 14 is doing, such
14 as sending a request for content to proxy
15 server six?

16 MR. TOLLIVER: Objection, form.
17 Objection, foundation.

18 A In -- in this diagram, client
19 device 14 says it's a client device by
20 just stating it's a client device. And
21 I'm saying if that client device has been
22 designated in the role of a client, then
23 sending a request on the basis of that
24 role it can be considered to be the
25 client.

1 It doesn't preclude it, it
2 doesn't preclude the client device of
3 being able to do something else, because
4 it's a device as opposed to the
5 definition of what you're asking that
6 initiates the request as part of a
7 process of a client that ha- -- that is
8 functioning in the role of a client.

9 Q And is that distinct from a
10 client that would be functioning in the
11 role of a server?

12 A A client defined as a client is
13 a client. A client device, that may have
14 a -- a server process running on it, can
15 operate as a server even though it were
16 the -- the physical device happens to be
17 tagged as a client device.

18 Q So when --

19 A But in the role of the client,
20 it can -- it's functioning as a client
21 making requests.

22 Q So in -- in your analysis of
23 the claims of the '319 and '510 patents,
24 sir, when the claim says first client
25 device, is it your understanding that

1 that must both be a client device and
2 something that's operating in the role of
3 a client or were you looking just in --
4 at whether something was operating in the
5 role of a client?

6 MR. TOLLIVER: Objection, form.

7 A I -- I -- I took the common
8 definition of -- that -- that you -- you
9 would use since there was no specificity
10 as to the -- the differentiation between
11 a -- the device and a role that a client
12 device, in my mind, as I was doing my
13 evaluation, is that that -- that device
14 is operating in the role of a client.

15 Q So can you take out the
16 MorphMix reference, please. And that's a
17 reference you reviewed; right?

18 A Yes. Do you want to give me
19 that exhibit number?

20 (Exhibit No. 1008 was
21 identified for the record.)

22 MR. DUNHAM: Sure. It's
23 Exhibit 1008. I lost my list of
24 exhibits, here. Hang on.

25 MR. TOLLIVER: Mr. Dunham, when

1 I just clicked on Exhibit 1008 it
2 tells me: We're sorry, the document
3 may be protected and it didn't -- it
4 didn't load. That was not the case
5 with the others, this is the first
6 time it's done that to me.

7 THE WITNESS: Well, it kind of
8 closed down my access, here.

9 MR. DUNHAM: I bet the -- can
10 you drop that one in the chat, then?
11 It's opening fine for me. And -- and
12 Craig, it appears in both IPRs 1492
13 and 1493, have you tried both just to
14 see if there's just a glitch in the
15 download?

16 MR. TOLLIVER: That's a good
17 point, I was trying 1493. No, it
18 says the same thing.

19 A Okay, you're -- you're saying
20 Exhibit 1008; is that correct?

21 Q Yes, sir.

22 A Okay. Looks like both Betsy
23 and I have dropped it into the chat, if
24 you're having any trouble.

25 MR. TOLLIVER: As he's looking

1 to the chat, it -- it looks like, for
2 whatever reason, certain of the
3 exhibits will pull up from the Box,
4 the Box site, and -- and certain
5 won't, and they say that they're
6 protected, at least from -- from
7 my -- from my access.

8 THE WITNESS: Okay. I -- I
9 have it. It keeps spinning. It must
10 be large.

11 MR. DUNHAM: Let me know when
12 you -- when you have it available.
13 And you should be able to download it
14 from the chat, as well, now.

15 And Craig, if it helps, it
16 might be because the file size is
17 more than typical Gateway limits. If
18 you just download all of the exhibits
19 from Box you'll get a Zip file that
20 expands, and that's how I downloaded
21 them, and they work just fine.

22 MR. TOLLIVER: I have -- I have
23 it up now, but I did it from the
24 chat, yep.

25 THE WITNESS: What would you --

1 BY MR. DUNHAM:

2 Q Sorry, Mr. Teruya. Do you have
3 MorphMix available, sir?

4 A Yes.

5 Q You mentioned it must be very
6 large. Did you read the entire MorphMix
7 reference in connection with the work you
8 did in this case?

9 A I -- I went -- I went through
10 most of it.

11 Q And what do you mean by most of
12 it?

13 A Well, when it got into the
14 weeds about statistical analysis and
15 things like that, I -- you know, I just
16 glossed -- I just skimmed over those
17 types of parts. You know, when -- when I
18 looked at, you know, the equations of
19 participant probabilities and things like
20 that, I didn't need to get into those
21 things, so I -- I would be more selective
22 about my chapter reviews. I looked at --
23 I -- I tended to concentrate more on
24 reading through sections of -- of
25 structure and architecture.

1 Q Okay. I'd like you to turn to
2 the page in MorphMix that has Figure 5.1,
3 and there's two different numbering
4 schemes, there's the internal document
5 number on the upper left, which would be
6 page 98, and then there's the exhibit
7 numbering on the bottom right, which
8 would be page 118. And I -- I will refer
9 to whichever one is easier for you, sir.

10 A Okay. 118.

11 Q Yes, sir, and it should show
12 Figure 5.1.

13 A Okay.

14 Q Are you at that point?

15 A I am.

16 Q Okay. With reference to Figure
17 5.1 of MorphMix, is it your understanding
18 that node A sends a request to node B?

19 A Is -- is that what's being
20 defined here in this overview?

21 Q I'm asking you for your
22 understanding of what is shown in Figure
23 5.1 by the bold line between A -- node A
24 and node B.

25 A Well, I -- I -- I make the

1 observation that it's a connection
2 between the two.

3 Q And in terms of the disclosure
4 of MorphMix, is it your understanding
5 that node A can send requests to node B?

6 A What -- what are you -- what
7 particular paragraph of my declaration
8 reference are you asking me about?

9 Q I'm asking you about your
10 understanding of MorphMix.

11 A Okay. I did an analysis of
12 MorphMix, and can you refer to my
13 declaration as to what the question is of
14 what -- what I've determined?

15 Q I'm asking you about your
16 understanding of the MorphMix reference
17 right now. We'll get to your declaration
18 later. And my question is: With
19 reference to Figure 5.1 of MorphMix, is
20 it your understanding that node A can
21 send requests to node B?

22 A It could, yes.

23 Q Okay. And in turn, then, could
24 node B send the requests onto node C?

25 A Yes.

1 Q And then would node C then be
2 able to send those requests onto the S in
3 the circle, the server?

4 A Yes.

5 Q So I want to focus on that
6 pathway and what happens when a request
7 is sent from node A to node B then on to
8 node C and onto the server. So for
9 context, that's what I'd like to focus
10 on.

11 And my -- my first question is:
12 At the point in time that node A, as
13 shown in Figure 5.1 of MorphMix, sends a
14 request to node B, is it your
15 understanding that node A is operating in
16 the role of a client?

17 MR. TOLLIVER: Objection, form.
18 Objection, foundation.

19 A In -- in this hypothetical,
20 let's assign him to be a client, yes.

21 Q Well, I'm -- I'm not assigning
22 A to be a client, sir. I'm asking --

23 A Well, if he's functioning in
24 the role of sending a request as a client
25 then we have to consider him a client.

1 Q And -- and I'm just asking for
2 your understanding, sir. So at that --

3 A My understanding would be that
4 he can do that if he is functioning in
5 the role of a client.

6 Q Okay. And at the point in
7 time, when node B receives that request
8 from node A, is node B operating in the
9 role of a client or a server?

10 MR. TOLLIVER: Objection, form.

11 A I can -- let -- let's -- let's
12 give it a role. Let's give it a role.

13 Q I'm asking for your
14 understanding, sir.

15 A My understanding is whatever
16 the role is defined as, as that request
17 comes in, he's going to act upon that
18 request appropriate to the role that he
19 has been assigned, if he is a -- assigned
20 as a role of a proxy that's a passthrough
21 proxy then he's going to take that
22 request and pass it on to -- to node C.

23 If he's a caching proxy, and is
24 not making a request that needs to be
25 passed on, then he's going to look at his

1 cache in B and return that data.

2 I don't -- you -- you
3 haven't defined for me the specificity
4 of role, here, for me to say that it's
5 one thing or another.

6 Q Sir, are you aware of any
7 disclosure in MorphMix where node B would
8 cache information that it could return --

9 A I -- I --

10 Q Sir, please, I allow you to
11 finish your answers, I need to ask you to
12 slow down and let me ask my questions.
13 Thank you.

14 Are you aware of any
15 disclosure in MorphMix where node B
16 operates as a caching proxy, as you
17 just testified?

18 A Not that I'm aware of.

19 Q Are you aware of disclosure in
20 MorphMix where node B will receive a
21 request from node A and then send that
22 request on to node C?

23 A That is one of the described
24 functions and paths that were defined by
25 MorphMix.

1 Q Okay. So for that described
2 function and path, where node A sends a
3 request to node B, under your
4 understanding of the terms of the '319
5 and '510 patents, would node B be
6 operating in the role of a client or in
7 the role of a server?

8 MR. TOLLIVER: Objection, form.
9 Objection, foundation.

10 A I -- I believe that node B
11 could -- could function as a server.

12 Q Okay. And I'm asking about
13 during that particular transaction, when
14 node A sends a request for node B, is it
15 your understanding that at that point in
16 time node B is operating in the role of a
17 server?

18 MR. TOLLIVER: Same objections.

19 THE WITNESS: Can you say that
20 again, please?

21 MR. DUNHAM: Sure.

22 BY MR. DUNHAM:

23 Q I'm asking about that
24 particular point in time, where, as shown
25 in Figure 5.1, node A sends a request to

1 node B, is it your understanding that
2 node B is operating in the role of a
3 server?

4 MR. TOLLIVER: Same objections.

5 A If -- if node B, in the context
6 of the '319 patent, is returning data
7 from a request coming in, then it's
8 operating in the role of a server.

9 Q So I want to -- I want to walk
10 with you, sir, the flow where node A as
11 shown in Figure 5.1 of MorphMix is
12 sending request to node B, node B sends
13 that request on to node C, node C goes
14 out and sends that request to the server
15 S, I want to first focus on that flow; do
16 you understand that?

17 A Okay.

18 Q So in that flow, when node A
19 sends a request to node B, is node B
20 operating in the role of a server under
21 your understanding of the terms?

22 MR. TOLLIVER: Same objections.

23 A Role, yes.

24 Q Okay. And then when node B
25 further, as shown in Figure 5.1, sends

1 that request on to node C, is node B
2 operating in the role of a client or a
3 server?

4 MR. TOLLIVER: Same objections.

5 A I -- I would say that it would
6 have -- it would be functioning in the
7 role of a server.

8 Q So when B sends the request on
9 to C, is it your testimony that B is
10 functioning in the role of a server?

11 MR. TOLLIVER: Same objections.

12 A In -- in -- in that example
13 here, in that context, I would say so.

14 Q Okay. And then, when node C
15 sends a request on to the server S, what
16 role is node C operating in?

17 A It depends on which side of
18 that connection you're looking at.

19 Q I'm asking you when node C --

20 A Yes.

21 Q -- sends a request on to server
22 S, is node C operating in the role of a
23 client or a server under your
24 understanding of the terms?

25 A Give me --

1 MR. TOLLIVER: Same objections.

2 A Give me the context. From the
3 server it's going -- server S is going to
4 look like a client.

5 Q Okay. And -- and what other
6 context do you have in mind when you say
7 with respect --

8 A Well, that is the context.
9 You -- you know, the other context would
10 be what is it operating as, you know,
11 what is C operating as? C could have a
12 dual role.

13 Q Sir --

14 A Has a dual role. It could act
15 as a -- as a client that's making a
16 request to the server for -- because --
17 you know, MorphMix is getting into
18 obfuscation, you -- you could have a
19 different stack then that operates to
20 pass that data back to B as a server role
21 as opposed to a client role in providing
22 them anonymity to go to server S, so it
23 could have a dual role.

24 Q So is it your understanding of
25 Figure 5.1 of MorphMix that node C has a

1 dual role, some of the time it's a
2 client, some of the time it's a server?

3 MR. TOLLIVER: Same objections.

4 A I -- I -- I don't know that --
5 I -- I would say that from -- from
6 dataflow I could -- I could see that
7 being defined that way, so that -- it's
8 not a very clear definition, but I -- I
9 could see that.

10 Q Well, I'm asking for your
11 understanding of the nodes of MorphMix as
12 relates to the term first client device
13 and second server in the '319 patent.

14 Is node C of MorphMix a first
15 client device or a second server in
16 connection with the relation of MorphMix
17 to the asserted patent claims?

18 MR. TOLLIVER: Same objections.

19 A I would say that point C is --
20 is functioning as a client and a server.

21 Q When is C, node C functioning
22 as a client?

23 A When it's making requests to
24 server S.

25 Q And when is node C functioning

1 as a server?

2 A Well, they could function as a
3 server in the case of sending a request
4 onto server S if -- if that request came
5 in from node B.

6 Q So in -- in the flow of A to B,
7 B to C, and C to S, I'm trying to
8 understand specifically your
9 understanding of whether node C, which is
10 receiving the request from B, and sending
11 that on to server S, is node C
12 functioning -- operating in the role of a
13 client or a server?

14 MR. TOLLIVER: Same objections.

15 A MorphMix is a peer-based
16 mixture. If you're -- if we're analyzing
17 MorphMix, and you're applying it to the
18 '319 patent, then what you have -- have
19 to ask me to do is apply the architecture
20 of the '319 patent onto MorphMix because
21 MorphMix defines itself very differently
22 because it has more flexibility in its
23 connection capability because of its
24 objectives. And what it contains can be
25 mapped to '319, but it can function very

1 differently at the same time.

2 Q Well, sir, then I'll take you
3 up on your invitation. Let's take out
4 the '319 patent and I'll ask you to refer
5 to Figure 1 -- I'm sorry, to claim one,
6 and we're also going to look at MorphMix
7 Figure 5.1.

8 A Okay. Where would you like me
9 to go?

10 Q Well, I believe you testified
11 that you could take the functionality
12 shown in the figure of MorphMix and map
13 it onto the '319 patent, so I'm -- I'm
14 going to ask you, how did you do that?

15 A How did I do that? By -- by
16 dataflow, as I described to you earlier.
17 Where -- where are we going in the '319
18 patent?

19 Q Claim one, please.

20 A Okay. Okay.

21 Q So -- so sir, I'm -- I'm -- I'm
22 taking you up on your invitation, sir,
23 and when you said that you could map the
24 function of MorphMix onto claim one of
25 the '319 patent, so I'd like you to show

1 me how you've done that.

2 A Well, I don't -- I don't
3 remember the exact numbers, okay,
4 rather -- can we reference Figure 3 in
5 the patent?

6 Q I -- I'm asking you to -- sir,
7 I'm asking you specifically, as you
8 said --

9 A Because I -- I don't remember
10 the numbers that were assigned in the --
11 in the Figure 3 that I can match up with
12 what's on MorphMix. If I could refer
13 back to Figure 3 in the patent that would
14 be helpful to me.

15 Q So, I mean, you're free to look
16 at anything you like, but is it -- is it
17 your testimony that when you compared
18 MorphMix to the '319 patent you tried to
19 map MorphMix onto Figure 3 of the patent;
20 is that what you're saying?

21 MR. TOLLIVER: Object.

22 Objection to form.

23 A No. I'm -- I'm -- I'm asking
24 you if I'm use -- can use it as a
25 reference, because you're asking me to

1 map it to Figure 5.1, in real-time right
2 now, and -- and I need some -- I need
3 some reference context for you so I can
4 tell you where each one of those pieces
5 match up. That's what you asked me to
6 do, right?

7 Q Sir, did you offer an opinion
8 that the MorphMix reference anticipates
9 claim one --

10 A Yes.

11 Q -- of the '319 --

12 A Yes, I did.

13 Q Please -- please allow me to
14 ask my question, sir. The court reporter
15 can only take down one of us at a time.

16 So my question is: Did you
17 offer an opinion that MorphMix
18 discloses each and every element of
19 claim one of the '319 patent?

20 A I believe I did.

21 Q So I'm asking you, sir, to walk
22 me through the steps of claim one of the
23 '319 patent and show me where you find
24 that corresponding disclosure in
25 MorphMix?

1 MR. TOLLIVER: Objection, form.

2 A Okay. Let me put this example
3 out for myself.

4 Okay. Okay. Claim one says a
5 method for use with the first client
6 device, right? In MorphMix the first
7 client device is node C.

8 Q What makes node C a first
9 client device, under your understanding?

10 A The first client device,
11 according to claim 1, is issuing a
12 request to the -- to the first server.

13 Q So how does that make node C of
14 MorphMix the first client device?

15 A Because it's the only one that
16 can talk to the server.

17 Q Oh, so that --

18 A That's --

19 Q So is that --

20 A That's --

21 Q Okay. So is it the fact that
22 node C and MorphMix can talk to server S
23 is what makes node C a client device?

24 MR. TOLLIVER: Objection, form.

25 Objection, foundation.

1 A I -- you're asking me did it --
2 to explain the mapping I came up with,
3 and I'm -- I'm trying to do that for you.

4 Q Sure. And I'm trying to
5 understand the reasoning behind your
6 mapping. So my question is --

7 A Dataflow.

8 Q So is it the fact that node C
9 can send requests to server S in
10 MorphMix, is that what makes node C
11 correspond to the first client device of
12 the -- of the '319 claims?

13 MR. TOLLIVER: Same objections.

14 A By definition, yes.

15 Q Okay. So let's keep going now
16 in the -- the '319 claim. You had -- you
17 had identified for me the first client
18 device, so keep going, please.

19 A Okay. The first server is
20 server S, the web server, it receives the
21 content requests from the client, right?
22 And the -- the second -- the second
23 server is -- the second server is B.

24 Q And why is node B of MorphMix
25 the -- correspond to the second server of

1 claim one of the '319 patent?

2 MR. TOLLIVER: Same objections.

3 A Well, because the -- it's --
4 it's described here that it has a
5 connection to the client, the second
6 server has a connection to the client.
7 It's the only node that has a connection
8 to the client.

9 Q What about the other nodes
10 shown in Figure 5.1 of MorphMix that
11 showed connections to node C like the
12 node in the upper right; do you see that
13 node?

14 A Yes.

15 Q So is that upper right node
16 that also has a connection to -- to node
17 C, is that a client or a server?

18 MR. TOLLIVER: Same objections.

19 A I don't have enough information
20 for that. These dark lines between these
21 nodes assume that there's some
22 connectivity. That is a -- a -- a
23 network that, you know, we don't know if
24 the connections are -- exist or not.
25 It's -- it's just a -- a path definition

1 in 5.1, assuming that we take 5.1 as the
2 example I would say that the dark lines
3 determine the connectivity.

4 Q Okay. So let's look at the
5 first step of claim one of the '319, it
6 says: Receiving from the second server
7 the first content identifier; do you see
8 that step?

9 A Yes.

10 Q So tell me where in MorphMix
11 with reference to Figure 5.1 you see the
12 first client device receiving from the
13 second server the first content
14 identifier?

15 A Between the connection between
16 B and C.

17 Q So -- so is it your testimony C
18 receives the request for content from B,
19 B is the second server and C is a first
20 client device?

21 A Say that again.

22 Q Sure. Is it -- is -- with
23 reference to the -- the first step of the
24 '319 claims, when the first client device
25 receives from the second server the first

1 content identifier, is it -- is it your
2 testimony that C, as shown in MorphMix,
3 is the first client device because it's
4 receiving a request from node B? That's
5 what I'm trying to understand.

6 A That -- please say that again.
7 I -- you're -- that -- that was confusing
8 to me.

9 Q Okay. It -- a minute ago did
10 you testify that node C is the first
11 client device shown in Figure 5.1 of
12 MorphMix?

13 A Yes, I did.

14 Q Was that because node C is able
15 to talk to server S?

16 A Correct.

17 MR. TOLLIVER: Objection, form.

18 BY MR. DUNHAM:

19 Q And I'm sorry, sir --

20 A Well, it has a connection to,
21 yes.

22 Q Okay.

23 A And -- and we're making the
24 assumption that it can talk to it, yes.

25 Q Well, what is your

1 understanding of MorphMix, does node C
2 talk to server S or not?

3 A You're asking me to lay '319 on
4 top of MorphMix. MorphMix has more
5 functionality, but in the context of the
6 '319 laying on top of MorphMix, I'm
7 saying that the client device is defined
8 in this particular example as node C.

9 Q So, again, I'm trying to
10 understand, was your objective then to --
11 to -- to lay '319, as you said, onto
12 MorphMix, is that what you were trying to
13 do when you did your analysis?

14 MR. TOLLIVER: Objection, form.
15 Objection, foundation.

16 A I -- that -- I -- I used it as
17 an example, it wasn't like I was, like,
18 you know, laying something on top of it.
19 I'm -- I was looking at dataflow and
20 functionality, I -- I explained that
21 earlier. It wasn't a -- not taking a
22 cells that I've drawn things out and
23 trying to match them on top of each
24 other.

25 I'm looking at the dataflow and

1 what could be supported by these
2 references. And I -- I believe that the
3 dataflow that's defined by the '319
4 patent can certainly be supported in the
5 dataflow that is -- is supported by
6 MorphMix.

7 Q So let's look at claim one of
8 the '319 patent, and let's look at that
9 first step together, and you understand
10 this is a method by the first client
11 device; correct?

12 A That's what it says.

13 Q Okay. So in the first step of
14 '319 it says receiving, so this would be
15 the first client device receiving from
16 the second server the first content
17 identifier. When we look at MorphMix
18 Figure 5.1, why do you conclude that node
19 C is the first client device?

20 A Because -- because it can get
21 the data from server S.

22 Q And -- and where in your
23 understanding of client device is that a
24 device is a client device because it can
25 get data from a server?

1 A No, it's --

2 MR. TOLLIVER: Object. Hold
3 on. Hold on. Let me give me one
4 second to lodge an objection, sir.

5 THE WITNESS: I'm sorry.

6 MR. TOLLIVER: Sure.
7 Objection, form. Objection,
8 foundation.

9 THE WITNESS: Do you want to
10 ask the question again?

11 MR. DUNHAM: Sure. BY MR.
12 DUNHAM:

13 Q When I asked you about your
14 understanding of client device earlier
15 you talked about a device that operates
16 in the role of a client, and I'm trying
17 to understand why do you say that,
18 because node C can obtain data from
19 server S, that's what makes it a client
20 device?

21 MR. TOLLIVER: Same objections.
22 BY MR. DUNHAM:

23 Q And what is the basis for your
24 statement that because node C can obtain
25 data from node S, that's what makes node

1 C a client device?

2 MR. TOLLIVER: Same objections.

3 A Client devices and server
4 devices are request/reply.

5 Q So looking at Figure 5.1 of
6 MorphMix, do you understand that node B
7 sends requests to node C?

8 A I -- I assume it can.

9 Q Is it your --

10 A That -- that -- that is one of
11 the possible roles.

12 Q Is it further your
13 understanding of MorphMix that node C can
14 respond to those requests for node B?

15 A It -- it could, based on its
16 definition in MorphMix, that's correct.

17 Q Okay. So in connection with
18 the flow, as you've been saying, where
19 node B sends a request to node C in
20 MorphMix, and thereafter node C responds
21 to that request and returns information
22 to node B, what role is node B operating
23 in?

24 A Say that again, please.

25 Q Sure. Within the flow, as

1 you've used that phrase, and we look at
2 the connection between node B and node C
3 in Figure 5.1 of MorphMix, when node B
4 makes a request for content and sends it
5 to node C, and node C thereafter responds
6 to that request and sends information
7 back to node B, is node B operating in
8 the role of a client or a server?

9 MR. TOLLIVER: Objection, form.
10 Objection, foundation.

11 A I'm -- I'm really sorry, run
12 that by me again.

13 Q Sure. In connection with the
14 flow of information, as described in
15 MorphMix, when node B, as shown in Figure
16 5.1 of MorphMix, makes a request to node
17 C, and node C thereafter responds to that
18 request and sends information back to
19 node B, is node B operating in the role
20 of a client or a server?

21 MR. TOLLIVER: Same objections.

22 A You -- you ask me on the one
23 hand to give you a referential example of
24 5.1 to Figure 5.1. In your question that
25 you gave me right now, you asked me how

1 this is working in MorphMix. MorphMix's
2 architecture can support what the '319
3 patent describes but MorphMix can operate
4 differently, as well.

5 The '31- -- the -- the
6 functional aspects of the '319 patent is
7 in many ways a subset of what MorphMix
8 can deliver in its ability to do
9 connectivity in that some of the MorphMix
10 nodes can act as relays, they don't
11 necessarily need to get something back in
12 MorphMix, they can operate as a relay and
13 just pass on path, not necessarily
14 operate in -- in the context of server or
15 client, but an additional role of relay
16 in order to help the context of the
17 privacy that it's trying to achieve in
18 the main objective of MorphMix.

19 Q Sir, I'm going to ask you to
20 answer my questions. So I'm going to ask
21 it again, politely, but I'm going to ask
22 you to answer the question that I'm
23 asking you.

24 And the question is: As shown
25 in Figure 5.1 of MorphMix, when node B

1 sends a request to node C, and then node
2 C responds to that request with
3 information, is node B, under your
4 understanding, operating in the role of a
5 client or a server?

6 MR. TOLLIVER: Objection, form.

7 Objection, foundation.

8 A My opinion is node B in this
9 example is the second server.

10 Q And when node C receives a
11 request from node C and sends it on to
12 server S, is it your testimony that you
13 believe node C is operating in the role
14 of a client?

15 A Has a role of a client, yes.

16 Q What do you mean by has the
17 role of a client?

18 A Can -- can have multiple roles,
19 it's a -- it's a -- you -- you drop the
20 term device, the device isn't necessarily
21 a role.

22 Q So is it -- I want to make sure
23 your sworn -- sworn testimony today, I
24 want this to be really clear on the
25 record, sir, is that when node B --

1 A It --

2 Q -- of MorphMix shown in Figure
3 5.1 sends a request for content to node
4 C, is it your testimony that node B is
5 operating in the role of a server?

6 A It depends on how it was
7 defined.

8 Q I'm asking you for your
9 understanding and analysis --

10 A My understanding and analysis
11 is --

12 Q Sir, please allow me to finish
13 my questions. I've asked you multiple
14 times --

15 A All right.

16 Q -- please.

17 My question here, under
18 oath, today, is when node B, as shown
19 in Figure 5.1 of MorphMix, sends a
20 request for content to node C, is it
21 your testimony that node B is
22 operating in the role of a client or a
23 server?

24 MR. TOLLIVER: Objection, form.

25 Objection, foundation. Sorry, I

1 might have been muted.

2 A I need more clarity here.

3 I'm -- I'm sorry, I'm in the weeds here.

4 Q Sir, I'm asking you a very
5 straightforward question. If you don't
6 know the answer you're free to tell me
7 that.

8 A It -- it -- it --

9 Q Sir, allow me to finish my
10 question. I just want to have a clear
11 record. As shown in Figure 5.1 of
12 MorphMix, when node B sends a request for
13 content to node C, is node B operating in
14 the role of a client or a server?

15 MR. TOLLIVER: Same objections.

16 A In that -- in that narrow
17 context, and defining that as a second
18 server, I -- I -- I'm defining it -- node
19 B as a second server.

20 Q So is it -- is node B operating
21 in the role of a client or a server? I'm
22 still asking the same question of you,
23 sir.

24 MR. TOLLIVER: Objection, form.

25 A I'm -- its role in that

1 particular dataflow is a server. As --
2 as I say, it -- I believe it to be the
3 second server.

4 MR. DUNHAM: Okay. We've been
5 going an hour. Why don't we take a
6 10-minute break?

7 MR. TOLLIVER: Sounds good.

8 THE VIDEOGRAPHER: The time is
9 2:13 p.m. We are off the record.

10 (Recess.)

11 THE VIDEOGRAPHER: The time is
12 2:37 p.m. We're back on the record.
13 Please proceed.

14 MR. DUNHAM: Mr. Teruya, I'd
15 like you to take out the Crowds
16 reference, Exhibit 1006, please, and
17 let me know when you have it?

18 (Exhibit No. 1006 was
19 identified for the record.)

20 THE WITNESS: I'm trying to
21 load it up here, give me a minute.
22 Sorry.

23 MR. DUNHAM: No problem, take
24 your time.

25 THE WITNESS: Okay. What page

1 would you like me to go to?

2 BY MR. DUNHAM:

3 Q If you could, sir, please --

4 MR. DUNHAM: And I'm sorry,

5 Mr. Tolliver, do you have the

6 reference, as well?

7 MR. TOLLIVER: I do, yes.

8 MR. DUNHAM: Great.

9 BY MR. DUNHAM:

10 Q If you could turn to PDF page 9

11 out of 27, and it's the page that shows

12 Figure 2?

13 A Okay.

14 Q Mr. Teruya, in connection with

15 the analysis that you performed, did you

16 analyze the mapped path shown in Figure 2

17 with the numbers 5, 4, 6, to server 5?

18 A I did.

19 Q Okay. And what is your

20 understanding of what is shown in the

21 mapped path of 5, 4, 6, 5 in Figure 2 of

22 Crowds?

23 A It -- it's a path that I --

24 I -- I used as a -- as a reference. Hang

25 on. I -- my -- my screen just went away

1 on that.

2 Q Okay. No problem.

3 A Let me try to get it back,
4 here. Okay. What -- what is your
5 question again?

6 Q My question was: What is your
7 understanding of what is shown in the
8 path 5, 4, to 6 to server 5 as depicted
9 in Figure 2 of Crowds?

10 A It's a connection path to talk
11 to server number 5 that, you know, has a
12 path from 5 to 4 to 6 to 5.

13 Q And is it your understanding
14 that the circles shown, for example, 5,
15 4, and 6, that those are Jondo's,
16 J-o-n-d-o, Jondo's?

17 A Yes.

18 Q And is the -- is the square
19 around number five, does that mean that
20 five is a server in that path of 5, 4, 6,
21 5?

22 A Yeah, they define those squares
23 as web servers, yes.

24 Q Okay. And what is your
25 understanding of arrows in Figure 2 such

1 as the arrow that's shown at the end of
2 the dotted line between Jondo5 and
3 Jondo4.

4 A I -- I view those as being
5 the -- the datapath.

6 Q Would you agree that the
7 arrows -- strike that -- would you agree
8 that the arrows shown between Jondo 5 and
9 Jondo 4, that represents a request?

10 A Yes, it's a request that goes
11 from Jondo5 to Jondo 4.

12 Q Okay. And then when Jondo 5
13 sends that request to Jondo 4, does Jondo
14 4, in turn, send that request to Jondo6?

15 A Yes.

16 Q And when Jondo6 receives that
17 request from Jondo 4, does Jondo 6 send
18 that request on to web server 5?

19 A Yes.

20 Q Okay. So at the point in time
21 when Jondo 5 sends a request to Jondo 4,
22 what role is Jondo 5 operating in?

23 A Jondo 5?

24 Q Yes, sir.

25 A I would say that Jondo 5, in

1 this example, is probably acting as a
2 client.

3 Q Okay. And when Jondo 4
4 receives a request from Jondo 5, what
5 role is Jondo 4 operating in?

6 A I believe Jondo 4 is operating
7 as a server.

8 Q Okay. And when Jondo 6
9 receives a request from Jondo 4, what
10 role is Jondo 6 operating in?

11 A It -- it's operating as a
12 client.

13 Q So can you explain for me why,
14 when Jondo 4 receives a request from
15 Jondo 5, it's operating in the role of a
16 server, but when Jondo 6 receives a
17 request from Jondo 4, Jondo 6 is
18 operating in the role of a client?

19 A Because a client makes -- it --
20 it's a client relationship in talking to
21 the web server, as I described in
22 MorphMix, as well, that -- that -- that
23 node number six is making a request and
24 getting a reply from the web server,
25 server 5.

1 Q So is any node that makes a
2 request of a web server and gets a reply
3 from it, is that node a client?

4 MR. TOLLIVER: Objection, form.
5 Objection, foundation.

6 A I don't know how to answer
7 that. I --

8 Q Well --

9 A Any is a big word, right? Any
10 is a -- all -- you know, an
11 all-encompassing word.

12 Q So with respect to the nodes
13 shown in Figure 2 of Crowds, is any node
14 that makes a request of a web server a
15 client, under your understanding of the
16 terms?

17 MR. TOLLIVER: Objection, form.
18 Objection, foundation.

19 A Can you say that again?
20 Because I -- I need to -- for you --
21 based on specificity in what you're
22 asking that I -- that I'm having
23 difficulty with.

24 Q I'm asking you for the nodes,
25 the Jondos shown in Figure 2 of Crowds,

1 is any Jondo that makes a request of a
2 web server a client?

3 MR. TOLLIVER: Same objections.

4 A It -- in the -- in the example
5 you gave me, I defined client six
6 operating as a role of the client when
7 it's talking to server number five.

8 Q Why did you define node 6 as
9 operating in the role of a client when
10 it's talking to server five?

11 A Because you asked me why is it
12 a client, and I -- and I gave you a
13 relationship between five -- server five
14 and -- and node six, and -- and I -- and
15 I defined it because of the request reply
16 nature with the web server.

17 Q So does node four -- Jondo 4
18 have a request reply relationship with
19 Jondo 6?

20 A I believe it does.

21 Q So with respect to the request
22 for reply relationship between Jondo 4
23 and Jondo 6, would Jondo 4 be a client
24 and Jondo 6 be a server?

25 A Well -- ask -- ask me that

1 again, please.

2 Q Sure. With regard to the
3 request, reply relationship between Jondo
4 4 and Jondo 6, would Jondo 4 be a client
5 and Jondo 6 be a server?

6 MR. TOLLIVER: Objection, form.

7 A I would consider Jondo 4 --
8 Jondo 4 to be a server.

9 Q And what would you consider
10 Jondo 6 to be within the request reply
11 relationship between Jondo 4 and Jondo 6?

12 MR. TOLLIVER: Objection, form.

13 A Well, I -- I -- I already said
14 it was the client.

15 Q I'm asking you to --

16 A Oh, you're saying between 5 and
17 6?

18 Q No, I'm asking you to focus on
19 the relationship between Jondo 4 --
20 strike that, let me start again and give
21 you the complete question.

22 I'm asking you between the
23 request reply relationship between
24 Jondo 4 and Jondo 6, would you agree
25 Jondo 4 is a client making the request

1 and Jondo 6 is the server that's going
2 to be responding to that request?

3 MR. TOLLIVER: Objection, form.

4 A I -- I believe that Jondo 6 can
5 have multiple functions as from a role
6 standpoint.

7 Q Okay. So when -- when Jondo 4
8 is making a request of Jondo 6, at that
9 point in time is Jondo 6 operating in the
10 role of a server?

11 A No, I -- I would really
12 classify it as a client device.

13 Q So does Jondo 6 -- in -- strike
14 that.

15 In the path of 5, 4, 6, 5, does
16 Jondo 6 ever have the role of a server?

17 A Not -- not -- not in -- in the
18 generic context, not in the generic
19 context, but it could, it could.

20 Q Okay.

21 A It depends on -- it depends on
22 what passes, it depends on what passes.

23 Q Okay. And in the pathway of 5,
24 4, 6, 5 still, does Jondo 4 operate in
25 both the role of a client some of the

1 time and the server some of the time?

2 MR. TOLLIVER: Objection, form.

3 THE WITNESS: Ask me again,
4 please.

5 MR. DUNHAM: Sure.

6 BY MR. DUNHAM:

7 Q Within the path of 5, 4, 6,
8 server 5, does Jondo 4 operate some of
9 the time in the role of a client and some
10 of the time in the role of a server?

11 MR. TOLLIVER: Objection, form.

12 A I think that Jondo 4 operates
13 more as a -- can be defined more as a
14 server in -- in this context, in -- in
15 the context of that illustration.

16 Q And why is Jondo 4 -- why would
17 you define it, in your words, more as a
18 server?

19 A Because of its role between 5,
20 4, and 6 in this example.

21 Q And what about the role of 4 in
22 this example makes it more of a server,
23 in your view?

24 A Because it's -- it's servicing
25 requests for node number 5.

1 Q Okay. Would you agree that
2 node 6 is servicing requests for node
3 number 4?

4 A Not necessarily. It -- it --
5 it -- it could act as a passthrough in
6 which it's -- it's really the origin of
7 the request could be node number 5.

8 Q Sir, would you agree, under
9 your sworn testimony today, that node 6
10 services requests for node number 4?

11 MR. TOLLIVER: Objection, form.

12 A Well, it's connected to it.

13 Q Yeah, what --

14 A At what -- what -- you know, a
15 request is -- you know, a -- a
16 passthrough is different than a request
17 reply architecture at the HTTP level. So
18 for instance, if -- you know, node
19 number -- node 6 is the requester to
20 return the data from the web server,
21 server 5, okay? So that's why I define
22 it as a client.

23 Q But with respect to the
24 transaction between node 4 and node 6,
25 would you agree that node 6 is returning

1 the data that's been requested by node 4?

2 MR. TOLLIVER: Objection, form.

3 A Returning in what way?

4 Q Would you agree that node 6
5 responds to requests that have been made
6 by node 4?

7 A Well, I need more specificity
8 with that, because it could be a -- a --
9 a passthrough address relay, you know,
10 that's not necessarily a request reply
11 transaction between node 4. Node 4 could
12 be passing, you know, information to node
13 6 that needs to -- to traverse the
14 connection in order to -- to transact
15 something with, you know, server number
16 5.

17 Q Sir, is it your understanding
18 that the arrows between the nodes shown
19 in Figure 2 of Crowds represent requests
20 for content that ultimately reside --
21 resides on the web servers?

22 A Yes, it -- this is, you know,
23 an example instance, yeah.

24 Q So would you agree that node 4
25 is going to return content to node 5 that

1 has been requested by node 5?

2 A Yeah, node 4 will return --
3 will return the information of the
4 request of node number 5.

5 Q And would you agree that node 6
6 will return the information of the
7 request that has been sought by node 4?

8 A I -- I would -- I would more
9 aptly say that node 6 provides a path for
10 that to happen.

11 Q So do you believe that the --
12 strike that. Let me ask my question
13 again. I want to make sure I have a
14 clear record.

15 Would you agree that node 6
16 returns the content that has been
17 requested by node 4?

18 A It provides a path, as I said.

19 Q Does node 4 provide a path for
20 content requested by node 5?

21 A Yes.

22 Q So in that respect, are nodes 4
23 and nodes 6 the same?

24 A No.

25 Q What's different between node 4

1 and node 6?

2 A I -- I believe because node
3 number 5 is deemed as a client there's --
4 there's more interaction in the setup of
5 this connection than there is with node
6 number 6.

7 Q What additional --

8 A That's fin- -- that's -- you
9 know, that's what I surmise from this
10 drawing, okay?

11 Q So that's your surmise; is that
12 correct?

13 A Yes.

14 Q Okay. Do you understand the
15 path of node 4 to node 4 to web server 4
16 as shown in Figure 2?

17 A Say that again?

18 Q Sure. Do you see Jondo 4?

19 A Yes.

20 Q Do you see the circular -- the
21 semicircular comes around with an
22 arrowhead on it where it originates in
23 node 4, Jondo 4 and also ends in Jondo 4?

24 A Yes.

25 Q Did you read the entire Crowds

1 reference?

2 A Yes. Well, caveat, I didn't --
3 I didn't pour through and analyze the
4 statistical analysis. I really only
5 looked at form, structure, and
6 architecture. I mean, I just passed
7 through the sections of statistical
8 analy- -- analysis in looking at the
9 probabilities of anonymity.

10 Q What is your understanding of
11 what the circle with the arrowhead on it
12 represents with Jondo 4?

13 A A Jondo in the crowd.

14 Q Not the circle around the 4,
15 sir, I'm sorry, the circle -- the
16 semicircle with the arrowhead on Jondo 4,
17 what is your understanding of that?

18 MR. TOLLIVER: Objection,
19 outside the scope of direct.

20 A I -- I -- I -- what --

21 MR. DUNHAM: Counsel, if I may,
22 I'll respond to that objection. The
23 witness testified he reviewed the
24 entirety of the reference for the
25 function and flow, and I'm asking him

1 a specific question about the
2 function and flow.

3 MR. TOLLIVER: And same --
4 same -- same objection, outside
5 direct. You can answer.

6 A I -- I -- I don't recall.

7 Q Mr. Teruya, did you consider
8 any of the other mapped paths shown in
9 Figure 2, other than the path of Jondo 5
10 to Jondo 4 to Jondo 6 to web server 5?

11 A Only in -- in context to
12 understanding its structure and
13 architecture of what it was trying to do.

14 Q Okay. So within that context,
15 what is your understanding of the
16 semicircle shown that starts at Jondo 4
17 and returns to Jondo 4?

18 A I -- I don't recall at this
19 point. It's been awhile since I really
20 took this thing apart. And once I
21 started to do the analysis of whether --
22 whether this, which is, again, like
23 MorphMix, a super set of what paths are
24 available to answer the claims in the
25 '319 patent, you know, the other -- other

1 issues or other observations about Crowds
2 became less important than how I -- I saw
3 the paths able to be supported, the '319
4 paths able to be supported by Crowds.

5 MR. TOLLIVER: And I -- I
6 would -- I would kind -- I would
7 just -- I'm sorry, I would kindly ask
8 the witness to -- to pause just for a
9 moment longer between que- -- after
10 the questions to give me a chance to
11 lodge any objections, and as to that
12 last question I do have the same
13 objection as being outside the scope
14 of direct.

15 BY MR. DUNHAM:

16 Q Mr. Teruya, I would ask you to
17 turn to paragraph 99 of your declaration
18 for the '319 patent, please?

19 A Okay. Let me pull that up.

20 Q Okay. I have some questions
21 about the second sentence, and I'm not
22 going to read it verbatim, you're free to
23 read as much as you need, but I want to
24 help focus you on the part of the
25 sentence that I'm interested in, okay?

1 A Okay.

2 Q Okay. So in paragraph 99 of
3 your declaration, in the second sentence,
4 you state: To improve performance a
5 POSITA could have put some higher powered
6 devices in the mix to run as proxy
7 servers without, in those instances,
8 running their own web browsers, and as I
9 said I eliminated some of the words to
10 make it a little clearer; do you see that
11 sentence?

12 A Let -- let -- let me read this,
13 if you would.

14 Q Sure.

15 A Okay. What is your question?

16 Q Certainly. My question is:
17 Are you aware of any disclosure, in
18 Crowds, of a Jondo that does not run its
19 own web browser?

20 A I am not, primarily because the
21 browser is used to con- -- for its crowd
22 connectivity in Crowds.

23 Q So would you agree that for
24 every Jondo that is disclosed in the
25 Crowds reference, that Jondo runs its own

1 web browser?

2 A I believe that Crowds have --
3 you know, you -- you -- you could provide
4 a path using Crowds where the browser
5 becomes benign, you know, by establishing
6 a persistent path for those Jondos, but,
7 you know, that's a -- that's an
8 implementation issue. I think it's an
9 implementation issue.

10 Q So --

11 A To -- to improve the -- the
12 path performance.

13 Q So -- so is it your testimony
14 that -- that in paragraph 99 you're
15 describing a way that someone could alter
16 Crowds to improve its performance?

17 MR. TOLLIVER: Objection, form.

18 A Yeah, I -- I would say that,
19 yeah, that -- that's true, that -- that
20 could be true, yeah.

21 Q Okay. And again, just so my
22 record is clear, would you agree that
23 every Jondo disclosed in Crowds runs its
24 own web browser?

25 A You know, I'd have to go back

1 through Crowds to make sure that there
2 wasn't an exclusion that I may have
3 missed, but my, you know, initial
4 observation is to initiate most
5 connections since Crowds was really, you
6 know, structured in a way where, you
7 know, you -- you'd have a -- a collection
8 of computers that make up the crowd that
9 the connection mechanism was, you know,
10 browser-based.

11 MR. DUNHAM: Okay. Counsel,
12 why don't we take a break? I'm very
13 close to wrapping up, I'd just like to
14 look at my notes. And we can either do
15 it on a short break, maybe 10 minutes, or
16 if the witness wants to take a lunch
17 break, whatever is better for the witness
18 is fine by me.

19 MR. TOLLIVER: I -- I would
20 definitely defer to the witness. A
21 short break is fine by me.

22 MR. DUNHAM: Mr. Teruya, your
23 call.

24 THE WITNESS: That -- that's
25 fine with me, short break.

1 MR. DUNHAM: Okay, let's take
2 about 10.

3 THE VIDEOGRAPHER: The time is
4 3:07 p.m. We are off the record.

5 (Recess.)

6 THE VIDEOGRAPHER: The time is
7 3:19 p.m. We're back on the record.
8 Please proceed.

9 MR. DUNHAM: Mr. Teruya, thank
10 you for your time today. I'll pass
11 the witness.

12 MR. TOLLIVER: On behalf of the
13 Code200 the defendant -- or
14 petitioners, I'm sorry, I have no
15 questions.

16 Mr. Bartlett: No redirect from
17 Major Data.

18 MR. DUNHAM: Great. Thank you.

19 Well, sir, again, thank you
20 very much. I appreciate your time.
21 Always a pleasure to see you.

22 THE WITNESS: Okay. Thank you.

23 MR. TOLLIVER: Thanks
24 everybody.

25 MR. DUNHAM: Okay. Let's go

1 off the record.

2 THE VIDEOGRAPHER: And with
3 that, that concludes the deposition
4 of Mr. Keith J. Teruya. The time is
5 3:20 p.m. We are off the record.

6 (Signature having not been
7 waived, the deposition of KEITH
8 TERUYA was concluded at 3:20 p.m.)

9
10
11
12
13
14
15
16
17
18
19
20
21
22
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

ACKNOWLEDGMENT OF DEPONENT

I, KEITH TERUYA, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct and complete transcription of the testimony given by me and any corrections appear on the attached Errata sheet signed by me.

(DATE)

(SIGNATURE)

1 CERTIFICATE OF SHORTHAND REPORTER
2 I, Cassandra E. Ellis, Registered
3 Professional Reporter, the officer before
4 whom the foregoing proceedings were taken,
5 do hereby certify that the foregoing
6 transcript is a true and correct record of
7 the proceedings; that said proceedings were
8 taken by me stenographically and thereafter
9 reduced to typewriting under my supervision;
10 and that I am neither counsel for, related
11 to, nor employed by any of the parties to
12 this case and have no interest, financial or
13 otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set
15 my hand this 16th day of December 2022.

16
17
18
19
20
21
22
23
24
25

CASSANDRA E. ELLIS, CSR-HI, CSR-VA, CCR-WA,
RPR, CRR
REALTIME SYSTEMS ADMINISTRATOR
NOTARY PUBLIC

1 E R R A T A S H E E T

2 IN RE: CODE200, UAB, et al., v. BRIGHT

3 DATA

4 RETURN BY: _____

5 PAGE LINE CORRECTION AND REASON

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

25 (DATE)

(SIGNATURE)

1 E R R A T A S H E E T C O N T I N U E D

2 IN RE: CODE200, UAB, et al., v. BRIGHT

3 DATA

4 RETURN BY: _____

5	PAGE	LINE	CORRECTION AND REASON
6	_____	_____	_____
7	_____	_____	_____
8	_____	_____	_____
9	_____	_____	_____
10	_____	_____	_____
11	_____	_____	_____
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____
20	_____	_____	_____
21	_____	_____	_____
22	_____	_____	_____
23	_____	_____	_____
24	_____	_____	_____
25	(DATE)	(SIGNATURE)	

A	agreement 2:2 8:17 9:1	anonymity 5:14 83:22 117:9	arrow 106:1	78:19,19 87:10
ability 99:8	agreements 13:17	answer 10:17,19 11:3,13 25:1,5	arrowhead 116:22 117:11 117:16	assigning 77:21
able 40:21 60:19 70:3 73:13 77:2 93:14 119:3,4	ahead 13:15 52:14 61:9	36:15 49:9 68:17 99:20,22 102:6 108:6 118:5,24	arrows 105:25 106:7,8 114:18	assist 14:11
Absolutely 8:12	al 127:2 128:2	answers 79:11	art 22:6 24:21 26:23 27:22 28:6 31:7,16 31:23 32:1,21 33:10 34:22,24 35:3,7,12 36:6 36:23 38:7 50:5,5	assume 67:2 91:21 97:8
academia 28:10	Alaska 9:24	anticipate 8:3	Article 5:15	assumed 61:17
academic 25:14 25:23,24 26:15 27:14	all-encompass... 108:11	anticipates 88:8	articulated 42:22	assuming 92:1
access 72:8 73:7	allow 11:7 61:3 65:20 79:10 88:13 101:12 102:9	apart 118:20	arts 23:21	assumption 93:24
accommodate 22:1	allowed 66:13 66:14	Appeal 1:2 6:6 6:14	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	attached 5:7 125:7
achieve 99:17	alter 121:15	appear 125:6	asking 10:6 14:7 14:8 18:11 37:3,3,5,7,13 37:15,20 42:7 44:16 45:16,20 49:24 58:4 64:13 67:24 70:5 75:21 76:8,9,15 77:22 78:1,13 80:12,23 82:19 84:10 87:6,7 87:23,25 88:21 90:1 94:3 99:23 101:8 102:4,22 108:22,24 110:15,18,22 117:25	attention 55:25
acknowledge 125:2	alternative 25:10,16 26:10 26:16 27:3,6 27:13,16	appearances 6:25	Article 5:15	attorneys 14:14 18:13 23:16
ACKNOWLEDGE... 125:1	alternatives 24:7,11,15	appears 72:12	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	audio 7:10 17:18
act 56:2,10,12 61:16 78:17 83:14 99:10 113:5	amount 27:19 39:14	applicable 32:5 34:6,14,25 35:21	asking 10:6 14:7 14:8 18:11 37:3,3,5,7,13 37:15,20 42:7 44:16 45:16,20 49:24 58:4 64:13 67:24 70:5 75:21 76:8,9,15 77:22 78:1,13 80:12,23 82:19 84:10 87:6,7 87:23,25 88:21 90:1 94:3 99:23 101:8 102:4,22 108:22,24 110:15,18,22 117:25	automatically 48:12
acting 107:1	anal- 117:8	application 28:5	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	available 47:21 61:24 63:1 73:12 74:3 118:24
action 19:5	analysis 27:21 29:2,7 31:6,10 31:20 32:25 33:13 35:10 37:6 38:18 41:6 43:12,19 45:5,23 46:11 47:2 50:3,9 53:13,13 63:3 70:22 74:14 76:11 94:13 101:9,10 104:15 117:4,8 118:21	applied 32:6 46:8 48:23 53:6	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	aware 16:1,5 18:21 19:16 79:6,14,18,19 120:17
added 17:8	analy- 117:8	apply 43:12 44:4 85:19	asking 10:6 14:7 14:8 18:11 37:3,3,5,7,13 37:15,20 42:7 44:16 45:16,20 49:24 58:4 64:13 67:24 70:5 75:21 76:8,9,15 77:22 78:1,13 80:12,23 82:19 84:10 87:6,7 87:23,25 88:21 90:1 94:3 99:23 101:8 102:4,22 108:22,24 110:15,18,22 117:25	awhile 118:19
addition 17:21	analysis 27:21 29:2,7 31:6,10 31:20 32:25 33:13 35:10 37:6 38:18 41:6 43:12,19 45:5,23 46:11 47:2 50:3,9 53:13,13 63:3 70:22 74:14 76:11 94:13 101:9,10 104:15 117:4,8 118:21	applying 45:9 85:17	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	B
additional 31:11 99:15 116:7	analyze 42:5 104:16 117:3	appreciate 54:9 123:20	asking 10:6 14:7 14:8 18:11 37:3,3,5,7,13 37:15,20 42:7 44:16 45:16,20 49:24 58:4 64:13 67:24 70:5 75:21 76:8,9,15 77:22 78:1,13 80:12,23 82:19 84:10 87:6,7 87:23,25 88:21 90:1 94:3 99:23 101:8 102:4,22 108:22,24 110:15,18,22 117:25	B 5:6 34:3 57:1 57:3 75:18,24 76:5,21,24 77:7,14 78:7,8 79:1,7,15,20 80:3,5,10,14 80:16 81:1,2,5 81:12,12,19,19 81:24 82:1,8,9 83:20 85:5,6,7 85:10 90:23,24 92:16,18,19 93:4 97:6,14 97:19,22,22 98:2,3,7,7,15 98:19,19 99:25 100:3,8,25 101:4,18,21 102:12,13,19
address 114:9	analyzed 26:23 31:16 50:7 53:3,6	appropriate 22:6 23:10 41:1 61:11 78:18	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	
Administrator 1:24 2:10 126:22	analyzing 85:16	April 12:18,23 15:11,12	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	
affect 27:20	announced 8:22	apty 115:9	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	
Agile 7:16		architecture 57:11,12 58:20 59:7 67:1 74:25 85:19 99:2 113:17 117:6 118:13	asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	
ago 7:18 93:9			asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	
agree 10:13 11:20 25:18 26:18 51:8 60:15 106:6,7 110:24 113:1,8 113:25 114:4 114:24 115:5 115:15 120:23 121:22			asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	
agreed 9:4,6			asked 24:19 29:11 53:23 55:13 88:5 96:13 98:25 101:13 109:11	

102:20	best 10:7,11	89:23 90:8,10	2:9 6:20	48:24 53:3,7
B's 57:2	11:18 39:13	91:11,17 92:16	certify 126:5	60:10 70:23
B2 5:9	bet 72:9	92:17,19 93:2	chance 119:10	84:17 90:12
Bachelor's	Betsy 72:22	93:10,14 94:1	change 25:7	92:24 118:24
25:12,19	better 23:5	94:8 95:19	26:25 50:25	clarify 10:12
back 13:19	30:22 122:17	96:18,24 97:1	changed 43:8	clarity 15:13
21:18 32:25	big 108:9	97:7,13,19,20	chapter 74:22	102:2
48:9 51:14,20	bit 10:22 19:23	98:2,5,5,17,17	characteristics	classify 111:12
54:13 55:9	51:21	100:1,2,10,11	45:13	clear 10:8 46:4
83:20 87:13	block 16:12	100:13 101:4	CHARHON 3:4	50:13 64:14
98:7,18 99:11	23:17	101:20 102:13	chat 72:10,23	84:8 100:24
103:12 105:3	blocks 17:14	128:1	73:1,14,24	102:10 115:14
121:25 123:7	Board 1:2 6:7,14	cache 79:1,8	check 12:19	121:22
background	boilerplate	caching 78:23	CHERIAN 4:5	clearer 120:10
10:23	23:25	79:16	chronologically	clicked 72:1
Bartlett 3:15 8:7	bold 75:23	California 2:4	28:25	client 43:14,22
8:15 9:5 18:17	bolts 40:9,15,17	call 22:11 56:25	circle 77:3	44:2 45:2
123:16	40:19	122:23	117:11,14,15	47:10,15,17,19
based 29:8	bottom 62:20	CALLAHAN	circles 105:14	48:13,19,23
42:15 48:1	75:7	3:4	circuits 56:22	49:2 51:11
69:9 97:15	Box 62:12 73:3,4	calls 18:18	circular 116:20	53:2,10 56:3,5
108:21	73:19	capability 85:23	circumstances	56:10,15 57:3
basic 10:6 40:23	break 54:21,24	capacity 30:23	60:14	57:20 58:5,24
49:19 50:5,20	55:2,13 103:6	carefully 39:9	cited 17:22	59:15,18,22
54:5	122:12,15,17	40:10	claim 31:25	60:9,16 61:5
basics 21:20	122:21,25	case 1:6 6:12	32:10,12,13	61:13,16,17
basis 69:23	Bright 1:10 6:11	26:24 31:17	33:2,8 34:21	64:1,2,7,18
96:23	127:2 128:2	45:24 56:15	35:1,4,6,12	65:3,8,10,12
beginning 6:3	browser 42:14	57:23 61:18	36:3,5,19,21	66:17 67:4,7
12:18	120:19,21	72:4 74:8 85:3	38:5 39:4,18	67:13,14,16,21
behalf 3:2,14	121:1,4,24	126:12	40:6,16 41:9	67:21,22,25
4:2 12:7,11	browser-based	cases 22:24 23:3	43:13,23 44:5	68:2,4,6,7,12
13:2 14:21	122:10	25:2,4 28:15	44:19 49:17	68:14,16,19,20
15:7,23 123:12	browsers 120:8	Cassandra 1:21	50:3,7,9,19	68:22 69:1,1,2
believe 12:17		2:3 6:22 126:2	51:4 53:25	69:3,8,8,13,18
13:3 15:10	C	126:20	54:2,4 64:12	69:19,20,21,22
22:6 28:1,20	C 3:1 4:1,1 5:1	caveat 117:2	70:24 86:5,19	69:25 70:2,7,8
38:14 46:22	6:1 57:1,2	CCR-WA 1:22	86:24 88:9,19	70:10,12,12,13
54:8 68:18	76:24 77:1,8	126:20	88:22 89:4,11	70:13,17,19,20
80:10 86:10	78:22 79:22	cells 94:22	90:16 91:1	70:24 71:1,3,5
88:20 95:2	81:13,13 82:1	certain 28:2	92:5 95:7	71:11,14 77:16
100:13 103:2	82:9,14,16,19	73:2,4	claiming 40:25	77:20,22,24,25
107:6 109:20	82:22 83:11,11	certainly 43:17	claims 31:21	78:5,9 80:6
111:4 115:11	83:25 84:14,19	95:4 120:16	32:2,6,8,18,20	82:2,23 83:4
116:2 121:2	84:21,21,25	CERTIFICA...	33:3,4,23 39:7	83:15,21 84:2
believed 39:12	85:7,7,9,11	126:1	42:21 45:9	84:12,15,20,22
benign 121:5	89:7,8,13,22	certified 2:3,5,6	46:9 47:5	85:13 89:5,7,9

89:10,14,23	81:7	connection 11:1	92:7,13,18	126:10
90:11,17,21	comment 12:5	13:6 14:1 18:4	93:1 95:16	course 31:18
91:5,6,8,17	common 22:25	18:13 19:17	98:4 101:3,20	40:20 58:2,3
92:12,20,24	34:11 43:6	23:11 24:10	102:13 114:20	court 2:6 6:21
93:3,11 94:7	48:17 50:15	29:2 31:9,19	114:25 115:16	7:3 8:21 88:14
95:10,15,19,23	71:7	41:7 43:11	115:20	courts 66:13
95:24 96:14,16	commonly 48:20	45:6 46:10	context 11:9,12	cover 9:2
96:19 97:1,3	communicating	47:2 55:14	17:20 19:4	covering 8:19
98:8,20 99:15	47:24	56:19 59:8,9	27:9 28:1 36:8	Craig 3:3 52:4
100:5,14,15,17	companies	59:10,19 60:1	37:8 38:22	72:12 73:15
101:22 102:14	65:24	60:5 65:5	44:15 45:15	crowd 117:13
102:21 107:2	company 29:25	66:11 74:7	46:18 52:22	120:21 122:8
107:12,18,19	30:5	76:1 82:18	57:24 58:18	Crowds 5:14
107:20 108:3	compare 36:4,10	84:16 85:23	61:11,12 67:20	32:12,15 33:11
108:15 109:2,5	compared 27:4	91:5,6,7,16	67:24 77:9	103:15 104:22
109:6,9,12,23	53:13 87:17	92:15 93:20	81:5 82:13	105:9 108:13
110:4,14,25	comparing 35:1	97:17 98:2,13	83:2,6,8,9 88:3	108:25 114:19
111:12,25	40:15	104:14 105:10	94:5 99:14,16	116:25 119:1,4
112:9 113:22	comparison	114:14 116:5	102:17 111:18	120:18,22,25
116:3	35:23 36:2	122:9	111:19 112:14	121:2,4,16,23
clients 42:16	38:10 39:16	connectionless	112:15 118:11	122:1,5
45:8 47:16	compatible	59:20,25	118:14	CRR 1:23
close 49:21	37:23	connections	copies 20:3	126:21
122:13	complete 52:23	65:19 91:11,24	copy 20:1,5	CSR-CA 1:21
closed 72:8	54:11 110:21	122:5	61:20	CSR-HI 1:22
cloud 66:9	125:5	connectivity	Coretech 1:6 6:9	126:20
CLVS 4:17	completely 37:9	57:13 91:22	correct 33:5	CSR-VA 126:20
coast 9:22,24	computer 47:18	92:3 99:9	46:21 60:20	Ctolliver@ccr...
Code200 1:4 3:2	computers	120:22	61:6 68:20	3:9
6:7 13:2 14:22	122:8	consider 77:25	72:20 93:16	currently 7:21
15:8,24 18:23	con- 40:5 120:21	110:7,9 118:7	95:11 97:16	customary
19:15 123:13	concentrate	considered	116:12 125:4	41:10,10
127:2 128:2	74:23	69:24	126:6	CV 16:12
collection 5:17	conclude 95:18	consistent 33:19	CORRECTION	
122:7	concluded 124:8	35:22 36:1	127:5 128:5	D
college 26:6	concludes 124:3	56:4	corrections 16:5	D 4:1 6:1 128:1
combination	configurations	construction	16:9,20 125:6	D.C 4:7
26:15	67:4	43:13	correspond	Dallas 3:7
come 23:14	configured 69:3	contacted 12:15	90:11,25	dark 91:20 92:2
24:14 25:3	69:10	15:7	correspondence	data 1:10 3:14
34:8 42:18	confirm 49:15	contain 65:20	12:20 14:4	6:11 12:12,15
51:14	conforming	contained 40:5	corresponding	13:5 14:10
comes 78:17	42:17	contains 85:24	88:24	15:24 18:23
116:21	conforms 42:13	content 42:15	counsel 6:25 8:9	19:15 34:1
comfortable	confusing 93:7	60:7 64:8,19	9:1 10:16	42:12,17 79:1
22:12	connected	67:8 68:1,5,24	17:24 19:21	81:6 83:20
coming 59:21	113:12	69:14 90:21	117:21 122:11	95:21,25 96:18

96:25 113:20 114:1 123:17 127:3 128:3 dataflow 84:6 86:16 90:7 94:19,25 95:3 95:5 103:1 datagram 59:10 datapath 106:5 date 6:17 12:20 13:19 15:20 22:8 125:10 127:25 128:25 day 126:15 day-to-day 28:11 days 17:11 dealing 33:5 December 1:15 6:17 126:15 decided 38:19 declaration 5:10 5:12 12:1 15:1 15:4,8,21 17:2 17:4 18:9 20:12 21:3 22:20,25 23:8 28:20 29:5 41:3 49:13 50:18 51:15,17 51:23 52:18 53:18 54:4,14 55:14,21 76:7 76:13,17 119:17 120:3 declarations 12:7,11,16 13:1,6 14:1,22 15:18,22 16:7 16:17 17:22 19:24 23:18,19 23:23 41:8 deemed 116:3 defendant 123:13 defer 122:20 define 44:21	105:22 109:8 112:17 113:21 defined 60:22,22 65:7 66:25 67:22 70:12 75:20 78:16 79:3,24 84:7 94:7 95:3 101:7 109:5,15 112:13 defines 85:21 defining 102:17 102:18 definitely 122:20 definition 22:11 22:14 36:24,25 37:3,11,16,21 37:22 43:18,20 44:3 45:10,22 46:7 61:1,3,15 70:5 71:8 84:8 90:14 91:25 97:16 definitions 37:23 45:2,3 47:11 degree 25:12,19 deliver 99:8 delve 50:11 depend 64:23 depending 28:15 depends 82:17 101:6 111:21 111:21,22 depicted 105:8 DEPONENT 125:1 deposition 1:14 2:1 6:4 7:20 8:10,18 10:5 11:18 17:1,6 17:25 18:8,15 21:11 124:3,7 depositions 11:5 derived 60:23	describe 35:19 57:12 described 79:23 80:1 86:16 91:4 98:14 107:21 describes 99:3 describing 51:1 121:15 description 5:8 35:5 designated 68:13 69:22 determination 35:18,20 36:11 57:8 60:20 determine 32:6 34:13 61:4 92:3 determined 34:5 34:23 38:25 76:14 determining 36:21 39:2 68:25 devi- 48:3 device 43:14,22 44:1,8,11,14 44:20,22,22 45:11,13 46:24 47:4,6,14,15 47:16,16,20,22 47:23 48:3,15 48:18,24 49:1 51:11 53:2,10 59:15,19,22 60:9 61:5 64:1 64:2,19 65:3,8 65:10,12 66:17 67:4,5,7,13,15 67:21,21,23,25 68:2,4,6,12,19 68:23 69:1,1,2 69:4,8,9,13,19 69:19,20,21 70:2,4,13,16 70:17,25 71:1	71:11,12,13 84:12,15 89:6 89:7,9,10,14 89:23 90:11,18 92:12,20,24 93:3,11 94:7 95:11,15,19,23 95:24,24 96:14 96:15,20 97:1 100:20,20 111:12 devices 66:24 97:3,4 120:6 diagram 69:18 dictate 57:3 difference 27:19 differences 15:21 53:9 different 9:21 23:3 24:2 25:5 37:9 48:11 51:5 75:3 83:19 113:16 115:25 differentiation 71:10 differently 85:21 86:1 99:4 difficulties 17:13 difficulty 11:9 30:11 108:23 dig 16:4 digits 11:22 direct 117:19 118:5 119:14 directed 65:11 directive 29:7 disclosed 39:5 120:24 121:23 discloses 88:18 disclosure 36:5 39:19 76:3 79:7,15,19 88:24 120:17 disclosures	32:15 discuss 21:14 discussed 27:12 discussion 11:16 discussions 17:23 18:3 distinct 45:12 70:9 DNS 48:16 document 40:5 72:2 75:4 documents 17:19 19:21 doing 69:13 71:12 dotted 106:2 download 72:15 73:13,18 downloaded 73:20 drawing 116:10 drawn 65:3 94:22 drill 40:2,3 drop 72:10 100:19 dropped 16:13 72:23 dual 83:12,14,23 84:1 due 31:18 Dunham 4:3 5:3 7:7,13 8:1,12 8:16 9:7,12 20:9,19,24 21:1 46:15,16 49:7 52:4,7,16 54:17 55:1,11 62:4,24 71:22 71:25 72:9 73:11 74:1 80:21,22 93:18 96:11,12,22 103:4,14,23 104:2,4,8,9 112:5,6 117:21 119:15 122:11
---	--	---	--	---

122:22 123:1,9 123:18,25 dyslexic 11:6	15:19 engagement 13:17,20 entire 74:6 116:25 entirety 63:5,16 117:24 entities 19:1,18 entity 44:24 45:1 equations 74:18 equivalent 25:12 26:14 28:13 Errata 125:7 ESQUIRE 3:3 3:15 4:3,4 essentially 15:4 53:25 established 60:2 establishing 121:5 et 127:2 128:2 evaluate 29:9 30:15 evaluation 28:7 28:16 29:12,15 29:17 30:25 71:13 everybody 123:24 exact 87:3 exactly 32:17 35:16,16 EXAMINATI... 5:2 9:11 examined 125:3 example 32:9 33:7 35:11 36:18 43:23 47:18 82:12 89:2 92:2 94:8 94:17 98:23 100:9 105:14 107:1 109:4 112:20,22 114:23 exclusion 122:2	exhibit 5:9,10,12 5:14,16 20:6 20:11,16 21:3 51:19,22,25 54:15 62:1,2,5 62:6,7,14 71:19,20,23 72:1,20 75:6 103:16,18 exhibits 62:10 62:18 71:24 73:3,18 exist 35:7 40:11 40:12 91:24 existence 37:4 exists 36:13 38:2 38:4 65:6 expands 73:20 experience 24:9 25:15,21,24,25 26:14,20 27:3 27:5,15,17,20 28:21 29:3,8 30:2,6,14,24 31:3,11,12 54:20 expert 5:10,12 10:24 explain 23:19 45:21 90:2 107:13 explained 94:20 extends 66:7 extent 29:6 eye 9:18	field 25:13 26:7 26:21 fields 25:19 figure 63:21,25 64:4,13,17 66:18 67:6 75:2,12,16,22 76:19 77:13 80:25 81:11,25 83:25 86:5,7 86:12 87:4,11 87:13,19 88:1 91:10 92:11 93:11 95:18 97:5 98:3,15 98:24 99:25 101:2,19 102:11 104:12 104:16,21 105:9,25 108:13,25 114:19 116:16 118:9 figures 63:8,19 file 73:16,19 filed 15:5 filings 14:15 15:2 fin- 116:8 financial 126:12 find 31:24 32:14 32:22 39:19 88:23 fine 72:11 73:21 122:18,21,25 finish 46:2 79:11 101:12 102:9 firewall 65:20 firms 14:6 first 12:15 15:7 25:9 27:3,12 35:11 37:13 39:6 43:13,22 48:23 53:2,10 58:8,11,21,23 59:15,18,21 60:2,4,6,8,15	61:4 62:6,7 65:13 70:24 72:5 77:11 81:15 84:12,14 89:5,6,8,10,12 89:14 90:11,17 90:19 92:5,7 92:12,13,19,23 92:24,25 93:3 93:10 95:9,10 95:13,15,16,19 five 39:10 105:19,20 109:7,10,13,13 flexibility 85:22 Floor 3:17 flow 33:17,18,18 33:20,22,22 35:19,21 38:12 81:10,15,18 85:6 97:18,25 98:14 117:25 118:2 flows 34:17 focus 24:1 47:4 55:24 63:24 77:5,9 81:15 110:18 119:24 focusing 23:6 follows 9:10 foot 39:6 foregoing 125:3 126:4,5 form 13:8 19:2 19:10 27:24 32:16 33:15 35:15 36:7 38:9 39:23 42:21,24 45:14 46:12 47:8 49:6 50:8 54:7 57:5,21 58:17 59:1 60:11 61:8 64:10,21 65:14 66:20 67:18 68:10 69:16 71:6
		F		
		face 26:3 fact 19:14 29:11 31:2,5 58:9 68:22 89:21 90:8 fair 19:12 familiar 22:22 far 13:19 faster 28:8 feel 57:15		

77:17 78:10	70:8,10,20	goes 68:5 81:13	57:15 87:14	in- 8:24
80:8 87:22	77:23 78:4	106:10	helps 73:15	incarnation 8:24
89:1,24 93:17	82:6,10 84:20	going 8:13,16	hereunto 126:14	individual 29:24
94:14 96:7	84:21,25 85:12	20:2,12 31:22	hesitate 10:10	30:1,20
98:9 100:6	functions 38:6,8	34:22 48:8	higher 120:5	industry 25:14
101:24 102:24	44:1 48:1,12	51:14,20 54:18	hire 30:1,8,15	25:25 27:14
108:4,17 110:6	79:24 111:5	78:17,21,25	history 16:14	28:12
110:12 111:3	fundamental	83:3,3 86:6,14	hold 41:20 96:2	information
112:2,11	28:3	86:17 90:15,18	96:3	56:13,14 57:10
113:11 114:2	further 81:25	99:19,20,21	holding 52:10	79:8 91:19
117:5 121:17	97:12	103:5 111:1	honest 50:23	97:21 98:6,14
format 10:4		114:25 119:22	hope 16:3	98:18 100:3
forth 22:4,15	G	good 6:2 9:13,14	hour 54:19	114:12 115:3,6
51:20	G 6:1	10:2 72:16	103:5	initial 122:3
foundation	GARZA 3:5	103:7	hours 17:5	initiate 122:4
58:17 59:2	Gateway 73:17	great 8:15 9:7	house 8:14	initiates 70:6
60:12 61:9	general 32:18	21:7 22:14	housekeep 8:14	install 48:10,14
67:19 68:11	33:16,21	30:11 53:22	housekeeping	installed 48:2
69:17 77:18	generally 44:23	104:8 123:18	7:14 63:14	65:24 66:23
80:9 89:25	48:4 60:23	greater 30:16	HTML 42:12	instance 16:11
94:15 96:8	generic 111:18	guidance 30:25	HTTP 42:17	48:6 113:18
98:10 100:7	111:18		113:17	114:23
101:25 108:5	gentlemen 9:8	H	Huang 18:17	instances 120:7
108:18	getting 36:8	H 5:6 127:1	hypothesized	instructed 10:17
four 109:17	83:17 107:24	128:1	30:5	interacted 14:5
free 57:15 87:15	give 11:6 37:8	ha- 70:7	hypothetical	interaction
102:6 119:22	39:12 41:8	hand 28:7 64:2	56:24 77:19	18:19 34:1
front 20:1	46:17 48:14	64:3 98:23		116:4
FTP 48:16	54:21 60:25	126:15	I	interactive 34:3
full-time 26:13	67:20 71:18	Hang 71:24	ICS 48:20,20	interest 126:12
26:20	78:12,12 82:25	104:24	identified 20:7	interested 23:7
function 36:24	83:2 96:3	happen 115:10	52:1 62:3	24:13 119:25
37:1,4,16,25	98:23 103:21	happening	71:21 90:17	internal 75:4
38:1,4 47:17	110:20 119:10	28:11	103:19	internet 42:13
47:19 60:17,18	given 29:7 31:1	happens 70:16	identifier 92:7	65:25 66:9,11
60:22,23 68:14	48:2 125:6	77:6	92:14 93:1	invention 22:9
80:2,11 85:2	glitch 72:14	hard 20:1	95:17	40:24 53:24
85:25 86:24	glossed 74:16	hardware 45:18	identifying	54:2
117:25 118:2	go 8:5 13:15	Hawaii 2:6	15:19	investigated
functional 45:3	26:6 33:9 35:1	head 12:3 24:25	illustration	29:10
45:10 99:6	35:12 36:20	53:16	112:15	investigation
functionality	38:6,17 39:2	hear 55:17	implementation	34:19
49:19 50:6,20	40:18 51:20	held 2:2 6:13	121:8,9	invitation 86:3
54:5 61:15	52:14 54:13	help 31:5 45:21	important 42:10	86:22
86:11 94:5,20	61:9 83:22	62:17 99:16	119:2	involved 12:16
functioning	86:9 104:1	119:24	improve 120:4	16:15 19:5,16
47:22 68:16	121:25 123:25	helpful 21:12	121:11,16	involvement

22:23 23:2	120:24,25	41:4,12,16,16	78:11,11,12	34:20 35:4,11
IPR 8:20 12:2	121:23	42:14,15 43:5	86:3 90:15	35:12 36:2
15:2 20:11,17	Jondo's 105:15	43:20 44:20,21	92:4 95:7,8	38:5,11 39:17
51:19,22 54:15	105:16	45:16 47:9,11	123:1,25	40:18 49:11
62:13	Jondo4 106:3	47:12,17,24	letter 16:12	69:12 78:25
IPR2022-00861	Jondo5 106:2,11	48:5,8,9,20	level 28:3 29:8	83:4 86:6
1:7 6:12	Jondo6 106:14	50:12,14,23,24	30:6 113:17	87:15 92:4
IPR2022-915	106:16	51:9 52:7,11	light 41:10	95:7,8,17 98:1
8:11	Jondos 108:25	52:19 53:19	limitations	122:14
IPRs 14:12	121:6	54:20 55:21	29:21 30:12	looked 52:8
19:16 23:12	Joseph 4:17	57:11 59:8	31:25 32:13	74:18,22 117:5
72:12	6:20	60:23,24 61:12	35:1 38:5	looking 27:1,10
issue 11:21 22:7		61:23 66:2,14	39:18	31:21,24 35:2
27:22 31:6	K	73:11 74:15,17	Limited 6:8,8,10	38:4,11 40:8
121:8,9	KAPOUYTIAN	74:18 83:9,10	6:11 10:25	42:20 45:11,12
issues 119:1	3:16	83:17 84:4	limits 73:17	45:17 47:3,6
issuing 89:11	keep 9:18 90:15	91:23,23 94:18	line 54:22 66:6	50:4 51:16
	90:18	102:6 103:17	75:23 106:2	52:9 71:3
J	keeps 73:9	105:11 108:6	127:5 128:5	72:25 82:18
J 5:11,13 6:5	Keith 1:14 2:1	108:10 113:14	lines 65:3 91:20	94:19,25 97:5
124:4	5:2,8,11,13 6:4	113:15,18	92:2	117:8
J-o-n-d-o 105:16	9:9 124:4,7	114:9,12,15,22	link 19:21	looks 62:19
JASON 3:15	125:2	116:9 118:25	list 32:2,3,8,17	66:10 72:22
JBartlett@mk...	kind 23:24	121:3,5,7,25	62:1 71:23	73:1
3:20	44:10,24 72:7	122:3,6,7,9	listed 23:15	lost 71:23
JOB 1:19	119:6	knowledge 23:1	25:20 26:20	lot 17:16 57:6
Jondo 106:8,9	kindly 119:7	30:21 43:7	28:22	LT 1:4,5,7
106:11,12,13	know 7:15,18,21	known 29:19	listings 14:15	lunch 122:16
106:13,17,17	8:4 10:3 11:10	49:20	lists 59:10	lunchtime 9:20
106:21,21,22	13:9,16,18,22	knows 56:6	little 10:22	
106:23,25	14:14,16 16:12		19:23 46:17	M
107:3,4,5,6,8,9	16:13 17:7,10	L	49:18 50:19	M 4:3
107:10,14,15	17:11,12,14,15	L 4:6	54:4 120:10	main 99:18
107:16,17,17	17:17 19:9,20	lags 28:10	live 7:20 8:3	Major 3:14
109:1,17,19,22	21:10,19,19,24	large 73:10 74:6	LLP 3:16 4:5	12:12,14 13:5
109:23,23,24	22:24 23:17,18	Law 7:16	load 72:4 103:21	14:10 15:23
110:3,4,4,5,7,8	23:20,20,24	lawyers 14:8	loaded 60:25	18:23 19:15
110:10,11,11	24:20 25:2,3,5	22:17 24:17	loading 63:2	123:17
110:19,24,24	25:7 26:5,7	lay 94:3,11	lodge 96:4	making 36:11
110:25 111:1,4	28:4,6,12,16	layer 59:12	119:11	70:21 78:24
111:7,8,9,13	29:13,14,18,23	laying 94:6,18	log 7:17	83:15 84:23
111:16,24	29:23 30:2,17	Lee 3:6	long 47:24	93:23 107:23
112:8,12,16	30:18 32:19	left 9:22,23 75:5	longer 17:16	110:25 111:8
116:18,23,23	33:1 34:8,9,10	legal 6:20,23	28:17 119:9	manager 29:25
117:12,13,16	34:20 36:9,13	lengthy 54:22	look 20:4 21:13	30:4,7
118:9,10,10,16	36:14,15 40:7	let's 32:9,11	25:9 26:9	manifestation
118:17 120:18	40:9,10,12,23	38:3,18 77:20	32:12 33:11	44:25 45:1

map 86:12,23 87:19 88:1	messages 59:21	30:19	node 56:2,10	114:6,11,11,12
mapped 85:25 104:16,21 118:8	met 61:4	multiple 14:15 47:25 48:15 100:18 101:13 111:5	57:1,1,1,19 58:8,8,9,10,11 58:12,22,23,23 60:4,5,6,7,8,15 61:4 75:18,18 75:23,24 76:5 76:5,20,21,24 76:24 77:1,7,7 77:8,12,14,15 78:7,8,8,22 79:7,15,20,21 79:22 80:2,3,5 80:10,14,14,16 80:25 81:1,2,5 81:10,12,12,13 81:13,18,19,19 81:24 82:1,1 82:14,16,19,22 83:25 84:14,21 84:25 85:5,9 85:11 89:7,8 89:13,22,23 90:8,10,24 91:7,11,12,13 91:15,16 93:4 93:10,14 94:1 94:8 95:18 96:18,24,25,25 97:6,7,13,14 97:19,19,20,22 97:22 98:2,2,3 98:5,5,7,7,15 98:16,17,19,19 99:25 100:1,1 100:3,8,10,11 100:13,25 101:3,4,18,20 101:21 102:12 102:13,13,18 102:20 107:23 108:1,3,13 109:8,14,17 112:25 113:2,2 113:7,9,10,18 113:19,24,24 113:25 114:1,4	114:6,11,11,12 114:24,25 115:1,2,4,5,7,9 115:15,17,19 115:20,25 116:1,2,5,15 116:15,23
mapping 90:2,6	method 33:4,23 89:5 95:10	muted 102:1		nodes 56:25 57:1 84:11 91:9,21 99:10 108:12,24 114:18 115:22 115:23
match 33:2 34:21 39:13,17 39:20 40:10 87:11 88:5 94:23	mind 16:10 71:12 83:6	<hr/> N <hr/>		Northwest 4:6
material 39:8	minute 21:14 93:9 103:21	N 3:1 4:1,1,1 5:1 5:1 6:1 128:1,1		NOTARY 126:23
materials 18:7 19:25 32:3	minutes 7:18 122:15	name 6:19		noted 7:1
matter 6:5 7:14 59:18	misquote 46:22	names 13:24 14:5,7,8		notes 122:14
MAURIEL 3:16	missed 122:3	narrow 102:16		number 6:12,13 12:2 20:17 21:8 28:8,9,14 28:17,18 51:19 71:19 75:5 105:11,19 107:23 109:7 112:25 113:3,7 113:10,19 114:15 115:4 116:3,6
McMinnville 9:16	Mister 7:13	nature 109:16		numbered 24:7 24:16 61:25
mean 19:4 22:20 23:17,21 25:21 28:24 34:15 36:25 37:11 39:25 41:13,16 48:7 49:22 50:10,15,16,22 56:9,11,17 74:11 87:15 100:16 105:19 117:6	mix 120:6	necessarily 47:13 99:11,13 100:20 113:4 114:10		numbering 75:3 75:7
meaning 41:10 44:21 57:18 60:9	mixture 85:16	need 8:1 10:19 11:9 12:19 16:6 21:14 24:21 29:22,23 59:3 66:22 69:12 74:20 79:11 88:2,2 99:11 102:2 108:20 114:7 119:23		numbers 8:20 11:1 87:3,10 104:17
meanings 56:5	moment 119:9	necessary 18:8		nuts 40:9,15,17 40:19
mech- 33:19	monitor 6:18	necessity 30:15		<hr/> O <hr/>
mechanics 33:19	morning 6:3 9:13,14 10:2	need 8:1 10:19 11:9 12:19 16:6 21:14 24:21 29:22,23 59:3 66:22 69:12 74:20 79:11 88:2,2 99:11 102:2 108:20 114:7 119:23		O 4:1 5:1 6:1 128:1
mechanism 122:9	MorphMix 5:16 71:16 74:3,6 75:2,17 76:4 76:10,12,16,19 77:13 79:7,15 79:20,25 81:11 83:17,25 84:11 84:14,16 85:15 85:17,20,21 86:6,12,24 87:12,18,19 88:8,17,25 89:6,14,22 90:10,24 91:10 92:10 93:2,12 94:1,4,4,6,12 95:6,17 97:6 97:13,16,20 98:3,15,16 99:1,3,7,9,12 99:18,25 101:2 101:19 102:12 107:22 118:23	needed 18:11 29:9 30:18		O'BRIEN 4:4
media 6:4 42:12	mentioned 14:9 14:10 15:17 74:5	needing 8:4		oath 101:18
meetings 17:23 18:3,9	mentorship 30:25	needs 57:7 78:24 114:13		obfuscation 83:18
mentioned 14:9 14:10 15:17 74:5	menu 48:10	neither 126:10		object 10:16
mentorship 30:25	move 30:13,19	NetNut 10:25 12:8 13:5,22 14:9 15:5,23		
menu 48:10		network 47:25 91:23		
		network-related 25:2		
		never 8:4		
		new 3:18,18 23:22		

87:21 96:2 objection 10:18 13:8 19:2 27:24 32:16 33:14,15 35:15 36:7 38:9 39:22 45:14 46:12 47:8 49:5,6 50:8 54:7 57:5,21 58:16,17 59:1 59:2 60:11,12 61:8,9 64:10 64:21 65:14 66:20 67:18,19 68:10,11 69:16 69:17 71:6 77:17,18 78:10 80:8,9 87:22 89:1,24,25 93:17 94:14,15 96:4,7,7 98:9 98:10 100:6,7 101:24,25 102:24 108:4,5 108:17,18 110:6,12 111:3 112:2,11 113:11 114:2 117:18,22 118:4 119:13 121:17 objections 80:18 81:4,22 82:4 82:11 83:1 84:3,18 85:14 90:13 91:2,18 96:21 97:2 98:21 102:15 109:3 119:11 objective 13:11 50:12,12 57:10 57:13 94:10 99:18 objectives 85:24 observation 76:1 122:4	observations 119:1 obtain 96:18,24 obvious 36:10 obviously 20:21 offer 24:6 88:7 88:17 Office 1:1 6:16 officer 126:3 oftentimes 17:14 Oh 9:25 55:19 62:21 89:17 110:16 okay 7:7,25 8:6 8:15 9:17,25 10:1,22 11:25 12:6,10,14,22 12:25 13:4,21 15:6 16:16,24 18:12,21 19:12 20:10,22 21:9 21:21 24:4,23 25:9 26:2,9 37:24 38:23 39:15 41:2,5 42:11,18 43:11 44:3 45:25 46:3,19 49:11 49:14 51:3,8 52:3,7,14,21 54:16,17,25 55:1,1,23,24 56:21 57:25 59:17 60:3,18 61:2,22 62:23 62:25 63:14,23 63:24 67:11 69:11 72:19,22 73:8 75:1,10 75:13,16 76:11 76:23 78:6 80:1,12 81:17 81:24 82:14 83:5 86:8,20 86:20 87:3 89:2,4,4,21 90:15,19 92:4	93:9,22 95:13 97:17 103:4,25 104:13,19 105:2,4,24 106:12,20 107:3,8 111:7 111:20,23 113:1,21 116:10,14 118:14 119:19 119:20,25 120:1,2,15 121:21 122:11 123:1,22,25 old 34:12 once 11:11 34:23 38:24 118:20 ones 39:12 open 20:10,14 21:5 61:20 66:13 opened 62:11 opening 72:11 operate 70:15 99:3,12,14 111:24 112:8 operates 79:16 83:19 96:15 112:12 operating 44:8 44:11 46:25 47:6 67:15 68:7,19 71:2,4 71:14 77:15 78:8 80:6,16 81:2,8,20 82:2 82:16,22 83:10 83:11 85:12 97:22 98:7,19 100:4,13 101:5 101:22 102:13 102:20 106:22 107:5,6,10,11 107:15,18 109:6,9 111:9 opinion 49:16	49:25 50:1 57:17 88:7,17 100:8 opinions 26:25 opportunity 39:13 opposed 70:4 83:21 option 28:23,23 order 11:11 17:18 28:4 29:14 32:5 40:25 57:8 99:16 114:14 ordinary 41:9 41:16 Oregon 9:16 origin 113:6 originally 10:25 originates 116:22 outcome 126:13 outside 117:19 118:4 119:13 overview 75:20 owner 1:11 4:2 6:11 Oxysales 1:6 6:9	24:6,16 25:10 26:12 27:4 31:4,13 41:3 49:12 50:17 52:18 53:18 55:15,18,20 56:1 57:16 76:7 119:17 120:2 121:14 parallel 30:20 Parkway 3:6 part 51:7 68:25 70:6 119:24 participant 74:19 particular 13:10 19:1 22:7 23:14 24:17 25:13,15 26:21 31:23 33:10 34:10,19,24 35:3,6 36:6,20 36:22 38:7,19 38:25 39:5,19 40:17 42:5 44:13 47:3 48:2 57:25 66:3 76:7 80:13,24 94:8 103:1 particularly 23:7 particulars 24:15 36:3,4 39:3 65:17 parties 8:18 13:12,25 14:9 126:11 parts 74:17 party 14:11 15:19 pass 78:22 83:20 99:13 123:10 passed 78:25 117:6 passes 111:22,22 passing 114:12
---	---	---	---	---

passthrough 78:20 113:5,16 114:9	paths 79:24 118:8,23 119:3 119:4	picked 39:11	120:5	55:10 103:13
patent 1:1,2,9 1:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	pathway 77:6 111:23	picking 50:25	position 23:20 30:8	123:8
1:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	pause 119:8	piece 31:23 34:24 35:3 36:6,22 38:7 45:17	possible 97:11	proceeding 42:10
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	PDF 104:10	pieces 88:4	potentially 8:20	proceedings 126:4,7,7
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	peer 30:21	place 37:14 60:2	pour 117:3	process 36:12 40:4,13,13,14 60:25 70:7,14
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	peer-based 85:15	placed 51:10	powered 120:5	Professional 2:8 126:3
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	people 14:6 48:19 65:24	places 36:13	practical 25:14 25:21	profile 66:25
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	Perfect 21:21	planning 7:15	preclude 70:1,2	profiles 67:3
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	perform 49:2	please 7:3,11 10:10 21:7 41:2 46:1 52:19 53:19 55:10,19 61:21 61:23 63:22 71:16 79:10 80:20 86:19 88:13,13 90:18 93:6 97:24 101:12,16 103:13,16 104:3 110:1 112:4 119:18 123:8	preparation 18:4,14	progress 30:12
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	performance 120:4 121:12 121:16	pleasure 123:21	prepared 16:25 28:20 29:5	progression 40:6
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	performed 29:3 33:12 37:6 46:11 104:15	PLL 3:5	preparing 17:6 18:14	properly 17:19
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	performing 31:20 41:6 43:19 45:5 47:2 63:3	plus 25:13,20	present 4:17 23:16 24:17 33:12 35:14 38:8 40:19	protected 72:3 73:6
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	performs 45:12	point 34:2,3 40:8 67:11,12 72:17 75:14 77:12 78:6 80:15,24 84:19 106:20 111:9 118:19	presented 22:17 25:10	protocol 59:25
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	permission 66:24 67:3	points 34:4	pretty 18:10 24:25 34:11,12 36:9 43:6 50:13	provide 14:22 15:8 19:3 23:9 30:24 42:17 45:15 58:18 61:12 115:19 121:3
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	persistent 121:6	politely 99:21	previous 11:4	provided 19:20 57:7
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	person 22:5 23:20 24:20 25:6,22 27:4 27:13,16 29:22 30:7	portion 63:25 64:4	primarily 120:20	provides 42:15 115:9,18
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	personally 31:3	POSITA 22:12 22:15 23:6,10 24:9 27:2 28:22 29:9,13 29:18 31:4,13 49:20 51:9 56:6 64:18	prior 21:10 23:19 26:23 27:22 28:5,5 31:7,16,23,25 32:21 33:10 34:22,24 35:3 35:7,12 36:6 36:23 38:7 50:5 54:20	providing 42:14 56:13 83:21
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	perspective 27:2		privacy 99:17	proxies 50:15
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	pertaining 15:24 20:13		probably 63:9 63:11 107:1	proxy 48:17 49:19 50:6,14 50:20 51:1,2,4 51:10 54:6 63:25 64:8,12 64:20,24 65:4 65:6,13,19,23 66:4,7,8,19 67:5,9,14 68:3 68:6,15,23,24 69:14 78:20,21 78:23 79:16 120:6
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	petition 12:1		problem 103:23 105:2	PUBLIC 126:23
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	petitioners 1:8 3:2,14 6:10 18:22 123:14		proceed 7:5,9	
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	phrase 34:25 42:20 43:21,22 61:5 98:1			
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	physical 44:25 47:23 70:16			
11:11 4:2 5:9,11 5:13 6:6,11,13 6:14,15 11:1 20:7,13 21:4 22:23 23:3 24:22 31:22 32:10 33:9 35:5,19 43:24 44:6,19 49:17 51:18,24 52:1 52:19 53:3,7 53:11,14,19,25 54:3,14 55:15 59:16,24 60:10 61:20 62:15 63:1,5,8,15,16 63:19,22 64:6 67:17 81:6 84:13,17 85:18 85:20 86:4,13 86:18,25 87:5 87:13,18,19 88:19,23 91:1 95:4,8 99:3,6 118:25 119:18	pick 40:25			

resides 114:21	45:4,11 46:25	82:15,22 83:3	64:4 72:14	42:3,5,11,21
respect 83:7	47:7,19 48:1	83:22 84:24	84:6,9 91:12	42:25 43:4,5,6
108:12 109:21	49:2,3 61:1,3	85:4,7,11	92:7,11 116:18	43:8,19 44:5,9
113:23 115:22	61:17 67:15,22	89:22 90:9,20	116:20 120:10	44:12,18 45:3
respond 97:14	68:7,14,19	93:15 94:2	123:21	45:23 46:9,24
117:22	69:22,24 70:8	95:21 96:19,25	seeking 30:7	46:25 47:7,10
responding	70:11,19 71:2	100:12 127:1	selection 38:13	47:23 48:7,9
56:13 111:2	71:5,11,14	128:1	39:10 40:3,22	48:16,16,16,17
responds 97:20	77:16,24 78:5	saw 42:20 119:2	selective 74:21	48:18,21,24
98:5,17 100:2	78:9,12,12,16	saying 51:6	semicircle	49:3,19 50:6
114:5	78:18,20 79:4	65:15 69:2,21	117:16 118:16	50:21 51:2,2,5
response 42:16	80:6,7,16 81:2	72:19 87:20	semicircular	51:10,12 53:2
restricted 18:10	81:8,20,23	94:7 97:18	116:21	53:11 54:6
retained 10:24	82:2,7,10,16	110:16	send 64:8,19	56:4,6 57:4
return 79:1,8	82:22 83:12,14	says 26:19 56:2	65:11,12 66:18	58:5,12 64:1,3
113:20 114:25	83:20,21,23	69:19 70:24	67:7 76:5,21	64:9,12,20,24
115:2,3,6	84:1 85:12	72:18 89:4	76:24 77:2	65:4,6,12,13
127:4 128:4	96:16 97:22	92:6 95:12,14	79:21 90:9	65:19 66:4,7,8
returning 81:6	98:8,19 99:15	schemes 75:4	106:14,17	66:19,19 67:5
113:25 114:3	100:4,13,15,17	scope 117:19	sending 57:19	67:6,8,9,14
returns 97:21	100:21 101:5	119:13	58:22 67:25	68:1,3,6,15,24
115:16 118:17	101:22 102:14	screen 52:12	68:5 69:14,23	69:15 70:11,14
review 11:8 12:4	102:21,25	62:18 104:25	77:24 81:12	70:15 77:3,8
14:4 18:9	106:22 107:5	second 26:10	85:3,10	78:9 80:7,11
21:15 63:4,7	107:10,15,18	27:5,15 44:4	sends 58:8 60:6	80:17 81:3,8
63:16,18	109:6,9 111:5	44:18 45:22	67:13 68:2,15	81:14,20 82:3
reviewed 13:18	111:10,16,25	46:8,24 48:24	68:23 75:18	82:7,10,15,21
17:2,3 27:23	112:9,10,19,21	53:2,11 55:25	77:13 80:2,14	82:23 83:3,3
39:8 47:5	role-based 47:11	58:9,10,12,23	80:25 81:12,14	83:16,20,22
63:15 71:17	roles 48:11,14	60:5,7 84:13	81:19,25 82:8	84:2,13,15,20
117:23	48:15 97:11	84:15 90:22,22	82:15,21 97:7	84:24 85:1,3,4
reviewing 17:21	100:18	90:23,25 91:5	97:19 98:4,6	85:11,13 89:12
33:24	route 59:20	92:6,13,19,25	98:18 100:1,11	89:16,22 90:9
reviews 74:22	row 56:25	95:16 96:4	101:3,19	90:19,20,20,23
right 11:12	RPR 1:22	100:9 102:17	102:12 106:13	90:23,25 91:6
17:20 19:6,9	126:21	102:19 103:3	106:21	91:17 92:6,13
20:14,18 37:17	rules 10:6	119:21 120:3	sense 34:1	92:19,25 93:15
41:17 44:24	run 69:5 98:11	sections 74:24	sensitive 9:19	94:2 95:16,21
55:4,12 56:22	120:6,18	117:7	sent 62:12 77:7	95:25 96:19
71:17 75:7	running 70:14	see 24:5,5,10	sentence 55:25	97:3 98:8,20
76:17 88:1,6	120:8	25:15 26:16	56:7 119:21,25	99:14 100:5,9
89:6 90:21	runs 120:25	31:24 32:4,14	120:3,11	100:12 101:5
91:12,15 98:25	121:23	32:25 33:11,18	series 10:6	101:23 102:14
101:15 108:9	<hr/>	35:5,13 37:22	serious 42:9	102:18,19,21
right-hand 66:6	S	38:1,4,6,7	serve 47:25	103:1,3 104:17
ROBSON 3:4	S 3:1 4:1 5:1,6	39:11 40:16,18	server 41:17,17	105:8,11,20
role 44:1,9,11,22	6:1 77:2 81:15	56:6 62:21	41:21,22,24,25	106:18 107:7

107:16,21,24 107:25 108:2 108:14 109:2,7 109:10,13,16 109:24 110:5,8 111:1,10,16 112:1,8,10,14 112:18,22 113:20,21 114:15 116:15 118:10 servers 45:7 65:23 105:23 114:21 120:7 serves 42:12 service 47:20 50:14 services 113:10 servicing 112:24 113:2 set 22:4,15 118:23 126:14 setup 65:16 116:4 severely 11:5 sheet 125:7 short 54:24 122:15,21,25 Shorthand 2:4,5 126:1 show 12:4 75:11 86:25 88:23 showed 50:5 91:11 shown 66:9,18 67:6 75:22 77:13 80:24 81:11,25 86:12 91:10 93:2,11 98:15 99:24 101:2,18 102:11 104:16 104:20 105:7 105:14 106:1,8 108:13,25 114:18 116:16 118:8,16	shows 63:25 104:11 Shribman 62:22 side 66:7 82:17 Signature 124:6 125:10 127:25 128:25 signed 125:7 similar 34:17 similarity 15:18 single 49:1 sir 10:1,2 42:3,9 46:1 49:9 50:16 51:21 52:24 55:16,19 56:7 63:1 64:13 66:5 68:17 70:24 72:21 74:3 75:9,11 77:22 78:2,14 79:6 79:10 81:10 83:13 86:2,21 86:22 87:6 88:7,14,21 93:19 96:4 99:19 100:25 101:12 102:4,9 102:23 104:3 106:24 113:8 114:17 117:15 123:19 sit 17:9 site 73:4 sits 42:12 sitting 16:4 49:16 66:15 situation 31:1 six 8:20 25:22 27:14 64:1,9 64:20 65:4,13 66:7,8,19 67:5 67:9,14 68:3,6 68:24 69:15 107:23 109:5 109:14 size 73:16	skill 30:16 skill-wise 25:6 skilled 22:5 23:21 24:20 skimmed 74:16 slow 79:12 slowly 30:13 small 17:13 software 48:5 59:5 60:24 61:15 Solutions 6:24 somebody 28:17 28:18 30:14,16 30:23 sorry 13:15 20:16 21:2 23:4 25:24 33:15 41:20 46:1 49:8,12 55:17 63:10 72:2 74:2 86:5 93:19 96:5 98:11 101:25 102:3 103:22 104:4 117:15 119:7 123:14 sorted 62:9,17 sought 32:19 115:7 Sounds 103:7 specific 14:16 31:18 43:12 45:17 57:24 118:1 specifically 24:14 85:8 87:7 specification 41:11 59:23 65:18 66:12 specificity 57:7 59:4 71:9 79:3 108:21 114:7 specifics 50:11 66:23 spend 17:6	spinning 73:9 spoke 18:13 square 105:18 squares 105:22 stack 47:21 83:19 stacks 59:5 standard 25:1 42:14 standpoint 111:6 start 19:22 26:6 31:21 40:8 54:22 110:20 started 7:9,14 16:22 26:7 50:11 118:21 starts 25:11 118:16 state 8:8 19:7 120:4 stated 40:7 statement 96:24 statements 21:12 States 1:1 6:15 stating 69:20 statistical 74:14 117:4,7 stenographer 7:10 stenographic 7:1 stenographica... 126:8 step 33:9,11 35:11,13 36:3 38:18 92:5,8 92:23 95:9,13 step-by-step 33:1 steps 33:8,23 35:18 39:4 40:5 88:22 stipulation 8:9 stop 7:7 straightforward	102:5 Street 3:17 4:6 strike 64:15,25 106:7 110:20 111:13 115:12 structure 64:23 66:3 74:25 117:5 118:12 structured 122:6 study 26:15 submitted 15:23 submitting 11:25 12:7,11 13:1 subset 99:7 substance 16:17 substantive 16:8 substantively 43:10 sufficient 11:7 suit 26:24 Suite 3:6 4:6 super 118:23 supervision 126:9 support 12:1 99:2 supported 95:1 95:4,5 119:3,4 supposed 29:14 52:13 sure 13:13 17:20 18:7 19:7,12 20:24 21:25,25 22:1 23:4 24:1 26:4 27:11 29:1 35:9,21 36:1,17 38:17 46:15 52:17,23 57:14 58:21 62:9,13 63:12 63:13,20 69:6 71:22 80:21 90:4 92:22 96:6,11 97:25 98:13 100:22
---	---	--	---	--

110:2 112:5 115:13 116:18 120:14 122:1 surmise 116:9 116:11 swear 7:4 sworn 7:6 9:10 66:16 100:23 100:23 113:9 SY006106 1:19 Systems 1:23 2:10 126:22	TCPIP 59:11,24 59:25 60:5 technical 23:23 26:7,14 27:17 30:23 technology 22:7 34:10 tell 16:25 18:2 34:14 37:10 39:25 88:4 92:10 102:6 telling 37:18 41:19,21 tells 72:2 tended 74:23 term 22:22 43:1 43:3,4,13 44:4 44:18 46:8 47:10 58:24 59:15 84:12 100:20 terminology 64:11 terms 31:5 41:9 41:15 44:17 48:23 50:3 58:13 67:17 68:8 76:3 80:4 81:21 82:24 108:16 Teruya 1:14 2:1 5:2,8,11,13 6:5 8:19 9:9,13 21:2 54:18 55:12 74:2 103:14 104:14 118:7 119:16 122:22 123:9 124:4,8 125:2 TESA 6:7 TESO 1:4 testified 9:10 46:20,23 53:5 68:18 79:17 86:10 117:23 testify 93:10 testifying 10:24	testimony 66:16 69:7 82:9 87:17 92:17 93:2 100:12,23 101:4,21 113:9 121:13 125:4,5 Texas 3:7 thank 8:13 9:7 10:1,2,15 15:15 16:24 20:22 42:1 52:14 79:13 123:9,18,19,22 Thanks 123:23 thing 36:10 72:18 79:5 118:20 things 8:5 9:20 13:18 21:13 25:7 30:11 37:9 74:15,19 74:21 94:22 think 23:9 28:2 28:8,12,14 30:10 31:8 52:13 64:22 112:12 121:8 third 62:20 THOMAS 4:3 thought 24:19 50:24 three 11:22 13:12,25 26:13 26:19 27:17 56:25 Thursday 1:15 time 6:18 7:16 9:18,21 10:15 10:16 11:8 17:14 24:21 25:8 28:19 29:4 39:14 40:4 48:19 49:3 55:5,8 67:11,13 72:6 77:12 78:7 80:16,24 84:1	84:2 86:1 88:15 103:8,11 103:24 106:20 111:9 112:1,1 112:9,10 123:3 123:6,10,20 124:4 timelines 28:16 times 101:14 today 9:3,15 16:4,21 17:1,6 17:25 18:5 20:3 42:9 49:17,25 66:15 100:23 101:18 113:9 123:10 Today's 6:17 told 38:14 Tolliver 3:3 7:12 7:25 8:6 9:4 13:8 18:16,20 19:2 20:15,22 27:24 32:16 33:14 35:15 36:7 38:9 39:22 45:14 46:12 47:8 49:5 50:8 52:6 52:11 54:7 57:5,21 58:16 59:1 60:11 61:8 62:16 64:10,21 65:14 66:20 67:18 68:10 69:16 71:6,25 72:16 72:25 73:22 77:17 78:10 80:8,18 81:4 81:22 82:4,11 83:1 84:3,18 85:14 87:21 89:1,24 90:13 91:2,18 93:17 94:14 96:2,6 96:21 97:2 98:9,21 100:6	101:24 102:15 102:24 103:7 104:5,7 108:4 108:17 109:3 110:6,12 111:3 112:2,11 113:11 114:2 117:18 118:3 119:5 121:17 122:19 123:12 123:23 Tom 20:15,15 Tomd@cheria... 4:9 top 12:3 24:25 39:10 53:15 94:4,6,18,23 total 25:23 27:19 track 28:9 Trademark 1:1 6:16 transact 114:14 transaction 68:4 80:13 113:24 114:11 Transactions 5:15 transcript 5:7 126:6 transcription 125:5 Transperfect 6:23 traverse 114:13 Trial 1:2 6:6,14 tried 7:17,23 72:13 87:18 trouble 72:24 true 9:25 121:19 121:20 125:4 126:6 try 9:18 32:14 39:18 105:3 trying 22:1 27:8 27:9 29:25 35:9,24,25
---	--	--	--	---

36:17 39:16 46:6 52:23 54:11 69:6 72:17 85:7 90:3,4 93:5 94:9,12,23 96:16 99:17 103:20 118:13 turn 21:7 41:2 49:12 52:17 53:17 55:15,20 63:21 75:1 76:23 104:10 106:14 119:17 two 11:21 13:1,7 14:2,12,23 15:24 24:2,6,8 24:11,15,16 25:13,20 28:8 28:18,23 31:6 37:9 59:9 75:3 76:2 type 44:13 47:3 50:14 types 74:17 typewriting 126:9 typical 73:17	96:17 97:6 116:14 understandable 10:8 understanding 14:19,20,25 28:3 32:18 33:17,21 37:12 38:14 40:23 41:24 42:4,19 42:22,24 43:4 44:12,17 46:23 48:22 49:1 50:2 53:1,4,10 53:24 54:1 58:4,13,24 59:14 60:8 64:7,17 65:2 65:10 66:5 67:12,16 70:25 75:17,22 76:4 76:10,16,20 77:15 78:2,3 78:14,15 80:4 80:15 81:1,21 82:24 83:24 84:11 85:9 89:9 94:1 95:23 96:14 97:13 100:4 101:9,10 104:20 105:7 105:13,25 108:15 114:17 117:10,17 118:12,15 understood 68:8 United 1:1 6:15 upper 75:5 91:12,15 use 17:15 19:22 32:23 34:24 48:20 53:1,4 71:9 87:24,24 89:5 utilized 53:12	<hr/> V <hr/> v 1:9 127:2 128:2 various 14:6 32:4 verbal 8:25 verbatim 119:22 versus 6:10 viable 38:15,20 39:1 video 7:8 videographer 6:2,21 55:5,8 103:8,11 123:3 123:6 124:2 Videotaped 1:14 view 39:7 51:3 106:4 112:23 viewed 43:25 44:7 virtual 44:25 virtually 15:3 visual 17:18	68:7 69:9 84:7 114:3 121:15 122:6 ways 99:7 we'll 7:9 56:25 76:17 we're 9:2,2,20 19:11 33:5 59:5,24 72:2 85:16 86:6 93:23 103:12 123:7 we've 14:10 19:20 27:12 51:15 54:18 103:4 web 5:15 41:17 41:17,21,22,24 41:25 42:3,4 42:11,20,25 43:4,5,5,6,8,18 48:15 51:12 64:3 65:11 66:19 67:5,8 68:1 90:20 105:23 106:18 107:21,24 108:2,14 109:2 109:16 113:20 114:21 116:15 118:10 120:8 120:19 121:1 121:24 weeds 74:14 102:3 went 32:4,22,24 39:7 74:9,9 104:25 WHEREOF 126:14 whichever 75:9 Windows 48:7 48:13,18 wish 16:21 witness 7:4,6,23 46:13 52:3 54:21,25 55:4	62:21 72:7 73:8,25 80:19 96:5,9 103:20 103:25 112:3 117:23 119:8 122:16,17,20 122:24 123:11 123:22 126:14 WOODS 3:16 word 23:6 56:16 56:17 108:9,11 words 50:25 51:6 112:17 120:9 work 11:18 26:15 30:3,9 73:21 74:7 working 7:21 20:2 54:10 99:1 wouldn't 21:23 29:20 30:9 34:7 wrapping 122:13 wrote 49:23
<hr/> U <hr/> U 4:1 128:1 UAB 1:4,4,5,6,7 6:7,8,9,9,10 127:2 128:2 ultimately 65:11 114:20 understand 10:20 22:3 28:4 29:20,22 35:9,25 36:18 38:21 45:21 46:7 52:25 64:15,18,25 66:17 67:9 69:7 81:16 85:8 90:5 93:5 94:10 95:9		<hr/> W <hr/> W 3:17 waived 124:7 walk 81:9 88:21 want 9:18 19:22 38:17 49:15 51:14,20 52:25 61:11 71:18 77:5 81:9,9,15 96:9 100:22,24 102:10 115:13 119:23 wanted 18:6 19:22 21:25 wants 122:16 warrant 34:18 Washington 2:7 4:7 wasn't 94:17,21 122:2 way 11:17 18:24 27:20 37:19 57:15 60:4	105:23 106:18 107:21,24 108:2,14 109:2 109:16 113:20 114:21 116:15 118:10 120:8 120:19 121:1 121:24 weeds 74:14 102:3 went 32:4,22,24 39:7 74:9,9 104:25 WHEREOF 126:14 whichever 75:9 Windows 48:7 48:13,18 wish 16:21 witness 7:4,6,23 46:13 52:3 54:21,25 55:4	<hr/> X <hr/> x 1:3,12 5:6
			<hr/> Y <hr/> yeah 22:13 43:1 45:25 50:1,1 51:7 52:11 63:2 105:22 113:13 114:23 115:2 121:18 121:19,20 year 15:11 years 23:2 25:13 25:20,22 26:13 26:19 27:14,17 yep 73:24 York 3:18,18	
			<hr/> Z <hr/> Zip 73:19	

zones 9:21	62:13 72:12	3:20 124:5,8	111:7,15,24,24	51:18,23,25
Zoom 1:14	1493 8:23 51:19	30,000 39:6	112:7,8,12,16	52:19 53:3,11
<hr/>	51:22 72:13,17	31- 99:5	112:20,21	53:19,25 57:18
0	15 1:15 3:17	319 5:11 11:22	113:3,10,24	58:6,14,25
<hr/>	7:18	20:6,13 21:4	114:1,6,11,11	60:10 61:6
1	15th 6:17	31:22 32:10,13	114:24 115:2,7	63:15,19 68:9
1 1:20 62:19	16 64:2	33:8 43:24	115:17,19,22	70:23 80:5
63:22,25 64:4	165 55:15,18,20	44:5,19 45:6	115:25 116:15	587-7263 3:8
64:13,17 66:18	56:1	46:10 48:25	116:15,15,18	<hr/>
67:6 86:5	166 57:16	49:17 51:16	116:23,23,23	6
89:11	16th 126:15	53:6,14 54:2	117:12,14,16	<hr/>
1:11 55:9	1901 4:6	54:14 55:14,20	118:10,16,17	6 104:17,21
10 7:18 122:15	<hr/>	57:18 58:6,14	415 3:19	105:8,12,15,20
123:2	2	58:25 59:16	460 3:6	106:17 107:8
10-minute 55:2	2 104:12,16,21	60:10 61:5,20	469 3:8	107:10,16,17
103:6	105:9,25	62:14,25 63:4	475 1:22 2:6	109:8,19,23,24
10,257,319 1:10	108:13,25	63:8,22 64:6	<hr/>	110:4,5,10,11
5:9 6:13 11:2	114:19 116:16	67:17 68:9	5	110:17,24
10,484,510 11:2	118:9	70:23 80:4	5 104:17,17,21	111:1,4,8,9,13
1001 5:9 62:2,5	2:13 103:9	81:6 84:13	104:21 105:8,8	111:15,16,24
62:14	2:37 103:12	85:18,20,25	105:11,12,12	112:7,20 113:2
10010 3:18	20 5:10 48:7	86:4,13,17,25	105:14,20,21	113:9,19,24,25
1003 5:14	2000 48:7	87:18 88:11,19	106:8,12,18,21	114:4,13 115:5
1005 5:10,12	2000s 25:4	88:23 90:12,16	106:22,23,25	115:9,15,23
20:6,11,17	2003 48:9	91:1 92:5,24	107:4,15,25	116:1,6 118:10
21:3 51:19,22	20036 4:7	94:3,6,11 95:3	110:16 111:15	62 5:9
51:25 54:15	2005 43:9	95:8,14 99:2,6	111:15,23,24	<hr/>
1006 5:14	2009 24:22	118:25 119:3	112:7,8,19,25	7
103:16,18	49:21 51:9	119:18	113:7,21	<hr/>
1008 5:16 71:20	2012 48:8	32 64:3 65:12	114:16,25	700 4:6
71:23 72:1,20	2015 43:9	66:19 67:6,8	115:1,4,20	71 5:16
1010 62:8	2019 48:8	68:1	116:3 118:9,10	738-6334 3:19
118 75:8,10	202 4:8	3333 3:6	110:16 111:15	7521 3:7
12:05 1:16 6:19	2022 1:15 6:18	3484 1:22 2:7	111:15,23,24	7th 3:17
12:59 55:6	12:23 15:12	37 49:12 50:17	112:7,8,19,25	<hr/>
128 1:20	126:15	53:18	113:7,21	8
13 41:3 52:18	26th 3:17	<hr/>	114:16,25	<hr/>
14 64:1,7,19	27 21:8 22:4,15	4	115:1,4,20	823848 1:23 2:9
65:3,8,10,12	23:8 24:6,16	4 104:17,21	116:3 118:9,10	838-1567 4:8
66:17 67:5,7	25:11 26:12	105:8,12,15,20	110:16 111:15	861 8:21
67:13,15,21,21	27:4 31:4,13	106:9,11,13,14	111:15,23,24	862 8:21
67:25 68:2,4,6	104:11	106:17,21	112:7,8,19,25	<hr/>
68:12,19,23	<hr/>	107:3,5,6,9,14	113:7,21	9
69:1,2,8,13,19	3	107:17 109:17	114:16,25	<hr/>
14448 1:22 2:5	3 87:4,11,13,19	109:22,23	115:1,4,20	9 5:3 104:10
1492 8:23 12:2	3:07 123:4	110:2,23	116:3 118:9,10	915 8:22
20:11,20 54:15	3:19 123:7	110:4,4,7,8,11	117:12,14,16	916 8:11,22
		110:19,24,25	118:10,16,17	98 75:6
			415 3:19	99 119:17 120:2
			460 3:6	121:14
			469 3:8	
			475 1:22 2:6	
			<hr/>	
			5	
			5 104:17,17,21	
			104:21 105:8,8	
			105:11,12,12	
			105:14,20,21	
			106:8,12,18,21	
			106:22,23,25	
			107:4,15,25	
			110:16 111:15	
			111:15,23,24	
			112:7,8,19,25	
			113:7,21	
			114:16,25	
			115:1,4,20	
			116:3 118:9,10	
			5.1 75:2,12,17	
			75:23 76:19	
			77:13 80:25	
			81:11,25 83:25	
			86:7 88:1	
			91:10 92:1,1	
			92:11 93:11	
			95:18 97:5	
			98:3,16,24,24	
			99:25 101:3,19	
			102:11	
			51 5:12	
			510 5:13 11:23	
			31:22 45:7	
			46:10 48:25	