

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

Case IPR2021-01492
Case IPR2021-01493

Case IPR02022-00915
Case IPR02022-00916

VIDEOCONFERENCE DEPOSITION OF:

TIM WILLIAMS, PH.D. - 02/23/2023

CODE200, UAB; TESO LT, UAB; METACLUSTER LT, UAB;
OXYSALES, UAB; AND CORETECH LT, UAB,

Petitioners,

v.

BRIGHT DATA LTD.,

Patent Owner.

MAJOR DATA UAB,

Petitioner,

v.

BRIGHT DATA LTD.

Patent Owner.

The deposition of TIM WILLIAMS,
PH.D. was taken by the Petitioner on February 23,
2023, commencing at the hour of 9:04 a.m. Pacific
Time, before ROSIE STAHL, Shorthand Reporter and
Notary Public.

Job No: 6618

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R E M O T E
A P P E A R A N C E S

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1	I N D E X		
2	EXAMINATION OF TIM WILLIAMS, PH.D.:		PAGE
3	February 23, 2023		
4	By Mr. Tolliver		4
5	By Mr. Bartlett		196
6	DEPOSITION EXHIBITS:		INITIAL REFERENCE
7	Exhibit 1006	Crowds: Anonymity for Web Transactions	Page 125
8		Michael K. Reiter	
9		Bell Laboratories, Lucent Technologies	
10	Exhibit 1012	United States Patent	Page 152
11		Border et al.	
12		US006795848B1	
13		(10) Patent No.: US	
14		6,795,848 B1	
15		(45) Date of Patent:	
16		Sep. 21, 2004	
17	Exhibit 1013	Memo: Hypertext Transfer Protocol	
18		HTTP/1.1	
19	Exhibit 1107	Photograph of IBM	Page 122
20		Computer	
21	Exhibit 1108	MacBook Pro (16-inch, 2023) Technical	Page 68
22		Specifications	
23	Exhibit 1109	iPhone 14 Pro Max -	Page 73
24		Technical	
25		Specifications	
26	Exhibit 1110	Mac mini Server (Late 2012) Technical	Page 101
27		Specifications	
28	Exhibit 2040	Appendix to	Page 178
29		Declaration of Dr.	
30		Tim Williams	

1 TIM WILLIAMS, PH.D.,
2 Being first duly sworn, was examined and testified
3 as follows:

4 EXAMINATION

5 BY MR. TOLLIVER:

6 Q Good morning, Dr. Williams.

7 A Good morning.

8 Q My name is Craig Tolliver, and I
9 represent the petitioners in the IPR numbers
10 2021-01492 and 01493. And those are -- the IPRs
11 that you might know is the -- you know, the code
12 200, the IPRs concerning the 319 and 510 patents.

13 And also attending is Jason
14 Bartlett, and he -- well, Jason, I'll let you
15 introduce yourself.

16 MR. BARTLETT: I'm representing the
17 Major Data petitioners in the IPRs having the
18 numbers 915 and 916.

19 THE DEPONENT: All right. Nice to
20 meet you.

21 MR. BARTLETT: Nice to meet you.

22 BY MR. TOLLIVER:

23 Q Dr. Williams, do you understand that
24 you are here today to provide deposition testimony
25 with respect to all four of those IPRs?

1 A Yes.

2 Q Okay. And sir, the reason that
3 we're doing this is rather than subject you to, you
4 know, four separate depositions, because of some
5 overlap that's involved in these IPRs, we decided
6 that we could really just do it in one sitting.

7 Does that make sense?

8 A Sounds good.

9 Q Okay. Do you recall submitting a
10 declaration in the two code 200 IPRs concerning the
11 319 and 510 patents?

12 A I do, yes.

13 Q Would you agree with me that the
14 declarations that you submitted in the 915 and 916
15 IPRs, the Major Data IPRs concerning the same
16 patents, would you agree those declarations are
17 substantially identical, for lack of a better word?

18 A Yes, they are.

19 Q Okay. And actually, would you
20 agree, sir, that your declarations, even between
21 the two patents -- so your declaration regarding
22 the 319 patent IPR and your declaration concerning
23 the 512 patent IPR, that those declarations are
24 also quite similar?

25 Would you agree with that?

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