



Planet Depos[®]
We Make It *Happen*[™]

Transcript of Dr. Michael Allen Jensen

Date: May 3, 2023

Case: Apple, Inc., et al -v- Smart Mobile Technologies LLC (PTAB)

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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

3 APPLE INC.; SAMSUNG ELECTRONICS :
4 CO., LTD.; and SAMSUNG :
5 ELECTRONICS AMERICA, INC., :
6 Petitioners, : IPR 2022-00808
7 versus : Patent No.
8 SMART MOBILE TECHNOLOGIES LLC, : 8,442,501 B1
9 Patent Owner. :

10 VIDEOTAPED DEPOSITION OF
11 DR. MICHAEL ALLEN JENSEN

12 9:00 a.m.

13 May 3, 2023

14 CONDUCTED REMOTELY

15
16
17 Susan DiFilippantonio, RPR, CCR No. B-2125
18
19
20
21
22

1 APPEARANCES:

2 On Behalf of the Petitioners, APPLE INC.; SAMSUNG
3 ELECTRONICS CO., LTD.; and SAMSUNG ELECTRONICS AMERICA,
4 INC.:

4 HAYNES AND BOONE, LLP
5 BY: Adam Fowles (via videoconference)
6 2323 Victory Avenue
7 Suite 700
8 Dallas, TX 75219
9 214.651.5116
10 adam.fowles@haynesboone.com

8 On Behalf of the Patent Owner, SMART MOBILE TECHNOLOGIES
9 LLC:

9 SKIERMONT DERBY LLP
10 BY: Todd Martin (via videoconference)
11 1601 Elm Street
12 Suite 4400
13 Dallas, TX 75201
14 214.978.6600
15 tmartin@skiermontderby.com

13 SKIERMONT DERBY LLP
14 BY: Rex Hwang (via videoconference)
15 633 West 5th Street
16 Suite 5800
17 Los Angeles, CA 90071
18 213.788.4500
19 rhwang@skiermontderby.com

18
19 Also Present: Kollin Caerez, Planet Depo Technician
20
21
22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

	I N D E X		P A G E
WITNESS/EXAMINATION			
DR. MICHAEL ALLEN JENSEN			4
EXAMINATION			4
BY MR. MARTIN			
CERTIFICATE OF REPORTER			135
SIGNATURE OF DEPONENT			137

E X H I B I T S

(None Tendered.)

1 (Wednesday, May 3, 2023 9:00 a.m.)

2 THE TECHNICIAN: Thank you to everyone
3 for attending this proceeding remotely, which we
4 anticipate will run smoothly. Please remember --
5 remember to speak slowly and do your best not to
6 talk over one another. Please be aware that we are
7 recording this proceeding for backup purposes. Any
8 off-the-record discussion should had -- be had away
9 from the computer. Please remember to mute your
10 microphones for those conversations. Please have
11 your video enabled to help the reporter identify
12 who is speaking. If you're unable to connect with
13 video and are connecting via phone, please identify
14 yourself each time before speaking. We will
15 provide a complimentary unedited recording of the
16 deposition with purchase of a transcript. I
17 apologize in advance for any technical-related
18 interruptions. Thank you.

19 (Witness sworn.)

20 DR. MICHAEL ALLEN JENSEN,
21 called as a witness was examined and deposed as follows:

22 EXAMINATION

1 BY MR. MARTIN:

2 Q. Okay. Dr. Jensen, how are you doing today?

3 A. Great. How are you?

4 Q. I'm doing great. Nice to be here with you. And
5 if you could, could you please give us your full name
6 for the record?

7 A. Yes. Michael Allen Jensen.

8 Q. Okay. And would you mind just spelling that for
9 us just so it's all clear?

10 A. Sure. Michael, M-I-C-H-A-E-L, Allen, A-L-L-E-N,
11 Jensen, J-E-N-S-E-N.

12 Q. Okay. And you understand that you are under
13 oath today, correct?

14 A. Yes, sir.

15 Q. Okay. And is there any reason why you can't
16 give your full and accurate testimony today?

17 A. No.

18 Q. Have you ever been deposed before?

19 A. Yes.

20 Q. How many times have you been deposed?

21 A. I -- I lose track. We're probably around 14, 15
22 times.

1 Q. Okay. So you're familiar with this process,
2 then; is that fair?

3 A. I believe so, yes.

4 Q. All right. I'm going to -- and I -- I'm going
5 to -- plan to ask you a few questions later about how
6 many times you've been deposed, but just wanted to go
7 ahead and lay down some ground rules just so that we're
8 on the same page. I think it's always helpful.

9 So the first thing is breaks. Any time you need
10 a break, feel free to ask me so it doesn't -- the only
11 caveat to that being if there's a pending question, I
12 would -- I'm going to ask you to finish your answer to
13 the question before you go take a break. But I just
14 want to be clear, so any time you need a break, just let
15 me know.

16 A. All right.

17 Q. Also I'm going to plan probably to take a break
18 about every hour, or your counsel might ask for a break
19 at some point in time, but that's typically how things
20 operate.

21 If I -- if I ever ask you a question that you
22 don't understand, please let me know and I can try to

1 rephrase it. Is that -- is that fair?

2 A. Yes, sir.

3 Q. Okay. And I'm going to do my best to make sure
4 that the questions are clear, but sometimes I'm not
5 perfect, so it might not come across. And if you don't
6 let me know, I'm going to assume that you understand the
7 question. Is that fair?

8 A. Yes, sir.

9 Q. Okay. Now -- and another thing that comes up
10 is, please try to just wait until I'm completely
11 finished with my question. I might -- I kind of have a
12 bad habit of pausing, so if you can wait until I'm
13 finished, it will make a better record and make it
14 easier on the Court Reporter. Does that make sense?

15 A. Yes.

16 Q. And also your counsel at different points in
17 time may want to interject after I ask a question with
18 an objection -- or I -- sorry, not your counsel, but
19 counsel for the petitioner. So after I finish asking a
20 question, if you can pause for a little bit to give your
21 -- to give counsel an opportunity to add an objection,
22 then that would be helpful.

1 A. I will do my best.

2 Q. Okay. And, of course, that may not be -- I
3 mean, nobody expects you to be perfect, but that's all
4 anyone can ask.

5 Now, one thing about breaks is during breaks I
6 would ask that you not consult with anyone else about
7 your testimony during any breaks. So it's just we're
8 trying to get your ideas and your opinions and nobody
9 else's for today.

10 A. I understand.

11 Q. Is there anybody else in the room with you?

12 A. No, sir.

13 Q. Are you in communication with anyone else?

14 A. No.

15 Q. Okay. Do you have anything beside you? Is
16 there anything -- any papers, any -- any notes that you
17 might look at?

18 A. No, there's no notes. I have -- I have a stack
19 of papers on the desk, but I don't have any notes
20 relevant to these proceedings.

21 Q. Okay. So the -- the papers on your desk there,
22 you don't have anything -- any of the exhibits that you

1 have cited in your declaration or any paper copies of
2 anything?

3 A. I don't have paper copies of anything --

4 Q. Okay.

5 A. -- like that.

6 Q. Are you running any other programs on your
7 computer other than this deposition interface?

8 A. So what I have open other than the deposition
9 interface is I do have Adobe Acrobat open, and there I
10 have electronic copies of several documents, clean
11 copies of several documents.

12 Q. Okay. What -- they're all clean. What
13 documents are those?

14 A. So the '863 Patent, a clean copy of my
15 declaration, and then the primary exhibit -- the primary
16 references that I relied on for my declaration.

17 Q. Okay. So --

18 A. And then I have Windows Explorer open with other
19 exhibits in case you should ask me to look at those.

20 Q. So all -- everything that you have open, they
21 are exhibits that you cited in your declaration; is that
22 correct?

1 A. Yes, other than my declaration -- yeah, other
2 than my declaration, yes, the rest are exhibits,
3 correct.

4 Q. Okay. And the Windows Explorer, those are all
5 -- all the exhibits you have on there, those are all
6 clean copies?

7 A. Those are all clean copies, yes, sir.

8 Q. Okay. So everything you have is a clean copy?

9 A. Yes, sir.

10 Q. Okay.

11 MR. MARTIN: So if we can, can we open up
12 Exhibit 1003, please.

13 THE WITNESS: And to be clear, you're
14 asking the tech to bring it on screen?

15 BY MR. MARTIN:

16 Q. Yes.

17 A. Okay.

18 Q. Yes, I'm asking the tech to bring it on screen.

19 THE TECHNICIAN: Give me one second. I'm
20 pulling it up now.

21 Exhibit 1003 should be on your screen
22 now.

1 BY MR. MARTIN:

2 Q. Okay. And can you see that, Dr. Jensen?

3 A. Yes, sir.

4 Q. And that is your exhibit in this case, correct?

5 A. This is the title page, the front page of my
6 declaration in this case.

7 Q. Okay. So -- and if I refer to this as your
8 declaration, you will understand what I'm talking about;
9 is that fair?

10 A. Yes, sir.

11 Q. Okay. And if we look at paragraph 1, you see
12 here that we have identified -- you have identified the
13 petitioner in this IPR, and that is Apple Inc. So when
14 I refer to Apple Inc. as the petitioner, you will know
15 who I'm talking about, correct?

16 A. Yes, that's correct.

17 Q. Okay. And this IPR is related to U.S. Patent
18 8,982,863. Is that your understanding?

19 A. Yes, sir.

20 Q. And if I refer to that patent as the '863
21 Patent, you'll understand that I am referring to Patent
22 Number 8,982,863, right?

1 A. Yes.

2 Q. Okay. And if I refer to the patent owner, you
3 understand that I'm referring to the owner of the '863
4 Patent. Is that fair?

5 A. Yes.

6 Q. Okay. So, Dr. Jensen, are you being compensated
7 for your role with respect to these IP -- this IPR
8 proceeding?

9 A. Yes. As I say in my declaration, I am being
10 compensated.

11 Q. Are you being paid hourly?

12 A. Yes, sir.

13 Q. And what is your hourly rate?

14 A. \$475 per hour.

15 Q. Is there -- now, besides the hourly part of your
16 compensation, is there any flat-rate component to how
17 you're being paid?

18 A. No, sir.

19 Q. Okay. So it's straight hourly compensation?

20 A. Yes, sir.

21 Q. And were you given a budget of any kind?

22 A. No, not a budget.

1 Q. Okay. When were you retained to provide your
2 opinions in this IPR?

3 A. I don't recall. It seems well over a year ago,
4 maybe two. I don't recall, but it was -- it's been some
5 time ago.

6 Q. Okay. So do you know if it would have been 2022
7 or 2021?

8 A. I believe it was approximately a year ago in
9 2020 -- early 2022, but I'm -- it's -- I am not -- I'm
10 not entirely certain.

11 Q. Okay. And to date, can you estimate how much
12 you've invoiced for this IPR proceeding?

13 A. I -- I -- I don't think I can. There have
14 been -- I've been involved in many different patents in
15 this family of patents for IPRs, and it's very difficult
16 for me to remember how much time I spent on each one, so
17 I would have to -- I would have to look at that. Tens
18 of hours, but beyond that, I cannot be specific.

19 Q. Okay. So you're unsure how much time you've
20 spent working on this specific IPR; is that fair?

21 A. Yes, sir. Yes, sir.

22 Q. Okay. And you can't provide any kind of

1 estimate? Tens of hours, I think, is -- you said is
2 your best estimate?

3 A. I mean, yeah, many tens of hours, but that's
4 really all I can say. It's -- it spanned a year at
5 least, so I just don't recall.

6 Q. Okay. That's fair.

7 So are you able to estimate how much time you
8 spent preparing the declaration that you submitted in
9 this IPR -- for this IPR proceeding, including the
10 review of any relevant materials?

11 A. No. I mean, the -- the bulk of my time has been
12 on preparing the declaration, so -- so, no, I cannot
13 give a better estimate than what I've already given
14 here.

15 Q. Okay. Which is many tens of hours?

16 A. Yeah. I'm -- yes.

17 Q. Okay. What else have you spent time on?

18 A. For -- for this IPR?

19 Q. Yes.

20 A. Beyond reviewing prior art and preparing the
21 declaration, which is what you asked me previously, any
22 other time has been preparing for this deposition.

1 Q. How much time do you estimate that you spent
2 preparing for this deposition?

3 A. Eight hours, ten hours, something in that.

4 Q. Okay.

5 A. I think.

6 Q. And did you meet with anyone to prepare for this
7 deposition?

8 A. I met with counsel for the petitioner.

9 Q. And just one time or more than one time?

10 A. Multiple times.

11 Q. Just for this declaration -- or just for this
12 deposition?

13 A. Yes, sir.

14 Q. And can you estimate how much time you spent
15 meeting with counsel?

16 A. Maybe four or five hours.

17 Q. Okay. And can we turn to page 122 of the
18 declaration, please. Okay. So that is your signature,
19 correct?

20 A. Yes, sir.

21 Q. And it's dated June 30th, 2022?

22 A. That's correct.

1 Q. Have any of your opinions changed, with respect
2 to your declaration, since June 30th, 2022?

3 A. No, sir.

4 Q. All right. Have you ever been retained as an
5 expert in an IPR before? I think I know the answer to
6 this question.

7 A. Only in the context of this family of -- of
8 patents.

9 Q. Okay. And when was the first -- what was --
10 what was the first patent that you worked on in this
11 family. Do you remember?

12 A. No, sir, I don't. I'm sorry.

13 Q. Do you remember how many -- how many different
14 IPRs you've worked on for this family of patents?

15 A. Eight.

16 Q. And you've provided eight separate declarations?

17 A. Yes, sir.

18 Q. And have you been deposed in each of those eight
19 cases?

20 A. Not yet. Not yet all of them; some of them.

21 Q. How many times have you been deposed for this
22 family?

1 A. So this will make my sixth.

2 Q. Okay. And so you've never been retained --
3 excuse me. You've never been retained by a patent owner
4 for an IPR; is that fair?

5 A. That's -- that's correct.

6 Q. Okay. Have you ever been retained as an expert
7 in a patent case in -- for district court?

8 A. Yes, sir, I have.

9 Q. Can you tell me how many times?

10 A. Six, eight, somewhere in that range.

11 Q. And did you provide a declaration in those
12 cases?

13 A. Yes.

14 Q. And did you give -- how many times were you --
15 have you been deposed in district court?

16 A. Depositions, a similar number, you know, in that
17 six, seven range.

18 Q. Have you ever testified at trial?

19 A. No, sir.

20 Q. So for -- have you ever testified -- have you
21 ever provided an opinion -- I'm sorry. Strike that.

22 Have you ever provided an opinion on behalf of a

1 patent owner in any circumstance?

2 A. Yes, I have.

3 Q. Okay. What -- what were the -- can you tell me
4 about that?

5 A. I -- I'd have to go through and look at old
6 materials, but in terms of a patent owner asserting
7 claims against a potential infringer.

8 Q. Was that in district court?

9 A. That would've been in district court.

10 Q. And do you remember who was involved, who the
11 parties were?

12 A. No, I don't. I am sorry.

13 Q. Okay. And about how long ago was that?

14 A. Years ago. I -- I -- yeah, years ago. I don't
15 know.

16 Q. Okay. So can you let me know -- can you give me
17 a little -- brief overview of what you did to prepare
18 for this declaration, besides meeting with counsel?

19 A. For this declaration?

20 Q. This -- I'm sorry. Excuse me. For this
21 deposition. Thank you.

22 A. Oh, for this deposition. Reviewing -- so beyond

1 meeting with counsel, reviewing my declaration,
2 reviewing the primary references and reviewing other
3 references as I needed to refresh my memory.

4 Q. Okay. So when you say "primary references,"
5 what are you referring to?

6 A. So I cited four primary references in my
7 declaration. Those would be 1005, Ahopelto; I think
8 1007, which is Matero; 1008, which is Hardwick; and
9 1009, which is Sood. I'm referring to those as primary
10 references.

11 Q. Okay. And you said that you also reviewed other
12 references. Are you referring to other references that
13 have been cited in your declaration?

14 A. Yes, others that are exhibits that -- that I
15 also referred to in my declaration. Yes, sir.

16 Q. Did you review anything that hasn't been
17 referred to in your declaration?

18 A. No, sir.

19 Q. Okay. So when you were retained in this matter,
20 were you given any assumptions to use in forming your
21 opinions?

22 MR. FOWLES: Beyond the scope.

1 Privilege.

2 MR. MARTIN: I can ask about any
3 assumptions that he was given.

4 MR. FOWLES: You're asking about content
5 of communications.

6 MR. MARTIN: I'm asking about any
7 assumptions that were provided by counsel.

8 MR. FOWLES: Dr. Jensen, I instruct you
9 not to answer that due to privilege.

10 MR. MARTIN: That -- that's Rule 26. You
11 can go -- do you need to look that up? I can wait
12 for a minute. It's -- comes straight from Rule 26.

13 MR. FOWLES: I don't --

14 MR. MARTIN: Ask -- we can wait for a
15 minute, because it's -- I can ask about facts or
16 data or assumptions.

17 Okay. Well, let's go ahead and move on.

18 Let's go ahead and move on.

19 BY MR. MARTIN:

20 Q. So let me rephrase the question and see if this
21 is -- works better. Okay. So were you given any
22 assumptions that you relied upon in forming your

1 opinions?

2 A. I don't recall ever being told any assumptions
3 or instructed to make any assumptions.

4 Q. Okay. And were -- was any -- were any facts or
5 data provided to you that you relied upon to -- in
6 forming your opinion?

7 A. Facts or data might include, for example, what?
8 I mean, documents?

9 Q. Just anything, yes, if -- that you were provided
10 any documents.

11 A. I mean, I was provided documents in -- as I was
12 preparing my declaration, yes, sir.

13 Q. Okay. So what documents were you provided?

14 A. Obviously the original patent, the '863 Patent,
15 as well as the file history, the prosecution history of
16 that patent, references such as the four we just talked
17 about. I mean, those are the -- those are the main
18 things that I recall.

19 Q. Okay.

20 MR. MARTIN: So can we turn to paragraph
21 23 of your declaration -- of the declaration,
22 please.

1 THE TECHNICIAN: Do you know what page
2 number that's under?

3 MR. MARTIN: Page 13.

4 THE TECHNICIAN: Yes, sir. Give me one
5 second. There we are.

6 BY MR. MARTIN:

7 Q. Okay. So here we talk -- you -- you testify
8 here in your declaration that the critical date for this
9 patent is June 4, 1999. Is that something that you
10 determined yourself?

11 A. No. So this is something that -- that counsel
12 informed me of.

13 Q. Okay. Who -- who wrote your declaration?

14 A. I wrote the vast majority of it or edited parts
15 that may have been drafted by someone else.

16 Q. Okay. So you wrote the first draft?

17 A. Of -- of -- of most of -- of this. But there
18 were parts that counsel had prepared, but I edited
19 everything before it was final.

20 Q. Okay. What parts did counsel provide?

21 A. Well, that's a good question. Certainly some of
22 the language about legal understanding, that was drafted

1 by counsel. And there -- counsel helps -- helped me
2 with -- with figures and diagrams, at my request. And
3 then there -- there were other places where there may
4 have been some drafting by counsel. I couldn't identify
5 and tweeze out what they may have draft -- counsel may
6 have drafted versus what I may have drafted on the first
7 draft.

8 Q. Okay.

9 MR. MARTIN: So could we move to
10 paragraph 21 of the declaration, which is on page
11 11.

12 BY MR. MARTIN:

13 Q. So in this paragraph, which extends onto page
14 12, there's a list of references that you reviewed in
15 forming your opinions, correct?

16 A. That's correct.

17 Q. Are there any additional references that you
18 reviewed before completing this declaration, that are
19 not listed in paragraph 21?

20 A. If -- if there were, I don't recall any. I
21 believe that I put everything in here.

22 Q. Okay. Is it fair to say that if there was

1 something important that you had seen or reviewed, you
2 would've included it in the -- in your declaration?

3 A. Yes, that's fair.

4 Q. All right. And the first reference listed is
5 U.S. Patent 5,970,059 to Ahopelto, correct?

6 A. Correct.

7 Q. And I think you had previously testified that
8 that was provided to you.

9 A. Yes, sir.

10 Q. Okay.

11 MR. MARTIN: And then, if we may, can we
12 go to paragraph 5 on page 5 of the declaration.

13 BY MR. MARTIN:

14 Q. And in page 5 -- on page 5 you said that, "I
15 will continue to review any new material as it is
16 provided."

17 Has any new material been provided to you since
18 June 30th, 2022?

19 A. No. Not that I recall, no.

20 Q. Okay. And have you reviewed anything else to
21 prepare, other than what you've already cited as an
22 exhibit in your declaration?

1 A. No, sir.

2 MR. MARTIN: Okay. So can we go back to
3 paragraph 21, please. And that's -- there we go.

4 BY MR. MARTIN:

5 Q. Can you tell me which of these references that
6 you found yourself?

7 A. I -- I would struggle to be comprehensive in --
8 in that. My recollection is that Granbohm, which is
9 Exhibit 1010, is something that I identified. And I
10 know there were others in the list, things like
11 Exhibit 10- -- 1021 and 1022 and 1023. I -- I
12 specifically recall identifying those references.
13 Beyond that, I don't recall.

14 Q. Okay. Have you read the petition that has been
15 filed in this matter?

16 A. I don't believe I've read the petition.

17 Q. Okay. Let's go on -- move on to something a
18 little different.

19 MR. MARTIN: Can we go to paragraph 27 of
20 the declaration.

21 BY MR. MARTIN:

22 Q. Okay. So in paragraph 27 you identify a

1 standard for a person of ordinary skill in the art; is
2 that correct?

3 A. Yes, sir.

4 Q. Did you formulate that standard yourself?

5 A. I don't recall exactly how I arrived at that
6 standard back at the time. I know there was discussion
7 with counsel for the petitioner. I don't remember the
8 details. This is a -- this is a definition with which I
9 am obviously comfortable.

10 Q. Okay. And so this definition, just so that
11 we're on the same page, is "a bachelor's degree" --
12 "someone with a bachelor's degree in electrical
13 engineering, computer engineering, computer science or a
14 related field, and at least two years of experience
15 related to the design or development of a wireless
16 communication system or the equivalent." Is that
17 accurate?

18 A. That, plus -- plus some caveats about additional
19 graduate education or experience could substitute.

20 Q. Okay. So when you were working to formulate
21 this opinion, did you rely on any facts or any evidence?

22 MR. FOWLES: Objection. Form.

1 THE WITNESS: So --

2 BY MR. MARTIN:

3 Q. So when you -- let me rephrase the question,
4 then. When you were formulating this opinion, did you
5 rely on any -- any facts?

6 A. And to be clear, when you say "this opinion,"
7 are you referring specifically to paragraph 27?

8 Q. Yes, I am.

9 A. Okay. My own experience. So not additional
10 facts that I can think of beyond my own experience.

11 Q. Okay. And this is based on someone at the time
12 -- at the critical date that we talked about earlier?

13 A. Yes, sir.

14 Q. Okay. So the -- for -- let me rephrase that.
15 You are viewing this from a person of ordinary skill in
16 the art as of June 4, 1999, correct?

17 A. That's correct.

18 Q. When did you complete your Ph.D.?

19 A. I completed my Ph.D. in 1994.

20 Q. And after you finished your Ph.D., you began to
21 work as a professor, correct?

22 A. That's correct.

1 Q. And that would've also been in 1994?

2 A. That's correct.

3 Q. So by 1999 you'd been a professor for five
4 years?

5 A. Yes, sir.

6 Q. And before you got your Ph.D., did you get a
7 master's degree?

8 A. Yes, sir.

9 Q. So it's fair to say that by 1999 you had far
10 exceeded the standard for a person of ordinary skill
11 that you have laid out in paragraph 27?

12 MR. FOWLES: Objection. Form.

13 THE WITNESS: So just -- just to be
14 precise, I -- I don't know what a word like "far"
15 means, but I would have exceeded the level of -- of
16 ordinary skill in the art by 1999.

17 BY MR. MARTIN:

18 Q. So do you agree that what was obvious to you in
19 June of 1999 would not have been necessarily obvious to
20 someone with two years of experience and a bachelor's
21 degree in one of the fields that you've identified in
22 paragraph 27?

1 MR. FOWLES: Objection. Form.

2 THE WITNESS: I would say that someone
3 who has additional insight, additional level of
4 understanding, it does make things more obvious.

5 BY MR. MARTIN:

6 Q. So you do agree, then, that things that may have
7 been obvious to you in 1999 would not have been obvious
8 to a POSITA, as you define it?

9 A. I -- I -- I think that's fair. I'm not sure if
10 I understand the implications of that. But generally
11 speaking, with my additional education and experience,
12 things would've been easier for me in 1999 than this
13 definition -- someone who met this definition of a
14 POSITA. So to the extent that makes things more
15 obvious, then that would be true.

16 Q. Okay. And throughout your declaration, you
17 offer many opinions about what a POSITA would have
18 known; is that fair?

19 A. Yes. I -- I use that kind of language
20 throughout the declaration.

21 Q. Okay. And you also offer opinions about what a
22 POSITA would have -- how a POSITA -- excuse me. Strike

1 that.

2 And you also offer opinions about how a POSITA
3 would've interpreted various references, correct?

4 A. Yeah. I think that that's fair, yes.

5 Q. Okay. And when I say "POSITA," we're on the
6 same page that we mean someone who has met the standard
7 that you've set forth in paragraph 27 of your
8 declaration?

9 A. Yes, that is how I -- I am interpreting when you
10 say "POSITA."

11 Q. Okay. So what -- did you take any steps to make
12 sure that you accurately represented what a person of
13 ordinary skill would have understood even though you
14 yourself in 1999 may have more easily or readily
15 understood it?

16 A. Well, this is always the challenge of an expert,
17 to be able to put him- or herself in the shoes of a
18 POSITA, whether my expertise was in 1999 or today. So
19 what I always have to do is consider what, for example,
20 my students or my recent graduates are capable of,
21 including reflecting back to what my graduates were
22 capable of in 1999 and what I would have seen from them

1 after two years of experience. So that's always the
2 exercise that I need to do to ensure that -- how -- to
3 ensure that I am considering how a POSITA would
4 interpret the art at the time of the critical date.

5 Q. Okay. So -- but you weren't overseeing your
6 students after they were working for two years; is that
7 fair to say?

8 A. If they were in the industry for -- for two
9 years, not most of my graduates. However, I do have a
10 company -- I started my first company around 1998 and my
11 second company around 2000. I have many of my graduates
12 there, so I have watched them develop and -- and
13 understand what, you know, two years of experience after
14 their bachelor's degree gives to them. So I do have
15 direct experience with these kinds of -- of individuals.

16 Q. Okay. So I think I'm ready to move on from
17 that.

18 MR. MARTIN: So can we go pull up
19 Exhibit 1005, please.

20 THE TECHNICIAN: Yes, sir. Give me one
21 moment. I'll pull that right up.

22 THE WITNESS: Counsel, as -- as we're

1 waiting, are you comfortable with me having these
2 references and referring to them on my own desktop?

3 BY MR. MARTIN:

4 Q. That's fine as long as they're just clean
5 versions and -- sure, absolutely.

6 A. As I've already testified, they're clean
7 versions.

8 Q. Okay. Yeah, no problem.

9 THE TECHNICIAN: Exhibit 1005 on the
10 screen now.

11 BY MR. MARTIN:

12 Q. Okay. So do you recognize -- you recognize this
13 as Ahopelto, correct?

14 A. Yes, sir. That's the front page of Ahopelto,
15 yes.

16 Q. Okay. And if I refer to this as Ahopelto, you
17 and I will be on the same page?

18 A. Yes, sir.

19 Q. And when I say that, I mean that you'll
20 understand that I'm referring to this reference?

21 A. Yes, sir.

22 Q. And you are familiar with this reference; is

1 that fair?

2 A. Yes.

3 Q. And you offer opinions about this reference in
4 your declaration?

5 A. That's correct.

6 Q. You previously testified that you reviewed this
7 reference to prepare for this declaration. How much
8 time did you spend reviewing it?

9 MR. FOWLES: Objection. Form.

10 THE WITNESS: I don't know how -- how
11 long I spent reviewing this -- this particular
12 reference. Maybe an hour. I don't -- I don't
13 know. It was sort of in -- in pieces, rather than
14 a sequential read through this reference.

15 BY MR. MARTIN:

16 Q. Okay. And I think you had said earlier that
17 Exhibit 1007, you -- is --

18 MR. MARTIN: Well, actually, can we pull
19 up Exhibit 1007 really quick, please.

20 THE TECHNICIAN: Yes, sir. Give me one
21 moment and I'll pull it right up.

22 Exhibit 1007 now on the screen.

1 BY MR. MARTIN:

2 Q. Okay. And this is -- well, let's strike that
3 previous question.

4 So what you see now on the screen, Exhibit 1007,
5 is to Matero, correct?

6 A. Yes, this is the front page of Matero.

7 Q. And if I refer to this reference as Matero, you
8 will understand what I'm referring to?

9 A. Yes.

10 Q. Okay. And Exhibit 1008, you understand that to
11 be Hardwick, correct?

12 A. 1008, yes, I refer to it as Hardwick.

13 Q. Okay. And if I refer to it as Hardwick, you'll
14 understand me?

15 A. Yes, sir, I will.

16 Q. Did you review Matero before this deposition?

17 A. Again, in some pieces, not -- I mean, in
18 preparation for the deposition, in some pieces, not in a
19 sequential examination of the reference.

20 Q. Did you review Hardwick to prepare for the
21 deposition?

22 A. I will say the same thing about Hardwick as I

1 did about Matero.

2 Q. Okay. Okay. And Exhibit 1009, would you -- if
3 I -- would you refer to that as Sood?

4 A. Yes, that's how I refer to it, as Sood.

5 Q. Okay. So if I refer to it as Sood, you will
6 understand what I'm talking about?

7 A. Yes, sir.

8 Q. And when I say "exhibit," you understand that I
9 mean exhibit cited in your declaration, correct?

10 A. Yes.

11 Q. And did you spend time reviewing Sood to prepare
12 for this deposition?

13 A. Very brief, but, yes, I have cited -- I have --
14 excuse me -- reviewed parts of Sood in preparation for
15 the deposition.

16 Q. And would you agree that Exhibit 1006 to your
17 declaration is -- would you refer to that as Lager?

18 A. That's what I -- yes, I call it Lager.

19 Q. And you're familiar with Lager, correct?

20 A. Yes. Not -- not in detail, but, yes, I am
21 familiar with Lager.

22 Q. Did you review Lager to prepare for this

1 deposition?

2 A. Again, some parts of Lager in preparation for
3 the deposition.

4 Q. Okay. And Exhibit 1010 to your declaration is
5 Granbohm; is that correct?

6 A. I believe that is correct. And let me just
7 ensure. Yes, 1- -- 1010 is Granbohm.

8 Q. Okay. And if I refer to that as Granbohm,
9 you'll -- you'll understand what I'm referring to?

10 A. Yes, sir.

11 MR. MARTIN: Okay. So can we go back to
12 1005, please.

13 THE TECHNICIAN: Yes, sir. Please stand
14 by. Pulling back up 1005 now.

15 1005 on the screen now.

16 MR. MARTIN: Okay. Can we go down to
17 Figure 1. Is it possible to rotate that so that we
18 can all -- there we go. Thank you.

19 BY MR. MARTIN:

20 Q. So Figure 1 -- do you agree that Figure 1
21 illustrates a GPRS network?

22 A. Yeah. At a high-level description, this would

1 be a GPR -- or two GPRS networks and connectivity
2 between them, as well as some other elements.

3 Q. So the two GPRS networks that you're referring
4 to are Operator 1 and Operator 2?

5 A. I mean, they're GPRS networks run by or operated
6 by Operators 1 and 2.

7 Q. Okay. So what does GPRS stand for?

8 A. Generalized packet radio service.

9 Q. And under Operator 1 in Figure 1, there are a
10 variety of components, fair?

11 A. Yes, sir.

12 Q. And under Operator 2, there are a variety of
13 components; is that fair?

14 A. Yes.

15 Q. So is it fair to associate those components
16 under Operator 1 with Operator 1?

17 A. Yeah. We need to be precise on where we're
18 drawing boundaries, but, yes, generally speaking, what
19 you're saying is correct.

20 Q. Okay. So what I'm referring to there is
21 underneath Operator 1 but on top of the -- well, let's
22 just strike that and we'll get -- I'm going to refer to

1 the specific components.

2 So within -- or underneath Operator 1, there is
3 a -- there are two GPRS support nodes; is that correct?

4 A. Yes. GPRS SN stands for a support node, GPRS
5 support node, yes, sir.

6 Q. Okay. So if we go over and look at Operator 2,
7 there are also two GPRS support nodes?

8 A. That's correct.

9 Q. And also in Operator 1 there is a home support
10 node; is that correct?

11 A. Yes. A GPRS home support node, yes.

12 Q. And then there is a GPRS home support node in
13 Operator 2 also?

14 A. Yes, sir.

15 Q. And then we -- under -- excuse me. Strike that.

16 In Operator 1, there is a GPRS gateway support
17 node; is that correct?

18 A. That's correct.

19 Q. And throughout your declaration you refer to the
20 GPRS gateway support node as a GGSN. Does that make --
21 do you remember that?

22 A. Yes, sir, I do.

1 Q. So if I refer to it as a GGSN, you'll understand
2 what I'm referring to?

3 A. Yes, I will.

4 Q. Okay. And then there is also a GGSN with the
5 Operator 2; is that fair?

6 A. Yes, sir.

7 Q. Then also for Operator 1 we have an intraop- --
8 intra-operator backbone network, fair?

9 A. That -- that's correct.

10 Q. And it says there in Figure 1 -- it identifies
11 X.25, X25 for the intra-operator backbone network of
12 Operator 1; is that fair?

13 A. Yes.

14 Q. And that refers to a protocol for the intra --
15 intra-operator backbone network?

16 A. Yes, precisely. X.25 is a network communication
17 protocol for that backbone network.

18 Q. Okay. So -- and then if we move over to
19 Operator 2, it also identifies an intra-operator
20 backbone network?

21 A. Yes.

22 Q. Is that fair?

1 A. Yes, sir.

2 Q. And it is labeled "CLNP," correct?

3 A. That's correct.

4 Q. And that refers to a communication proto- --
5 protocol also?

6 A. That -- that -- that's also correct. CLNP
7 refers to a networking communication protocol.

8 Q. Okay. And then also for Operator 1 we have
9 three boxes labeled "IWF"?

10 A. Yes.

11 Q. And those refer to interworking functions; is
12 that correct?

13 A. That's correct.

14 Q. And the same -- excuse me. Strike that.

15 And for Operator 2 we have three boxes labeled
16 "IWF," correct?

17 A. That's correct.

18 Q. And those are interworking functions?

19 A. As well, yes, sir.

20 Q. Okay. So Operator 1 and Operator 2 have the
21 same components; is that fair?

22 A. Largely the same components, yes, with the

1 difference of the protocol -- the difference being the
2 protocol that the -- the backbone networks use.

3 Q. Okay. So the main difference between Operator 1
4 network and Operator 2 network is the protocol being
5 used in the respective intra-operator backbone networks?

6 A. Yes.

7 MR. MARTIN: Okay. Can we pull up
8 Dr. Jensen's declaration, please, and turn to
9 paragraph 124 on page 61.

10 THE TECHNICIAN: Yes. Please stand by.
11 Pulling back up the declaration now. Give me one
12 second.

13 And I do apologize, Counsel. What page
14 number was that?

15 MR. MARTIN: Page 61.

16 THE TECHNICIAN: 61. Thank you so much.
17 Perfect.

18 BY MR. MARTIN:

19 Q. Okay. Dr. Jensen, here on page 61, do you see
20 an annotated Figure 1 from Ahopelto?

21 A. I do.

22 Q. And did you write those annotations yourself?

1 A. As I already -- as I already testified, counsel
2 helped me prepare figures.

3 Q. Okay. So -- but in Figure 1, you see where it
4 says "routing functionality of GGSN" and it's pointing
5 to the GGSN in Operator 1 and it's also pointing to the
6 GGSN of Operator 2?

7 A. Yes.

8 Q. So does that mean that the routing functionality
9 of the GGSN renders obvious the -- well, let me strike
10 that.

11 MR. MARTIN: So can we -- let's move to
12 paragraph 122 of the declaration, please.

13 BY MR. MARTIN:

14 Q. And in paragraph 122 you testified that, "A
15 POSITA would understand that Ahopelto's GGSN as
16 rendering obvious a network switch box," correct?

17 A. That's what I testified -- that's what I say,
18 yes.

19 Q. Okay. So -- and I think you -- well, strike
20 that.

21 And when you say "the GGSN is rendering obvious
22 the network switch box," do you mean that the routing

1 functionality of the GGSN is rendering obvious the
2 network switch box?

3 A. Well, I mean, the way I precisely say it below
4 is that the GGSN -- that that includes that routing
5 functionality, is the example of the network switch box,
6 so, you know, with their rout- -- with the routing
7 functionality. And so that routing functionality is
8 something that I'm citing to as -- as referring to a
9 network switch box.

10 Q. Okay. So what you're saying is that the GGSN as
11 a whole renders obvious the network switch box?

12 A. Well, the GGSN has several functionalities that
13 I relied on for identifying mapping it to different
14 parts of the claims. In -- in this particular -- in
15 this particular case, when -- when we -- when we define
16 a box, it doesn't necessarily define a functionality.
17 So the GGSN, as a whole, with these different
18 functionalities, might be the best mapping to a network
19 switch box, but the GGSN has different functionalities
20 in it that might map to other parts if we -- if we sort
21 of go through step by step.

22 Q. Okay. Give me a moment, please.

1 So I just want to make sure I understood what
2 you said, which is that the GGSN as a whole renders
3 obvious the network switch box, not the GGSN routing
4 functionality.

5 MR. FOWLES: Objection. Form.

6 THE WITNESS: The hard part here is the
7 claim language uses a box, a single sort of thing.
8 The GGSN is also sort of a -- a system in, say, a
9 box or -- and -- and so it's that routing
10 functionality that indicates that it is a
11 switching -- it has a switching functionality. So
12 essentially, yes, the routing functionality is what
13 gives it that network switch functionality as
14 required by the claims.

15 MR. MARTIN: Okay. So can we go to
16 paragraph 122 of your declaration -- or of
17 Dr. Jensen's declaration, please.

18 THE TECHNICIAN: Counsel, you mentioned
19 paragraph 122; am I correct?

20 MR. MARTIN: Yes.

21 THE TECHNICIAN: That should be on the
22 screen now.

1 MR. MARTIN: Okay. I -- yes, I see it.

2 I'm sorry.

3 BY MR. MARTIN:

4 Q. Okay. So in paragraph 122 you say, "Ahopelto's
5 GGSN" -- "a POSITA would understand that Ahopelto's GGSN
6 as rendering obvious the network switch box," right?

7 A. I say that, yes.

8 Q. Okay. So when you say that, are you referring
9 to the routing functionality or are you referring to the
10 GGSN as a whole?

11 A. Really focusing on the routing functionality.
12 As -- as -- as you read on in this paragraph, it talks
13 about that routing mechanism, that routing
14 functionality.

15 Q. Okay. So -- and then you quote some language
16 from Exhibit 1006 which says, "The GGSN appears to act
17 like an IP router." And when you say that, you mean
18 because of the routing functionality, it appears to act
19 like the -- an IP router? Is that fair?

20 A. The routing functionality in the GGSN acts --
21 that -- that's exactly what this is referring to. It
22 acts like an IP router behind which the GPRS network is

1 hidden.

2 Q. Okay. And then if we go down, you also cite --
3 provide a few quotes, one quote from Exhibit 1001 where
4 you say "a router function has been integrated into the
5 GSN." And you're referring to the routing functionality
6 there?

7 MR. FOWLES: Objection. Form.

8 THE WITNESS: And I want to be precise.
9 You said Exhibit 1001. That's 1010. But the
10 quote -- the quote that you cited is correct.

11 BY MR. MARTIN:

12 Q. And then for Exhibit 1000 -- from Exhibit 1013
13 -- excuse me. Strike that.

14 And then from Exhibit 1013, you provide a quote
15 that says, "The GGSN routing process decides to which
16 output port a packet will be sent based on the
17 destination address."

18 Are you referring to the GGSN routing
19 functionality there?

20 A. Yes, similar. GGSN routing process, the
21 functionality in the GGSN that performs routing.

22 Q. And the deciding where to send a packet is an

1 essential part of routing; is that correct?

2 MR. FOWLES: Objection. Form.

3 THE WITNESS: Yes. Routing is about
4 where to send a packet, that's correct.

5 BY MR. MARTIN:

6 Q. Okay. So the routing functionality decides
7 where to send a packet?

8 A. Generally speaking, that's what a -- that's --
9 that's -- it doesn't decide. The address decides, but
10 the router is an important implementation in -- in using
11 that address to decide how to send that -- that packet
12 out.

13 Q. Okay. So the router will look at the address
14 and decide, based on the address, where to send the
15 packet?

16 A. Yeah. So this is -- this is -- this is a
17 high-level description of what a router does, but, yes.

18 Q. Okay.

19 MR. MARTIN: And can we go back up to
20 paragraph 120, please.

21 THE TECHNICIAN: Paragraph 120 on the
22 screen now.

1 MR. MARTIN: Actually, can we go back up
2 one more. Okay.

3 BY MR. MARTIN:

4 Q. You testified that Ahopelto renders obvious the
5 network switch box. Would you agree that to be a
6 network switch box -- or let me strike that.

7 Would you agree that to qualify as a network
8 switch box, a device would have to have the ability to
9 decide how to route a packet?

10 MR. FOWLES: Objection. Form.

11 THE WITNESS: I'm not -- I'm not
12 testifying in general that to satisfy the meaning
13 of a network switch box there's a -- for example,
14 routing has to be present. I'm testifying
15 differently, that a router does satisfy the
16 requirements to be a network switch box in the
17 context of the '863 Patent.

18 BY MR. MARTIN:

19 Q. Okay. Let's go to paragraph 61 of your
20 declaration on page 29. So here you are -- offer some
21 testimony about mobile originated and mobile terminated
22 packets, correct?

1 A. That's correct.

2 Q. And we're referring to mobile originated packets
3 from Ahopelto, right?

4 A. I -- yes. This paragraph is talking
5 specifically about Ahopelto, yes.

6 Q. Okay. So mobile originated packets refers to
7 packets that are being transmitted from a mobile device
8 operating in a network of Ahopelto?

9 A. Yes, I'm -- precisely in -- I mean the mobile is
10 operating in the GPRS net- -- one of the GPRS networks
11 in Ahopelto.

12 Q. Okay. And the mobile terminated transmission is
13 one that is received by a mobile device operating in
14 Ahopelto's network; is that fair?

15 A. Yes. Again with the same precision, it's in the
16 GPRS network, yes.

17 Q. Okay. Thank you.

18 MR. MARTIN: Okay. So can we move on to
19 paragraph 123, please. And that's on page 60.

20 BY MR. MARTIN:

21 Q. And, Dr. Jensen, it's been almost an hour. Are
22 you ready to take a break?

1 A. Sometime soon, but it -- I'll -- I'll leave that
2 up to you, the exact timing.

3 Q. Okay. So why don't we go ahead and take a
4 break. This is a good stopping point, I think, and
5 maybe reconvene in -- is ten minutes good for you?

6 A. That's sufficient for me.

7 Q. Okay. Sounds good.

8 (Recess.)

9 BY MR. MARTIN:

10 Q. So let's go back on the record then, Dr. Jensen.

11 A. Okay.

12 Q. So where we left off we were looking at
13 paragraph 123 of your declaration. And specifically in
14 paragraph 123 you testify that "a POSITA would have
15 recognized that the GGSN itself, as well as including
16 the GGSN server functionality, access server
17 functionality and routing functionality, would be
18 implemented as different logical entities on a shared
19 platform."

20 Do you see that?

21 A. I see that.

22 Q. Okay. So do you mean that the GGSN collectively

1 with the server functionality, route -- routing
2 functionality and access server are implemented as one
3 single separate entity?

4 MR. FOWLES: Objection. Form.

5 THE WITNESS: Can you -- can you clarify
6 what you mean by a single entity? Maybe -- maybe
7 ask that a different way. I'm not sure I
8 understand what you're asking me.

9 BY MR. MARTIN:

10 Q. Okay. So are you asking -- I'm sorry. Scratch
11 that. Strike that, please.

12 Are you testifying there that the GGSN can be
13 implemented separately and include the server
14 functionality, the routing functionality and the access
15 server, or are you saying that the server functionality,
16 the routing functionality and the access server are
17 implemented separately?

18 MR. FOWLES: Objection. Form.

19 THE WITNESS: I'm -- I'm testifying
20 exactly what I say here. There are logical
21 functions that the GGSN has to perform, and I've
22 identified some of them: Routing, serving,

1 controlling. Controlling is not referenced here
2 but elsewhere. I'm testifying that those could be
3 implemented as different logical functions on a
4 single processor or on a single piece of hardware.
5 That's what I'm precisely testifying. And I'm not
6 sure if I understand exactly your question.

7 BY MR. MARTIN:

8 Q. No -- well, I think -- okay, let's -- let's move
9 on. And you cite, in support of that, Exhibit 1010 at
10 page 84, correct?

11 A. Yes, that is -- I do -- I do cite that here.

12 Q. Okay. And Exhibit 1010 is Granbohm?

13 A. That's correct.

14 Q. Okay. And then you also cite, in support,
15 Exhibit 1022, correct?

16 A. I do.

17 MR. MARTIN: All right. So let's look at
18 Exhibit 1010, please. Can you pull that up.

19 THE TECHNICIAN: Yes, sir. Give me one
20 quick second and I'll pull up 1010.

21 1010 on your screen now, and I may zoom
22 in a little.

1 MR. MARTIN: And can you go to page 84.
2 I don't -- I'm not sure which page that is of the
3 exhibit.

4 THE TECHNICIAN: That's okay. It should
5 be 84. Let me zoom that, as well.

6 Yes, sir.

7 BY MR. MARTIN:

8 Q. Okay. So, Dr. Jensen, do you agree that nothing
9 on page 84 of Exhibit 1010 uses the term "server
10 functionality"?

11 A. I don't recall the level of detail you're asking
12 me, so I would have to review it to answer your
13 question. I'm happy to do that.

14 Q. Okay. If you'd go ahead and review it. If you
15 -- you can take as much time as you need.

16 A. Okay.

17 THE TECHNICIAN: Counsel, would it be
18 okay if he had control over the document so that he
19 can kind of manipulate it?

20 MR. MARTIN: Yeah, that's fine.

21 THE WITNESS: Just -- just so all are
22 clear, I have it locally.

1 THE TECHNICIAN: Okay. Perfect.

2 THE WITNESS: Okay. So I have reviewed
3 that down through on page 85 where it starts
4 talking about "serving GPRS support node."

5 BY MR. MARTIN:

6 Q. Uh-huh.

7 A. So just so you know, that's what I've reviewed.
8 So can you ask me your question again now that I've
9 reviewed that?

10 Q. Does the page 84 of Exhibit 1010 use the term
11 "server functionality"?

12 A. The term "server functionality" does not appear
13 explicitly in -- in what's written here.

14 Q. Okay. So is it fair to say that this page does
15 not specifically refer to implementing server
16 functionality in one way or the other?

17 MR. FOWLES: Objection. Form.

18 THE WITNESS: Just to be precise, this --
19 this discussion does not say "server
20 functionality." The -- the routing functionality
21 needs to have a server function to go with it, but
22 the term "server functionality" does not exist in

1 this description.

2 BY MR. MARTIN:

3 Q. Okay. Does it say -- is the term "routing
4 functionality" used on this page 84 of Exhibit 1010?

5 A. So on page 84 it does not. It does on page 85,
6 but it does not on page 84.

7 Q. Okay. So page 84, which is what you cite in
8 your declaration, does not have the term "routing
9 functionality," correct?

10 A. It -- it doesn't have it on page 84. It has it
11 on page 85.

12 Q. The term "routing functionality" is on page 85?

13 A. "A router function."

14 Q. Okay. So -- and on page 84 specifically, does
15 the term "access server" appear?

16 A. The -- yeah, the -- this reference doesn't go
17 into the de- -- to a lot of details about a GGSN, so
18 things like "access server," those words do not appear
19 here on 84 or -- I don't believe I saw 85. Again, a
20 POSITA knows -- GG- -- a GGSN is known, so these
21 functionalities are known, but this reference doesn't
22 talk about those specifics.

1 Q. Okay. So it's fair to say, then, that it
2 doesn't not talk specifically about implementing the
3 server functionality one way or the other?

4 MR. FOWLES: Objection. Form.

5 THE WITNESS: Well, I want to be very
6 careful here, because really I'm citing to this
7 reference to talk about implementation of different
8 aspects of a GGSN on a single sort of piece of
9 hardware, whether it's a single processor or
10 multiple in kind of a single unit. And that's
11 what -- that's what this reference is -- is talking
12 about. It is not going into fine-grain details of
13 all of the functions that exist in the G- -- in the
14 GGSN.

15 BY MR. MARTIN:

16 Q. Okay. So this doesn't show the routing
17 functionality implemented separately from an access
18 server; is that correct?

19 MR. FOWLES: Objection. Form.

20 THE WITNESS: It doesn't teach, period,
21 how it is implementing things, other than a single
22 sort of box and that it's teaching us that a

1 routing function has -- is there, as well as other
2 functionality that -- that it talks about.

3 BY MR. MARTIN:

4 Q. Okay. That's fair.

5 MR. MARTIN: So can we open up
6 Exhibit 1022, please, at page 12.

7 THE TECHNICIAN: Yes, sir. Please stand
8 by and I'll have it pulled right up. 1022, page
9 12. Okay. Let me share this document. Here's
10 1022 on -- I see nine pages.

11 MR. MARTIN: Yeah, I think. Yes. Yes,
12 that is.

13 THE TECHNICIAN: Okay.

14 MR. MARTIN: And can you zoom in a little
15 more, please?

16 BY MR. MARTIN:

17 Q. So now on page 12 of Exhibit 1022, now looking
18 at page 12 -- I'm sorry. Strike that.

19 Does anything on page 12 of Exhibit 1022 refer
20 to a GPRS system?

21 A. Again, just looking -- I -- this is not about
22 GPRS systems specifically, this reference, nor did I

1 cite to it to -- to teach anything about GPRS systems.

2 Q. Okay. So then is it fair to say that it does
3 not refer to anything about implementing routing
4 functionality -- well, sorry. Strike that.

5 Is it fair to say that page 12 of Exhibit 1022
6 does not refer to implementing routing functionality in
7 a GGSN?

8 A. Well, again, to be precise, this reference is
9 talking about the kinds of data communications
10 networking communications that are relevant to a GPRS
11 GSN, a GGSN. It's not specifically talking about that
12 kind of a functionality, a GGSN functionality but it's
13 talking about the kinds of communications systems
14 required for that. So I think that's the important way
15 to answer your question.

16 Q. Okay. Let me think about that a second.

17 Okay. So since this isn't talking specifically
18 about a GGSN or a GPRS system, it doesn't provide you
19 any details about specifically implementing a server
20 functionality in a GGSN of a GPRS system; is that fair?

21 MR. FOWLES: Objection. Form.

22 THE WITNESS: Well, it -- it has no

1 specifics about that except for what I'm relying on
2 this -- a POSITA would understand that these
3 different functionalities in a GPRS GSN needed to
4 be implemented on something. And I'm only relying
5 on this that's talking about the kinds of data
6 communications we're talking about at a high level
7 in this reference, is that it can be done, as it
8 says here, "coextensive," so kind of in a single
9 unit where there might be multiple functionalities.
10 And that's -- so, yes, you're right, it does not
11 have a specific description of doing this with a
12 GPRS GSN, but it's confirming what a POSITA would
13 already understand about being able to implement
14 the G- -- GGSN functionalities on some sort of a
15 single system.

16 BY MR. MARTIN:

17 Q. Okay. So you're not relying on this to
18 specifically show server functionality being implemented
19 on a GGSN; is that correct?

20 A. The reason I'm not just saying yes or no to that
21 question is because it does demonstrate those kinds of
22 functionalities on a single system. It's not

1 specifically about those functionalities, the -- saying,
2 okay, a GGSN needs certain blocks to function. So --

3 Q. So -- sorry. Go ahead.

4 A. -- that's what I'm testifying. That's what I'm
5 testifying of, that this just lends credence to what a
6 POSITA would understand about implementation of those
7 GGSN functionalities.

8 Q. Okay. Nothing on this page refers to a GGS --
9 GGSN; is that correct?

10 A. No, this page does not refer specifically to a
11 GGSN. It refers to --

12 Q. Okay.

13 A. -- the kinds of systems that -- that are similar
14 to a GGSN in terms of these data communications.

15 Q. Okay. And it doesn't refer to server
16 functionality of a GGSN; is that fair?

17 A. Specifically those words do not appear in this
18 reference.

19 Q. Okay. And it does not refer to routing
20 functionality of a GGSN; is that fair?

21 A. Again, it doesn't talk about GGSN specifically
22 at all, and so it does not talk about routing

1 functionality of a GGSN.

2 Q. And it does not refer specifically to an access
3 server of a GGSN; is that fair?

4 A. Same -- same -- same testimony: It does not
5 specifically use those words.

6 Q. Did you cite any reference in your declaration
7 that expressly discloses implementing server
8 functionality of a GGSN in a separate logical entity
9 than the routing functionality of a GGSN in your
10 declaration?

11 MR. FOWLES: Objection. Form.

12 THE WITNESS: Boy, I think -- I think
13 there that's such an open-ended question, I would
14 need for us to go -- I -- I just don't recall
15 whether I did or didn't, so I would need us to talk
16 about some specific sections in -- in order for me
17 to answer that well.

18 BY MR. MARTIN:

19 Q. Okay. But sitting here today, you can't point
20 to any reference that you cited that expressly discloses
21 implementing the server functionality of a GGSN in a
22 separate logical entity than the routing functionality

1 of a GGSN?

2 MR. FOWLES: Objection. Form.

3 THE WITNESS: Well, I'm -- I'm not saying
4 that. The references that I have cited identify
5 these functionalities of a GGSN. Do they -- so --
6 so we're -- we're just going to need to get into
7 the details to identify that, rather than me rely
8 on my memory of exactly which references and where
9 all those functionalities are cited.

10 BY MR. MARTIN:

11 Q. Okay. Can you show me where? Which -- which
12 reference discloses implementing the server
13 functionality of a GGSN separately from -- as a separate
14 logical -- let me strike that.

15 Which reference expressly discloses implementing
16 the server functionality of a GGSN as a separate logical
17 entity than the routing functionality of a GGSN?

18 MR. FOWLES: Objection. Form.

19 THE WITNESS: Can you -- as I'm -- as I'm
20 -- I'm browsing some things. When you ask about
21 separately, can you be more precise about what you
22 mean about separately? I mean, are you -- just

1 help me understand what you're trying to ask me
2 about this separately.

3 BY MR. MARTIN:

4 Q. Well, I think if we go back to paragraph 123 of
5 your declaration, you say that, "The server
6 functionality, access server functionality, and routing
7 functionality would be implemented as different logical
8 entities on a shared platform." So I'm talking about
9 your testimony there when you refer to different logical
10 entities. So if you -- does that clarify?

11 A. Okay. So I think -- I think -- I think -- I
12 think I understand what you're trying to talk about.
13 But when you say implementing them separately -- these
14 functionalities were -- were there, so if we're talking
15 about a reference that says here's specifically how I'm
16 going to implement those different function --
17 functionalities at a detailed level, I don't recall that
18 level of specificity in my references. I'm not saying
19 it's there -- it's not there. What -- what I am saying
20 is my references identify those functionalities.

21 Q. Okay. But sitting here today, you can't point
22 to any reference that you cited in your declaration that

1 shows implementing the server functionality and the
2 routing functionality of a GGSN as different entities;
3 is that correct?

4 MR. FOWLES: Objection. Form.

5 THE WITNESS: Again, I -- I think what
6 I'm struggling with is your implementing them as --
7 separately as different entities. Obviously all of
8 these things work together in a system. The system
9 requires those different functionalities. You
10 know, Ahopelto talks about implementing those
11 functionalities -- he doesn't talk about those
12 specific ones, but the GGSN, you know,
13 functionalities along with other functionalities on
14 a single computer. So I'm struggling with the "as
15 different entities" sort of language, exactly what
16 that means. Obviously they're all there working
17 together.

18 BY MR. MARTIN:

19 Q. Okay.

20 A. But they are limited.

21 Q. So I think you -- let's go look at your
22 paragraph 123 of your declaration. And in paragraph 123

1 you say that these are -- that the server function --
2 strike that.

3 In paragraph 123 you say, "The access server
4 functionality and routing functionality and the server
5 functionality would be implemented as different logical
6 entities"; is that correct?

7 A. I do say that.

8 Q. Okay. Can you identify any reference that shows
9 expressly the server functionality, the access server
10 functionality and the routing functionality as different
11 logical entities?

12 MR. FOWLES: Objection. Form.

13 THE WITNESS: Again, I -- I think -- I
14 think I stick with my prior testimony. I have in
15 my references the identification of all of these
16 functionalities. They all have to be implemented.
17 So if you're asking me about a reference that
18 specifically shows how to implement each of those
19 functionalities, I do not cite to such a reference,
20 at least not to my recollection.

21 BY MR. MARTIN:

22 Q. Okay.

1 A. But my references do cite -- do -- do indicate
2 that these functionalities have to exist.

3 MR. MARTIN: So can we go to
4 Exhibit 1005, please.

5 THE TECHNICIAN: Yes, sir. Please stand
6 by. Pulling back up 1005.

7 Exhibit 1005 on now.

8 BY MR. MARTIN:

9 Q. Dr. Jensen, does the phrase "server
10 functionality" appear anywhere in Ahopelto?

11 A. Well, I cannot be entirely confident without a
12 detailed review. My recollection that the word "server
13 functionality" -- my recollection is that it doesn't
14 appear in Ahopelto.

15 Q. Okay. Do you agree that the term "routing
16 functionality" does not appear in Ahopelto?

17 A. Again, same -- same -- same testimony. I would
18 have to review this to be confident if that term does or
19 does not appear before I testify on that.

20 Q. Does the term "access server" appear in
21 Ahopelto?

22 A. Again, same -- same -- same testimony. I don't

1 recall Ahopelto referring to those specifics of a GGSN,
2 but I'd have to review it in detail to be confident of
3 what it says.

4 Q. Do you need some time to review it?

5 A. Well, if -- if that's what you'd like me to
6 spend my time doing, I certainly can.

7 I will say this: Ahopelto's goal was not to
8 give highly specific details about each of the blocks in
9 the GPRS network or in the overall system. So the
10 likelihood that those kinds of terms appear is -- is
11 going to be low. He left it to a POSITA to understand
12 what these known blocks did, which is why I refer to
13 other references to validate what a POSITA would have
14 understood something like a GGSN to represent.

15 Q. Okay. So is -- okay. So is it fair to say to
16 you -- is it fair to say that, sitting here today, you
17 can't identify any portion of Ahopelto that uses the
18 phrase "server functionality"?

19 A. That is fair. I can't sit here today and say
20 let me -- I can show you references or citations in
21 Ahopelto that use the words "server functionality."

22 Q. And is it fair to say that, sitting here today,

1 you cannot identify a portion of Ahopelto that uses the
2 term "routing functionality"?

3 A. Same testimony: I cannot sit here and point to
4 references within there -- citations within Ahopelto
5 that use the term "routing functionality."

6 Q. Okay. And sitting here today, you -- can you
7 point to any portion of Ahopelto that uses the term
8 "access server"?

9 A. Again, same testimony. But my -- my discomfort
10 with this is that a POSITA would understand that the
11 disclosure of a GSN -- GGSN has these functionalities.
12 And so while the express terms are not there, I don't
13 want to imply that it is not disclosing those, because a
14 POSITA would understand what a GGSN was and what
15 functionalities it needed.

16 MR. MARTIN: Okay. Move to strike --
17 move to strike that as nonresponsive.

18 BY MR. MARTIN:

19 Q. Sitting here today, can you identify any portion
20 of Ahopelto that identifies an "access server"?

21 A. I've already testified and I've already given my
22 caveat.

1 Q. So is that a "no"?

2 A. It is a "no" that I cannot point to any
3 references within Ahopelto that use the words expressly
4 "access server."

5 Q. Okay.

6 MR. MARTIN: So can we open up
7 Exhibit 1007, please.

8 THE TECHNICIAN: Yes, sir. Please stand
9 by. Pulling up Exhibit 1007 now.

10 Exhibit 1007 on the screen.

11 BY MR. MARTIN:

12 Q. Sitting here today, can you identify any portion
13 of Matero that uses the phrase "server functionality"?

14 A. No, I cannot. Matero, that's -- that is not the
15 objective of Matero's disclosure.

16 Q. Sitting here today, can you identify any portion
17 of Matero that uses the term "routing functionality"?

18 A. Not -- not to my recollection.

19 Q. Do you recall the term "routing functionality"
20 appearing in the Lager reference?

21 A. I -- I would -- I would -- I would need to
22 review that to be confident about that record -- that --

1 that reference.

2 MR. MARTIN: Can we open up Exhibit 1006,
3 please.

4 THE TECHNICIAN: Yes, sir. Give me one
5 quick moment. Pulling up 1006.

6 Exhibit 1006 on the screen now, and let
7 me zoom in a little.

8 BY MR. MARTIN:

9 Q. Can you identify for me any portion in this
10 reference Lager that uses the term "routing
11 functionality"?

12 A. What I recall about Lager is that Lager does
13 talk about the routing of data packets.

14 Do I have control of it?

15 MR. MARTIN: Can you give him control?

16 THE TECHNICIAN: Yes, sir. Give me one
17 quick second.

18 Now you should have control. Just click
19 in the middle of your screen and you can manipulate
20 the document.

21 THE WITNESS: Thank you.

22 So there is a discussion there about

1 routing. It's not necessarily the routing
2 functionality of the GS -- of the -- of the GGSN.
3 It's -- it's certainly about routing of data
4 packets to/from a mobile station. So there is
5 discussion in here about that functionality.

6 MR. MARTIN: Okay. I'm going to move to
7 strike the nonresponsive portion of that.

8 BY MR. MARTIN:

9 Q. But can you identify any portion of this
10 reference that uses the term "routing functionality"?

11 A. Oh, if you want the -- the specific words
12 "routing functionality," I don't recall any such
13 references in here. Routing functionality, of course,
14 is more of a term that I adopted to describe what the
15 references use, and there may be other references. I
16 don't recall. But I don't recall the term "routing
17 functionality" in this reference.

18 Q. Can you identify any reference that uses the
19 term "routing functionality" that you have cited as an
20 exhibit to your declaration?

21 MR. FOWLES: Objection. Form.

22 THE WITNESS: It -- with the -- if you

1 want that specific term, I'm just not prepared to
2 identify locations in my references where those
3 specific words "routing functionality" are
4 disclosed.

5 BY MR. MARTIN:

6 Q. Okay. So for server functionality, can you
7 identify any portion -- excuse me. Strike that.

8 Can you identify anywhere in Exhibit 1006 where
9 the term "server functionality" appears?

10 MR. FOWLES: Objection. Form.

11 THE WITNESS: I am going to testify the
12 same way, that I don't recall -- that's not saying
13 it's not there, but I don't recall anything that
14 uses those words together, serving functionality,
15 in this -- in 1006.

16 BY MR. MARTIN:

17 Q. So it's fair to say that you cannot point to the
18 term "server functionality" in Exhibit 1006?

19 A. Yeah. Again, I want to be precise. The use of
20 that precise term is -- is what is absent from the
21 reference.

22 Q. Okay. That's -- let me move on a little bit.

1 Do --

2 MR. MARTIN: Actually, let's move on to
3 Exhibit -- can you pull back Exhibit 1010, please.

4 THE TECHNICIAN: Yes, sir. Give me one
5 quick moment.

6 1010 back on the screen.

7 BY MR. MARTIN:

8 Q. Can you tell me when this was published,
9 Dr. Jensen?

10 A. Oh, I -- I remember looking that up. We know
11 it's in 1999. I need to go back to my report. You
12 don't need to do it. I have it locally. Just -- I --
13 just to see if I had any more information on that.

14 My recollection is I could not find precisely
15 when in the year in 1999 it was published, so I -- and I
16 don't see anything in my report where -- in my
17 declaration where I have more specific information.
18 That's my recollection.

19 Q. Okay. So is it fair to say that you cannot
20 swear that this was published before June 4, 1999?

21 A. Yeah.

22 MR. FOWLES: Objection. Form.

1 THE WITNESS: My recollection is I -- I
2 was not able to find the specific month in which it
3 was published.

4 MR. MARTIN: Okay. So can we move back
5 to Dr. Jensen's declaration, please.

6 THE TECHNICIAN: Yes, sir. Please stand
7 by. Pulling back up the declaration.

8 Declaration back on the screen.

9 MR. MARTIN: And can we go to paragraph
10 147? I think that's around page 74.

11 BY MR. MARTIN:

12 Q. So I believe it's your testimony that
13 limitations of Dependent Claim 3 are rendered obvious by
14 Ahopelto. Is that accurate?

15 A. Let me just make sure that that's correct.
16 That is what I say here.

17 Q. All right. So let's move down to paragraph 149.

18 MR. MARTIN: And can you keep scrolling
19 down a little more, please. There's a...

20 THE TECHNICIAN: Do you want the figure
21 on?

22 MR. MARTIN: Yeah, I wanted -- I wanted

1 to see the figure.

2 BY MR. MARTIN:

3 Q. Okay. So, Dr. Jensen, you agree with me that
4 that is an annotated version of Exhibit -- of -- excuse
5 me. Strike that.

6 You agree -- Dr. Jensen, you agree that that is
7 an annotated version of Figure 10 from Ahopelto; is that
8 true?

9 A. That's correct.

10 Q. Would you agree with me that Figure 10 shows
11 routing of a mobile originated data packet?

12 A. Let -- let -- I'm just going to verify. That --
13 that is my recollection. I just -- I want to be very
14 careful.

15 Q. Sure.

16 A. Yeah, this is a mobile originated --
17 transmission of a mobile originated packet, yes, sir.

18 MR. MARTIN: Okay. Actually, can we go
19 to Ahopelto, please. Pull up Exhibit 1005.

20 THE TECHNICIAN: Yes, sir. Give me one
21 moment. Pulling back up 1005.

22 1005 on the screen now.

1 MR. MARTIN: Okay. And can we scroll
2 down to -- I need to go to column 4.

3 THE TECHNICIAN: Figure 4; am I correct?

4 MR. MARTIN: No. Keep going, column --
5 column 4.

6 THE WITNESS: There you go.

7 MR. MARTIN: Yeah. And can we -- can you
8 zoom in on that, please.

9 THE TECHNICIAN: Yes, sir.

10 MR. MARTIN: Well, actually, strike that.
11 I'm jumping around, but let's -- let's go to Figure
12 2.

13 THE TECHNICIAN: Okay. Give me one
14 second. Let me go back up to Figure 2.

15 Figure 2 on the screen now. Let me zoom
16 in a little.

17 BY MR. MARTIN:

18 Q. And, Dr. Jensen, you would agree that that is a
19 mobile terminate -- that -- let me strike that.

20 Would you agree that Figure 2 of Ahopelto
21 illustrates routing of a mobile terminated data packet?

22 A. Yes. This is -- this is a mobile terminated

1 data packet, yes.

2 Q. Okay. And the arrow in Figure 2 on Path 1, that
3 indicates the direction of the transmission from the
4 host; is that correct?

5 A. Yeah, the arrowhead -- the arrowhead is -- is
6 showing that, yes.

7 MR. MARTIN: Okay. Can we go to Figure
8 4, please.

9 BY MR. MARTIN:

10 Q. So Figure 4 is showing a mobile originated data
11 packet; is that correct?

12 A. Yes. This is a mobile originated data packet,
13 yes, sir.

14 MR. MARTIN: Okay. Can we go to Figure
15 6.

16 BY MR. MARTIN:

17 Q. And Figure 6 is showing a mobile terminated data
18 packet; is that correct?

19 A. Let's see. Figure 6 is a mobile terminated
20 packet, yes, sir.

21 MR. MARTIN: Okay. And can we go to
22 Figure 8.

1 BY MR. MARTIN:

2 Q. Figure 8 shows a mobile originated data packet;
3 is that correct?

4 A. Yes, sir, that's correct.

5 MR. MARTIN: And can we go to Figure 12.

6 BY MR. MARTIN:

7 Q. Figure 12 also shows a mobile originated data
8 packet; is that correct?

9 A. That's correct.

10 Q. Okay. So can we go back to your declaration or
11 go --

12 MR. MARTIN: Can we go back to
13 Dr. Jensen's declaration, please, at paragraph 149,
14 which is on page 74.

15 THE TECHNICIAN: Yes, sir. Give me one
16 quick second and I will take us back.

17 Here is the declaration on page 74.

18 BY MR. MARTIN:

19 Q. Okay. So those annotations indicate that you
20 are mapping the router in yellow on Figure 10 to a
21 second network switch box; is that fair?

22 A. Yes, sir. Yes, sir, that's -- that's correct.

1 Q. Okay. And the first network switch box is
2 matched -- is mapped to the GPRS GSN of Operator 2; is
3 that correct?

4 A. That's correct.

5 Q. Now, in this figure, do you see the mobile phone
6 on the top right?

7 A. Yes. The mobile station, yes, sir.

8 Q. Okay. And the figure reads "mobile station of
9 Operator 1." Do you see that?

10 A. That's -- yes, sir.

11 Q. Okay. So does that mean that -- would it be --
12 let me strike that.

13 If I refer to Operator 1 as the home network of
14 the mobile station, does that make sense?

15 A. Yes. That's my understanding of the references
16 description of GPRS mobile station of Operator 1, the
17 home network is the network operated by Operator 1.

18 Q. Okay. And in this example illustrated in Figure
19 2, Operator 2 is a visited network of -- of the mobile
20 station; is that correct?

21 A. Yes, that's -- that's correct.

22 Q. Okay. Thank you.

1 And what you illustrate as the first path here
2 goes through the home network, fair? Well, let me
3 strike that.

4 What you've illustrated here in Figure 10 goes
5 through the GGSN of the home network; is that fair?

6 A. Yes, the packet is routed through the GGSN of
7 the home network.

8 Q. Okay.

9 MR. MARTIN: Can we scroll down to
10 paragraph 50 so we can see paragraph 50, please.

11 THE TECHNICIAN: Paragraph 150 or just
12 50?

13 MR. MARTIN: 150. I'm sorry. 150.

14 THE TECHNICIAN: That's okay. Just
15 confirming, Counsel.

16 MR. MARTIN: Thank you.

17 BY MR. MARTIN:

18 Q. So in paragraph 150 you testified that Ahopelto
19 discloses reconfiguring its routing functionality to use
20 a different network path for sending packets, right?

21 A. I do say that there, yes, sir.

22 Q. And if we go down to paragraph 151, you talk

1 about one example of that. Fair?

2 A. That's -- yes. That's the purpose of 151, yes.

3 Q. Okay. And in the scenario that you're
4 discussing in paragraph 159 -- 151, the Operator 2
5 network supports the protocol of the mobile station; is
6 that correct?

7 A. Yes. In this case, the -- yes, operator -- GGSN
8 Operator 2 supports the protocol of the mobile
9 originated packet.

10 Q. Okay. And your testimony is that a data packet
11 originating from the mobile station could be forced to
12 be routed through the home network even though the
13 network -- the visited network supports the protocol of
14 the mobile station; is that correct?

15 A. Yes. That's -- that's -- that's this example
16 exactly.

17 Q. So --

18 A. And just to be precise, I think this is implied,
19 but meaning that the GGSN of Operator 2 supports the
20 packet type of the mobile station.

21 Q. Okay. So if I say that the visited network
22 supports the protocol of the mobile station, it's

1 fair -- let me strike that.

2 If I say "the mobile station" -- let me strike
3 that again.

4 If I say "the visited network supports the
5 protocol of the mobile station", you will understand
6 that to mean that the GGSN of that network supports the
7 protocol of the mobile station; is that fair?

8 A. Yes, that's fair.

9 Q. Okay.

10 MR. MARTIN: So can we go pull up
11 Exhibit 1005, please, at column 10.

12 THE TECHNICIAN: Yes, sir. Give me one
13 quick second.

14 1005 pulled up, and let me go down to
15 column 10.

16 MR. MARTIN: And can we zoom in a little
17 bit? Thank you.

18 THE TECHNICIAN: No problem.

19 BY MR. MARTIN:

20 Q. So starting at line 13, do you agree that -- let
21 me strike that.

22 Do you agree that column 10, beginning at line

1 13, Ahopelto is discussing Figure 10?

2 A. Yes, sir --

3 Q. Okay.

4 A. -- Figure 10 and 11, that's correct.

5 Q. And do you see where it says that the example
6 illustrated in Figure -- Figure 10, the network does not
7 support the protocol to mobile station?

8 A. Yes, I see that in that paragraph.

9 Q. And in your testimony in paragraph 150 of your
10 declaration, you testify that Ahopelto discloses
11 reconfiguring routing functionality to use a different
12 network path for sending packets in a scenario where the
13 visited network can support the protocol of the mobile
14 -- mobile station; is that correct?

15 MR. FOWLES: Objection. Form.

16 THE WITNESS: I -- I say that in my -- I
17 say that in my declaration, yes.

18 BY MR. MARTIN:

19 Q. Okay. So in your declaration, the scenario that
20 you're talking about there, the network can support the
21 protocol of the mobile station?

22 A. I'm sorry. It -- what I say -- what I say in my

1 declaration is that even -- that even if the visited
2 operator does support -- I'm sorry. Maybe I don't
3 understand your question.

4 Q. Okay. So you were saying in your declaration
5 that even if the network does support the protocol of
6 the mobile station, that it can be routed home through
7 the home network in a forced manner; is that correct?

8 A. That's correct, I do, yes.

9 Q. Okay. And the reason why that would occur is --
10 be for billing reasons or security reasons?

11 A. That's Ahopelto's disclosure, yes.

12 Q. Okay. So the reason for the routing to one path
13 or to the other path is for billing reasons or security
14 reasons; is that accurate?

15 A. Well, the -- I -- that is -- those are -- those
16 are reasons that it might -- that the system may choose
17 to route through the home network, yes.

18 Q. But that would be the reason for routing through
19 the home network specifically in the example you provide
20 in paragraph 150 of your declaration; is that correct?

21 MR. FOWLES: Objection. Form.

22 THE WITNESS: Yeah, I'm -- I'm really

1 struggling to understand what you're asking me.
2 Yes, I am citing -- I am citing an example here of
3 routing through the home network for -- being
4 forced to route through the home network for
5 billing or security reasons. I am testifying that.

6 BY MR. MARTIN:

7 Q. Okay. So the way I understood your declaration
8 is that it would -- Ahopelto could route from -- through
9 the home network or through another path that supports
10 the protocol of the mobile station, but it's forced to
11 go through the home network. Is that true?

12 A. Yes. That's -- that's the scenario I'm
13 referring to in paragraph 151.

14 Q. Okay. And the reason why it would choose to go
15 the path through the home network is because of security
16 reasons or billing reasons?

17 A. Yes, sir.

18 MR. MARTIN: Okay. So can we go down to
19 paragraph 153, which is on page 75 of Dr. Jensen's
20 declaration.

21 THE TECHNICIAN: Yes, sir. Please stand
22 by. Pulling back up the declaration now. And you

1 said page 75; am I correct?

2 MR. MARTIN: Yes, that is what I said.

3 THE TECHNICIAN: 153 on the screen now.

4 BY MR. MARTIN:

5 Q. Okay. So in this paragraph 153, you identify
6 another scenario where you're talking about routing
7 along different paths; is that correct?

8 A. Yes.

9 Q. Okay.

10 MR. MARTIN: And can we scroll down a
11 little bit more, please. I think there is another
12 annotated figure that I wanted to look at. There
13 we go.

14 BY MR. MARTIN:

15 Q. So, Dr. Jensen, can you see Figure 12 on your
16 screen anno- -- let me strike that.

17 Dr. Jensen, can you see annotated Figure 12 on
18 your screen now?

19 A. Yes, sir, I can.

20 Q. Okay. And you have labeled here a second
21 network path.

22 A. Yes, sir.

1 Q. Okay. So in the scenario that we're talking
2 about here, the network -- let me strike that.

3 In the paragraph that we're talking about here,
4 the visited network does not support the protocol of the
5 mobile station; is that correct?

6 A. Yes, that's -- that's -- let me double-check,
7 but that is -- yes, that is correct. GGSN does not
8 support the protocol of the mobile station.

9 Q. Okay. So in this scenario, what would be the
10 first path?

11 A. Can you point me to where you're referring to
12 the -- oh, you're talking about in the figure, the
13 second path?

14 Q. Yes.

15 A. Oh, the -- the first path is -- would be
16 presumably that -- not presumably. The first path would
17 be that they -- it could be routed, as we saw
18 previously, through the home network so the -- the
19 packet's encapsulated, sent over the IP network to the
20 home network of Operator 1, which can then pre- -- then
21 can handle that, in this case, IPX packet. This is a --
22 this is a second possible routing path for that packet

1 through a third operator.

2 Q. Okay. So I'm not sure I understood you, so let
3 me see if I can clarify that. So the first path would
4 be going through the home network; is that correct?

5 A. Yeah, the first path would be going through the
6 home network, GGSN.

7 Q. Okay. And we're in a scenario where the visited
8 network does not support the protocol of the mobile
9 station, correct?

10 A. That's correct.

11 Q. Okay. And it would be forced -- it would -- let
12 me strike that.

13 And it would go to the home network in a forced
14 manner, correct?

15 MR. FOWLES: Objection. Form.

16 THE WITNESS: No, sir, it doesn't have to
17 be forced. That is somewhat of a default mode
18 where if the visited network doesn't understand it,
19 you could -- it might be forced for security or
20 billing reasons or it might just send it there
21 because it's known that the home network can
22 accommodate the packet of the mobile station.

1 BY MR. MARTIN:

2 Q. Okay. So -- but in this scenario, the GPRS GSN
3 of Operator 3 also could accommodate the packet of the
4 mobile station; is that correct?

5 A. That's correct.

6 Q. Okay. And the reason why you would go to the
7 home network would be for billing reasons or security
8 reasons?

9 MR. FOWLES: Objection. Form.

10 THE WITNESS: Again, as I already
11 testified, those are two reasons it might go to the
12 home network. It -- again, it could also go just
13 because that would be the default routing, knowing
14 that the home network could accommodate the packet
15 and forward -- and forward it on to the host.

16 BY MR. MARTIN:

17 Q. Okay. So if that's the default routing, then
18 the packets would be going through the home network; is
19 that correct?

20 A. I don't want to say default. It depends on the
21 system operation. So maybe that was a poor choice of
22 words. But that is another reason that it might get

1 routed through the home network GGSN, because it's known
2 it could handle -- it could accommodate the packet
3 structure.

4 Q. Okay. But in this case we have two networks
5 that can accommodate the packet structure?

6 A. That's correct.

7 Q. Okay. And so we're deciding to send it to the
8 first network or the second network for some reason
9 other than the network's ability to accommodate the
10 packet structure; is that fair?

11 A. Yes. We have another reason to route it through
12 Operator 3's GGSN.

13 Q. Okay. Okay. Dr. Jensen, can we turn to
14 paragraph 156 of your declaration. I'm asking the
15 technician, of course.

16 A. Of course.

17 THE TECHNICIAN: Perfectly okay. 156 on
18 the screen now.

19 BY MR. MARTIN:

20 Q. Okay. So here we are -- let me strike that.

21 This portion of your testimony refers to your
22 opinions related to Claim 4, correct?

1 A. Yes, sir.

2 Q. And let's go down to paragraph 158 of this
3 section. And here you use the term -- I'm sorry.
4 You -- let me strike that.

5 You testify that it would've been obvious that
6 the use of the first network path or a second -- second
7 network path by the GGSN demonstrates dynamic control,
8 and particularly dynamically changing network paths; is
9 that correct?

10 A. That is -- that is what I say in paragraph 158.

11 Q. Okay. How would a POSITA at the critical date
12 define the term "dynamically"?

13 A. Again, it's a -- it's a broad term with a --
14 with a relatively plain meaning that means changing with
15 time based on certain criteria or conditions.

16 MR. MARTIN: Okay. All right. I think
17 that we've been going for about another hour, so I
18 think it's a good time to take another break.

19 THE WITNESS: Okay.

20 (Recess.)

21 BY MR. MARTIN:

22 Q. Okay. Dr. Jensen --

1 MR. MARTIN: Or, actually, can we move to
2 paragraph 166 of Dr. Jensen's declaration.

3 THE TECHNICIAN: Yes, sir. Give me one
4 moment.

5 166 on the screen now.

6 BY MR. MARTIN:

7 Q. And this portion of your declaration refers --
8 strike that.

9 This portion of your declaration contains your
10 opinion as to Claim 6; is that accurate, Dr. Jensen?

11 A. Yes, sir.

12 Q. And you testify that Ahopelto renders obvious
13 wherein the server is configured to control the first
14 network switch box to switch between a first network
15 path and a second network path in response to an
16 application. Do you see that?

17 A. I do.

18 MR. MARTIN: Okay. Can we move down to
19 paragraph 171.

20 BY MR. MARTIN:

21 Q. And, again, we are -- let me strike that.

22 You testify here that routing in a force --

1 about routing in a forced manner for billing or security
2 reasons; is that true?

3 A. Yes, that's what this paragraph is discussing.

4 Q. And you testify that that discloses switching
5 between paths in response to an application; is that
6 correct?

7 A. That's correct. It's an example of that, yes,
8 sir.

9 Q. So is there anything in Ahopelto that you can
10 cite that teaches a software application -- let me
11 strike that.

12 Is there anything in Ahopelto that you can cite
13 or point to that teaches billing software application?

14 A. Specifically using those words "billing software
15 application," I don't recall anything in Ahopelto that
16 uses those three words in combination.

17 Q. So is there any portion of Ahopelto that you can
18 point to that teaches a billing software application?

19 A. Specifically no. Application, yes, and
20 disclosure of billing, yes, but using those together in
21 one disclosure, no, I cannot recall in -- any such
22 reference to that.

1 Q. Okay. And the same -- is the same true for
2 security application?

3 A. Same testimony, discloses security reasons,
4 disclose -- discloses an application, but does not use
5 those, that I recall, in a combined way.

6 Q. Okay. So it doesn't teach a security
7 application?

8 MR. FOWLES: Objection. Form.

9 THE WITNESS: Well, again, it -- you
10 know, it teaches applications and -- and packets
11 generated in response to applications, and it
12 discloses -- there's billing or security reasons.
13 So to say it doesn't disclose that at all I think
14 is -- is -- would be imprecise, but to have one
15 discussion that talks about a security -- a
16 security application in one localized discussion,
17 that's what I'm saying is not -- is not disclosed
18 or not -- I don't -- I don't recall that being in
19 Ahopelto.

20 BY MR. MARTIN:

21 Q. So does Ahopelto have any teachings about
22 specific applications run on a mobile station?

1 A. The -- the disclosure that I recall is that
2 packets are -- that Ahopelto discloses packets being
3 generated at the mobile station in response to an
4 application or being received by the application.
5 That's my recollection.

6 Q. Okay. But it doesn't say anything about what
7 kinds of applications those are; is that fair?

8 A. I don't recall anything specific where Ahopelto
9 discloses different examples of applications. I -- I
10 don't recall any.

11 Q. Okay. And it has no discussion of any kind
12 related to the types of applications that may be run on
13 a mobile station; is that true?

14 A. I -- I don't recall any such discussion in
15 Ahopelto.

16 Q. Can you point to anything here today about where
17 it says discuss -- discusses the -- any kind of
18 application being run -- well, let me strike that.

19 Can you point to any discussion in Ahopelto
20 about the types of applications being run on a mobile
21 station?

22 A. No. Again, and to be precise to that specific

1 discussion, I cannot point to any references there
2 but -- other than what a POSITA would understand from
3 the disclosure that's there.

4 Q. Okay. So looking at the paragraph 171, how are
5 you using the word "application" -- or let me strike
6 that.

7 How are you interpreting the word "application"
8 for your opinion offered in paragraph 171?

9 A. The reason I'm looking a little more deeply is
10 generally I use two different interpretations of
11 "application." One is, of course, the -- the
12 application for which we're using the device or the
13 communication, and one is a software application that's
14 -- that implements that sort of -- that communication.
15 I don't see here where I have been explicit in this case
16 about that, so I think both -- both would be appropriate
17 here. But certainly the mobile station does talk about
18 an application which could be interpreted as a software
19 application.

20 Q. So can you provide an example of a billing
21 reason?

22 MR. FOWLES: Objection. Form and scope.

1 THE WITNESS: You -- you would like me
2 just to come up with an appli- -- with -- with a
3 reason to -- to route packets based on billing?

4 BY MR. MARTIN:

5 Q. Well, would you agree with me that Ahopelto
6 doesn't explain what -- excuse me. Let me strike that.

7 Would you agree to -- would you agree with me
8 that Ahopelto does not elaborate about what a billing
9 reason would constitute?

10 A. Well, to be clear, Ahopelto discloses a variety
11 of different scenarios, some in particular -- I can
12 think of one -- which would likely have billing
13 connotations. However, I don't recall in his discussion
14 that he points to billing as being the reason for the
15 selection.

16 Q. Okay. So what's -- what's the one example that
17 you're referring to that had billing connotations?

18 A. A -- a -- a mobile station visiting a foreign
19 country, and rather than routing -- because the --
20 because the visited network doesn't support the packets,
21 rather than routing packets back to the home network,
22 which is in a different country only then to -- to

1 connect back to the country where he's visiting, where
2 -- they instead route it a different way in order to
3 avoid that trans-country transmission of data.

4 Q. Okay. In that scenario that you're referring
5 to, the billing reason is not a billing software
6 application; is that correct?

7 MR. FOWLES: Objection. Form.

8 THE WITNESS: Those details aren't --
9 aren't disclosed in Ahopelto, how -- how that
10 decision would be made. Certainly software
11 applications would indicate the -- the -- you know,
12 where that roaming mobile is from, and so there
13 would be that kind of information included from the
14 mobile station. The details of how that's
15 implemented, he -- Ahopelto does not provide.

16 BY MR. MARTIN:

17 Q. But I believe you testified -- well, hold on.
18 Let me -- why would the billing be different in a
19 foreign country than the home country?

20 MR. FOWLES: Objection. Form. Scope.

21 MR. MARTIN: Let me strike that.

22 BY MR. MARTIN:

1 Q. In your opinion, why would the billing be
2 different when a mobile station is in a foreign country
3 than when the mobile station is in its home country?

4 MR. FOWLES: Objection. Scope.

5 THE WITNESS: Again, this is -- this is a
6 very broad thing. Back in 1999, when cellular
7 networks were not as integrated as they are now --
8 so there's operator agreements, there's sending
9 data, you know, across country boundaries. All of
10 those things can incur costs. To really -- to be
11 precise to give an answer here, I would need to
12 spend more time and -- and research it.

13 BY MR. MARTIN:

14 Q. Okay. So the things that you're talking about
15 that you did mention, those would -- those do not depend
16 on which application someone would be running in a
17 different country; is that fair?

18 MR. FOWLES: Objection. Form.

19 THE WITNESS: But -- but -- but -- but
20 that's not -- no, I don't think that is accurate,
21 because if the application is something with
22 sensitive data, they're -- then there might be a

1 reason to send it to the home network, like a
2 banking transaction. So that decision is going to
3 be based on -- on the nature of the transaction or
4 of the communication that's happening.

5 BY MR. MARTIN:

6 Q. So we're talking about billing reasons, though,
7 right now.

8 A. Again, it could be similar. There's all kinds
9 of scenarios, so we're opening a can of worms here.
10 Could it -- could it depend on the -- on the software
11 application? It -- it -- it could. The -- the -- you
12 know, I just need to spend more time if you really want
13 me to discuss that. I'm just not really prepared to
14 opine on all the different reasons why you might do
15 something.

16 Q. Okay. And Ahopelto itself doesn't provide that
17 disclosure?

18 A. Again, it provides a disclosure of applications.
19 He provides a disclosure of billing and security
20 reasons. The rest, a POSITA would have to figure out
21 those implement- -- implementation details.

22 Q. Are you aware of any reference before June 4,

1 1999 -- excuse me. Let me strike that.

2 Are you -- are you aware of any reference that
3 was published before June 4, 1999, where data packets
4 were routed differently based on software applications?

5 MR. FOWLES: Objection. Form. Scope.

6 THE WITNESS: Well, I think the hard part
7 of that question is it is my opinion that the
8 references that I am citing here, specifically
9 Ahopelto, have disclosed that.

10 BY MR. MARTIN:

11 Q. But are you aware of any references that cite
12 specifically routing based on application --

13 MR. FOWLES: Objection.

14 BY MR. MARTIN:

15 Q. -- before -- that was published before June 4,
16 1999?

17 MR. FOWLES: Objection. Form.

18 THE WITNESS: I -- I just sort of need to
19 return to my former testimony. I talked about the
20 elements in the disclosures in Ahopelto and what a
21 POSITA would have understood from it, and I believe
22 Ahopelto does disclose that prior to June 4, 1999.

1 BY MR. MARTIN:

2 Q. Okay. So what about the term "billing reason"
3 to you implicates software?

4 A. A POSITA would understand that things like
5 billing, there has to be some sort of indication from
6 the phone, right, about this is my home -- this is my
7 home network, this is where I'm traveling, here's the
8 implications of my contract with my providers. I mean,
9 I'm -- I'm speculating here. I don't like to do that.
10 But a POSITA would understand that all of these issues
11 have to be worked out, and these issues impact the
12 billing to the subscriber. And -- and the mobile device
13 would have to have software which would -- which would
14 communicate all of this information to allow a good
15 decision to be made.

16 Q. So whether you're in your home network or -- let
17 me strike that.

18 Whether a mobile station is in its home
19 network -- let me strike that again.

20 There are some applications that a user would be
21 able to run on a mobile station in a home network and in
22 a visited network?

1 A. Generally speaking, yes.

2 Q. So you could run the same application in a home
3 network and in a visited network; is that fair?

4 A. Generally, yes. I mean, you know, let's get
5 specific, but in general, yes, there are applications
6 that -- that -- that could be run in either network.

7 Q. Okay. So did you cite any references -- well,
8 let me strike that a second.

9 All right. I want to move on, Dr. Jensen.

10 A. Okay.

11 Q. So can we go to paragraph 267 of your
12 declaration.

13 A. Of course.

14 THE TECHNICIAN: Do you know what page
15 that is on, Counsel?

16 MR. MARTIN: 118.

17 THE TECHNICIAN: Give me one moment.

18 BY MR. MARTIN:

19 Q. Okay. So this claim term that this section is
20 about refers to video streaming application -- "a video
21 streaming application and the data communication
22 comprises of video stream data."

1 Do you see that?

2 A. I do.

3 Q. Would you agree that a video stream is a
4 continuous multimedia transmission?

5 MR. FOWLES: Objection. Form.

6 THE WITNESS: A video stream is a stream
7 of data containing video, yes. I mean, I --
8 multimedia gets a little broader. This
9 specifically discloses video.

10 BY MR. MARTIN:

11 Q. So you agree that a video stream is a continuous
12 transmission of video?

13 MR. FOWLES: Objection. Form.

14 THE WITNESS: I don't know that I agree
15 to -- with that or not. Continuous -- I mean,
16 there can be gaps. There are ways to handle that.
17 So it depends on what you mean by "continuous."
18 But you are constantly feeding data across the
19 channel. It just might be at varying rates
20 depending on channel conditions.

21 BY MR. MARTIN:

22 Q. So a video stream would require a continuous

1 feed of data; is that correct?

2 MR. FOWLES: Objection. Form.

3 THE WITNESS: The problem is I need you
4 to define "continuous" before we can agree on that
5 definition.

6 MR. MARTIN: Okay. Can we look at
7 Exhibit 2003, please.

8 THE TECHNICIAN: Yes, sir, give me one
9 moment. Pulling it up now.

10 MR. FOWLES: I don't see that in the
11 share folder. Is that going to show up?

12 THE TECHNICIAN: It should. It might
13 just be a little bigger of a file, so it may just
14 take a few moments. It should be in there. I
15 would definitely double-check in a few minutes.
16 And if it's still not in there, let me know and I
17 can definitely correct it.

18 Let me zoom in.

19 MR. MARTIN: Okay. Can we look at the
20 first page.

21 BY MR. MARTIN:

22 Q. Okay. Dr. Jensen, do you see there on the first

1 page it says "the deposition of Michael Allen Jensen"?

2 Do you see that?

3 A. I do.

4 MR. MARTIN: Okay. Can we go to page 71.

5 And can you zoom in on that a little bit more. I'm

6 having trouble seeing it. And can you scroll down

7 to line 14. Okay. Hold on one second.

8 All right. We're going to come back to

9 that. Let me scratch that for a minute. Let's

10 move on to a different topic. So can we go to

11 paragraph 184 of your declaration, please.

12 THE TECHNICIAN: Pulling back up the

13 declaration now.

14 THE WITNESS: Kollin, it's page 87.

15 THE TECHNICIAN: Thank you so much.

16 BY MR. MARTIN:

17 Q. Okay. So this section of your declaration, we

18 are talking about Claim 11. Do you agree?

19 A. I do.

20 Q. And you testify in paragraph 184 that, "Ahopelto

21 renders obvious wherein the server is configured to send

22 control parameters to the network switch box using at

1 least one protocol." Did I get that right?

2 A. Yes, sir.

3 Q. So I want to go down to paragraph 188 of your
4 declaration now. And you testify there that, "It
5 would've been obvious that an access server sends a
6 command to either allow the routing functionality to go
7 to forward traffic to a given network or not from a
8 mobile station." Is that fair?

9 A. That's what I say here, yes.

10 Q. Okay. And I think we -- hold on one second.

11 A. Of course.

12 MR. MARTIN: Can we go off the record a
13 second.

14 (Recess.)

15 BY MR. MARTIN:

16 Q. Okay. Dr. Jensen, where we left off, we were
17 talking about paragraph 188 -- or we were looking at
18 paragraph 188 of your declaration.

19 A. That's correct.

20 Q. And I think we had agreed that you testified
21 that it would have been obvious that an access server
22 sends a command to either allow the routing

1 functionality to forward traffic to a given network or
2 not from a mobile station -- actually, strike that. I
3 don't think we agreed.

4 So let me ask that question. Do you agree that
5 paragraph 1 -- in paragraph 188 of your declaration, you
6 testified that it would have been obvious that an access
7 server sends a command to either allow the routing
8 functionality to forward -- forward traffic to a given
9 network or not from a mobile station?

10 A. Yes, I agree that I said that here.

11 Q. Okay. And an access server is not depicted in
12 any figure of Ahopelto. Do you agree with that?

13 A. I don't -- yeah -- yes, I don't recall any
14 depiction of an access server in Ahopelto.

15 Q. And you reference Exhibit 1006 to Lager to
16 support your statement; is that true?

17 A. I believe -- that's -- generally I know Lager
18 discloses that, yes.

19 Q. And when I say "to support your statement," I
20 mean specifically you use Exhibit 1006 --

21 A. Yes.

22 Q. -- to support your statement in paragraph 188?

1 A. Yes. Yes. That's it, yes.

2 Q. All right. So can we pull up Exhibit 1006,
3 please.

4 THE TECHNICIAN: Yes, sir. Please stand
5 by.

6 Exhibit 1006 on the screen now.

7 MR. MARTIN: Can you zoom in a little
8 bit.

9 BY MR. MARTIN:

10 Q. So looking at column 12, if we go down to column
11 12, line 60, do you see where -- do you agree that it
12 teaches that a control means activates the access means?

13 A. Did you say -- did you say column 12?

14 Q. Yeah.

15 A. Is that where we were looking on the screen?

16 Q. No. I think we weren't there. Let's --

17 A. Oh, okay.

18 Q. So beginning there where -- "within" -- "within
19 each access means there is a control means."

20 A. Yes. Yes, that -- that's there in Lager.

21 Q. Okay. And that's what you cited in your --
22 for -- in paragraph 188 of your declaration?

1 A. I did cite that.

2 Q. And then you -- okay. And then you also cited
3 column 13, lines 6 through 12.

4 MR. MARTIN: Can we look at column 13,
5 lines 6 through 12, please.

6 BY MR. MARTIN:

7 Q. And there, Lager teaches that the access means
8 only activates the access server if it receives network
9 indication parameters that match subscription parameters
10 stored in the subscription memory means HLR.

11 What does HLR stand for? Do you know?

12 A. I don't recall.

13 Q. Does home location register sound familiar?

14 A. It's been some time since I've read this. That
15 could be true. I just don't recall.

16 MR. MARTIN: Can we look at column 11,
17 line 6.

18 THE WITNESS: There it says the home
19 location register, HLR, so, yes.

20 BY MR. MARTIN:

21 Q. Okay. So would you agree that the home location
22 register stores the subscription -- or the home location

1 register is the subscription memory means?

2 A. Yes. That's what column 13, line 11, says -- or
3 12 says, yes.

4 MR. MARTIN: Okay. Can we look at Figure
5 8, please.

6 BY MR. MARTIN:

7 Q. So in Figure 8, do you see the HLR?

8 A. Yes, sir, I do.

9 Q. Okay. And there's a box drawn around the HLR --
10 or there's a box around -- drawn around a number of
11 components, and that box is labeled "PLMN-SW."

12 A. Yes, sir.

13 Q. Do you see that?

14 A. Yes, I do.

15 Q. And the -- the HLR is one of the components that
16 is grouped inside of that box PLM -- LMN-SW?

17 A. Yes, sir.

18 Q. Okay. And so is the GGSN. Do you see that?

19 A. I do.

20 Q. Okay. So would you agree that the access server
21 is only activated after the subscription information has
22 been verified within the PLMN-SW of Lager?

1 A. Yes, I think that's a fair characterization.
2 Just to be precise, to make sure I say it properly, the
3 access server would only be activated if the
4 subscription information stored in the HLR matches
5 the -- what's sent from the mobile station.

6 Q. Okay. All right. Now I want to move to
7 paragraph 189 of your declaration, please.

8 MR. MARTIN: So let's go back to
9 Dr. Jensen's declaration.

10 THE TECHNICIAN: Give me one second. I'm
11 pulling it up now.

12 BY MR. MARTIN:

13 Q. I think that's around page 88 or so. We were
14 there anyway.

15 So the -- and now you testify that the primary
16 purpose of the access server is to establish the
17 connection through a desired internet service provide --
18 provider, right?

19 A. That is correct.

20 Q. Okay. And based on the testimony that you just
21 offered, do you agree that the subscription information
22 would be verified before the access server tries to

1 establish a connection with an internet service
2 provider?

3 A. Well, I'm not deep into all of the handshaking
4 that would happen, but generally that would be a step
5 that would be required, is verifying that subscription
6 information.

7 Q. Okay. And so what we already talked about,
8 though, is that the access server's not turned on or --
9 I'm sorry, let me use the exact -- let me strike that.

10 Let's look at the specific wording. I think
11 we've already established that the access server is not
12 activated until after the subscription has been verified
13 within the PLMN-SW. Is that correct?

14 A. Yes.

15 Q. Okay.

16 A. That's what we already discussed, yes, sir.

17 Q. Okay. So before it can seek to establish a
18 connection with internet service provider, it must be
19 activated, right?

20 MR. FOWLES: Objection. Form.

21 THE WITNESS: Sorry.

22 THE REPORTER: Repeat the answer. I

1 missed that.

2 THE WITNESS: I thought Mr. Fowles might
3 have been saying something, so I was waiting.

4 MR. FOWLES: I said it.

5 THE WITNESS: Oh. I didn't hear it.

6 Well, can you -- can you -- can you
7 rephrase the -- can you ask the question again,
8 Mr. Martin? I -- I -- now I've lost my train of
9 thought. Please ask me again.

10 BY MR. MARTIN:

11 Q. Sure. Before an access server can seek to
12 establish a connection with an internet service
13 provider, it must be activated. Is that -- do you agree
14 with that?

15 MR. FOWLES: Objection. Form.

16 THE WITNESS: Yes. The access server
17 needs to be activated, yes, before it starts to
18 negotiate with the network to establish a
19 connection.

20 BY MR. MARTIN:

21 Q. Okay. So in Lager, the control means selects
22 the access server. Do you agree with that?

1 A. Yes. Selects, activates, yes.

2 Q. So I'm specifically -- specifically asking about
3 selects. So would you --

4 A. Okay.

5 Q. -- agree that the control means selects the
6 access server?

7 A. I'm sorry, I'm not 100 percent certain about
8 that selection process. I believe there's different
9 ways to do it. But, generally speaking, an access
10 server has to be selected by a control means.

11 MR. MARTIN: Okay. And can we look at
12 Exhibit 1006 at column 14, please.

13 THE TECHNICIAN: Yes, sir. Give me one
14 moment. That was Exhibit 1006; am I correct?

15 MR. MARTIN: Yes.

16 BY MR. MARTIN:

17 Q. So go to line 1. So there it says "the access
18 control means in the selected GGSN selects an
19 appropriate access server." Do you see that?

20 A. Yes, sir, I do see that.

21 Q. Do you -- do you agree with me now that the
22 control means selects the access server in Lager?

1 A. Yes.

2 Q. Okay. If an access server failed to establish a
3 connection with an ISP, would it communicate that to the
4 control means?

5 A. Again, I'm not deep enough in the exact exchange
6 of information to be able to give you a good answer to
7 that. I don't know.

8 Q. Okay. So is it fair to say, then, that you have
9 don't know where it would -- let me strike that.

10 So you don't know whether the access means would
11 need to communicate a failure to establish a connection
12 to other parts of the GGSN?

13 A. No. That's -- that's -- that's quite simple.
14 It would need to -- I mean, any functional system would
15 need to communicate a failure to establish a connection
16 to -- basically back to the mobile station through the
17 GGSN.

18 Q. Okay. So -- but it wouldn't have to communicate
19 with all parts of the GGSN? Is that what you're saying?

20 A. I -- all I'm saying is I don't know the exact
21 path of information flow through the different subparts
22 of the GGSN.

1 Q. Okay. So it's possible that it could
2 communicate that message without that message being
3 delivered to all the parts of the GGSN; is that fair?

4 MR. FOWLES: Objection. Form.

5 THE WITNESS: I -- I would really -- I
6 would -- to really testify well on this, I would
7 need to study this, and I am not prepared -- I'm
8 not prepared to give you a good opinion on this
9 right now.

10 BY MR. MARTIN:

11 Q. So you're willing to testify that it would need
12 to communicate to some part of the GGSN; is that
13 correct? Let me strike that.

14 You're willing to testify that the access server
15 would be willing -- must communicate some -- to some
16 part of the GGSN the success or failure of a connection
17 with an internet service provider; is that correct?

18 MR. FOWLES: Objection. Form.

19 THE WITNESS: The -- the radius protocol
20 does require getting that feedback that -- that --
21 that a network connection could not be established,
22 and so the GGSN would have that information. In

1 any -- any -- in any functional system, it would
2 need to feed that back.

3 BY MR. MARTIN:

4 Q. Okay. But you just don't know, sitting here
5 today, what parts of the GGSN it would need to
6 communicate that information to?

7 A. Or -- yes, or -- or through. The access server
8 would certainly get that information, but then what
9 happens at that point is where I am uncertain.

10 Q. Okay. So it's possible that it could circumvent
11 the control means. Is that what you're saying?

12 MR. FOWLES: Objection.

13 BY MR. MARTIN:

14 Q. Let me strike that.

15 It's possible that the communication of the
16 success or failure to establish a connection could
17 circumvent the control means?

18 MR. FOWLES: Objection. Form.

19 BY MR. MARTIN:

20 Q. Is that fair?

21 A. I don't want to say whether it's possible or not
22 possible without considering this in detail.

1 Q. Okay. So sitting here today, you don't know
2 where it would communicate whether its attempt -- and
3 let me strike that.

4 Sitting here today, you don't know whether the
5 access -- where the access server would communicate
6 within the GGSN whether a successful connection has been
7 established?

8 A. That's correct. I -- I -- I am not prepared --
9 I do not know and I'm not prepared to offer information
10 on that right now.

11 Q. Okay. And sitting here today, you do not know
12 where it would need to communicate -- let me strike that
13 again. I'm sorry.

14 Sitting here today, you do not know where an
15 access server would need to communicate the success of
16 failure -- sorry. Let me strike that again.

17 Sitting here today, you do not know where the
18 access server would communicate the failure of an
19 attempt to establish a connection with an internet
20 service provider?

21 A. Yeah. I cannot testify to all the parts that
22 would need to be aware of that sitting here today.

1 MR. MARTIN: Okay. Can we look at
2 paragraph 190 of your declaration, please.

3 THE TECHNICIAN: Pulling it up now. 190.

4 BY MR. MARTIN:

5 Q. There you say, "A POSITA would have recognized
6 that the access server must communicate the outcome of
7 the connection establishment exchange with the rest of
8 the GGSN."

9 Do you see that?

10 A. I do.

11 Q. Okay. And you can't tell us today where it
12 would need to communicate the establishment of that
13 outcome of the connection -- I'm sorry. Let me strike
14 that.

15 You can't sit here today -- you cannot, sitting
16 here today, tell us where the access server would
17 communicate the outcome of the connection establishment
18 exchange with the ISP radius within the GGSN?

19 MR. FOWLES: Objection. Form.

20 THE WITNESS: Well, what I testified is
21 in the -- in the case where it's denied, exactly
22 what would have to happen at that point is what

1 I've been unable to tell you about. So to be
2 precise, in the case that it's rejected.

3 BY MR. MARTIN:

4 Q. Okay. And -- and how about when it's accepted?
5 Where would it communicate that? Where would the access
6 server communicate that?

7 A. Well, at a minimum, if it's accepted, there is
8 other information that is passed along to the access
9 server to enable access to the network, right. There's
10 parameters -- addressing or whatever these parameters
11 are, to facilitate accessing that internet service
12 provider, ISP. The router has to have that information.
13 The router functionality of the GGSN has to have that.
14 So that certainly -- in that case, at a minimum, that
15 routing functionality would need some of that
16 information.

17 Q. What kind of information would the routing
18 functionality need?

19 A. The -- are you -- are you asking me what is the
20 configuration information that the IETF defines?

21 Q. I'm asking you what kind of information the
22 routing functionality would need from the access server

1 after it has established a connection like you describe
2 in paragraph 190.

3 A. I alluded to that in what I said a few moments
4 ago. The standard is that the radius server has to
5 report that configuration information that -- that the
6 router has to have in order to then be able to route the
7 packets over that network, over that ISP. So there
8 might be -- there might be access code -- I don't know
9 all the information. You -- it's defined in the
10 standard, but I don't know them all.

11 Q. Okay. Would it be possible to store that
12 information in a register within the PLMN-SW?

13 MR. FOWLES: Objection. Form.

14 THE WITNESS: Well, any information can
15 be stored. So in a -- in a -- in the abstract,
16 yes, of course that information can be stored.

17 BY MR. MARTIN:

18 Q. Okay. So the routing information could be
19 stored within a register -- let me strike that.

20 The configuration information needed for the
21 routing functionality to operate with the internet
22 service provider could be stored within the PLMN-SW?

1 MR. FOWLES: Objection. Form.

2 THE WITNESS: Yes, information can be
3 stored. I think the key question is for what
4 purpose is where we need the more detailed
5 discussion. But information can be stored.

6 BY MR. MARTIN:

7 Q. Okay. So, Dr. Jensen, is there any difference
8 between a parameter and the command?

9 A. These terms don't necessarily have a single
10 meaning in the art, so maybe we ought to talk about
11 specifics rather than generalities about the definition
12 of those terms.

13 Q. So as you were interpreting parameters -- well,
14 actually, let's scroll up.

15 MR. MARTIN: Can we go up a little bit in
16 his declaration. Can we -- keep going. Okay.

17 Scroll down, Claim 11, where we have --

18 BY MR. MARTIN:

19 Q. So do you see Claim 11, where it recites "the
20 service configured to send control parameters to the
21 network switch box using at least one protocol"?

22 A. I do.

1 Q. Okay. So when you read Claim 11, did you
2 interpret the term "parameters" to mean something
3 different than a command?

4 A. Control parameters could -- in the art, a POSITA
5 would read that and say a control parameter could
6 represent a command to do something. It could represent
7 information that enables something to happen. I -- I
8 think broadly in the art that term could -- could
9 include either. It's just some sort of information to
10 be able to control the system.

11 Q. How did you interpret it when you were applying
12 Ahopelto to Claim 11?

13 MR. FOWLES: Objection. Form.

14 BY MR. MARTIN:

15 Q. Let me rephrase that. Dr. Jensen, how were you
16 interpreting the term "parameters" when you were
17 applying Claim 11 to Ahopelto?

18 A. I gave it, in my opinion, a -- a broad
19 definition of what I've already testified information.
20 Again, it's specifically used for control in this claim,
21 but it's -- it's information that facilitates that
22 control. It could be a command to do something. It

1 could be information that goes along with a command or
2 -- or other information, like the configuration
3 information that we talked about previously for the
4 access server and the radius server. So I believe I
5 gave it quite a broad definition.

6 Q. Okay. So I think we've been going again for
7 about an hour. We took a little mini break, but I only
8 have a few more questions. But do we want to go off the
9 record for another ten minutes or so and then reconvene
10 to finish this up?

11 A. It's okay with me.

12 MR. MARTIN: Okay. Let's go off the
13 record, please.

14 (Recess.)

15 MR. MARTIN: Okay. So can we go back to
16 Exhibit 2003, please.

17 THE TECHNICIAN: Yes, sir. Give me one
18 moment. Let me pull back up Exhibit 2003.

19 Exhibit 2003 on the screen now.

20 MR. MARTIN: Okay. And so can we go to
21 page 70 -- it's transcript page 71, so that's --
22 just scroll down -- scroll down to the next page,

1 please.

2 BY MR. MARTIN:

3 Q. Okay. Dr. Jensen, do you remember -- do you
4 recall earlier that you agreed that this was your
5 deposition testimony?

6 A. Yes, I did agree to that. Yeah, yes.

7 Q. Okay. And it was in the matter of IPR
8 2022-01005?

9 A. Okay. I don't -- I don't remember that, but I
10 certainly trust you're representing that right.

11 Q. Okay. So looking there on page 71 of your
12 transcript, line 14, you were asked if you agreed that a
13 video stream -- stream is a continuous video stream -- a
14 continuous video transmission. Do you see that?

15 A. Can you scroll -- I -- is that below where we
16 are?

17 Q. Yeah, I'm beginning on line 14.

18 A. Yes, I see -- I see that now.

19 Q. So do you still agree that a video stream is a
20 continuous video transmission?

21 A. Well, I noticed now in my answer that I put sort
22 of a caveat there, as well: At least from the

1 standpoint of the user, it's continuous.

2 Q. Okay. So you stand -- is your testimony in
3 response to this question accurate?

4 A. Yes, it's -- it's accurate from the standpoint
5 of a user.

6 Q. Okay. So you agree with me that your testimony
7 here on lines 16 through 17 is accurate?

8 A. Yes, yes. That's what I testified.

9 Q. Okay.

10 A. And I stand -- I stand by that testimony.

11 Q. Okay. Let me -- for the record, I'm going to
12 read it:

13 "Would you agree that a video stream is a
14 continuous video transmission?"

15 And you answered, "Yes. At least from the
16 standpoint of the user, it's a continuous -- it's
17 continuous, yes, sir."

18 So do you agree with me that that's accurate?

19 A. Yes, I agree that that's accurate.

20 Q. Okay. Then moving on to the next question. And
21 you asked, "And then video streams in general, they can
22 be viewed before the video has been transmitted in its

1 entirety, correct?"

2 And you answered -- well, let's go on to the
3 next line. Sorry. The question beginning on 23, you
4 were asked, "Video streams, generally speaking, they can
5 be viewed before the entire video has been transmitted
6 in its entirety, correct?"

7 And you answered, "Oh, yes. Yes, portions can
8 be viewed before they end. Yes."

9 Do you agree that that is accurate?

10 A. Yes.

11 Q. And then you were asked after that, "So when
12 you're doing video streaming, you can view the video
13 without downloading the video first, correct?"

14 And then in response you answered, "Yes. When
15 it's being streamed, that is correct."

16 So do you agree that that testimony is still
17 accurate?

18 A. Yes. The only caveat I put on that last answer
19 is what I -- my answer above, "portions can be viewed
20 before the end arrives."

21 Q. Okay. But you -- so you agree with your
22 testimony here, your answer that, "Yes. When it's being

1 streamed, that is correct"?

2 A. Again -- again, I don't -- I don't want that
3 taken out of context. I gave that answer in the context
4 of my prior answer, that portions -- you can't -- you
5 can't view the -- the whole video before it's all
6 arrived. So to be precise, with that caveat that the
7 portion that have already arrived can be viewed before
8 the end has arrived or the rest has arrived -- with that
9 caveat, yes, this testimony is -- is correct. I just
10 don't want that last answer being taken out of that
11 context.

12 Q. Okay. That's fair.

13 And do you agree with this next question and
14 answer? Here you were asked -- hold on. Strike that.

15 You were asked at this deposition, "Are you
16 aware of any phones at the critical date that were
17 capable of streaming videos?"

18 And in response you answered, "Again, I'm not
19 aware of any that were capable of it at the critical
20 date. It doesn't mean" -- let me strike that, actually,
21 because the critical date, I'm sure, was different.

22 Are you aware of any phones available before

1 June 4, 1999, that were capable of streaming videos?

2 A. I give the same answer to that question that I
3 did then: I was not -- I'm not aware of any that were
4 capable of it at that critical date, June 4, 1999. And,
5 again, it doesn't mean there weren't some, but I'm not
6 aware.

7 Q. Okay. And have you done any research into
8 whether it was -- they were available or not?

9 A. No, sir, I have not.

10 Q. And does Ahopelto disclose any mobile station
11 that has a streaming application?

12 A. Specifically Ahopelto, it, to my recollection,
13 does not get into the details of the data that is
14 streamed; and so, no, I'm not aware of anything in
15 Ahopelto that specifically discloses streaming video as
16 the data payload. It just talks about data.

17 Q. Okay. So I want to move to paragraph 161 of
18 your declaration.

19 THE TECHNICIAN: 161 on the screen now.

20 BY MR. MARTIN:

21 Q. And can we scroll up just a little bit. And
22 paragraph 161 relates to Dependent Claim 5. Do you

1 agree with that?

2 A. Yes, sir, I do.

3 Q. Okay. If you look at Independent Claim 5, you
4 see that it -- one of the terms that it cites is a
5 network condition. Do you see what I'm talking about?

6 A. I do.

7 Q. Okay. How did you interpret the term "network
8 condition" when you were evaluating this limitation?

9 A. I gave it the broadest, plainest meaning that I
10 think that I could. That would be any kind of a
11 condition that would be relevant for the network.

12 Q. And how did you come up with that meaning?

13 A. My recollection -- it's been some time. Of
14 course, I had read the specification of the '863 Patent,
15 and then, of course, my own experience -- a network
16 condition is a -- while I won't say it's rigidly defined
17 in the art, it's not a difficult term to define.

18 Q. Okay. So did you do anything specifically to
19 evaluate what the meaning of this term was?

20 MR. FOWLES: Objection to form.

21 THE WITNESS: Well --

22 BY MR. MARTIN:

1 Q. Let me strike that. Let me strike that.

2 Did you do anything specifically to evaluate the
3 meaning of the term "network condition"?

4 A. Again, I've already testified I remember reading
5 the '863 Patent specification. Beyond that, no, not to
6 my recollection.

7 MR. MARTIN: Okay. I -- I think that's
8 all I have, so I will pass the witness.

9 MR. FOWLES: Can we take a -- go off the
10 record and take a ten-minute break?

11 MR. MARTIN: That's fine with me.

12 THE WITNESS: Okay.

13 (Recess.)

14 MR. FOWLES: Thank you. No further
15 questions at this time from our side.

16 (The deposition was concluded at 12:51
17 p.m.)

18

19

20

21

22

1 STATE OF CALIFORNIA:

2 COUNTY OF SANTA CLARA:

3 I hereby certify that the foregoing transcript
4 was reported, as stated in the caption, and the
5 questions and answers thereto were reduced to
6 typewriting under my direction; that the foregoing
7 pages represent a true, complete, and correct
8 transcript of the evidence given upon said hearing,
9 and I further certify that I am not of kin or
10 counsel to the parties in the case; am not in the
11 employ of counsel for any of said parties; nor am I
12 in any way interested in the result of said case.

13

14

Susan DiFilippantonio

15

Susan DiFilippantonio, Notary Public
and Registered Professional Reporter
Commission Expires 10-22-2028
California Certificate Number 14363

16

17

18

19

20

21

22

23

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CAPTION

The Deposition of DR. MICHAEL ALLEN JENSEN, taken in the matter, on the date, and at the time and place set out on the title page hereof.

It was requested that the deposition be taken by the reporter and that same be reduced to typewritten form.

It was agreed by and between counsel and the parties that the Deponent will read and sign the transcript of said deposition.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CERTIFICATE OF REPORTER

STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

Before me, this day, personally appeared, DR.
MICHAEL ALLEN JENSEN, who, being duly sworn, states that
the foregoing transcript of his deposition, taken in the
matter, on the date, and at the time and place set out
on the title page hereof, constitutes a true and
accurate transcript of said deposition.

If no changes need to be made on the following two
pages, place a check here , and return only this
signed page.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

DEPOSITION ERRATA SHEET

Assignment No. 491112

Case Caption: Apple, Inc. -vs- Smart Mobile

Technologies, LLC

Witness: DR. MICHAEL ALLEN JENSEN

DECLARATION UNDER PENALTY OF PERJURY I declare under penalty of perjury that I have read the entire transcript of my deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

_____ There are no changes noted.

_____ The following changes are noted:

Page No. ___ Line No. ___
Should read:

Reason for Change: _____
Page No. ___ Line No. ___
Should read:

Reason for Change: _____
Page No. ___ Line No. ___
Should read:

1 Reason for Change: _____
Page No. ___ Line No. ___
2 Should read: _____

3 _____
4 Reason for Change: _____
Page No. ___ Line No. ___
5 Should read: _____

6 Reason for Change: _____
Page No. ___ Line No. ___
7 Should read: _____

8 _____
9 Reason for Change: _____

10 SIGNATURE OF DEPONENT

11 DR. MICHAEL ALLEN JENSEN _____

12 Sworn to and subscribed before me
13 this ___ day of _____, _____.

14
15
16
17
18
19
20
21
22

A			
a-l-l-e-n	125:4	address	75:3, 75:6,
5:10	accessing	46:17, 47:9,	75:10, 76:18,
ability	121:11	47:11, 47:13,	76:20, 82:20,
48:8, 90:9	accommodate	47:14	82:22, 97:5,
able	88:22, 89:3,	addressing	97:7, 104:3,
14:7, 30:17,	89:14, 90:2,	121:10	104:11, 104:14,
59:13, 74:2,	90:5, 90:9	adobe	105:4, 106:18,
102:21, 116:6,	accurate	9:9	108:4, 108:10,
122:6, 124:10	5:16, 26:17,	adopted	108:12, 109:11,
above	74:14, 84:14,	71:14	110:21, 111:20,
128:19	92:10, 99:20,	advance	112:21, 114:13,
absent	127:3, 127:4,	4:17	114:22, 115:5,
72:20	127:7, 127:18,	after	115:21, 126:6,
absolutely	127:19, 128:9,	7:17, 7:19,	126:19, 127:6,
32:5	128:17, 135:9,	27:20, 31:1,	127:13, 127:18,
abstract	136:10	31:6, 31:13,	127:19, 128:9,
122:15	accurately	111:21, 113:12,	128:16, 128:21,
accepted	30:12	122:1, 128:11	129:13, 131:1
121:4, 121:7	acrobat	again	agreed
access	9:9	34:17, 36:2,	107:20, 108:3,
50:16, 51:2,	across	49:15, 54:8,	126:4, 126:12,
51:14, 51:16,	7:5, 99:9,	55:19, 57:21,	134:8
55:15, 55:18,	104:18	58:8, 60:21,	agreements
56:17, 61:2,	act	64:5, 65:13,	99:8
63:6, 65:3,	45:16, 45:18	66:17, 66:22,	ahead
65:9, 66:20,	activated	68:9, 72:19,	6:7, 20:17,
68:8, 68:20,	111:21, 112:3,	82:3, 89:10,	20:18, 50:3,
69:4, 107:5,	113:12, 113:19,	89:12, 91:13,	53:14, 60:3
107:21, 108:6,	114:13, 114:17	92:21, 94:9,	ahopelto
108:11, 108:14,	activates	95:22, 99:5,	19:7, 24:5,
109:12, 109:19,	109:12, 110:8,	100:8, 100:18,	32:13, 32:14,
110:7, 110:8,	115:1	102:19, 114:7,	32:16, 41:20,
111:20, 112:3,	acts	114:9, 116:5,	48:4, 49:3,
112:16, 112:22,	45:20, 45:22	119:13, 119:16,	49:5, 49:8,
113:8, 113:11,	actually	124:20, 125:6,	49:11, 64:10,
114:11, 114:16,	33:18, 48:1,	129:2, 129:18,	66:10, 66:14,
114:22, 115:6,	73:2, 75:18,	130:5, 132:4	66:16, 66:21,
115:9, 115:17,	76:10, 92:1,	against	67:1, 67:17,
115:19, 115:22,	108:2, 123:14,	18:7	67:21, 68:1,
116:2, 116:10,	129:20	ago	68:4, 68:7,
117:14, 118:7,	adam	13:3, 13:5,	68:20, 69:3,
119:5, 119:15,	2:6, 2:11	13:8, 18:13,	74:14, 75:7,
119:18, 120:6,	add	18:14, 122:4	75:19, 76:20,
120:16, 121:5,	7:21	agree	80:18, 83:1,
121:8, 121:9,	additional	28:18, 29:6,	83:10, 85:8,
121:22, 122:8,	23:17, 26:18,	35:16, 36:20,	92:12, 93:9,
	27:9, 29:3,	48:5, 48:7,	93:12, 93:15,
	29:11	53:8, 66:15,	93:17, 94:19,

<p>94:21, 95:2, 95:8, 95:15, 95:19, 97:5, 97:8, 97:10, 98:9, 98:15, 100:16, 101:9, 101:20, 101:22, 106:20, 108:12, 108:14, 124:12, 124:17, 130:10, 130:12, 130:15 ahopelto's 42:15, 45:4, 45:5, 49:14, 67:7, 84:11 all 5:9, 6:4, 6:16, 8:3, 9:12, 9:20, 10:4, 10:5, 10:7, 14:4, 16:4, 16:20, 24:4, 36:18, 52:17, 53:21, 56:13, 60:22, 62:9, 64:7, 64:16, 65:15, 65:16, 74:17, 91:16, 94:13, 99:9, 100:8, 100:14, 102:10, 102:14, 103:9, 106:8, 109:2, 112:6, 113:3, 116:19, 116:20, 117:3, 119:21, 122:9, 122:10, 129:5, 132:8 allen 1:19, 3:4, 4:20, 5:7, 5:10, 106:1, 134:2, 135:5, 136:5, 137:20 allow 102:14, 107:6, 107:22, 108:7 alluded 122:3</p>	<p>almost 49:21 along 64:13, 86:7, 121:8, 125:1 already 14:13, 24:21, 32:6, 42:1, 59:13, 68:21, 89:10, 113:7, 113:11, 113:16, 124:19, 129:7, 132:4 also 2:33, 6:17, 7:16, 19:11, 19:15, 28:1, 29:21, 30:2, 38:7, 38:9, 38:13, 39:4, 39:7, 39:19, 40:5, 40:6, 40:8, 42:5, 44:8, 46:2, 52:14, 78:7, 89:3, 89:12, 110:2 always 6:8, 30:16, 30:19, 31:1 america 1:7, 2:3 angeles 2:27 anno 86:16 annotated 41:20, 75:4, 75:7, 86:12, 86:17 annotations 41:22, 78:19 another 4:6, 7:9, 85:9, 86:6, 86:11, 89:22, 90:11, 91:17, 91:18, 125:9</p>	<p>answer 6:12, 16:5, 20:9, 53:12, 58:15, 61:17, 99:11, 113:22, 116:6, 126:21, 128:18, 128:19, 128:22, 129:3, 129:4, 129:10, 129:14, 130:2 answered 127:15, 128:2, 128:7, 128:14, 129:18 answers 133:5 anticipate 4:4 any 4:7, 4:17, 5:15, 6:9, 6:14, 8:7, 8:16, 8:19, 8:22, 9:1, 9:6, 12:16, 12:21, 13:22, 14:10, 14:21, 16:1, 18:1, 19:20, 20:2, 20:6, 20:21, 21:2, 21:3, 21:4, 21:10, 23:17, 23:20, 24:15, 24:17, 26:21, 27:5, 30:11, 58:19, 61:6, 61:20, 63:22, 65:8, 67:17, 68:7, 68:19, 69:2, 69:12, 69:16, 70:9, 71:9, 71:12, 71:18, 72:7, 73:13, 93:17, 93:21, 94:21, 95:10, 95:11, 95:14, 95:17, 95:19, 96:1, 100:22, 101:2,</p>	<p>101:11, 103:7, 108:12, 108:13, 116:14, 118:1, 122:14, 123:7, 129:16, 129:19, 129:22, 130:3, 130:7, 130:10, 131:10, 133:11, 133:12, 136:11 anybody 8:11 anyone 8:4, 8:6, 8:13, 15:6 anything 8:15, 8:16, 8:22, 9:2, 9:3, 19:16, 21:9, 24:20, 57:19, 58:1, 58:3, 72:13, 73:16, 93:9, 93:12, 93:15, 95:6, 95:8, 95:16, 130:14, 131:18, 132:2 anyway 112:14 anywhere 66:10, 72:8 apologize 4:17, 41:13 appeal 1:2 appear 54:12, 55:15, 55:18, 60:17, 66:10, 66:14, 66:16, 66:19, 66:20, 67:10 appearances 2:1 appeared 135:4 appearing 69:20 appears 45:16, 45:18,</p>
---	---	--	---

<p>72:9 apple 1:5, 2:2, 11:13, 11:14, 136:3 appli 97:2 application 92:16, 93:5, 93:10, 93:13, 93:15, 93:18, 93:19, 94:2, 94:4, 94:7, 94:16, 95:4, 95:18, 96:5, 96:7, 96:11, 96:12, 96:13, 96:18, 96:19, 98:6, 99:16, 99:21, 100:11, 101:12, 103:2, 103:20, 103:21, 130:11 applications 94:10, 94:11, 94:22, 95:7, 95:9, 95:12, 95:20, 98:11, 100:18, 101:4, 102:20, 103:5 applying 124:11, 124:17 appropriate 96:16, 115:19 approximately 13:8 aren't 98:8, 98:9 around 5:21, 31:10, 31:11, 74:10, 76:11, 111:9, 111:10, 112:13 arrived 26:5, 129:6, 129:7, 129:8 arrives 128:20</p>	<p>arrow 77:2 arrowhead 77:5 art 14:20, 26:1, 27:16, 28:16, 31:4, 123:10, 124:4, 124:8, 131:17 asked 14:21, 126:12, 127:21, 128:4, 128:11, 129:14, 129:15 asking 7:19, 10:14, 10:18, 20:4, 20:6, 51:8, 51:10, 53:11, 65:17, 85:1, 90:14, 115:2, 121:19, 121:21 aspects 56:8 asserting 18:6 assignment 136:2 associate 37:15 assume 7:6 assumptions 19:20, 20:3, 20:7, 20:16, 20:22, 21:2, 21:3 attempt 119:2, 119:19 attending 4:3 available 129:22, 130:8 avenue 2:7 avoid 98:3</p>	<p>aware 4:6, 100:22, 101:2, 101:11, 119:22, 129:16, 129:19, 129:22, 130:3, 130:6, 130:14 away 4:8</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>b 1:26 b1 1:12 bachelor's 26:11, 26:12, 28:20, 31:14 back 25:2, 26:6, 30:21, 36:11, 36:14, 41:11, 47:19, 48:1, 50:10, 63:4, 66:6, 73:3, 73:6, 73:11, 74:4, 74:7, 74:8, 75:21, 76:14, 78:10, 78:12, 78:16, 85:22, 97:21, 98:1, 99:6, 106:8, 106:12, 112:8, 116:16, 118:2, 125:15, 125:18 backbone 39:8, 39:11, 39:15, 39:17, 39:20, 41:2, 41:5 backup 4:7 bad 7:12 banking 100:2 based 27:11, 46:16,</p>	<p>47:14, 91:15, 97:3, 100:3, 101:4, 101:12, 112:20 basically 116:16 because 20:15, 45:18, 56:6, 59:21, 68:13, 85:15, 88:21, 89:13, 90:1, 97:19, 97:20, 99:21, 129:21 been 5:18, 5:20, 6:6, 13:4, 13:6, 13:14, 14:11, 14:22, 16:4, 16:18, 16:21, 17:2, 17:3, 17:6, 17:15, 18:9, 19:13, 19:16, 22:15, 23:4, 24:17, 25:14, 28:1, 28:3, 28:19, 29:7, 29:12, 46:4, 49:21, 91:5, 91:17, 96:15, 107:5, 107:21, 108:6, 110:14, 111:22, 113:12, 114:3, 119:6, 121:1, 125:6, 127:22, 128:5, 131:13, 136:9 before 1:2, 4:14, 5:18, 6:13, 16:5, 22:19, 23:18, 28:6, 34:16, 66:19, 73:20, 100:22, 101:3, 101:15, 105:4, 112:22, 113:17, 114:11,</p>
--	---	---	--

<p>114:17, 127:22, 128:5, 128:8, 128:20, 129:5, 129:7, 129:22, 135:4, 137:22 began 27:20 beginning 82:22, 109:18, 126:17, 128:3 behalf 2:2, 2:12, 17:22 behind 45:22 being 6:11, 12:6, 12:9, 12:11, 12:17, 21:2, 41:1, 41:4, 49:7, 59:13, 59:18, 85:3, 94:18, 95:2, 95:4, 95:18, 95:20, 97:14, 117:2, 128:15, 128:22, 129:10, 135:5 believe 6:3, 13:8, 23:21, 25:16, 36:6, 55:19, 74:12, 98:17, 101:21, 108:17, 115:8, 125:4 below 43:3, 126:15 beside 8:15 besides 12:15, 18:18 best 4:5, 7:3, 8:1, 14:2, 43:18 better 7:13, 14:13, 20:21 between 37:2, 41:3,</p>	<p>92:14, 93:5, 123:8, 134:8 beyond 13:18, 14:20, 18:22, 19:22, 25:13, 27:10, 132:5 bigger 105:13 billing 84:10, 84:13, 85:5, 85:16, 88:20, 89:7, 93:1, 93:13, 93:14, 93:18, 93:20, 94:12, 96:20, 97:3, 97:8, 97:12, 97:14, 97:17, 98:5, 98:18, 99:1, 100:6, 100:19, 102:2, 102:5, 102:12 bit 7:20, 72:22, 82:17, 86:11, 106:5, 109:8, 123:15, 130:21 blocks 60:2, 67:8, 67:12 board 1:2 boone 2:5 both 96:16 boundaries 37:18, 99:9 box 42:16, 42:22, 43:2, 43:5, 43:9, 43:11, 43:16, 43:19, 44:3, 44:7, 44:9, 45:6, 48:5, 48:6, 48:8, 48:13,</p>	<p>48:16, 56:22, 78:21, 79:1, 92:14, 106:22, 111:9, 111:10, 111:11, 111:16, 123:21 boxes 40:9, 40:15 boy 61:12 break 6:10, 6:13, 6:14, 6:17, 6:18, 49:22, 50:4, 91:18, 125:7, 132:10 breaks 6:9, 8:5, 8:7 brief 18:17, 35:13 bring 10:14, 10:18 broad 91:13, 99:6, 124:18, 125:5 broader 104:8 broadest 131:9 broadly 124:8 browsing 62:20 budget 12:21, 12:22 bulk 14:11</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>ca 2:27 caerez 2:33 california 133:1, 133:18, 135:2 call 35:18</p>	<p>called 4:21 can't 5:15, 13:22, 61:19, 63:21, 67:17, 67:19, 120:11, 120:15, 129:4, 129:5 cannot 13:18, 14:12, 66:11, 68:1, 68:3, 69:2, 69:14, 72:17, 73:19, 93:21, 96:1, 119:21, 120:15 capable 30:20, 30:22, 129:17, 129:19, 130:1, 130:4 caption 133:4, 134:1, 136:3 captioned 136:8 careful 56:6, 75:14 case 9:19, 11:4, 11:6, 17:7, 43:15, 81:7, 87:21, 90:4, 96:15, 120:21, 121:2, 121:14, 133:10, 133:12, 136:3 cases 16:19, 17:12 caveat 6:11, 68:22, 126:22, 128:18, 129:6, 129:9 caveats 26:18 ccr 1:26 cellular 99:6</p>
--	--	--	---

Transcript of Dr. Michael Allen Jensen
 Conducted on May 3, 2023

<p>certain 13:10, 60:2, 91:15, 115:7 certainly 22:21, 67:6, 71:3, 96:17, 98:10, 118:8, 121:14, 126:10 certificate 3:7, 133:18, 135:1 certify 133:3, 133:9 challenge 30:16 change: _ 136:19, 136:24, 137:1, 137:6, 137:10 change: _ 137:15 changed 16:1 changes 135:11, 136:10, 136:13, 136:14, 136:15 changing 91:8, 91:14 channel 104:19, 104:20 characterization 112:1 check 135:12 choice 89:21 choose 84:16, 85:14 circumstance 18:1 circumvent 118:10, 118:17 citations 67:20, 68:4 cite 46:2, 52:9, 52:11, 52:14,</p>	<p>55:7, 58:1, 61:6, 65:19, 66:1, 93:10, 93:12, 101:11, 103:7, 110:1 cited 9:1, 9:21, 19:6, 19:13, 24:21, 35:9, 35:13, 46:10, 61:20, 62:4, 62:9, 63:22, 71:19, 109:21, 110:2 cites 131:4 citing 43:8, 56:6, 85:2, 101:8 claim 44:7, 74:13, 90:22, 92:10, 103:19, 106:18, 123:17, 123:19, 124:1, 124:12, 124:17, 124:20, 130:22, 131:3 claims 18:7, 43:14, 44:14 clara 133:2, 135:3 clarify 51:5, 63:10, 88:3 clean 9:10, 9:12, 9:14, 10:6, 10:7, 10:8, 32:4, 32:6 clear 5:9, 6:14, 7:4, 10:13, 27:6, 53:22, 97:10 click 70:18 clnp 40:2, 40:6</p>	<p>code 122:8 coextensive 59:8 collectively 50:22 column 76:2, 76:4, 76:5, 82:11, 82:15, 82:22, 109:10, 109:13, 110:3, 110:4, 110:16, 111:2, 115:12 com 2:11, 2:21, 2:29 combination 93:16 combined 94:5 come 7:5, 97:2, 106:8, 131:12 comes 7:9, 20:12 comfortable 26:9, 32:1 command 107:6, 107:22, 108:7, 123:8, 124:3, 124:6, 124:22, 125:1 commission 133:17 communicate 102:14, 116:3, 116:11, 116:15, 116:18, 117:2, 117:12, 117:15, 118:6, 119:2, 119:5, 119:12, 119:15, 119:18, 120:6, 120:12, 120:17, 121:5, 121:6 communication 8:13, 26:16,</p>	<p>39:16, 40:4, 40:7, 96:13, 96:14, 100:4, 103:21, 118:15 communications 20:5, 58:9, 58:10, 58:13, 59:6, 60:14 company 31:10, 31:11 compensated 12:6, 12:10 compensation 12:16, 12:19 complete 27:18, 133:7 completed 27:19 completely 7:10 completing 23:18 complimentary 4:15 component 12:16 components 37:10, 37:13, 37:15, 38:1, 40:21, 40:22, 111:11, 111:15 comprehensive 25:7 comprises 103:22 computer 4:9, 9:7, 26:13, 64:14 concluded 132:16 condition 131:5, 131:8, 131:11, 131:16, 132:3 conditions 91:15, 104:20 conducted 1:22</p>
---	---	--	--

<p>confident 66:11, 66:18, 67:2, 69:22</p> <p>configuration 121:20, 122:5, 122:20, 125:2</p> <p>configured 92:13, 106:21, 123:20</p> <p>confirming 59:12, 80:15</p> <p>connect 4:12, 98:1</p> <p>connecting 4:13</p> <p>connection 112:17, 113:1, 113:18, 114:12, 114:19, 116:3, 116:11, 116:15, 117:16, 117:21, 118:16, 119:6, 119:19, 120:7, 120:13, 120:17, 122:1</p> <p>connectivity 37:1</p> <p>connotations 97:13, 97:17</p> <p>consider 30:19</p> <p>considering 31:3, 118:22</p> <p>constantly 104:18</p> <p>constitute 97:9</p> <p>constitutes 135:8</p> <p>consult 8:6</p> <p>containing 104:7</p> <p>contains 92:9</p> <p>content 20:4</p> <p>context 16:7, 48:17,</p>	<p>129:3, 129:11</p> <p>continue 24:15</p> <p>continuous 104:4, 104:11, 104:15, 104:17, 104:22, 105:4, 126:13, 126:14, 126:20, 127:1, 127:14, 127:16, 127:17</p> <p>contract 102:8</p> <p>control 53:18, 70:14, 70:15, 70:18, 91:7, 92:13, 106:22, 109:12, 109:19, 114:21, 115:5, 115:10, 115:18, 115:22, 116:4, 118:11, 118:17, 123:20, 124:4, 124:5, 124:10, 124:20, 124:22</p> <p>controlling 52:1</p> <p>conversations 4:10</p> <p>copies 9:1, 9:3, 9:10, 9:11, 10:6, 10:7</p> <p>copy 9:14, 10:8</p> <p>corrections 136:11</p> <p>costs 99:10</p> <p>could 5:5, 23:9, 26:19, 52:2, 73:14, 81:11, 85:8, 87:17, 88:19, 89:3, 89:12, 89:14, 90:2, 96:18, 100:8, 100:10,</p>	<p>100:11, 103:2, 103:6, 110:15, 117:1, 117:21, 118:10, 118:16, 122:18, 122:22, 124:4, 124:5, 124:6, 124:8, 124:22, 125:1, 131:10</p> <p>couldn't 23:4</p> <p>counsel 6:18, 7:16, 7:18, 7:19, 7:21, 15:8, 15:15, 18:18, 19:1, 20:7, 22:11, 22:18, 22:20, 23:1, 23:4, 23:5, 26:7, 31:22, 41:13, 42:1, 44:18, 53:17, 80:15, 103:15, 133:10, 133:11, 134:8</p> <p>country 97:19, 97:22, 98:1, 98:19, 99:2, 99:3, 99:9, 99:17</p> <p>county 133:2, 135:3</p> <p>course 8:2, 71:13, 90:15, 90:16, 96:11, 103:13, 107:11, 122:16, 131:14, 131:15</p> <p>court 7:14, 17:7, 17:15, 18:8, 18:9</p> <p>credence 60:5</p> <p>criteria 91:15</p> <p>critical 22:8, 27:12,</p>	<p>31:4, 91:11, 129:16, 129:19, 129:21, 130:4</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>dallas 2:9, 2:19</p> <p>data 20:16, 21:5, 21:7, 58:9, 59:5, 60:14, 70:13, 71:3, 75:11, 76:21, 77:1, 77:10, 77:12, 77:17, 78:2, 78:7, 81:10, 98:3, 99:9, 99:22, 101:3, 103:21, 103:22, 104:7, 104:18, 105:1, 130:13, 130:16</p> <p>date 13:11, 22:8, 27:12, 31:4, 91:11, 129:16, 129:20, 129:21, 130:4, 134:3, 135:7</p> <p>dated 15:21</p> <p>day 135:4, 137:23</p> <p>de 55:17</p> <p>decide 47:9, 47:11, 47:14, 48:9</p> <p>decides 46:15, 47:6, 47:9</p> <p>deciding 46:22, 90:7</p> <p>decision 98:10, 100:2, 102:15</p> <p>declaration 9:1, 9:15,</p>
--	--	--	--

<p>9:16, 9:21, 10:1, 10:2, 11:6, 11:8, 12:9, 14:8, 14:12, 14:21, 15:11, 15:18, 16:2, 17:11, 18:18, 18:19, 19:1, 19:7, 19:13, 19:15, 19:17, 21:12, 21:21, 22:8, 22:13, 23:10, 23:18, 24:2, 24:12, 24:22, 25:20, 29:16, 29:20, 30:8, 33:4, 33:7, 35:9, 35:17, 36:4, 38:19, 41:8, 41:11, 42:12, 44:16, 44:17, 48:20, 50:13, 55:8, 61:6, 61:10, 63:5, 63:22, 64:22, 71:20, 73:17, 74:5, 74:7, 74:8, 78:10, 78:13, 78:17, 83:10, 83:17, 83:19, 84:1, 84:4, 84:20, 85:7, 85:20, 85:22, 90:14, 92:2, 92:7, 92:9, 103:12, 106:11, 106:13, 106:17, 107:4, 107:18, 108:5, 109:22, 112:7, 112:9, 120:2, 123:16, 130:18, 136:6 declarations 16:16 declare 136:6</p>	<p>deep 113:3, 116:5 deeply 96:9 default 88:17, 89:13, 89:17, 89:20 define 29:8, 43:15, 43:16, 91:12, 105:4, 131:17 defined 122:9, 131:16 defines 121:20 definitely 105:15, 105:17 definition 26:8, 26:10, 29:13, 105:5, 123:11, 124:19, 125:5 degree 26:11, 26:12, 28:7, 28:21, 31:14 delivered 117:3 demonstrate 59:21 demonstrates 91:7 denied 120:21 depend 99:15, 100:10 dependent 74:13, 130:22 depending 104:20 depends 89:20, 104:17 depicted 108:11 depiction 108:14 depo 2:33</p>	<p>deponent 3:8, 134:9, 137:17 deposed 4:21, 5:18, 5:20, 6:6, 16:18, 16:21, 17:15 deposition 1:18, 4:16, 9:7, 9:8, 14:22, 15:2, 15:7, 15:12, 18:21, 18:22, 34:16, 34:18, 34:21, 35:12, 35:15, 36:1, 36:3, 106:1, 126:5, 129:15, 132:16, 134:2, 134:5, 134:10, 135:6, 135:9, 136:1, 136:8, 136:12 depositions 17:16 derby 2:15, 2:23 describe 71:14, 122:1 description 36:22, 47:17, 55:1, 59:11, 79:16 design 26:15 desired 112:17 desk 8:19, 8:21 desktop 32:2 destination 46:17 detail 35:20, 53:11, 67:2, 118:22 detailed 63:17, 66:12,</p>	<p>123:4 details 26:8, 55:17, 56:12, 58:19, 62:7, 67:8, 98:8, 98:14, 100:21, 130:13 determined 22:10 develop 31:12 development 26:15 device 48:8, 49:7, 49:13, 96:12, 102:12 diagrams 23:2 difference 41:1, 41:3, 123:7 different 7:16, 13:14, 16:13, 25:18, 43:13, 43:17, 43:19, 50:18, 51:7, 52:3, 56:7, 59:3, 63:7, 63:9, 63:16, 64:2, 64:7, 64:9, 64:15, 65:5, 65:10, 80:20, 83:11, 86:7, 95:9, 96:10, 97:11, 97:22, 98:2, 98:18, 99:2, 99:17, 100:14, 106:10, 115:8, 116:21, 124:3, 129:21 differently 48:15, 101:4 difficult 13:15, 131:17 difilippantonio 1:26, 133:15</p>
---	---	--	--

<p>direct 31:15 direction 77:3, 133:6 disclose 94:4, 94:13, 101:22, 130:10 disclosed 72:4, 94:17, 98:9, 101:9 discloses 61:7, 61:20, 62:12, 62:15, 80:19, 83:10, 93:4, 94:3, 94:4, 94:12, 95:2, 95:9, 97:10, 104:9, 108:18, 130:15 disclosing 68:13 disclosure 68:11, 69:15, 84:11, 93:20, 93:21, 95:1, 96:3, 100:17, 100:18, 100:19 disclosures 101:20 discomfort 68:9 discuss 95:17, 100:13 discussed 113:16 discusses 95:17 discussing 81:4, 83:1, 93:3 discussion 4:8, 26:6, 54:19, 70:22, 71:5, 94:15, 94:16, 95:11, 95:14, 95:19, 96:1, 97:13, 123:5</p>	<p>district 17:7, 17:15, 18:8, 18:9 document 53:18, 57:9, 70:20 documents 9:10, 9:11, 9:13, 21:8, 21:10, 21:11, 21:13 doing 5:2, 5:4, 59:11, 67:6, 128:12 done 59:7, 130:7 double-check 87:6, 105:15 down 6:7, 36:16, 46:2, 54:3, 74:17, 74:19, 76:2, 80:9, 80:22, 82:14, 85:18, 86:10, 91:2, 92:18, 106:6, 107:3, 109:10, 123:17, 125:22 downloading 128:13 dr 1:19, 3:4, 4:20, 5:2, 11:2, 12:6, 20:8, 41:8, 41:19, 44:17, 49:21, 50:10, 53:8, 66:9, 73:9, 74:5, 75:3, 75:6, 76:18, 78:13, 85:19, 86:15, 86:17, 90:13, 91:22, 92:2, 92:10, 103:9, 105:22, 107:16, 112:9,</p>	<p>123:7, 124:15, 126:3, 134:2, 135:4, 136:5, 137:20 draft 22:16, 23:5, 23:7 drafted 22:15, 22:22, 23:6 drafting 23:4 drawing 37:18 drawn 111:9, 111:10 due 20:9 duly 135:5 during 8:5, 8:7 dynamic 91:7 dynamically 91:8, 91:12</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>each 4:14, 13:16, 16:18, 65:18, 67:8, 109:19 earlier 27:12, 33:16, 126:4 early 13:9 easier 7:14, 29:12 easily 30:14 edited 22:14, 22:18 education 26:19, 29:11 eight 15:3, 16:15, 16:16, 16:18,</p>	<p>17:10 either 103:6, 107:6, 107:22, 108:7, 124:9 elaborate 97:8 electrical 26:12 electronic 9:10 electronics 1:5, 1:7, 2:3 elements 37:2, 101:20 elm 2:17 else 8:6, 8:11, 8:13, 14:17, 22:15, 24:20 else's 8:9 elsewhere 52:2 employ 133:11 enable 121:9 enabled 4:11 enables 124:7 encapsulated 87:19 end 128:8, 128:20, 129:8 engineering 26:13 enough 116:5 ensure 31:2, 31:3, 36:7 entire 128:5, 136:7 entirely 13:10, 66:11</p>
--	--	---	---

<p>entirety 128:1, 128:6</p> <p>entities 50:18, 63:8, 63:10, 64:2, 64:7, 64:15, 65:11</p> <p>entities" 65:6</p> <p>entity 51:3, 51:6, 61:8, 61:22, 62:17</p> <p>equivalent 26:16</p> <p>errata 136:1, 136:12</p> <p>essential 47:1</p> <p>essentially 44:12</p> <p>establish 112:16, 113:1, 113:17, 114:12, 114:18, 116:2, 116:11, 116:15, 118:16, 119:19</p> <p>established 113:11, 117:21, 119:7, 122:1</p> <p>establishment 120:7, 120:12, 120:17</p> <p>estimate 13:11, 14:1, 14:2, 14:7, 14:13, 15:1, 15:14</p> <p>evaluate 131:19, 132:2</p> <p>evaluating 131:8</p> <p>even 30:13, 81:12, 84:1, 84:5</p> <p>ever 5:18, 6:21, 16:4, 17:6,</p>	<p>17:18, 17:20, 17:21, 17:22, 21:2</p> <p>every 6:18</p> <p>everyone 4:2</p> <p>everything 9:20, 10:8, 22:19, 23:21</p> <p>evidence 26:21, 133:8</p> <p>exact 50:2, 113:9, 116:5, 116:20</p> <p>exactly 26:5, 45:21, 51:20, 52:6, 62:8, 64:15, 81:16, 120:21</p> <p>examination 3:2, 3:5, 4:22, 34:19</p> <p>examined 4:21</p> <p>example 21:7, 30:19, 43:5, 48:13, 79:18, 81:1, 81:15, 83:5, 84:19, 85:2, 93:7, 96:20, 97:16</p> <p>examples 95:9</p> <p>exceeded 28:10, 28:15</p> <p>except 59:1, 136:10</p> <p>exchange 116:5, 120:7, 120:18</p> <p>excuse 17:3, 18:20, 29:22, 35:14, 38:15, 40:14, 46:13, 72:7, 75:4, 97:6,</p>	<p>101:1</p> <p>exercise 31:2</p> <p>exhibit 9:15, 10:12, 10:21, 11:4, 24:22, 25:9, 25:11, 31:19, 32:9, 33:17, 33:19, 33:22, 34:4, 34:10, 35:2, 35:8, 35:9, 35:16, 36:4, 45:16, 46:3, 46:9, 46:12, 46:14, 52:9, 52:12, 52:15, 52:18, 53:3, 53:9, 54:10, 55:4, 57:6, 57:17, 57:19, 58:5, 66:4, 66:7, 69:7, 69:9, 69:10, 70:2, 70:6, 71:20, 72:8, 72:18, 73:3, 75:4, 75:19, 82:11, 105:7, 108:15, 108:20, 109:2, 109:6, 115:12, 115:14, 125:16, 125:18, 125:19</p> <p>exhibits 8:22, 9:19, 9:21, 10:2, 10:5, 19:14</p> <p>exist 54:22, 56:13, 66:2</p> <p>expects 8:3</p> <p>experience 26:14, 26:19, 27:9, 27:10, 28:20, 29:11, 31:1, 31:13,</p>	<p>31:15, 131:15</p> <p>expert 16:5, 17:6, 30:16</p> <p>expertise 30:18</p> <p>expires 133:17</p> <p>explain 97:6</p> <p>explicit 96:15</p> <p>explicitly 54:13</p> <p>explorer 9:18, 10:4</p> <p>express 68:12</p> <p>expressly 61:7, 61:20, 62:15, 65:9, 69:3</p> <p>extends 23:13</p> <p>extent 29:14</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>facilitate 121:11</p> <p>facilitates 124:21</p> <p>facts 20:15, 21:4, 21:7, 26:21, 27:5, 27:10</p> <p>failed 116:2</p> <p>failure 116:11, 116:15, 117:16, 118:16, 119:16, 119:18</p> <p>fair 6:2, 7:1, 7:7, 11:9, 12:4, 13:20, 14:6, 17:4, 23:22, 24:3, 28:9,</p>
---	--	---	--

<p>29:9, 29:18, 30:4, 31:7, 33:1, 37:10, 37:13, 37:15, 39:5, 39:8, 39:12, 39:22, 40:21, 45:19, 49:14, 54:14, 56:1, 57:4, 58:2, 58:5, 58:20, 60:16, 60:20, 61:3, 67:15, 67:16, 67:19, 67:22, 72:17, 73:19, 78:21, 80:2, 80:5, 81:1, 82:1, 82:7, 82:8, 90:10, 95:7, 99:17, 103:3, 107:8, 112:1, 116:8, 117:3, 118:20, 129:12 familiar 6:1, 32:22, 35:19, 35:21, 110:13 family 13:15, 16:7, 16:11, 16:14, 16:22 far 28:9, 28:14 feed 105:1, 118:2 feedback 117:20 feeding 104:18 feel 6:10 few 6:5, 46:3, 105:14, 105:15, 122:3, 125:8 field 26:14</p>	<p>fields 28:21 figure 36:17, 36:20, 37:9, 39:10, 41:20, 42:3, 74:20, 75:1, 75:7, 75:10, 76:3, 76:11, 76:14, 76:15, 76:20, 77:2, 77:7, 77:10, 77:14, 77:17, 77:19, 77:22, 78:2, 78:5, 78:7, 78:20, 79:5, 79:8, 79:18, 80:4, 83:1, 83:4, 83:6, 86:12, 86:15, 86:17, 87:12, 100:20, 108:12, 111:4, 111:7 figures 23:2, 42:2 file 21:15, 105:13 filed 25:15 final 22:19 find 73:14, 74:2 fine 32:4, 53:20, 132:11 fine-grain 56:12 finish 6:12, 7:19, 125:10 finished 7:11, 7:13, 27:20 first 6:9, 16:9, 16:10, 22:16,</p>	<p>23:6, 24:4, 31:10, 79:1, 80:1, 87:10, 87:15, 87:16, 88:3, 88:5, 90:8, 91:6, 92:13, 92:14, 105:20, 105:22, 128:13 five 15:16, 28:3 flat-rate 12:16 flow 116:21 focusing 45:11 folder 105:11 following 135:11, 136:15 follows 4:21 force 92:22 forced 81:11, 84:7, 85:4, 85:10, 88:11, 88:13, 88:17, 88:19, 93:1 foregoing 133:3, 133:6, 135:6 foreign 97:18, 98:19, 99:2 form 26:22, 28:12, 29:1, 33:9, 44:5, 46:7, 47:2, 48:10, 51:4, 51:18, 54:17, 56:4, 56:19, 58:21, 61:11, 62:2, 62:18, 64:4, 65:12, 71:21,</p>	<p>72:10, 73:22, 83:15, 84:21, 88:15, 89:9, 94:8, 96:22, 98:7, 98:20, 99:18, 101:5, 101:17, 104:5, 104:13, 105:2, 113:20, 114:15, 117:4, 117:18, 118:18, 120:19, 122:13, 123:1, 124:13, 131:20, 134:7 former 101:19 forming 19:20, 20:22, 21:6, 23:15 formulate 26:4, 26:20 formulating 27:4 forth 30:7 forward 89:15, 107:7, 108:1, 108:8 found 25:6 four 15:16, 19:6, 21:16 fowles 2:6, 19:22, 20:4, 20:8, 20:13, 26:22, 28:12, 29:1, 33:9, 44:5, 46:7, 47:2, 48:10, 51:4, 51:18, 54:17, 56:4, 56:19, 58:21, 61:11, 62:2, 62:18, 64:4, 65:12, 71:21, 72:10, 73:22, 83:15,</p>
--	---	--	--

<p>84:21, 88:15, 89:9, 94:8, 96:22, 98:7, 98:20, 99:4, 99:18, 101:5, 101:13, 101:17, 104:5, 104:13, 105:2, 105:10, 113:20, 114:2, 114:4, 114:15, 117:4, 117:18, 118:12, 118:18, 120:19, 122:13, 123:1, 124:13, 131:20, 132:9, 132:14 fowles@haynesboone 2:11 free 6:10 front 11:5, 32:14, 34:6 full 5:5, 5:16 function 46:4, 54:21, 55:13, 57:1, 60:2, 63:16, 65:1 functional 116:14, 118:1 functionalities 43:12, 43:18, 43:19, 55:21, 59:3, 59:9, 59:14, 59:22, 60:1, 60:7, 62:5, 62:9, 63:14, 63:17, 63:20, 64:9, 64:11, 64:13, 65:16, 65:19, 66:2, 68:11, 68:15 functionality 42:4, 42:8,</p>	<p>43:1, 43:5, 43:7, 43:16, 44:4, 44:10, 44:11, 44:12, 44:13, 45:9, 45:11, 45:14, 45:18, 45:20, 46:5, 46:19, 46:21, 47:6, 50:16, 50:17, 51:1, 51:2, 51:14, 51:15, 51:16, 53:10, 54:11, 54:12, 54:16, 54:20, 54:22, 55:4, 55:9, 55:12, 56:3, 56:17, 57:2, 58:4, 58:6, 58:12, 58:20, 59:18, 60:16, 60:20, 61:1, 61:8, 61:9, 61:21, 61:22, 62:13, 62:16, 62:17, 63:6, 63:7, 64:1, 64:2, 65:4, 65:5, 65:9, 65:10, 66:10, 66:13, 66:16, 67:18, 67:21, 68:2, 68:5, 69:13, 69:17, 69:19, 70:11, 71:2, 71:5, 71:10, 71:12, 71:13, 71:17, 71:19, 72:3, 72:6, 72:9, 72:14, 72:18, 80:19, 83:11, 107:6, 108:1, 108:8, 121:13, 121:15, 121:18, 121:22, 122:21 functions 40:11, 40:18,</p>	<p>51:21, 52:3, 56:13 further 132:14, 133:9 <hr/>G<hr/>g 56:13, 59:14 gaps 104:16 gateway 38:16, 38:20 gave 124:18, 125:5, 129:3, 131:9 general 48:12, 103:5, 127:21 generalities 123:11 generalized 37:8 generally 29:10, 37:18, 47:8, 96:10, 103:1, 103:4, 108:17, 113:4, 115:9, 128:4 generated 94:11, 95:3 getting 117:20 gg 55:20 ggs 60:8 ggsn 38:20, 39:1, 39:4, 42:4, 42:5, 42:6, 42:9, 42:15, 42:21, 43:1, 43:4, 43:10, 43:12, 43:17, 43:19, 44:2, 44:3, 44:8, 45:5, 45:10, 45:16, 45:20,</p>	<p>46:15, 46:18, 46:20, 46:21, 50:15, 50:16, 50:22, 51:12, 51:21, 55:17, 55:20, 56:8, 56:14, 58:7, 58:11, 58:12, 58:18, 58:20, 59:14, 59:19, 60:2, 60:7, 60:9, 60:11, 60:14, 60:16, 60:20, 60:21, 61:1, 61:3, 61:8, 61:9, 61:21, 62:1, 62:5, 62:13, 62:16, 62:17, 64:2, 64:12, 67:1, 67:14, 68:11, 68:14, 71:2, 80:5, 80:6, 81:7, 81:19, 82:6, 87:7, 88:6, 90:1, 90:12, 91:7, 111:18, 115:18, 116:12, 116:17, 116:19, 116:22, 117:3, 117:12, 117:16, 117:22, 118:5, 119:6, 120:8, 120:18, 121:13 give 5:5, 5:16, 7:20, 7:21, 10:19, 14:13, 17:14, 18:16, 22:4, 31:20, 33:20, 41:11, 43:22, 52:19, 67:8, 70:4, 70:15, 70:16, 73:4, 75:20, 76:13, 78:15, 82:12, 92:3,</p>
---	--	---	--

<p>99:11, 103:17, 105:8, 112:10, 115:13, 116:6, 117:8, 125:17, 130:2 given 12:21, 14:13, 19:20, 20:3, 20:21, 68:21, 107:7, 108:1, 108:8, 133:8 gives 31:14, 44:13 go 6:6, 6:13, 18:5, 20:11, 20:17, 20:18, 24:12, 25:2, 25:3, 25:17, 25:19, 31:18, 36:11, 36:16, 36:18, 38:6, 43:21, 44:15, 46:2, 47:19, 48:1, 48:19, 50:3, 50:10, 53:1, 53:14, 54:21, 55:16, 60:3, 61:14, 63:4, 64:21, 66:3, 73:11, 74:9, 75:18, 76:2, 76:6, 76:11, 76:14, 77:7, 77:14, 77:21, 78:5, 78:10, 78:11, 78:12, 80:22, 82:10, 82:14, 85:11, 85:14, 85:18, 86:13, 88:13, 89:6, 89:11, 89:12, 91:2, 103:11, 106:4, 106:10, 107:3, 107:6, 107:12, 109:10, 112:8, 115:17,</p>	<p>123:15, 125:8, 125:12, 125:15, 125:20, 128:2, 132:9 goal 67:7 goes 80:2, 80:4, 125:1 going 6:4, 6:12, 6:17, 7:3, 7:6, 37:22, 56:12, 62:6, 63:16, 67:11, 71:6, 72:11, 75:12, 76:4, 88:4, 88:5, 89:18, 91:17, 100:2, 105:11, 106:8, 123:16, 125:6, 127:11 good 22:21, 50:4, 50:5, 50:7, 91:18, 102:14, 116:6, 117:8 gpr 37:1 gprs 36:21, 37:1, 37:3, 37:5, 37:7, 38:3, 38:4, 38:7, 38:11, 38:12, 38:16, 38:20, 45:22, 49:10, 49:16, 54:4, 57:20, 57:22, 58:1, 58:10, 58:18, 58:20, 59:3, 59:12, 67:9, 79:2, 79:16, 89:2 graduate 26:19 graduates 30:20, 30:21,</p>	<p>31:9, 31:11 granbohm 25:8, 36:5, 36:7, 36:8, 52:12 great 5:3, 5:4 ground 6:7 grouped 111:16 gs 71:2 gsn 46:5, 58:11, 59:3, 59:12, 68:11, 79:2, 89:2 <hr/>H<hr/>habit 7:12 handle 87:21, 90:2, 104:16 handshaking 113:3 happen 113:4, 120:22, 124:7 happening 100:4 happens 118:9 happy 53:13 hard 44:6, 101:6 hardware 52:4, 56:9 hardwick 19:8, 34:11, 34:12, 34:13, 34:20, 34:22 haynes 2:5 hear 114:5</p>	<p>hearing 133:8 help 4:11, 63:1 helped 23:1, 42:2 helpful 6:8, 7:22 helps 23:1 here 5:4, 11:12, 14:14, 22:7, 22:8, 23:21, 41:19, 44:6, 48:20, 51:20, 52:1, 52:11, 54:13, 55:19, 56:6, 59:8, 61:19, 63:21, 67:16, 67:19, 67:22, 68:3, 68:6, 68:19, 69:12, 69:16, 71:5, 71:13, 74:16, 78:17, 80:1, 80:4, 85:2, 86:20, 87:2, 87:3, 90:20, 91:3, 92:22, 95:16, 96:15, 96:17, 99:11, 100:9, 101:8, 102:9, 107:9, 108:10, 118:4, 119:1, 119:4, 119:11, 119:14, 119:17, 119:22, 120:15, 120:16, 127:7, 128:22, 129:14, 135:12 here's 57:9, 63:15, 102:7 hereby 133:3 hereof 134:4, 135:8,</p>
---	---	--	--

<p>136:12 herself 30:17 hidden 46:1 high 59:6 high-level 36:22, 47:17 highly 67:8 history 21:15 hlr 110:10, 110:11, 110:19, 111:7, 111:9, 111:15, 112:4 hold 98:17, 106:7, 107:10, 129:14 home 38:9, 38:11, 38:12, 79:13, 79:17, 80:2, 80:5, 80:7, 81:12, 84:6, 84:7, 84:17, 84:19, 85:3, 85:4, 85:9, 85:11, 85:15, 87:18, 87:20, 88:4, 88:6, 88:13, 88:21, 89:7, 89:12, 89:14, 89:18, 90:1, 97:21, 98:19, 99:3, 100:1, 102:6, 102:7, 102:16, 102:18, 102:21, 103:2, 110:13, 110:18, 110:21, 110:22 host 77:4, 89:15 hour 6:18, 12:14,</p>	<p>33:12, 49:21, 91:17, 125:7 hourly 12:11, 12:13, 12:15, 12:19 hours 13:18, 14:1, 14:3, 14:15, 15:3, 15:16 however 31:9, 97:13 hwang 2:24</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>ideas 8:8 identification 65:15 identified 11:12, 25:9, 28:21, 51:22 identifies 39:10, 39:19, 68:20 identify 4:11, 4:13, 23:4, 25:22, 62:4, 62:7, 63:20, 65:8, 67:17, 68:1, 68:19, 69:12, 69:16, 70:9, 71:9, 71:18, 72:2, 72:7, 72:8, 86:5 identifying 25:12, 43:13 ietf 121:20 illustrate 80:1 illustrated 79:18, 80:4, 83:6 illustrates 36:21, 76:21 impact 102:11</p>	<p>implement 59:13, 63:16, 65:18, 100:21 implementation 47:10, 56:7, 60:6, 100:21 implemented 50:18, 51:2, 51:13, 51:17, 52:3, 56:17, 59:4, 59:18, 63:7, 65:5, 65:16, 98:15 implementing 54:15, 56:2, 56:21, 58:3, 58:6, 58:19, 61:7, 61:21, 62:12, 62:15, 63:13, 64:1, 64:6, 64:10 implements 96:14 implicates 102:3 implications 29:10, 102:8 implied 81:18 imply 68:13 important 24:1, 47:10, 58:14 imprecise 94:14 inc 1:5, 1:7, 2:2, 2:4, 11:13, 11:14, 136:3 include 21:7, 51:13, 124:9 included 24:2, 98:13 includes 43:4 including 14:9, 30:21,</p>	<p>50:15 incur 99:10 independent 131:3 indicate 66:1, 78:19, 98:11 indicated 136:11 indicates 44:10, 77:3 indication 102:5, 110:9 individuals 31:15 industry 31:8 information 73:13, 73:17, 98:13, 102:14, 111:21, 112:4, 112:21, 113:6, 116:6, 116:21, 117:22, 118:6, 118:8, 119:9, 121:8, 121:12, 121:16, 121:17, 121:20, 121:21, 122:5, 122:9, 122:12, 122:14, 122:16, 122:18, 122:20, 123:2, 123:5, 124:7, 124:9, 124:19, 124:21, 125:1, 125:2, 125:3 informed 22:12 infringer 18:7 inside 111:16 insight 29:3 instead 98:2 instruct 20:8</p>
--	--	---	--

<p>instructed 21:3</p> <p>integrated 46:4, 99:7</p> <p>interested 133:12</p> <p>interface 9:7, 9:9</p> <p>interject 7:17</p> <p>internet 112:17, 113:1, 113:18, 114:12, 117:17, 119:19, 121:11, 122:21</p> <p>interpret 31:4, 124:2, 124:11, 131:7</p> <p>interpretations 96:10</p> <p>interpreted 30:3, 96:18</p> <p>interpreting 30:9, 96:7, 123:13, 124:16</p> <p>interruptions 4:18</p> <p>interworking 40:11, 40:18</p> <p>intra 39:14</p> <p>intra-operator 39:8, 39:11, 39:15, 39:19, 41:5</p> <p>intraop 39:7</p> <p>invoiced 13:12</p> <p>involved 13:14, 18:10</p> <p>ip 12:7, 45:17, 45:19, 45:22, 87:19</p> <p>ipr 1:9, 11:13, 11:17, 12:7,</p>	<p>13:2, 13:12, 13:20, 14:9, 14:18, 16:5, 17:4, 126:7</p> <p>iprs 13:15, 16:14</p> <p>ipx 87:21</p> <p>isp 116:3, 120:18, 121:12, 122:7</p> <p>issues 102:10, 102:11</p> <p>itself 50:15, 100:16</p> <p>iwf 40:9, 40:16</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>j-e-n-s-e-n 5:11</p> <p>jensen 1:19, 3:4, 4:20, 5:2, 5:7, 5:11, 11:2, 12:6, 20:8, 41:19, 49:21, 50:10, 53:8, 66:9, 73:9, 75:3, 75:6, 76:18, 86:15, 86:17, 90:13, 91:22, 92:10, 103:9, 105:22, 106:1, 107:16, 123:7, 124:15, 126:3, 134:2, 135:5, 136:5, 137:20</p> <p>jensen's 41:8, 44:17, 74:5, 78:13, 85:19, 92:2, 112:9</p> <p>jumping 76:11</p> <p>june 15:21, 16:2,</p>	<p>22:9, 24:18, 27:16, 28:19, 73:20, 100:22, 101:3, 101:15, 101:22, 130:1, 130:4</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>keep 74:18, 76:4, 123:16</p> <p>key 123:3</p> <p>kin 133:9</p> <p>kind 7:11, 12:21, 13:22, 29:19, 53:19, 56:10, 58:12, 59:8, 95:11, 95:17, 98:13, 121:17, 121:21, 131:10</p> <p>kinds 31:15, 58:9, 58:13, 59:5, 59:21, 60:13, 67:10, 95:7, 100:8</p> <p>know 6:15, 6:22, 7:6, 11:14, 13:6, 16:5, 17:16, 18:15, 18:16, 22:1, 25:10, 26:6, 28:14, 31:13, 33:10, 33:13, 43:6, 54:7, 64:10, 64:12, 73:10, 94:10, 98:11, 99:9, 100:12, 103:4, 103:14, 104:14, 105:16, 108:17, 110:11, 116:7, 116:9, 116:10, 116:20, 118:4,</p>	<p>119:1, 119:4, 119:9, 119:11, 119:14, 119:17, 122:8, 122:10</p> <p>knowing 89:13</p> <p>known 29:18, 55:20, 55:21, 67:12, 88:21, 90:1</p> <p>knows 55:20</p> <p>kollin 2:33, 106:14</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>labeled 40:2, 40:9, 40:15, 86:20, 111:11</p> <p>lager 35:17, 35:18, 35:19, 35:21, 35:22, 36:2, 69:20, 70:10, 70:12, 108:15, 108:17, 109:20, 110:7, 111:22, 114:21, 115:22</p> <p>laid 28:11</p> <p>language 22:22, 29:19, 44:7, 45:15, 64:15</p> <p>largely 40:22</p> <p>last 128:18, 129:10</p> <p>later 6:5</p> <p>lay 6:7</p> <p>least 14:5, 26:14, 65:20, 107:1, 123:21, 126:22, 127:15</p>
--	---	---	---

Transcript of Dr. Michael Allen Jensen
 Conducted on May 3, 2023

<p>leave 50:1</p> <p>left 50:12, 67:11, 107:16</p> <p>legal 22:22</p> <p>lends 60:5</p> <p>let's 20:17, 20:18, 25:17, 34:2, 37:21, 42:11, 48:19, 50:10, 52:8, 52:17, 64:21, 73:2, 74:17, 76:11, 77:19, 91:2, 103:4, 106:9, 109:16, 112:8, 113:10, 123:14, 125:12, 128:2</p> <p>level 28:15, 29:3, 53:11, 59:6, 63:17, 63:18</p> <p>likelihood 67:10</p> <p>likely 97:12</p> <p>limitation 131:8</p> <p>limitations 74:13</p> <p>limited 64:20</p> <p>line 82:20, 82:22, 106:7, 109:11, 110:17, 111:2, 115:17, 126:12, 126:17, 128:3</p> <p>lines 110:3, 110:5, 127:7</p> <p>list 23:14, 25:10</p> <p>listed 23:19, 24:4</p>	<p>little 7:20, 18:17, 25:18, 52:22, 57:14, 70:7, 72:22, 74:19, 76:16, 82:16, 86:11, 96:9, 104:8, 105:13, 106:5, 109:7, 123:15, 125:7, 130:21</p> <p>llc 1:13, 2:13, 136:4</p> <p>llp 2:5, 2:15, 2:23</p> <p>lmn-sw 111:16</p> <p>localized 94:16</p> <p>locally 53:22, 73:12</p> <p>location 110:13, 110:19, 110:21, 110:22</p> <p>locations 72:2</p> <p>logical 50:18, 51:20, 52:3, 61:8, 61:22, 62:14, 62:16, 63:7, 63:9, 65:5, 65:11</p> <p>long 18:13, 32:4, 33:11</p> <p>look 8:17, 9:19, 11:11, 13:17, 18:5, 20:11, 38:6, 47:13, 52:17, 64:21, 86:12, 105:6, 105:19, 110:4, 110:16, 111:4, 113:10, 115:11, 120:1, 131:3</p>	<p>looking 50:12, 57:17, 57:21, 73:10, 96:4, 96:9, 107:17, 109:10, 109:15, 126:11</p> <p>los 2:27</p> <p>lose 5:21</p> <p>lost 114:8</p> <p>lot 55:17</p> <p>low 67:11</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>m-i-c-h-a-e-l 5:10</p> <p>made 98:10, 102:15, 135:11</p> <p>main 21:17, 41:3</p> <p>majority 22:14</p> <p>make 7:3, 7:13, 7:14, 17:1, 21:3, 29:4, 30:11, 38:20, 44:1, 74:15, 79:14, 112:2</p> <p>makes 29:14</p> <p>manipulate 53:19, 70:19</p> <p>manner 84:7, 88:14, 93:1</p> <p>many 5:20, 6:6, 13:14, 14:3, 14:15, 16:13, 16:21, 17:9, 17:14, 29:17, 31:11</p>	<p>map 43:20</p> <p>mapped 79:2</p> <p>mapping 43:13, 43:18, 78:20</p> <p>master's 28:7</p> <p>match 110:9</p> <p>matched 79:2</p> <p>matches 112:4</p> <p>material 24:15, 24:17</p> <p>materials 14:10, 18:6</p> <p>matero 19:8, 34:5, 34:6, 34:7, 34:16, 35:1, 69:13, 69:14, 69:17</p> <p>matero's 69:15</p> <p>matter 19:19, 25:15, 126:7, 134:3, 135:7, 136:9</p> <p>maybe 13:4, 15:16, 33:12, 50:5, 51:6, 84:2, 89:21, 123:10</p> <p>mean 8:3, 14:3, 14:11, 21:8, 21:11, 21:17, 30:6, 32:19, 34:17, 35:9, 37:5, 42:8, 42:22, 43:3, 45:17, 49:9, 50:22, 51:6, 62:22, 79:11, 82:6, 102:8,</p>
--	---	---	--

<p>103:4, 104:7, 104:15, 104:17, 108:20, 116:14, 124:2, 129:20, 130:5 meaning 48:12, 81:19, 91:14, 123:10, 131:9, 131:12, 131:19, 132:3 means 28:15, 64:16, 91:14, 109:12, 109:19, 110:7, 110:10, 111:1, 114:21, 115:5, 115:10, 115:18, 115:22, 116:4, 116:10, 118:11, 118:17 mechanism 45:13 meet 15:6 meeting 15:15, 18:18, 19:1 memory 19:3, 62:8, 110:10, 111:1 mention 99:15 mentioned 44:18 message 117:2 met 15:8, 29:13, 30:6 michael 1:19, 3:4, 4:20, 5:7, 5:10, 106:1, 134:2, 135:5, 136:5, 137:20 microphones 4:10 middle 70:19</p>	<p>might 6:18, 7:5, 7:11, 8:17, 21:7, 43:18, 43:20, 59:9, 84:16, 88:19, 88:20, 89:11, 89:22, 99:22, 100:14, 104:19, 105:12, 114:2, 122:8 mind 5:8 mini 125:7 minimum 121:7, 121:14 minute 20:12, 20:15, 106:9 minutes 50:5, 105:15, 125:9 missed 114:1 mobile 1:13, 2:12, 48:21, 49:2, 49:6, 49:7, 49:9, 49:12, 49:13, 71:4, 75:11, 75:16, 75:17, 76:19, 76:21, 76:22, 77:10, 77:12, 77:17, 77:19, 78:2, 78:7, 79:5, 79:7, 79:8, 79:14, 79:16, 79:19, 81:5, 81:8, 81:11, 81:14, 81:20, 81:22, 82:2, 82:5, 82:7, 83:7, 83:13, 83:14, 83:21, 84:6, 85:10, 87:5,</p>	<p>87:8, 88:8, 88:22, 89:4, 94:22, 95:3, 95:13, 95:20, 96:17, 97:18, 98:12, 98:14, 99:2, 99:3, 102:12, 102:18, 102:21, 107:8, 108:2, 108:9, 112:5, 116:16, 130:10, 136:3 mode 88:17 moment 31:21, 33:21, 43:22, 70:5, 73:5, 75:21, 92:4, 103:17, 105:9, 115:14, 125:18 moments 105:14, 122:3 month 74:2 more 15:9, 29:4, 29:14, 30:14, 48:2, 57:15, 62:21, 71:14, 73:13, 73:17, 74:19, 86:11, 96:9, 99:12, 100:12, 106:5, 123:4, 125:8 most 22:17, 31:9 move 20:17, 20:18, 23:9, 25:17, 31:16, 39:18, 42:11, 49:18, 52:8, 68:16, 68:17, 71:6, 72:22, 73:2, 74:4, 74:17, 92:1, 92:18, 103:9, 106:10,</p>	<p>112:6, 130:17 moving 127:20 much 13:11, 13:16, 13:19, 14:7, 15:1, 15:14, 33:7, 41:16, 53:15, 106:15 multimedia 104:4, 104:8 multiple 15:10, 56:10, 59:9 must 113:18, 114:13, 117:15, 120:6 mute 4:9</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>name 5:5 nature 100:3 necessarily 28:19, 43:16, 71:1, 123:9 need 6:9, 6:14, 20:11, 31:2, 37:17, 53:15, 61:14, 61:15, 62:6, 67:4, 69:21, 73:11, 73:12, 76:2, 99:11, 100:12, 101:18, 105:3, 116:11, 116:14, 116:15, 117:7, 117:11, 118:2, 118:5, 119:12, 119:15, 119:22, 120:12, 121:15, 121:18, 121:22, 123:4, 135:11 needed 19:3, 59:3,</p>
---	---	--	--

<p>68:15, 122:20 needs 54:21, 60:2, 114:17 negotiate 114:18 net 49:10 network's 90:9 networking 40:7, 58:10 networks 37:1, 37:3, 37:5, 41:2, 41:5, 49:10, 90:4, 99:7 never 17:2, 17:3 new 24:15, 24:17 next 125:22, 127:20, 128:3, 129:13 nice 5:4 nine 57:10 nobody 8:3, 8:8 node 38:4, 38:5, 38:10, 38:11, 38:12, 38:17, 38:20, 54:4 nodes 38:3, 38:7 none 3:11 nonresponsive 68:17, 71:7 notary 133:15 noted 136:14, 136:15 notes 8:16, 8:18, 8:19</p>	<p>nothing 53:8, 60:8 noticed 126:21 number 11:22, 17:16, 22:2, 41:14, 111:10, 133:18</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 5:13, 136:13 objection 7:18, 7:21, 26:22, 28:12, 29:1, 33:9, 44:5, 46:7, 47:2, 48:10, 51:4, 51:18, 54:17, 56:4, 56:19, 58:21, 61:11, 62:2, 62:18, 64:4, 65:12, 71:21, 72:10, 73:22, 83:15, 84:21, 88:15, 89:9, 94:8, 96:22, 98:7, 98:20, 99:4, 99:18, 101:5, 101:13, 101:17, 104:5, 104:13, 105:2, 113:20, 114:15, 117:4, 117:18, 118:12, 118:18, 120:19, 122:13, 123:1, 124:13, 131:20 objective 69:15 obvious 28:18, 28:19, 29:4, 29:7, 29:15, 42:9, 42:16, 42:21, 43:1, 43:11, 44:3, 45:6,</p>	<p>48:4, 74:13, 91:5, 92:12, 106:21, 107:5, 107:21, 108:6 obviously 21:14, 26:9, 64:7, 64:16 occur 84:9 off-the-record 4:8 offer 29:17, 29:21, 30:2, 33:3, 48:20, 119:9, 136:13 offered 96:8, 112:21 office 1:1 oh 18:22, 71:11, 73:10, 87:12, 87:15, 109:17, 114:5, 128:7 old 18:5 one 4:6, 8:5, 10:19, 13:16, 15:9, 22:4, 28:21, 31:20, 33:20, 41:11, 46:3, 48:2, 49:10, 49:13, 51:2, 52:19, 54:16, 56:3, 70:4, 70:16, 73:4, 75:20, 76:13, 78:15, 81:1, 82:12, 84:12, 92:3, 93:21, 94:14, 94:16, 96:11, 96:13, 97:12, 97:16, 103:17, 105:8, 106:7, 107:1, 107:10,</p>	<p>111:15, 112:10, 115:13, 123:21, 125:17, 131:4 ones 64:12 only 6:10, 16:7, 59:4, 97:22, 110:8, 111:21, 112:3, 125:7, 128:18, 135:12 open 9:8, 9:9, 9:18, 9:20, 10:11, 57:5, 69:6, 70:2 open-ended 61:13 opening 100:9 operate 6:20, 122:21 operated 37:5, 79:17 operating 49:8, 49:10, 49:13 operation 89:21 operator 37:4, 37:9, 37:12, 37:16, 37:21, 38:2, 38:6, 38:9, 38:13, 38:16, 39:5, 39:7, 39:12, 39:19, 40:8, 40:15, 40:20, 41:3, 41:4, 42:5, 42:6, 79:2, 79:9, 79:13, 79:16, 79:17, 79:19, 81:4, 81:7, 81:8, 81:19, 84:2, 87:20, 88:1, 89:3, 90:12, 99:8</p>
---	--	---	---

<p>operators 37:6 opine 100:14 opinion 17:21, 17:22, 21:6, 26:21, 27:4, 27:6, 92:10, 96:8, 99:1, 101:7, 117:8, 124:18 opinions 8:8, 13:2, 16:1, 19:21, 21:1, 23:15, 29:17, 29:21, 30:2, 33:3, 90:22 opportunity 7:21 order 61:16, 98:2, 122:6 ordinary 26:1, 27:15, 28:10, 28:16, 30:13 original 21:14 originated 48:21, 49:2, 49:6, 75:11, 75:16, 75:17, 77:10, 77:12, 78:2, 78:7, 81:9 originating 81:11 other 9:6, 9:7, 9:8, 9:18, 10:1, 14:22, 19:2, 19:11, 19:12, 23:3, 24:21, 37:2, 43:20, 54:16, 56:3, 56:21, 57:1, 64:13, 67:13, 71:15, 84:13,</p>	<p>90:9, 96:2, 116:12, 121:8, 125:2 others 19:14, 25:10 ought 123:10 out 23:5, 28:11, 47:12, 100:20, 102:11, 129:3, 129:10, 134:4, 135:7 outcome 120:6, 120:13, 120:17 output 46:16 over 4:6, 13:3, 38:6, 39:18, 53:18, 87:19, 122:7 overall 67:9 overseeing 31:5 overview 18:17 own 27:9, 27:10, 32:2, 131:15 owner 1:15, 2:12, 12:2, 12:3, 17:3, 18:1, 18:6</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>packet 37:8, 46:16, 46:22, 47:4, 47:7, 47:11, 47:15, 48:9, 75:11, 75:17, 76:21, 77:1, 77:11, 77:12, 77:18, 77:20, 78:2, 78:8,</p>	<p>80:6, 81:9, 81:10, 81:20, 87:21, 87:22, 88:22, 89:3, 89:14, 90:2, 90:5, 90:10 packet's 87:19 packets 48:22, 49:2, 49:6, 49:7, 70:13, 71:4, 80:20, 83:12, 89:18, 94:10, 95:2, 97:3, 97:20, 97:21, 101:3, 122:7 page 3:2, 6:8, 11:5, 15:17, 22:1, 22:3, 23:10, 23:13, 24:12, 24:14, 26:11, 30:6, 32:14, 32:17, 34:6, 41:9, 41:13, 41:15, 41:19, 48:20, 49:19, 52:10, 53:1, 53:2, 53:9, 54:3, 54:10, 54:14, 55:4, 55:5, 55:6, 55:7, 55:10, 55:11, 55:12, 55:14, 57:6, 57:8, 57:17, 57:18, 57:19, 58:5, 60:8, 60:10, 74:10, 78:14, 78:17, 85:19, 86:1, 103:14, 105:20, 106:1, 106:4, 106:14, 112:13, 125:21, 125:22, 126:11, 134:4, 135:8, 135:13,</p>	<p>136:16, 136:20, 136:25, 137:2, 137:7, 137:11 pages 57:10, 133:7, 135:12 paid 12:11, 12:17 paper 9:1, 9:3 papers 8:16, 8:19, 8:21 paragraph 11:11, 21:20, 23:10, 23:13, 23:19, 24:12, 25:3, 25:19, 25:22, 27:7, 28:11, 28:22, 30:7, 41:9, 42:12, 42:14, 44:16, 44:19, 45:4, 45:12, 47:20, 47:21, 48:19, 49:4, 49:19, 50:13, 50:14, 63:4, 64:22, 65:3, 74:9, 74:17, 78:13, 80:10, 80:11, 80:18, 80:22, 81:4, 83:8, 83:9, 84:20, 85:13, 85:19, 86:5, 87:3, 90:14, 91:2, 91:10, 92:2, 92:19, 93:3, 96:4, 96:8, 103:11, 106:11, 106:20, 107:3, 107:17, 107:18, 108:5, 108:22, 109:22, 112:7, 120:2, 122:2, 130:17, 130:22</p>
---	--	--	--

<p>parameter 123:8, 124:5</p> <p>parameters 106:22, 110:9, 121:10, 123:13, 123:20, 124:2, 124:4, 124:16</p> <p>part 12:15, 44:6, 47:1, 101:6, 117:12, 117:16</p> <p>particular 33:11, 43:14, 43:15, 97:11</p> <p>particularly 91:8</p> <p>parties 18:11, 133:10, 133:11, 134:9</p> <p>parts 22:14, 22:18, 22:20, 35:14, 36:2, 43:14, 43:20, 116:12, 116:19, 117:3, 118:5, 119:21</p> <p>pass 132:8</p> <p>passed 121:8</p> <p>patent 1:1, 1:2, 1:11, 1:15, 2:12, 9:14, 11:17, 11:20, 11:21, 12:2, 12:4, 16:10, 17:3, 17:7, 18:1, 18:6, 21:14, 21:16, 22:9, 24:5, 48:17, 131:14, 132:5</p> <p>patents 13:14, 13:15, 16:8, 16:14</p> <p>path 77:2, 80:1, 80:20, 83:12,</p>	<p>84:12, 84:13, 85:9, 85:15, 86:21, 87:10, 87:13, 87:15, 87:16, 87:22, 88:3, 88:5, 91:6, 91:7, 92:15, 116:21</p> <p>paths 86:7, 91:8, 93:5</p> <p>pause 7:20</p> <p>pausing 7:12</p> <p>payload 130:16</p> <p>penalty 136:6, 136:7</p> <p>pending 6:11</p> <p>percent 115:7</p> <p>perfect 7:5, 8:3, 41:17, 54:1</p> <p>perfectly 90:17</p> <p>perform 51:21</p> <p>performs 46:21</p> <p>period 56:20</p> <p>perjury 136:6, 136:7</p> <p>person 26:1, 27:15, 28:10, 30:12</p> <p>personally 135:4</p> <p>petition 25:14, 25:16</p> <p>petitioner 7:19, 11:13, 11:14, 15:8, 26:7</p> <p>petitioners 1:9, 2:2</p>	<p>ph 27:18, 27:19, 27:20, 28:6</p> <p>phone 4:13, 79:5, 102:6</p> <p>phones 129:16, 129:22</p> <p>phrase 66:9, 67:18, 69:13</p> <p>piece 52:4, 56:8</p> <p>pieces 33:13, 34:17, 34:18</p> <p>place 134:3, 135:7, 135:12</p> <p>places 23:3</p> <p>plain 91:14</p> <p>plainest 131:9</p> <p>plan 6:5, 6:17</p> <p>planet 2:33</p> <p>platform 50:19, 63:8</p> <p>please 4:4, 4:6, 4:9, 4:10, 4:13, 5:5, 6:22, 7:10, 10:12, 15:18, 21:22, 25:3, 31:19, 33:19, 36:12, 36:13, 41:8, 41:10, 42:12, 43:22, 44:17, 47:20, 49:19, 51:11, 52:18, 57:6, 57:7, 57:15, 66:4, 66:5, 69:7, 69:8, 70:3, 73:3,</p>	<p>74:5, 74:6, 74:19, 75:19, 76:8, 77:8, 78:13, 80:10, 82:11, 85:21, 86:11, 105:7, 106:11, 109:3, 109:4, 110:5, 111:5, 112:7, 114:9, 115:12, 120:2, 125:13, 125:16, 126:1</p> <p>plm 111:16</p> <p>plmn-sw 111:11, 111:22, 113:13, 122:12, 122:22</p> <p>plus 26:18</p> <p>point 6:19, 50:4, 61:19, 63:21, 68:3, 68:7, 69:2, 72:17, 87:11, 93:13, 93:18, 95:16, 95:19, 96:1, 118:9, 120:22</p> <p>pointing 42:4, 42:5</p> <p>points 7:16, 97:14</p> <p>poor 89:21</p> <p>port 46:16</p> <p>portion 67:17, 68:1, 68:7, 68:19, 69:12, 69:16, 70:9, 71:7, 71:9, 72:7, 90:21, 92:7, 92:9, 93:17, 129:7</p> <p>portions 128:7, 128:19,</p>
--	---	---	---

<p>129:4 posita 29:8, 29:14, 29:17, 29:22, 30:2, 30:5, 30:10, 30:18, 31:3, 42:15, 45:5, 50:14, 55:20, 59:2, 59:12, 60:6, 67:11, 67:13, 68:10, 68:14, 91:11, 96:2, 100:20, 101:21, 102:4, 102:10, 120:5, 124:4 possible 36:17, 87:22, 117:1, 118:10, 118:15, 118:21, 118:22, 122:11 potential 18:7 pre 87:20 precise 28:14, 37:17, 46:8, 54:18, 58:8, 62:21, 72:19, 72:20, 81:18, 95:22, 99:11, 112:2, 121:2, 129:6 precisely 39:16, 43:3, 49:9, 52:5, 73:14 precision 49:15 preparation 34:18, 35:14, 36:2 prepare 15:6, 18:17, 24:21, 33:7, 34:20, 35:11, 35:22, 42:2 prepared 22:18, 72:1,</p>	<p>100:13, 117:7, 117:8, 119:8, 119:9 preparing 14:8, 14:12, 14:20, 14:22, 15:2, 21:12 present 2:33, 48:14 presumably 87:16 previous 34:3 previously 14:21, 24:7, 33:6, 87:18, 125:3 primary 9:15, 19:2, 19:4, 19:6, 19:9, 112:15 prior 14:20, 65:14, 101:22, 129:4 privilege 20:1, 20:9 probably 5:21, 6:17 problem 32:8, 82:18, 105:3 proceeding 4:3, 4:7, 12:8, 13:12, 14:9 proceedings 8:20 process 6:1, 46:15, 46:20, 115:8 processor 52:4, 56:9 professional 133:16 professor 27:21, 28:3 programs 9:6 properly 112:2</p>	<p>prosecution 21:15 proto 40:4 protocol 39:14, 39:17, 40:5, 40:7, 41:1, 41:2, 41:4, 81:5, 81:8, 81:13, 81:22, 82:5, 82:7, 83:7, 83:13, 83:21, 84:5, 85:10, 87:4, 87:8, 88:8, 107:1, 117:19, 123:21 provide 4:15, 13:1, 13:22, 17:11, 22:20, 46:3, 46:14, 58:18, 84:19, 96:20, 98:15, 100:16, 112:17 provided 16:16, 17:21, 17:22, 20:7, 21:5, 21:9, 21:11, 21:13, 24:8, 24:16, 24:17 provider 112:18, 113:2, 113:18, 114:13, 117:17, 119:20, 121:12, 122:22 providers 102:8 provides 100:18, 100:19 public 133:15 published 73:8, 73:15, 73:20, 74:3, 101:3, 101:15 pull 31:18, 31:21,</p>	<p>33:18, 33:21, 41:7, 52:18, 52:20, 73:3, 75:19, 82:10, 109:2, 125:18 pulled 57:8, 82:14 pulling 10:20, 36:14, 41:11, 66:6, 69:9, 70:5, 74:7, 75:21, 85:22, 105:9, 106:12, 112:11, 120:3 purchase 4:16 purpose 81:2, 112:16, 123:4 purposes 4:7 put 23:21, 30:17, 126:21, 128:18</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualify 48:7 question 6:11, 6:13, 6:21, 7:7, 7:11, 7:17, 7:20, 16:6, 20:20, 22:21, 27:3, 34:3, 52:6, 53:13, 54:8, 58:15, 59:21, 61:13, 84:3, 101:7, 108:4, 114:7, 123:3, 127:3, 127:20, 128:3, 129:13, 130:2 questions 6:5, 7:4, 125:8, 132:15, 133:5</p>
--	---	--	---

<p>quick 33:19, 52:20, 70:5, 70:17, 73:5, 78:16, 82:13 quite 116:13, 125:5 quote 45:15, 46:3, 46:10, 46:14 quotes 46:3</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>radio 37:8 radius 117:19, 120:18, 122:4, 125:4 range 17:10, 17:17 rate 12:13 rates 104:19 rather 33:13, 62:7, 97:19, 97:21, 123:11 read 25:14, 25:16, 33:14, 45:12, 110:14, 124:1, 124:5, 127:12, 131:14, 134:9, 136:7, 136:9, 136:17, 136:21, 136:26, 137:3, 137:8, 137:12 readily 30:14 reading 132:4 reads 79:8 ready 31:16, 49:22 really 14:4, 33:19,</p>	<p>45:11, 56:6, 84:22, 99:10, 100:12, 100:13, 117:5, 117:6 reason 5:15, 59:20, 84:9, 84:12, 84:18, 85:14, 89:6, 89:22, 90:8, 90:11, 96:9, 96:21, 97:3, 97:9, 97:14, 98:5, 100:1, 102:2, 136:19, 136:24, 137:1, 137:6, 137:10, 137:15 reasons 84:10, 84:13, 84:14, 84:16, 85:5, 85:16, 88:20, 89:7, 89:8, 89:11, 93:2, 94:3, 94:12, 100:6, 100:14, 100:20 recall 13:3, 13:4, 14:5, 21:2, 21:18, 23:20, 24:19, 25:12, 25:13, 26:5, 53:11, 61:14, 63:17, 67:1, 69:19, 70:12, 71:12, 71:16, 72:12, 72:13, 93:15, 93:21, 94:5, 94:18, 95:1, 95:8, 95:10, 95:14, 97:13, 108:13, 110:12, 110:15, 126:4 received 49:13, 95:4 receives 110:8</p>	<p>recent 30:20 recess 50:8, 91:20, 107:14, 125:14, 132:13 recites 123:19 recognize 32:12 recognized 50:15, 120:5 recollection 25:8, 65:20, 66:12, 66:13, 69:18, 73:14, 73:18, 74:1, 75:13, 95:5, 130:12, 131:13, 132:6 reconfiguring 80:19, 83:11 reconvene 50:5, 125:9 record 5:6, 7:13, 50:10, 69:22, 107:12, 125:9, 125:13, 127:11, 132:10 recording 4:7, 4:15 reduced 133:5, 134:6 refer 11:7, 11:14, 11:20, 12:2, 32:16, 34:7, 34:12, 34:13, 35:3, 35:4, 35:5, 35:17, 36:8, 37:22, 38:19, 39:1, 40:11, 54:15, 57:19, 58:3, 58:6, 60:10, 60:15, 60:19, 61:2, 63:9,</p>	<p>67:12, 79:13 reference 24:4, 32:20, 32:22, 33:3, 33:7, 33:12, 33:14, 34:7, 34:19, 55:16, 55:21, 56:7, 56:11, 57:22, 58:8, 59:7, 60:18, 61:6, 61:20, 62:12, 62:15, 63:15, 63:22, 65:8, 65:17, 65:19, 69:20, 70:1, 70:10, 71:10, 71:17, 71:18, 72:21, 93:22, 100:22, 101:2, 108:15 referenced 52:1 references 9:16, 19:2, 19:3, 19:4, 19:6, 19:10, 19:12, 21:16, 23:14, 23:17, 25:5, 25:12, 30:3, 32:2, 62:4, 62:8, 63:18, 63:20, 65:15, 66:1, 67:13, 67:20, 68:4, 69:3, 71:13, 71:15, 72:2, 79:15, 96:1, 101:8, 101:11, 103:7 referred 19:15, 19:17 referring 11:21, 12:3, 19:5, 19:9, 19:12, 27:7, 32:2, 32:20, 34:8, 36:9,</p>
---	--	---	---

<p>37:3, 37:20, 39:2, 43:8, 45:8, 45:9, 45:21, 46:5, 46:18, 49:2, 67:1, 85:13, 87:11, 97:17, 98:4 refers 39:14, 40:4, 40:7, 49:6, 60:8, 60:11, 90:21, 92:7, 103:20 reflecting 30:21 refresh 19:3 register 110:13, 110:19, 110:22, 111:1, 122:12, 122:19 registered 133:16 rejected 121:2 related 11:17, 26:14, 26:15, 90:22, 95:12 relates 130:22 relatively 91:14 relevant 8:20, 14:10, 58:10, 131:11 relied 9:16, 20:22, 21:5, 43:13 rely 26:21, 27:5, 62:7 relying 59:1, 59:4, 59:17 remember 4:4, 4:5, 4:9,</p>	<p>13:16, 16:11, 16:13, 18:10, 26:7, 38:21, 73:10, 126:3, 126:9, 132:4 remotely 1:22, 4:3 rendered 74:13 rendering 42:16, 42:21, 43:1, 45:6 renders 42:9, 43:11, 44:2, 48:4, 92:12, 106:21 repeat 113:22 rephrase 7:1, 20:20, 27:3, 27:14, 114:7, 124:15 report 73:11, 73:16, 122:5 reported 133:4 reporter 3:7, 4:11, 7:14, 113:22, 133:16, 134:6, 135:1 represent 67:14, 124:6, 133:7 represented 30:12 representing 126:10 request 23:2 requested 134:5 require 104:22, 117:20 required 44:14, 58:14, 113:5</p>	<p>requirements 48:16 requires 64:9 research 99:12, 130:7 respect 12:7, 16:1 respective 41:5 response 92:15, 93:5, 94:11, 95:3, 127:3, 128:14, 129:18 rest 10:2, 100:20, 120:7, 129:8 result 133:12 retained 13:1, 16:4, 17:2, 17:3, 17:6, 19:19 return 101:19, 135:12 review 14:10, 19:16, 24:15, 34:16, 34:20, 35:22, 53:12, 53:14, 66:12, 66:18, 67:2, 67:4, 69:22 reviewed 19:11, 23:14, 23:18, 24:1, 24:20, 33:6, 35:14, 54:2, 54:7, 54:9 reviewing 14:20, 18:22, 19:1, 19:2, 33:8, 33:11, 35:11 rex 2:24 rhwang@skiermont- derby 2:29</p>	<p>right 6:4, 6:16, 11:22, 16:4, 24:4, 31:21, 33:21, 45:6, 49:3, 52:17, 57:8, 59:10, 74:17, 79:6, 80:20, 91:16, 100:7, 102:6, 103:9, 106:8, 107:1, 109:2, 112:6, 112:18, 113:19, 117:9, 119:10, 121:9, 126:10 rigidly 131:16 roaming 98:12 role 12:7 room 8:11 rotate 36:17 rout 43:6 route 48:9, 51:1, 84:17, 85:4, 85:8, 90:11, 97:3, 98:2, 122:6 routed 80:6, 81:12, 84:6, 87:17, 90:1, 101:4 router 45:17, 45:19, 45:22, 46:4, 47:10, 47:13, 47:17, 48:15, 55:13, 78:20, 121:12, 121:13, 122:6 routing 42:4, 42:8,</p>
---	--	---	---

<p>42:22, 43:4, 43:6, 43:7, 44:3, 44:9, 44:12, 45:9, 45:11, 45:13, 45:18, 45:20, 46:5, 46:15, 46:18, 46:20, 46:21, 47:1, 47:3, 47:6, 48:14, 50:17, 51:1, 51:14, 51:16, 51:22, 54:20, 55:3, 55:8, 55:12, 56:16, 57:1, 58:3, 58:6, 60:19, 60:22, 61:9, 61:22, 62:17, 63:6, 64:2, 65:4, 65:10, 66:15, 68:2, 68:5, 69:17, 69:19, 70:10, 70:13, 71:1, 71:3, 71:10, 71:12, 71:13, 71:16, 71:19, 72:3, 75:11, 76:21, 80:19, 83:11, 84:12, 84:18, 85:3, 86:6, 87:22, 89:13, 89:17, 92:22, 93:1, 97:19, 97:21, 101:12, 107:6, 107:22, 108:7, 121:15, 121:17, 121:22, 122:18, 122:21 rpr 1:26 rule 20:10, 20:12 rules 6:7 run 4:4, 37:5,</p>	<p>94:22, 95:12, 95:18, 95:20, 102:21, 103:2, 103:6 running 9:6, 99:16 <hr/>S<hr/>said 14:1, 19:11, 24:14, 33:16, 44:2, 46:9, 86:1, 86:2, 108:10, 114:4, 122:3, 133:8, 133:11, 133:12, 134:10, 135:9 same 6:8, 26:11, 30:6, 32:17, 34:22, 40:14, 40:21, 40:22, 49:15, 61:4, 66:17, 66:22, 68:3, 68:9, 72:12, 94:1, 94:3, 103:2, 130:2, 134:6, 136:9 samsung 1:5, 1:6, 2:2, 2:3 santa 133:2, 135:3 satisfy 48:12, 48:15 save 136:10 saw 55:19, 87:17 say 12:9, 14:4, 19:4, 23:22, 27:6, 28:9, 29:2, 30:5, 30:10, 31:7, 32:19, 34:22, 35:8, 42:17,</p>	<p>42:21, 43:3, 44:8, 45:4, 45:7, 45:8, 45:17, 46:4, 51:20, 54:14, 54:19, 55:3, 56:1, 58:2, 58:5, 63:5, 63:13, 65:1, 65:3, 65:7, 67:7, 67:15, 67:16, 67:19, 67:22, 72:17, 73:19, 74:16, 80:21, 81:21, 82:2, 82:4, 83:16, 83:17, 83:22, 89:20, 91:10, 94:13, 95:6, 107:9, 108:19, 109:13, 112:2, 116:8, 118:21, 120:5, 124:5, 131:16 saying 37:19, 43:10, 51:15, 59:20, 60:1, 62:3, 63:18, 63:19, 72:12, 84:4, 94:17, 114:3, 116:19, 116:20, 118:11 says 39:10, 42:4, 45:16, 46:15, 59:8, 63:15, 67:3, 83:5, 95:17, 106:1, 110:18, 111:2, 111:3, 115:17 scenario 81:3, 83:12, 83:19, 85:12, 86:6, 87:1, 87:9, 88:7, 89:2, 98:4 scenarios 97:11, 100:9</p>	<p>science 26:13 scope 19:22, 96:22, 98:20, 99:4, 101:5 scratch 51:10, 106:9 scream 126:13 screen 10:14, 10:18, 10:21, 32:10, 33:22, 34:4, 36:15, 44:22, 47:22, 52:21, 69:10, 70:6, 70:19, 73:6, 74:8, 75:22, 76:15, 86:3, 86:16, 86:18, 90:18, 92:5, 109:6, 109:15, 125:19, 130:19 scroll 76:1, 80:9, 86:10, 106:6, 123:14, 123:17, 125:22, 126:15, 130:21 scrolling 74:18 second 10:19, 22:5, 31:11, 41:12, 52:20, 58:16, 70:17, 76:14, 78:16, 78:21, 82:13, 86:20, 87:13, 87:22, 90:8, 91:6, 92:15, 103:8, 106:7, 107:10, 107:13, 112:10 section 91:3, 103:19, 106:17 sections 61:16</p>
--	--	--	---

<p>security 84:10, 84:13, 85:5, 85:15, 88:19, 89:7, 93:1, 94:2, 94:3, 94:6, 94:12, 94:15, 94:16, 100:19 see 11:2, 11:11, 20:20, 34:4, 41:19, 42:3, 45:1, 50:20, 50:21, 57:10, 73:13, 73:16, 75:1, 77:19, 79:5, 79:9, 80:10, 83:5, 83:8, 86:15, 86:17, 88:3, 92:16, 96:15, 104:1, 105:10, 105:22, 106:2, 109:11, 111:7, 111:13, 111:18, 115:19, 115:20, 120:9, 123:19, 126:14, 126:18, 131:4, 131:5 seeing 106:6 seek 113:17, 114:11 seems 13:3 seen 24:1, 30:22 selected 115:10, 115:18 selection 97:15, 115:8 selects 114:21, 115:1, 115:3, 115:5, 115:18, 115:22 send 46:22, 47:4, 47:7, 47:11,</p>	<p>47:14, 88:20, 90:7, 100:1, 106:21, 123:20 sending 80:20, 83:12, 99:8 sends 107:5, 107:22, 108:7 sense 7:14, 79:14 sensitive 99:22 sent 46:16, 87:19, 112:5 separate 16:16, 51:3, 61:8, 61:22, 62:13, 62:16 separately 51:13, 51:17, 56:17, 62:13, 62:21, 62:22, 63:2, 63:13, 64:7 sequential 33:14, 34:19 server 50:16, 51:1, 51:2, 51:13, 51:15, 51:16, 53:9, 54:11, 54:12, 54:15, 54:19, 54:21, 54:22, 55:15, 55:18, 56:3, 56:18, 58:19, 59:18, 60:15, 61:3, 61:7, 61:21, 62:12, 62:16, 63:5, 63:6, 64:1, 65:1, 65:3, 65:4, 65:9, 66:9, 66:12, 66:20, 67:18, 67:21, 68:8,</p>	<p>68:20, 69:4, 69:13, 72:6, 72:9, 72:18, 92:13, 106:21, 107:5, 107:21, 108:7, 108:11, 108:14, 110:8, 111:20, 112:3, 112:16, 112:22, 113:11, 114:11, 114:16, 114:22, 115:6, 115:10, 115:19, 115:22, 116:2, 117:14, 118:7, 119:5, 119:15, 119:18, 120:6, 120:16, 121:6, 121:9, 121:22, 122:4, 125:4 server's 113:8 service 37:8, 112:17, 113:1, 113:18, 114:12, 117:17, 119:20, 121:11, 122:22, 123:20 serving 51:22, 54:4, 72:14 set 30:7, 134:4, 135:7 seven 17:17 several 9:10, 9:11, 43:12 share 57:9, 105:11 shared 50:18, 63:8 sheet 136:1, 136:12 shoes 30:17 should 4:8, 9:19,</p>	<p>10:21, 44:21, 53:4, 70:18, 105:12, 105:14, 136:17, 136:21, 136:26, 137:3, 137:8, 137:12 show 56:16, 59:18, 62:11, 67:20, 105:11 showing 77:6, 77:10, 77:17 shows 64:1, 65:8, 65:18, 75:10, 78:2, 78:7 side 132:15 sign 134:9 signature 3:8, 15:18, 137:17 signature-plkal 133:13 signed 135:13 similar 17:16, 46:20, 60:13, 100:8 simple 116:13 since 16:2, 24:17, 58:17, 110:14 single 44:7, 51:3, 51:6, 52:4, 56:8, 56:9, 56:10, 56:21, 59:8, 59:15, 59:22, 64:14, 123:9 sir 5:14, 7:2, 7:8, 8:12, 10:7, 10:9, 11:3,</p>
---	---	--	--

<p>11:10, 11:19, 12:12, 12:18, 12:20, 13:21, 15:13, 15:20, 16:3, 16:12, 16:17, 17:8, 17:19, 19:15, 19:18, 21:12, 22:4, 24:9, 25:1, 26:3, 27:13, 28:5, 28:8, 31:20, 32:14, 32:18, 32:21, 33:20, 34:15, 35:7, 36:10, 36:13, 37:11, 38:5, 38:14, 38:22, 39:6, 40:1, 40:19, 52:19, 53:6, 57:7, 66:5, 69:8, 70:4, 70:16, 73:4, 74:6, 75:17, 75:20, 76:9, 77:13, 77:20, 78:4, 78:15, 78:22, 79:7, 79:10, 80:21, 82:12, 83:2, 85:17, 85:21, 86:19, 86:22, 88:16, 91:1, 92:3, 92:11, 93:8, 105:8, 107:2, 109:4, 111:8, 111:12, 111:17, 113:16, 115:13, 115:20, 125:17, 127:17, 130:9, 131:2 sit 67:19, 68:3, 120:15 sitting 61:19, 63:21, 67:16, 67:22,</p>	<p>68:6, 68:19, 69:12, 69:16, 118:4, 119:1, 119:4, 119:11, 119:14, 119:17, 119:22, 120:15 six 17:10, 17:17 sixth 17:1 skiermont 2:15, 2:23 skill 26:1, 27:15, 28:10, 28:16, 30:13 slowly 4:5 smart 1:13, 2:12, 136:3 smoothly 4:4 sn 38:4 software 93:10, 93:13, 93:14, 93:18, 96:13, 96:18, 98:5, 98:10, 100:10, 101:4, 102:3, 102:13 some 6:7, 6:19, 13:4, 16:20, 22:21, 23:4, 26:18, 34:17, 34:18, 36:2, 37:2, 45:15, 48:20, 51:22, 59:14, 61:16, 62:20, 67:4, 90:8, 97:11, 102:5, 102:20, 110:14, 117:12, 117:15, 121:15, 124:9, 130:5, 131:13</p>	<p>someone 22:15, 26:12, 27:11, 28:20, 29:2, 29:13, 30:6, 99:16 something 15:3, 22:9, 22:11, 24:1, 25:9, 25:17, 43:8, 59:4, 67:14, 99:21, 100:15, 114:3, 124:2, 124:6, 124:7, 124:22 sometime 50:1 sometimes 7:4 somewhat 88:17 somewhere 17:10 sood 19:9, 35:3, 35:4, 35:5, 35:11, 35:14 soon 50:1 sorry 7:18, 16:12, 17:21, 18:12, 18:20, 45:2, 51:10, 57:18, 58:4, 60:3, 80:13, 83:22, 84:2, 91:3, 113:9, 113:21, 115:7, 119:13, 119:16, 120:13, 128:3 sort 33:13, 43:20, 44:7, 44:8, 56:8, 56:22, 59:14, 64:15, 96:14, 101:18, 102:5, 124:9, 126:21</p>	<p>sound 110:13 sounds 50:7 spanned 14:4 speak 4:5 speaking 4:12, 4:14, 29:11, 37:18, 47:8, 103:1, 115:9, 128:4 specific 13:18, 13:20, 38:1, 59:11, 61:16, 64:12, 67:8, 71:11, 72:1, 72:3, 73:17, 74:2, 94:22, 95:8, 95:22, 103:5, 113:10 specifically 25:12, 27:7, 49:5, 50:13, 54:15, 55:14, 56:2, 57:22, 58:11, 58:17, 58:19, 59:18, 60:1, 60:10, 60:17, 60:21, 61:2, 61:5, 63:15, 65:18, 84:19, 93:14, 93:19, 101:8, 101:12, 104:9, 108:20, 115:2, 124:20, 130:12, 130:15, 131:18, 132:2 specification 131:14, 132:5 specificity 63:18 specifics 55:22, 59:1, 67:1, 123:11</p>
---	--	---	--

<p>speculating 102:9</p> <p>spelling 5:8</p> <p>spend 33:8, 35:11, 67:6, 99:12, 100:12</p> <p>spent 13:16, 13:20, 14:8, 14:17, 15:1, 15:14, 33:11</p> <p>stack 8:18</p> <p>stand 36:13, 37:7, 41:10, 57:7, 66:5, 69:8, 74:6, 85:21, 109:4, 110:11, 127:2, 127:10</p> <p>standard 26:1, 26:4, 26:6, 28:10, 30:6, 122:4, 122:10</p> <p>standpoint 127:1, 127:4, 127:16</p> <p>stands 38:4</p> <p>started 31:10</p> <p>starting 82:20</p> <p>starts 54:3, 114:17</p> <p>state 133:1, 135:2</p> <p>stated 133:4</p> <p>statement 108:16, 108:19, 108:22</p> <p>states 1:1, 135:5</p> <p>station 71:4, 79:7,</p>	<p>79:8, 79:14, 79:16, 79:20, 81:5, 81:11, 81:14, 81:20, 81:22, 82:2, 82:5, 82:7, 83:7, 83:14, 83:21, 84:6, 85:10, 87:5, 87:8, 88:9, 88:22, 89:4, 94:22, 95:3, 95:13, 95:21, 96:17, 97:18, 98:14, 99:2, 99:3, 102:18, 102:21, 107:8, 108:2, 108:9, 112:5, 116:16, 130:10</p> <p>step 43:21, 113:4</p> <p>steps 30:11</p> <p>stick 65:14</p> <p>still 105:16, 126:19, 128:16, 136:13</p> <p>stopping 50:4</p> <p>store 122:11</p> <p>stored 110:10, 112:4, 122:15, 122:16, 122:19, 122:22, 123:3, 123:5</p> <p>stores 110:22</p> <p>straight 12:19, 20:12</p> <p>stream 103:22, 104:3, 104:6, 104:11, 104:22, 126:13, 126:19, 127:13</p> <p>streamed 128:15, 129:1,</p>	<p>130:14</p> <p>streaming 103:20, 103:21, 128:12, 129:17, 130:1, 130:11, 130:15</p> <p>streams 127:21, 128:4</p> <p>street 2:17, 2:25</p> <p>strike 17:21, 29:22, 34:2, 37:22, 38:15, 40:14, 42:9, 42:19, 46:13, 48:6, 51:11, 57:18, 58:4, 62:14, 65:2, 68:16, 68:17, 71:7, 72:7, 75:5, 76:10, 76:19, 79:12, 80:3, 82:1, 82:2, 82:21, 86:16, 87:2, 88:12, 90:20, 91:4, 92:8, 92:21, 93:11, 95:18, 96:5, 97:6, 98:21, 101:1, 102:17, 102:19, 103:8, 108:2, 113:9, 116:9, 117:13, 118:14, 119:3, 119:12, 119:16, 120:13, 122:19, 129:14, 129:20, 132:1</p> <p>structure 90:3, 90:5, 90:10</p> <p>struggle 25:7</p> <p>struggling 64:6, 64:14, 85:1</p> <p>students 30:20, 31:6</p>	<p>study 117:7</p> <p>submitted 14:8</p> <p>subparts 116:21</p> <p>subscribed 137:22</p> <p>subscriber 102:12</p> <p>subscription 110:9, 110:10, 110:22, 111:1, 111:21, 112:4, 112:21, 113:5, 113:12</p> <p>substitute 26:19</p> <p>success 117:16, 118:16, 119:15</p> <p>successful 119:6</p> <p>sufficient 50:6</p> <p>suite 2:8, 2:18, 2:26</p> <p>support 38:3, 38:4, 38:5, 38:7, 38:9, 38:11, 38:12, 38:16, 38:20, 52:9, 52:14, 54:4, 83:7, 83:13, 83:20, 84:2, 84:5, 87:4, 87:8, 88:8, 97:20, 108:16, 108:19, 108:22</p> <p>supports 81:5, 81:8, 81:13, 81:19, 81:22, 82:4, 82:6, 85:9</p> <p>sure 5:10, 7:3, 29:9, 30:12,</p>
--	---	---	--

<p>32:5, 44:1, 51:7, 52:6, 53:2, 74:15, 75:15, 88:2, 112:2, 114:11, 129:21 susan 1:26, 133:15 swear 73:20 switch 42:16, 42:22, 43:2, 43:5, 43:9, 43:11, 43:19, 44:3, 44:13, 45:6, 48:5, 48:6, 48:8, 48:13, 48:16, 78:21, 79:1, 92:14, 106:22, 123:21 switching 44:11, 93:4 sworn 4:19, 135:5, 137:22 system 26:16, 44:8, 57:20, 58:18, 58:20, 59:15, 59:22, 64:8, 67:9, 84:16, 89:21, 116:14, 118:1, 124:10 systems 57:22, 58:1, 58:13, 60:13</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>take 6:13, 6:17, 30:11, 49:22, 50:3, 53:15, 78:16, 91:18, 105:14, 132:9, 132:10 taken 129:3, 129:10,</p>	<p>134:2, 134:5, 135:6, 136:8 talk 4:6, 22:7, 55:22, 56:2, 56:7, 60:21, 60:22, 61:15, 63:12, 64:11, 70:13, 80:22, 96:17, 123:10 talked 21:16, 27:12, 101:19, 113:7, 125:3 talking 11:8, 11:15, 35:6, 49:4, 54:4, 56:11, 58:9, 58:11, 58:13, 58:17, 59:5, 59:6, 63:8, 63:14, 83:20, 86:6, 87:1, 87:3, 87:12, 99:14, 100:6, 106:18, 107:17, 131:5 talks 45:12, 57:2, 64:10, 94:15, 130:16 teach 56:20, 58:1, 94:6 teaches 93:10, 93:13, 93:18, 94:10, 109:12, 110:7 teaching 56:22 teachings 94:21 tech 10:14, 10:18 technical-related 4:17 technician 2:33, 4:2,</p>	<p>10:19, 22:1, 22:4, 31:20, 32:9, 33:20, 36:13, 41:10, 41:16, 44:18, 44:21, 47:21, 52:19, 53:4, 53:17, 54:1, 57:7, 57:13, 66:5, 69:8, 70:4, 70:16, 73:4, 74:6, 74:20, 75:20, 76:3, 76:9, 76:13, 78:15, 80:11, 80:14, 82:12, 82:18, 85:21, 86:3, 90:15, 90:17, 92:3, 103:14, 103:17, 105:8, 105:12, 106:12, 106:15, 109:4, 112:10, 115:13, 120:3, 125:17, 130:19 technologies 1:13, 2:12, 136:4 tell 17:9, 18:3, 25:5, 73:8, 120:11, 120:16, 121:1 ten 15:3, 50:5, 125:9 ten-minute 132:10 tendered 3:11 tens 13:17, 14:1, 14:3, 14:15 term 53:9, 54:10, 54:12, 54:22, 55:3, 55:8,</p>	<p>55:12, 55:15, 66:15, 66:18, 66:20, 68:2, 68:5, 68:7, 69:17, 69:19, 70:10, 71:10, 71:14, 71:16, 71:19, 72:1, 72:9, 72:18, 72:20, 91:3, 91:12, 91:13, 102:2, 103:19, 124:2, 124:8, 124:16, 131:7, 131:17, 131:19, 132:3 terminate 76:19 terminated 48:21, 49:12, 76:21, 76:22, 77:17, 77:19 terms 18:6, 60:14, 67:10, 68:12, 123:9, 123:12, 131:4 testified 17:18, 17:20, 24:7, 32:6, 33:6, 42:1, 42:14, 42:17, 48:4, 68:21, 80:18, 89:11, 98:17, 107:20, 108:6, 120:20, 124:19, 127:8, 132:4 testify 22:7, 50:14, 66:19, 72:11, 83:10, 91:5, 92:12, 92:22, 93:4, 106:20, 107:4, 112:15, 117:6, 117:11, 117:14, 119:21 testifying 48:12, 48:14,</p>
--	--	---	--

<p>51:12, 51:19, 52:2, 52:5, 60:4, 60:5, 85:5 testimony 5:16, 8:7, 48:21, 61:4, 63:9, 65:14, 66:17, 66:22, 68:3, 68:9, 74:12, 81:10, 83:9, 90:21, 94:3, 101:19, 112:20, 126:5, 127:2, 127:6, 127:10, 128:16, 128:22, 129:9 th 15:21, 16:2, 24:18 thank 4:2, 4:18, 18:21, 36:18, 41:16, 49:17, 70:21, 79:22, 80:16, 82:17, 106:15, 132:14 thereto 133:5 thing 6:9, 7:9, 8:5, 34:22, 44:7, 99:6 things 6:19, 21:18, 25:10, 29:4, 29:6, 29:12, 29:14, 55:18, 56:21, 62:20, 64:8, 99:10, 99:14, 102:4 think 6:8, 13:13, 14:1, 15:5, 16:5, 19:7, 24:7, 27:10, 29:9, 30:4, 31:16, 33:16, 42:19, 50:4,</p>	<p>52:8, 57:11, 58:14, 58:16, 61:12, 63:4, 63:11, 63:12, 64:5, 64:21, 65:13, 65:14, 74:10, 81:18, 86:11, 91:16, 91:18, 94:13, 96:16, 97:12, 99:20, 101:6, 107:10, 107:20, 108:3, 109:16, 112:1, 112:13, 113:10, 123:3, 124:8, 125:6, 131:10, 132:7 third 88:1 thought 114:2, 114:9 three 40:9, 40:15, 93:16 through 18:5, 33:14, 43:21, 54:3, 80:2, 80:5, 80:6, 81:12, 84:6, 84:17, 84:18, 85:3, 85:4, 85:8, 85:9, 85:11, 85:15, 87:18, 88:1, 88:4, 88:5, 89:18, 90:1, 90:11, 110:3, 110:5, 112:17, 116:16, 116:21, 118:7, 127:7 throughout 29:16, 29:20, 38:19 time 4:14, 6:9, 6:14, 6:19, 7:17, 13:5,</p>	<p>13:16, 13:19, 14:7, 14:11, 14:17, 14:22, 15:1, 15:9, 15:14, 26:6, 27:11, 31:4, 33:8, 35:11, 53:15, 67:4, 67:6, 91:15, 91:18, 99:12, 100:12, 110:14, 131:13, 132:15, 134:3, 135:7 times 5:20, 5:22, 6:6, 15:10, 16:21, 17:9, 17:14 timing 50:2 title 11:5, 134:4, 135:8 tmartin@skiermon- tderby 2:21 today 5:2, 5:13, 5:16, 8:9, 30:18, 61:19, 63:21, 67:16, 67:19, 67:22, 68:6, 68:19, 69:12, 69:16, 95:16, 118:5, 119:1, 119:4, 119:11, 119:14, 119:17, 119:22, 120:11, 120:15, 120:16 todd 2:16 together 64:8, 64:17, 72:14, 93:20 told 21:2 took 125:7</p>	<p>top 37:21, 79:6 topic 106:10 track 5:21 trademark 1:1 traffic 107:7, 108:1, 108:8 train 114:8 trans-country 98:3 transaction 100:2, 100:3 transcript 4:16, 125:21, 126:12, 133:3, 133:8, 134:10, 135:6, 135:9, 136:8 transmission 49:12, 75:17, 77:3, 98:3, 104:4, 104:12, 126:14, 126:20, 127:14 transmitted 49:7, 127:22, 128:5 traveling 102:7 trial 1:2, 17:18 tries 112:22 trouble 106:6 true 29:15, 75:8, 85:11, 93:2, 94:1, 95:13, 108:16, 110:15, 133:7, 135:8, 136:10 trust 126:10</p>
--	---	---	---

<p>try 6:22, 7:10 trying 8:8, 63:1, 63:12 turn 15:17, 21:20, 41:8, 90:13 turned 113:8 tweeze 23:5 two 13:4, 26:14, 28:20, 31:1, 31:6, 31:8, 31:13, 37:1, 37:3, 38:3, 38:7, 89:11, 90:4, 96:10, 135:11 tx 2:9, 2:19 type 81:20 types 95:12, 95:20 typewriting 133:6 typewritten 134:6 typically 6:19</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 54:6 unable 4:12, 121:1 uncertain 118:9 under 5:12, 22:2, 37:9, 37:12, 37:16, 38:15, 133:6, 136:6, 136:7, 136:13 underneath 37:21, 38:2</p>	<p>understand 5:12, 6:22, 7:6, 8:10, 11:8, 11:21, 12:3, 29:10, 31:13, 32:20, 34:8, 34:10, 34:14, 35:6, 35:8, 36:9, 39:1, 42:15, 45:5, 51:8, 52:6, 59:2, 59:13, 60:6, 63:1, 63:12, 67:11, 68:10, 68:14, 82:5, 84:3, 85:1, 88:18, 96:2, 102:4, 102:10 understanding 11:18, 22:22, 29:4, 79:15, 136:12 understood 30:13, 30:15, 44:1, 67:14, 85:7, 88:2, 101:21 unedited 4:15 unit 56:10, 59:9 united 1:1 unsure 13:19 until 7:10, 7:12, 113:12 use 19:20, 29:19, 41:2, 54:10, 61:5, 67:21, 68:5, 69:3, 71:15, 72:19, 80:19, 83:11, 91:3, 91:6, 94:4, 96:10,</p>	<p>108:20, 113:9 user 102:20, 127:1, 127:5, 127:16 uses 44:7, 53:9, 67:17, 68:1, 68:7, 69:13, 69:17, 70:10, 71:10, 71:18, 72:14, 93:16 using 47:10, 93:14, 93:20, 96:5, 96:12, 106:22, 123:21</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>validate 67:13 variety 37:10, 37:12, 97:10 various 30:3 varying 104:19 vast 22:14 verified 111:22, 112:22, 113:12 verify 75:12 verifying 113:5 version 75:4, 75:7 versions 32:5, 32:7 versus 1:11, 23:6 via 2:6, 2:16, 2:24, 4:13 victory 2:7 video 4:11, 4:13,</p>	<p>103:20, 103:22, 104:3, 104:6, 104:7, 104:9, 104:11, 104:12, 104:22, 126:13, 126:14, 126:19, 126:20, 127:13, 127:14, 127:21, 127:22, 128:4, 128:5, 128:12, 128:13, 129:5, 130:15 videoconference 2:6, 2:16, 2:24 videos 129:17, 130:1 videotaped 1:18 view 128:12, 129:5 viewed 127:22, 128:5, 128:8, 128:19, 129:7 viewing 27:15 visited 79:19, 81:13, 81:21, 82:4, 83:13, 84:1, 87:4, 88:7, 88:18, 97:20, 102:22, 103:3 visiting 97:18, 98:1 vs 136:3</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wait 7:10, 7:12, 20:11, 20:14 waiting 32:1, 114:3 want 6:14, 7:17, 44:1, 46:8, 56:5, 68:13,</p>
--	--	---	--

71:11, 72:1, 72:19, 74:20, 75:13, 89:20, 100:12, 103:9, 107:3, 112:6, 118:21, 125:8, 129:2, 129:10, 130:17 wanted 6:6, 74:22, 86:12 watched 31:12 way 43:3, 51:7, 54:16, 56:3, 58:14, 72:12, 85:7, 94:5, 98:2, 133:12 ways 104:16, 115:9 we'll 37:22 we're 5:21, 6:7, 8:7, 26:11, 30:5, 31:22, 37:17, 49:2, 59:6, 62:6, 63:14, 87:1, 87:3, 88:7, 90:7, 96:12, 100:6, 100:9, 106:8 we've 91:17, 113:11, 125:6 wednesday 4:1 weren't 31:5, 109:16, 130:5 west 2:25 whatever 121:10 wherein 92:13, 106:21 whether 30:18, 56:9,	61:15, 102:16, 102:18, 116:10, 118:21, 119:2, 119:4, 119:6, 130:8 whole 43:11, 43:17, 44:2, 45:10, 129:5 willing 117:11, 117:14, 117:15 windows 9:18, 10:4 wireless 26:15 within 38:2, 68:4, 69:3, 109:18, 111:22, 113:13, 119:6, 120:18, 122:12, 122:19, 122:22 without 66:11, 117:2, 118:22, 128:13 witness 3:2, 4:19, 4:21, 10:13, 27:1, 28:13, 29:2, 31:22, 33:10, 44:6, 46:8, 47:3, 48:11, 51:5, 51:19, 53:21, 54:2, 54:18, 56:5, 56:20, 58:22, 61:12, 62:3, 62:19, 64:5, 65:13, 70:21, 71:22, 72:11, 74:1, 76:6, 83:16, 84:22, 88:16, 89:10, 91:19, 94:9, 97:1, 98:8, 99:5, 99:19, 101:6,	101:18, 104:6, 104:14, 105:3, 106:14, 110:18, 113:21, 114:2, 114:5, 114:16, 117:5, 117:19, 120:20, 122:14, 123:2, 131:21, 132:8, 132:12, 136:5 word 28:14, 66:12, 96:5, 96:7 wording 113:10 words 55:18, 60:17, 61:5, 67:21, 69:3, 71:11, 72:3, 72:14, 89:22, 93:14, 93:16 work 27:21, 64:8 worked 16:10, 16:14, 102:11 working 13:20, 26:20, 31:6, 64:16 works 20:21 worms 100:9 would've 18:9, 24:2, 28:1, 29:12, 30:3, 91:5, 107:5 wouldn't 116:18 write 41:22 written 54:13 wrote 22:13, 22:14, 22:16	<hr/> Y <hr/> yeah 10:1, 14:3, 14:16, 18:14, 30:4, 32:8, 36:22, 37:17, 47:16, 53:20, 55:16, 57:11, 72:19, 73:21, 74:22, 75:16, 76:7, 77:5, 84:22, 88:5, 108:13, 109:14, 119:21, 126:6, 126:17 year 13:3, 13:8, 14:4, 73:15 years 18:14, 26:14, 28:4, 28:20, 31:1, 31:6, 31:9, 31:13 yellow 78:20 yourself 4:14, 22:10, 25:6, 26:4, 30:14, 41:22 <hr/> Z <hr/> zoom 52:21, 53:5, 57:14, 70:7, 76:8, 76:15, 82:16, 105:18, 106:5, 109:7 <hr/> \$ <hr/> \$475 12:14 <hr/> . <hr/> .25 39:11, 39:16 .4500 2:28
--	---	---	--

Transcript of Dr. Michael Allen Jensen

Conducted on May 3, 2023

<p>.5116 2:10 .6600 2:20</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p>00 1:20, 4:1 00808 1:9 01005 126:8</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 36:7, 39:12 10 25:11, 75:7, 75:10, 78:20, 80:4, 82:11, 82:15, 82:22, 83:1, 83:4, 83:6, 133:17 100 115:7 1000 46:12 1001 46:3, 46:9 1003 10:12, 10:21 1005 19:7, 31:19, 32:9, 36:12, 36:14, 36:15, 66:4, 66:6, 66:7, 75:19, 75:21, 75:22, 82:11, 82:14 1006 35:16, 45:16, 70:2, 70:5, 70:6, 72:8, 72:15, 72:18, 108:15, 108:20, 109:2, 109:6, 115:12, 115:14 1007 19:8, 33:17,</p>	<p>33:19, 33:22, 34:4, 69:7, 69:9, 69:10 1008 19:8, 34:10, 34:12 1009 19:9, 35:2 1010 25:9, 36:4, 36:7, 46:9, 52:9, 52:12, 52:18, 52:20, 52:21, 53:9, 54:10, 55:4, 73:3, 73:6 1013 46:12, 46:14 1021 25:11 1022 25:11, 52:15, 57:6, 57:8, 57:10, 57:17, 57:19, 58:5 1023 25:11 11 23:11, 83:4, 106:18, 110:16, 111:2, 123:17, 123:19, 124:1, 124:12, 124:17 118 103:16 12 23:14, 57:6, 57:9, 57:17, 57:18, 57:19, 58:5, 78:5, 78:7, 86:15, 86:17, 109:10, 109:11, 109:13, 110:3, 110:5, 111:3, 132:16 120 47:20, 47:21 122 15:17, 42:12,</p>	<p>42:14, 44:16, 44:19, 45:4 123 49:19, 50:13, 50:14, 63:4, 64:22, 65:3 124 41:9 13 22:3, 82:20, 83:1, 110:3, 110:4, 111:2 135 3:7 137 3:8 14 5:21, 106:7, 115:12, 126:12, 126:17 14363 133:18 147 74:10 149 74:17, 78:13 15 5:21 150 80:11, 80:13, 80:18, 83:9, 84:20 151 80:22, 81:2, 81:4, 85:13 153 85:19, 86:3, 86:5 156 90:14, 90:17 158 91:2, 91:10 159 81:4 16 127:7 1601 2:17</p>	<p>161 130:17, 130:19, 130:22 166 92:2, 92:5 17 127:7 171 92:19, 96:4, 96:8 184 106:11, 106:20 188 107:3, 107:17, 107:18, 108:5, 108:22, 109:22 189 112:7 190 120:2, 120:3, 122:2 1994 27:19, 28:1 1998 31:10 1999 22:9, 27:16, 28:3, 28:9, 28:16, 28:19, 29:7, 29:12, 30:14, 30:18, 30:22, 73:11, 73:15, 73:20, 99:6, 101:1, 101:3, 101:16, 101:22, 130:1, 130:4</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 39:5, 79:2 2000 31:11 2003 105:7, 125:16, 125:18, 125:19 2020 13:9</p>
---	--	--	---

Transcript of Dr. Michael Allen Jensen
 Conducted on May 3, 2023

<p>2021 13:7 2022 1:9, 13:6, 13:9, 15:21, 16:2, 24:18, 126:8 2023 1:21, 4:1 2028 133:17 21 23:10, 23:19, 25:3, 25:11 2125 1:26 213.788 2:28 214.651 2:10 214.978 2:20 22 25:11, 133:17 23 21:21, 25:11, 128:3 2323 2:7 25 39:11 26 20:10, 20:12 267 103:11 27 25:19, 25:22, 27:7, 28:11, 28:22, 30:7 29 48:20</p>	<p style="text-align: center;">4</p> <hr/> <p>4 76:3 4400 2:18 491112 136:2</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5,970,059 24:5 50 80:10, 80:12 51 132:16 5800 2:26 5th 2:25</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 92:10 60 49:19, 109:11 61 41:9, 41:15, 41:16, 41:19, 48:19 633 2:25</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>70 125:21 700 2:8 71 106:4, 125:21, 126:11 74 74:10, 78:14, 78:17 75 85:19, 86:1</p>	<p>75219 2:9</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8,442,501 1:12 8,982,863 11:18, 11:22 84 52:10, 53:1, 53:5, 53:9, 54:10, 55:4, 55:5, 55:6, 55:7, 55:10, 55:14, 55:19 85 54:3, 55:5, 55:11, 55:12, 55:19 863 9:14, 11:20, 12:3, 21:14, 48:17, 131:14, 132:5 87 106:14 88 112:13</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 1:20, 4:1 90071 2:27</p>	
<hr/> <p style="text-align: center;">3</p> <hr/> <p>3's 90:12 30 15:21, 16:2, 24:18</p>	<hr/> <p>75201 2:19</p>		