

EXHIBIT 15

DR. NEIL G. SIEGEL - 11/14/2018

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

AGIS SOFTWARE DEVELOPMENT LLC,)	
)	Civil Action No.
Plaintiff,)	2:17-cv-513-JRG
)	(LEAD CASE)
vs.)	Civil Action No.
)	2:17-cv-516-JRG
APPLE, INC.,)	Pages 1 to 237
)	
Defendant.)	
)	

DEPOSITION OF DR. NEIL G. SIEGEL
TAKEN ON
WEDNESDAY, NOVEMBER 14, 2018

Reported by: PHILIP D. NORRIS
CSR NO. 4980

<p style="text-align: right;">Page 90</p> <p>1 computer, the device.</p> <p>2 But when we talk about designating a unit,</p> <p>3 what we are -- you don't designate a computer, you</p> <p>4 designate a military role. That's how people are</p> <p>5 identified in FBCB2.</p> <p>6 Q. So what you're --</p> <p>7 A. So that was the distinction I was trying to</p> <p>8 get to by this terminology. I apologize if it</p> <p>9 confused you.</p> <p>10 Q. Okay. So you say the unit receives</p> <p>11 information from FBCB2 devices and forwards it to</p> <p>12 other FBCB2 devices, so --</p> <p>13 A. No, that's not what it says, sir.</p> <p>14 Q. It says:</p> <p>15 "Individual FBCB2 units were designated to</p> <p>16 receive information from FBCB2 devices and</p> <p>17 forward it to other FBCB2 devices."</p> <p>18 Am I reading that correctly?</p> <p>19 A. Yes, sir.</p> <p>20 Q. And so was there an FBCB2 device that</p> <p>21 received information from FBCB2 devices or was it</p> <p>22 something else in the unit that received the</p> <p>23 information from FBCB2 devices?</p> <p>24 A. There is an FBCB2 device in that unit, but</p> <p>25 it was designated by the role name that is the</p>	<p style="text-align: right;">Page 91</p> <p>1 military term for the unit.</p> <p>2 Q. And so when you talk about servers in this</p> <p>3 paragraph, "servers consist of computers mounted on</p> <p>4 Army vehicles," those are just the FBCB2 devices;</p> <p>5 right?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And so an FBCB2 device, that same hardware,</p> <p>8 could either be a server or not a server; right?</p> <p>9 A. Correct. It services the FBCB2 mission for</p> <p>10 the user on that military platform, whether it is a</p> <p>11 server or not. But it may serve, as you indicated,</p> <p>12 the additional role of being a server.</p> <p>13 Q. And so is it fair to say that any FBCB2</p> <p>14 device could have been a server?</p> <p>15 A. There is some technical limitations that</p> <p>16 prevented some FBCB2 devices being considered</p> <p>17 servers.</p> <p>18 Q. So let's talk about these FBCB2 computers</p> <p>19 you're talking about mounted on Army vehicles. Is</p> <p>20 it fair to say that any of those FBCB2 computers</p> <p>21 could have been a server?</p> <p>22 A. Subject to the technical limitations I just</p> <p>23 mentioned, yes.</p> <p>24 Q. And I'm not going to ask you specifically</p> <p>25 about those technical limitations, but I'm going to</p>
<p style="text-align: right;">Page 92</p> <p>1 ask you: Did you mention those in your report? Let</p> <p>2 me ask you a different way.</p> <p>3 Can you point to a paragraph in your report</p> <p>4 where you describe those technical limitations of</p> <p>5 the devices that would prevent them from being a</p> <p>6 server?</p> <p>7 A. It was not relevant to the argument.</p> <p>8 Q. So to confirm, you didn't put that in your</p> <p>9 report; right?</p> <p>10 A. It might be discussed in the '559 patent,</p> <p>11 which is referenced in several of these paragraphs,</p> <p>12 but the -- the fact that only some portion of the</p> <p>13 FBCB2 devices in a given unit were eligible to be</p> <p>14 elected as servers was not relevant to the argument</p> <p>15 I was making.</p> <p>16 Q. So to confirm, you didn't discuss that in</p> <p>17 your report; right?</p> <p>18 A. I did not discuss the specific technical</p> <p>19 limitation that would allow some FBCB2 devices to</p> <p>20 become servers and others not eligible to become</p> <p>21 servers, no, sir.</p> <p>22 Q. Have you ever heard the term "mesh</p> <p>23 network"?</p> <p>24 A. I have, sir.</p> <p>25 MR. RUBINO: I think we're being told that</p>	<p style="text-align: right;">Page 93</p> <p>1 we have to take some time to change the tape, if you</p> <p>2 want to go off the record, if that's okay.</p> <p>3 THE VIDEOGRAPHER: This marks the end of</p> <p>4 Media No. 1. Going off the record. The time is</p> <p>5 11:38 a.m.</p> <p>6 (Brief recess.)</p> <p>7 THE VIDEOGRAPHER: Back on the record.</p> <p>8 Here marks the beginning of Volume 1, Tape No. 2, in</p> <p>9 the deposition of Dr. Neil Siegel. The time is</p> <p>10 11:50 a.m.</p> <p>11 BY MR. RUBINO:</p> <p>12 Q. Good afternoon again, Dr. Siegel. So</p> <p>13 before the break we were discussing FBCB2 devices</p> <p>14 and whether or not they could be servers; do you</p> <p>15 recall that discussion?</p> <p>16 A. I do, sir.</p> <p>17 Q. And so I want to direct your attention to</p> <p>18 your report, at paragraph 103.</p> <p>19 A. Okay. Yes, sir.</p> <p>20 Q. So in this paragraph you discuss the</p> <p>21 limitation sending to a second server a request for</p> <p>22 a second georeferenced map data different from the</p> <p>23 first georeferenced map data receiving from the</p> <p>24 second server of the second georeference map data.</p> <p>25 Do you see that limitation?</p>

<p style="text-align: right;">Page 94</p> <p>1 A. I see that, uh-huh.</p> <p>2 Q. And so you have a discussion here where you</p> <p>3 say: "FBCB2 users could toggle among different maps</p> <p>4 while in the field"; you see that? It's in the</p> <p>5 middle of the paragraph.</p> <p>6 A. Yes, I do see that, uh-huh.</p> <p>7 Q. And then you say: "Many maps were</p> <p>8 preloaded on FBCB2 devices prior to each mission" --</p> <p>9 A. Right.</p> <p>10 Q. -- "but users could also receive new maps."</p> <p>11 A. Uh-huh.</p> <p>12 Q. And so when you say they could receive maps</p> <p>13 from FBCB2 servers, were you talking about from</p> <p>14 other FBCB2 devices?</p> <p>15 MS. BI: Objection to form.</p> <p>16 THE WITNESS: From FBCB2 that were acting</p> <p>17 in the role as a server.</p> <p>18 BY MR. RUBINO:</p> <p>19 Q. So for all purposes, other than the</p> <p>20 technical limitations you had described earlier, any</p> <p>21 device could be a server; right?</p> <p>22 MS. BI: Objection to form.</p> <p>23 THE WITNESS: Let me be a little more</p> <p>24 precise. In a typical brigade there are about 1,000</p> <p>25 FBCB2 devices, 1,000 military units, probably</p>	<p style="text-align: right;">Page 95</p> <p>1 between three and 400 were eligible to act as</p> <p>2 servers, so there were a large number of FBCB2</p> <p>3 devices on the military units that could be</p> <p>4 elected -- were eligible to be elected as servers.</p> <p>5 At any given point in time there would be some</p> <p>6 number of servers that had actually been elected.</p> <p>7 BY MR. RUBINO:</p> <p>8 Q. And so those three or 400 units would have</p> <p>9 maps preloaded on them?</p> <p>10 A. 1,000 units would have maps preloaded on</p> <p>11 them.</p> <p>12 Q. Can you take a look at paragraph 104,</p> <p>13 please?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Actually, no, I'm sorry, take -- go back to</p> <p>16 103.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Do you see the last two sentences where you</p> <p>19 discuss a figure depicting an aerial photograph?</p> <p>20 A. Starting with "for example"?</p> <p>21 Q. Yes.</p> <p>22 A. Yes, I see that.</p> <p>23 Q. And so this map was taken from an unmanned</p> <p>24 aircraft; right?</p> <p>25 A. The picture was taken by the unmanned</p>
<p style="text-align: right;">Page 96</p> <p>1 aircraft, and the unmanned aircraft provided the</p> <p>2 georeferencing information as well, and then that</p> <p>3 was sent down to the ground and eventually made its</p> <p>4 way to an FBCB2 server, which then upon request</p> <p>5 provided to one or more FBCB2 units and devices.</p> <p>6 Q. So the, just to confirm, the unmanned</p> <p>7 device that -- unmanned aircraft that took this</p> <p>8 picture was not an FBCB2 unit; right?</p> <p>9 A. No, sir. We could use pictures taken from</p> <p>10 all sorts of devices.</p> <p>11 Q. So we may get into it, but I'm just going</p> <p>12 to ask you about whether you know something and not</p> <p>13 what you know about it. Okay?</p> <p>14 A. Okay.</p> <p>15 Q. So do you know the actual mechanism as</p> <p>16 implemented by FBCB2 for requesting or receiving</p> <p>17 maps?</p> <p>18 MS. BI: Objection to form.</p> <p>19 THE WITNESS: I do.</p> <p>20 BY MR. RUBINO:</p> <p>21 Q. And to confirm, what you know about that</p> <p>22 method you've provided in your report; right?</p> <p>23 MS. BI: Objection to form.</p> <p>24 MR. RUBINO: Let me ask it a different way.</p> <p>25 Well, I'll ask you a different question.</p>	<p style="text-align: right;">Page 97</p> <p>1 THE WITNESS: Okay.</p> <p>2 BY MR. RUBINO:</p> <p>3 Q. And so you would know whether FBCB2 units</p> <p>4 could receive maps upon request; right? I'm not</p> <p>5 asking you whether they did, I'm just asking if you</p> <p>6 know.</p> <p>7 A. I personally, I know?</p> <p>8 Q. Yes.</p> <p>9 A. Yes, I know, I know that.</p> <p>10 Q. Do you know whether FBCB2 units could</p> <p>11 receive maps as a push of data instead of as a -- in</p> <p>12 response to a request?</p> <p>13 MS. BI: Objection to form.</p> <p>14 THE WITNESS: Define "push" in this</p> <p>15 context, please.</p> <p>16 BY MR. RUBINO:</p> <p>17 Q. Do you understand the difference between a</p> <p>18 push and a pull?</p> <p>19 MS. BI: Objection to form.</p> <p>20 THE WITNESS: I understand the way I have</p> <p>21 heard technical people discuss it, but honestly, the</p> <p>22 terms are used very haphazardly and many things are</p> <p>23 described as a pull and many things are described as</p> <p>24 a data push, so I ask you to tell me exactly a</p> <p>25 little more detail so I can answer your question</p>

<p style="text-align: right;">Page 98</p> <p>1 appropriately.</p> <p>2 BY MR. RUBINO:</p> <p>3 Q. You've at least heard the two terms before;</p> <p>4 right?</p> <p>5 A. Absolutely.</p> <p>6 Q. And you have a basic understanding of what</p> <p>7 you think they mean in the industry; right?</p> <p>8 MS. BI: Objection to form.</p> <p>9 THE WITNESS: As I said, my experience is</p> <p>10 that there's not a consistent use and many things</p> <p>11 are meant by both of those terms in the industry.</p> <p>12 BY MR. RUBINO:</p> <p>13 Q. So I'm going to ask you about the FBCB2</p> <p>14 device as it's designated as a server, at the</p> <p>15 instant it is designated as a server. Okay?</p> <p>16 A. Uh-huh.</p> <p>17 Q. So when an FBCB2 device is designated as a</p> <p>18 server, can it receive maps from another source?</p> <p>19 A. Yes, sir.</p> <p>20 Q. So --</p> <p>21 A. After, after it is designated as a server.</p> <p>22 Q. So when it is designated as a server and</p> <p>23 after it is designated as a server, that FBCB2</p> <p>24 device can request maps from another source; right?</p> <p>25 A. It can receive maps from another source.</p>	<p style="text-align: right;">Page 99</p> <p>1 Q. So is there a difference, in your mind,</p> <p>2 between requesting maps and receiving maps?</p> <p>3 A. Requesting gets into details of the process</p> <p>4 by which the map gets there and the control of that</p> <p>5 process. Receiving maps, in my mind, is independent</p> <p>6 of that. It just means that a process has taken</p> <p>7 place that allowed a new map to arrive at the</p> <p>8 server.</p> <p>9 Q. So with regard to the process by which the</p> <p>10 new map arrives at the server, do you understand how</p> <p>11 that process worked?</p> <p>12 A. Only partially, in some cases, but maybe</p> <p>13 not in all instances, because there's many types of</p> <p>14 maps.</p> <p>15 Q. So do you know whether the map would have</p> <p>16 arrived at the server by a request issued by the</p> <p>17 server or whether the map would have arrived by some</p> <p>18 other mechanism?</p> <p>19 MS. BI: Objection to form.</p> <p>20 THE WITNESS: Both of those are possible.</p> <p>21 BY MR. RUBINO:</p> <p>22 Q. So sitting here today, you can't tell me</p> <p>23 which one would have been the method employed by an</p> <p>24 FBCB2 server?</p> <p>25 MS. BI: Objection to form.</p>
<p style="text-align: right;">Page 100</p> <p>1 THE WITNESS: No, no, that's not what I</p> <p>2 meant by my answer. Both methods are possible in</p> <p>3 FBCB2.</p> <p>4 BY MR. RUBINO:</p> <p>5 Q. So in the context of a server receiving a</p> <p>6 map without having requested it, how does that map</p> <p>7 arrive at the server? What is the process?</p> <p>8 A. The end result is that it ends up on a list</p> <p>9 of additional maps, and that list is forwarded to</p> <p>10 the units, FBCB2 units, that are serviced by this</p> <p>11 server and therefore the person at those FBCB2 units</p> <p>12 and devices can look at this list and say oh, that's</p> <p>13 a map I would want. That is one mechanism.</p> <p>14 Another mechanism is that any FBCB2 user</p> <p>15 can send a message saying I really need a map of</p> <p>16 this type or photograph of this type, of this area,</p> <p>17 and that will be sent off to see if we can get the</p> <p>18 Air Force or somebody to go take that picture and</p> <p>19 send it back to us.</p> <p>20 So both -- both of what I think you might</p> <p>21 mean by push and pull are possible.</p> <p>22 Q. So in that second scenario where you're</p> <p>23 talking about let's see if the Air Force can go get</p> <p>24 that picture for us, that's a case where the map</p> <p>25 doesn't exist; right?</p>	<p style="text-align: right;">Page 101</p> <p>1 A. Right. So in some cases the map in the --</p> <p>2 in the first instance I talked about, the map</p> <p>3 exists, and it's provided to FBCB2 and it shows up</p> <p>4 on a list, and then people say oh, I want to use</p> <p>5 that one.</p> <p>6 But, we also have the possibility to say I</p> <p>7 really need to see behind this hill. Can an Army</p> <p>8 UAV or an Army helicopter or the Air Force, can</p> <p>9 somebody go out and collect that photograph for me?</p> <p>10 Q. So after the photograph is collected, is it</p> <p>11 then automatically sent to everyone?</p> <p>12 A. It would be -- it would be sent to the</p> <p>13 servers and it would then appear on the list, and</p> <p>14 there would also -- to the person who made the</p> <p>15 request he would get a note saying the picture you</p> <p>16 requested is now available. But other people would</p> <p>17 have access to use that picture, too.</p> <p>18 Q. And so is it always the case that -- let me</p> <p>19 ask you a different question.</p> <p>20 So you testified earlier about how the</p> <p>21 servers were fluid in this environment; right?</p> <p>22 MS. BI: Objection to form.</p> <p>23 THE WITNESS: Yeah, I used the term</p> <p>24 "elected."</p> <p>25 ///</p>

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