

Exhibit J

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

 STRATOSAUDIO INC.,)
)
 Plaintiff,)
 V.) Case No.
) 6:20-CV-01125-ADA
 HYUNDAI MOTOR AMERICA,)
)

 STRATOSAUDIO INC.,)
)
 Plaintiff,)
 V.) Case No.
) 6:20-cv-1126-ADA
 MAZDA MOTORS OF AMERICA,)
 INC.,)
)
 Defendant.)
)

 STRATOSAUDIO INC.,)
)
 Plaintiff,)
 V.) Case No.
) 6:20-cv-1128-ADA
 VOLVO CARS USA, LLC,)
)
 Defendant.)
)

 STRATOSAUDIO INC.)
)
 Plaintiff,)
 V.) Case No.
) 6:20-CV-01131-ADA
 VOLKSWAGEN GROUP OF)
 AMERICA, INC.,)
)
 Defendants.)

ZOOM DEPOSITION OF TIM A. WILLIAMS, PH.D.
Danville, California
FRIDAY, AUGUST 27, 2021
Volume I

Reported by:
LORI M. BARKLEY, CSR No. 6426
PAGES 1 - 80



1 recited earlier in the claim? 11:31:56

2 A. Yes. 11:32:00

3 Q. Okay. 11:32:01

4 A. But again it's not clear what the output of 11:32:02

5 the stream analysis module is. 11:32:04

6 Q. But you agree the stream analysis module is 11:32:09

7 what performs the analyzing of the step, true? 11:32:12

8 A. Well, it says "using." So there might be 11:32:16

9 other elements that are not claimed. 11:32:20

10 Q. Do you have an understanding as to what 11:32:23

11 third-party encoded data is referring to here in the 11:32:36

12 claim? 11:32:39

13 A. No. 11:32:41

14 Q. So you don't have any opinions as to how 11:32:42

15 that third-party encoded data might be encoded? 11:32:51

16 A. I don't know what third-party encoded data 11:33:00

17 means. 11:33:03

18 Q. Could it mean data that was encoded by a 11:33:15

19 third party? 11:33:21

20 MR. LUCAS: Objection to form. 11:33:24

21 THE WITNESS: A third party to whom? 11:33:28

22 BY MR. LAMBERSON: 11:33:32

23 Q. The -- 11:33:32

24 A. There has to be a first and a second party 11:33:36

25 for there to be a third party. 11:33:37

1 Q. Right. 11:33:39

2 A. So who are the first party and the second 11:33:39

3 party? 11:33:41

4 Q. The first party would be the source of the 11:33:42

5 data stream and the second party would be the 11:33:49

6 recipient of the data stream. 11:33:54

7 A. That's not clear in the specification or the 11:33:59

8 claim. 11:34:01

9 Q. There's no reason to continue to debate 11:34:04

10 that, that will be briefed. 11:34:07

11 Switching over to the '843 patent for a 11:34:09

12 moment. There's a limitation there that refers to a 11:34:22

13 broadcast scanning module that you opined on. Do you 11:34:28

14 recall that? 11:34:31

15 A. I do. 11:34:31

16 Q. Would you agree that the broadcast scanning 11:34:31

17 module is the same as the stream scanner module 11:34:38

18 that's described in the specification? 11:34:42

19 A. Can I have question again, please. 11:34:55

20 Q. Would you agree that the broadcast scanning 11:37:23

21 module that you analyzed in the '843 patent is the 11:37:28

22 same thing as the stream scanner module that's 11:37:33

23 described in the specification? 11:37:37

24 A. I discuss this in my declaration starting in 11:37:39

25 paragraph 57 and proceeding on into really 11:37:46