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1 Q So prior to April, 1996, is it the case
2 that the EZ Reader received electronic messages from
3 a source such as a customer?

4 A Could you please tell me what -- what
5 paragraph it was again?

6 Q Oh, sure. It's column 14, number 26,
7 Claim 26.

8 A Please restate your question again.

9 Q Sure. The -- prior to April, 1996, the
10 EZ Reader was receiving electronic messages from a
11 source such as a customer, right?

12 A Correct.

13 Q And is it your understanding that prior
14 to April of 1996, that the EZ Reader would be
15 interpreting electronic messages using rule-base and
16 case-base knowledge engines?

17 A Yes.

18 Q And is it your understanding that prior
19 to April, 1996, the EZ Reader would retrieve one or
20 more predetermined responses corresponding to the
21 interpretation of them by the rule-base and
22 case-base knowledge engine for delivery back to the
23 source, i.e., the customer?

24 A Yes.

25 Q And prior to April, 1996, when the EZ

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1 Reader was being deployed, did Chase always -- did
2 Chase know in advance who the source of the e-mail
3 might be, i.e., which particular customer might be
4 querying the system at any particular time?

5 MR. THOMPSON: Objection, form.

6 THE WITNESS: Could you -- could you
7 rephrase that question?

8 BY MR. PERLSON:

9 Q Sure. So prior to April of 1996, when
10 a customer would send an e-mail that would be
11 interpreted by the EZ Reader system, would the EZ
12 Reader system know who that customer would be in
13 advance of receiving the e-mail?

14 A I don't believe so.

15 Q One of the things that you had
16 mentioned before that the EZ Reader did was -- that
17 sometimes the e-mail would be sent to a person to
18 review and respond and then sometimes it would be
19 responded to automatically; is that correct?

20 A Correct.

21 Q Okay. And was that true in the system
22 that was deployed prior to April, 1996?

23 A Yes.

24 Q Do you know whether there were any
25 other consultants other than Brightware that were