

1 UNITED STATES INTERNATIONAL TRADE COMMISSION
2 WASHINGTON, D.C.

3 In the Matter of

Inv. No. 337-TA-1355

4 CERTAIN COMPACT WALLET AND
5 COMPONENTS THEREOF,
6

7 VIDEO DEPOSITION OF KIMBERLY CAMERON, PH.D.
8 June 8, 2023

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PURSUANT TO WRITTEN NOTICE and the appropriate rules of civil procedure, the video deposition of KIMBERLY CAMERON, Ph.D., called for examination by the Complainant The Ridge Wallet LLC, was taken at WilmerHale, 1225 17th Street, Suite 2600, Denver, Colorado, commencing at 9:13 a.m. on June 8, 2023, before Laurel S. Tubbs, a Registered Professional Reporter, Registered Merit Reporter, Certified Realtime Reporter and Notary Public in and for the State of Colorado.

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P R O C E E D I N G S

KIMBERLY CAMERON, Ph.D.

having been first duly sworn/affirmed, was examined and testified as follows:

EXAMINATION

BY MR. WEED:

Q. Good morning, Dr. Cameron.

A. Good morning.

Q. Would you please state and spell your full name for the record?

A. Kimberly Cameron. K-i-m-b-e-r-l-y, Cameron, C-a-m-e-r-o-n.

Q. And you have a Ph.D. degree, right?

A. Yes.

Q. What is that degree in?

A. I have a Ph.D. in mechanical engineering from Stanford University with a minor in materials science.

Q. And you go by "Dr. Cameron," right?

A. Right.

Q. That would be appropriate?

A. You can call me Kim. It doesn't matter to me.

Q. Dr. Cameron, when were you first retained for this case?

1 A. I don't know. Sometime -- sometime this
2 year.

3 Q. Do you have any idea if it was before March
4 of this year?

5 A. I'm not sure, but I think so, yeah.

6 Q. And your declaration says that you're
7 billing your employers at a rate of \$550 per hour;
8 correct?

9 A. That's correct.

10 Q. Is that money that you're receiving
11 directly, or is your employer receiving that money?

12 A. No, I'm just a salaried employee, so my
13 company gets that.

14 Q. And when you say "my company," what are you
15 referring to?

16 A. I work for a company called Engineering
17 Systems.

18 Q. Are you the owner of Engineering Systems?

19 A. No.

20 Q. How many employees are there at Engineering
21 Systems?

22 A. I don't know. Maybe between 250 and 300.
23 I'm not sure.

24 Q. Okay. And obviously, one of the services
25 that Engineering Systems provides is litigation

Page 5

1 consulting, right?

2 A. That's true, yes.

3 Q. Does Engineering Systems do things other
4 than litigation consulting?

5 A. Yes.

6 Q. What kinds of things?

7 A. They -- so, primarily, they just do
8 engineering support for different industries.

9 Q. And do you, yourself, do any work for ESI
10 other than litigation consulting?

11 A. Yes.

12 Q. How much would you say of your time do you
13 spend on litigation consulting as compared to other kinds
14 of work?

15 A. Probably about half.

16 Q. Okay. And is your litigation consulting
17 work limited to consulting in patent infringement cases?

18 A. No. I also do litigation support for,
19 like -- I don't know what category to put it in. It's
20 product liability or construction defects, things like
21 that.

22 Q. Okay. Can you give me a sense for how much
23 of your litigation support work is in connection with
24 patent cases versus other kinds of cases?

25 A. Probably like about half of that, yeah.

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1 Q. Okay. And is it possible for you, as you
2 sit here, to break down how often you work for a patent
3 owner as compared to a party accused of infringing a
4 patent?

5 A. That's probably pretty even too.

6 Q. Okay. Do you make any kind of a concerted
7 effort to ensure that you're doing equal work for patent
8 owners versus alleged infringers?

9 A. No, it just kind of randomly happens that
10 way. Yeah.

11 Q. Okay. Fair enough. And you understand
12 that the case you're here to talk about today is in the
13 ITC?

14 A. Yes.

15 Q. And you've had experience with the ITC
16 before; is that right?

17 A. I have, yes.

18 Q. You've actually worked for K&L Gates before
19 in an ITC case, right?

20 A. I don't remember law firms, but that could
21 be, yeah. Oh, actually, yeah, that is for sure true,
22 yes.

23 Q. Do you remember what case that was?

24 A. I think that was -- I think that was
25 for -- I could be wrong, but I think that was for

Page 7

1 Nintendo.

2 Q. I think it was for Luxshare. It was our
3 client.

4 A. Okay.

5 Q. Do you remember that case?

6 A. Yes, yes, I do. Mm-hmm.

7 Q. And I did not work on that case.

8 Is it your understanding that that case is
9 now resolved?

10 A. I actually -- I think so, but I'm not
11 100 percent sure. I mean, I know -- I know -- I know
12 they always have a preliminary. I don't know what
13 happens, like, after. I wasn't really kept in the loop
14 of what happened after that, I guess. Yeah.

15 Q. Sorry. But you testified at the ITC
16 hearing?

17 A. Yes, yes, the hearing, but I -- I'm not as
18 involved after the hearing, but I know other things
19 happen after that, yeah.

20 Q. Got it. Got it.

21 So other than that case and this case, have
22 you had other experience at the ITC?

23 A. So the Nintendo case, which I guess was
24 for a different law firm, was also at the ITC, which is
25 probably why I got them confused. And then I have

Page 8

1 done -- I have done a few other ITC cases as well, yeah.

2 Q. And have you ever, to your recollection,
3 given a declaration in support of claim construction
4 before?

5 A. At the ITC or just in general?

6 Q. In general.

7 A. Yeah, I have, yes.

8 Q. Any idea how many times?

9 A. I'm not sure.

10 Q. Okay. Can you recall, as you sit here,
11 whether you've ever given a declaration or written an
12 expert report opining about the issue of indefiniteness
13 before this case?

14 A. I have, yes.

15 Q. And which cases can you recall doing that
16 in?

17 A. There was one case that had -- had to do
18 with baby, like, bassinets or cradles. I can't remember
19 who the parties were, but I remember indefiniteness was
20 an issue there, and I'm pretty sure I put a declaration
21 in.

22 There was a case Victaulic --
23 Victaulic v. Anvil. I put in a declaration that
24 addressed indefiniteness.

25 Q. Okay.

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1 A. Oh, yeah, there was another case that -- I
2 think the parties -- I can't remember who the other party
3 was, but one of the parties was Wow, and I submitted a
4 declaration about indefiniteness in that one as well.

5 Q. Okay.

6 A. There is others. It's hard to remember.

7 Q. I was going to say, it's not a memory test.
8 So it's fair to say that this is not the first time you've
9 opined about the issue of indefiniteness, right?

10 A. That's correct.

11 Q. And you're not an attorney, right?

12 A. That's correct.

13 Q. Have you ever taken any legal classes?

14 A. I have, yes.

15 Q. Can you give me a sense for what those
16 were?

17 A. I've taken -- so I've taken all kinds of
18 legal classes. I don't practice as an attorney, but I've
19 taken classes in patent law and many other areas, yeah.

20 Q. Do you have a patent office registration
21 number?

22 A. I do, yes.

23 Q. Do you know what that is?

24 A. 58 -- I don't remember. 58-something,
25 yeah.

Page 10

1 Q. Okay. Do you remember what year you got
2 that number?

3 A. I don't know. Something between 2005 and
4 2010, something in there, yeah.

5 Q. Okay. Did you ever -- have you ever
6 prosecuted patents at the patent office?

7 A. I have, yes.

8 Q. And in the course of prosecuting patents,
9 have you ever had to address arguments by patent examiners
10 about indefiniteness?

11 A. I have not.

12 Q. Okay. You understand that in this case the
13 examiner never rejected any claims as indefinite, right?

14 A. That's correct.

15 Q. And you reviewed the file history in this
16 case, right?

17 A. I did, yes.

18 Q. When you have prosecuted patents using your
19 reg number, do you do that under your own name, or do you
20 do that under ESI customer numbers?

21 A. I haven't done that in a pretty long time.

22 Q. It's so exciting.

23 A. It's not really. I haven't done that in a
24 long time. I think in the past it's just been under
25 my -- my own. I don't remember, though, for sure.

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1 Q. And have you prosecuted patents where you
2 are the inventor or other people are the inventor?

3 A. Where other people are the inventor.

4 Q. Have you been paid for that work?

5 A. Like, indirectly, yes.

6 Q. How do you know?

7 A. So, like, my company will get paid, and I
8 don't get paid, like, directly, yes.

9 Q. So you worked, at some point, for a company
10 that offered the service of patent prosecution support,
11 right, and you did that work?

12 A. I did do that work.

13 Q. And when you did that work, were you
14 working at all with people who were actually attorneys as
15 well?

16 A. Yeah. Sometimes there would also be other
17 attorneys involved, yes.

18 Q. Are you the named inventor on any U.S.
19 patents?

20 A. I think I am on two, maybe, yeah.

21 Q. And I actually did some searching, and your
22 name is, unfortunately, somewhat common. So can you give
23 me a sense for what the subject matter of the patents that
24 you're a named inventor for?

25 A. Sure. One of them is -- is related to,

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1 basically, like, tablets. And the other was related
2 to -- actually like a device that melts snow.

3 Q. When you say "tablets," do you mean like
4 computer tablets?

5 A. Computer tablets, yeah.

6 Q. All right. Let's do a little bit of
7 housekeeping here about the record. So you have some
8 documents over there in front of you in paper form, right?

9 A. Yeah.

10 Q. Would you just, for the record, flip
11 through them and let me know what you have there in paper
12 form. And just sort of as -- as you see a new document,
13 say what it is into the record.

14 A. Sure. So I have my Notice of Deposition.
15 And I have Exhibit A, which is my declaration.

16 Q. Okay.

17 A. And I have Exhibit 2, which is a U.S.
18 Patent 1,525,745. I have Exhibit 1, which is the --

19 THE REPORTER: I'm sorry. I just am
20 having trouble hearing you.

21 THE DEPONENT: Sorry. One second.

22 A. I have Exhibit 1, which is U.S. Patent
23 10,791,808.

24 Q. (By Mr. Weed) And before you go on, you
25 understand that's the asserted patent in this case?

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1 A. Yeah. That's what I said originally it
2 was, but it might not be clear.

3 Then I have Exhibit 3, which I think is an
4 attachment, like, from my deposition. I guess the rest
5 would be separately.

6 Q. And, I'm sorry. Before we go on, what is
7 Exhibit 3?

8 A. It's a -- it's a dictionary definition. I
9 think it was something that I referenced in my
10 declaration.

11 Q. Okay.

12 A. Exhibit 4 is another excerpt from a
13 dictionary that I cited to in my deposition -- I mean,
14 declaration. Sorry.

15 I have Exhibit 5, which is another excerpt
16 from a dictionary that I cited to in my declaration. And
17 then I have Exhibit 6, which is another excerpt from a
18 dictionary that I cited to in my declaration.

19 Q. Okay. And so I think, just to clarify one
20 point, the first document -- or the second document you
21 talked about was called Exhibit A?

22 A. Mm-hmm.

23 Q. I believe that is an exhibit to a brief
24 that is your declaration, and then the numbered exhibits
25 are exhibits to your declaration, just for clarity.

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1 MR. YAO: That is correct, yes.

2 A. Okay.

3 Q. (By Mr. Weed) So I have all those things
4 electronically if you want to see them or search them.

5 A. Okay.

6 Q. But my plan is to use the paper versions
7 you have here, even though people are online, because
8 everybody kind of has those documents.

9 A. Yeah. Yeah.

10 Q. One question I forgot about your prior
11 work. Have you ever -- in the cases where you've offered
12 opinions about indefiniteness, can you recall whether
13 you've offered opinions about claims being indefinite or
14 claims not being indefinite in the past?

15 A. I've offered both of those opinions.

16 Q. And do you recall whether any court or
17 administrative agency has ever agreed with you that claims
18 you've opined are indefinite are, in fact, indefinite?

19 A. I know I haven't -- I know that I have, in
20 the past, opined that a claim has been indefinite. The
21 only one I can think of, though, offhand, that matter's
22 not resolved on, like, a different issue, so there was
23 never -- they never came to a conclusion one way or the
24 other on that.

25 Q. Okay.

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1 A. And all the other ones I'm remembering
2 offhand was on the other -- other side where I was
3 arguing that they were not indefinite.

4 Q. Okay. And what case or proceeding was it
5 where you opined that something was indefinite?

6 A. That was in Victaulic v. Anvil.

7 Q. And what was the technology there?

8 A. It was a pipe -- a pipe coupling.

9 Q. Okay. Do you remember if that was a court
10 case or an ITC case, PTAB case?

11 A. So it was little -- I can't remember on
12 what stage the -- my declaration was, but, you know, it
13 was a little bit of -- had a long history that was
14 started as a patent infringement case, and then there was
15 a settlement, and then there was a subsequent lawsuit
16 alleging breach of that settlement.

17 And so then I think we were actually not
18 in -- I think it was not, strictly speaking, a patent
19 infringement suit, but there was -- those arguments still
20 came in as defenses because the underlying settlement
21 agreement was -- so I don't -- I don't actually
22 understand all the ins and outs, but --

23 Q. Do you know if that case was in a state
24 court somewhere?

25 A. That's what I'm trying to remember. It

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1 may well have been because -- maybe not, though. Because
2 it was in Delaware. So maybe it was in federal court.
3 But I think it was not in federal court because it was a
4 patent case, I think.

5 I just don't remember all the ins and
6 outs, but there was indefinite -- I did have indefinite
7 opinions on that. But then it was -- the jury decided
8 that the -- there was no breach of a contract in the
9 first instance, so they didn't have to reach the issues
10 that had to do with indefiniteness.

11 Q. Understood. Understood.

12 In your declaration -- and feel free to
13 look at it if you'd like, but in your declaration in this
14 case you have a summary of the law of indefiniteness,
15 right?

16 A. Yes.

17 Q. And is that summary consistent with your
18 past understanding of the law of indefiniteness?

19 A. Um --

20 Q. Feel free to look at it.

21 A. Yeah, so I don't remember exactly what I
22 looked at, but, yeah, it should be.

23 Q. So if you look at -- starting at paragraph
24 14 in your report, the summary of the law of
25 indefiniteness. Just give it a read and confirm that it's

Page 17

1 consistent with the way you've opined about indefiniteness
2 in the past.

3 A. Yeah. This -- this looks very reasonable,
4 yes.

5 Q. Okay. I asked the question in part because
6 we're in the ITC. So is your -- do you have any
7 understanding about any differences in making an argument
8 about indefiniteness in court versus in the ITC?

9 A. I guess I'm not -- I'm not that familiar
10 with any nuances that are different, yeah.

11 Q. Okay. Another question. So in the -- in
12 paragraph 15, you say, "A patent claim lacks definiteness
13 if, when read in light of the specification and
14 prosecution history..." and then you go on, right?

15 A. Yes.

16 Q. And you said you reviewed the prosecution
17 history for the '808 patent, correct?

18 A. I did, yes.

19 Q. And when you looked at the file history,
20 did you look at the file history for the parent as well?

21 A. I think I did, but I don't have a specific
22 memory right now, yeah.

23 Q. Okay. Did you look at the file histories
24 of any continuation applications based on the '808 patent?

25 A. I don't think I did that.

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1 Q. But whatever you looked at, you never saw
2 the examiner reject claims as being indefinite, right?

3 A. No, I don't remember seeing that.

4 Q. Let's talk a little bit about the other
5 documents that are in that folder. Obviously, the Notice
6 of Deposition is a thing that we created. But did you
7 locate any of the documents that are exhibits to your
8 report?

9 A. I -- I looked at all of them.

10 Q. Okay. So you found all the dictionary
11 definitions?

12 A. Correct.

13 Q. And you found that -- the old U.S. patent
14 attached to your report, right?

15 A. That's correct.

16 Q. Why did you -- or how did you locate that
17 old U.S. patent?

18 A. I actually didn't have to even go
19 searching for an example because I already had that
20 patent from -- I guess, from my review. And I don't
21 remember exactly why that was, whether that was a patent
22 that was either cited by the examiner or maybe just
23 listed on the face of the -- of the patent or maybe was
24 just part of my general review of the art.

25 THE REPORTER: I'm sorry. "Review of

Page 19

1 the..."

2 THE DEPONENT: Of the art, a-r-t. Art.

3 A. But I remember when I was writing it, you
4 know, I wanted an example. And I didn't have to do an
5 additional search beyond what I already had collected,
6 yeah.

7 Q. (By Mr. Weed) I see. So as you sit here,
8 is it your recollection that you found the patent attached
9 to Exhibit 2 because it is cited in the face of the '808
10 patent?

11 A. That's one possibility. So I'm just kind
12 of giving a flavor of some of the things that I would
13 typically look at. What I know is that I had already
14 assembled that just based on my, you know, review of the
15 patent generally. I didn't have to go specifically
16 looking for what I wanted to cite it to in my
17 declaration. But I don't remember specifically why I
18 collected it or put it in.

19 Because it was on the face of the patent.
20 It could have been -- requires a more just general review
21 of the art, even if it's not on the face. Like, that
22 part I don't remember.

23 Q. You can look at the '808 patent. It's
24 cited on the face of the '808 --

25 A. Yeah, but I guess -- I think -- I guess

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1 the line -- or what I was trying to explain, I don't
2 know, but that's the reason is because it's on there or I
3 was independently just looking in the art and that was
4 something that I had already collected, or if the reason
5 that it was collected is because it was on the -- on the
6 face, yeah.

7 Q. Understood. Understood.

8 So are there any -- to your knowledge, are
9 there any other items that you considered in forming your
10 opinions but didn't attach as exhibits to your report?

11 A. Sure. So -- so as I mentioned, I
12 collected other -- other pieces of prior art. I don't
13 think I attached those. Yeah.

14 Q. Okay.

15 A. Just as, you know, as part of the general
16 review.

17 Q. But at this point is it fair to say you
18 have not formed an opinion about validity on the basis of
19 prior art?

20 A. No, I haven't finished doing that yet.

21 Q. Okay. Okay. Are you -- by citing that old
22 patent, Exhibit 2 to your report, are you contending that
23 that patent is analogous art to the '808 patent?

24 A. Yeah, I would agree with that, yeah.

25 Q. Okay. But that old patent is related to a

Page 21

1 cigarette holder, right?

2 A. It is. I cited to that patent just to
3 give an example of the concept I was explaining in my
4 report, yes.

5 Q. Okay. And did you look at the file history
6 for that old patent?

7 A. I don't believe I did.

8 Q. I assume you're not opining one way or the
9 other about whether the claim language in that old patent
10 is definite or indefinite, right?

11 A. No, I'm not. The reason that that patent
12 is cited in my report is I wanted to give an example of
13 the concept I was explaining today.

14 Q. Okay. Okay. So let's talk about the other
15 exhibits to your report, which are all dictionary
16 definitions, right?

17 A. Everything else I saw in here was
18 dictionary definitions, yes.

19 Q. All right. So I think Exhibits 3, 4, 5,
20 and 6 are all -- if you would confirm that 3, 4, 5, and 6
21 are all dictionary definitions, right?

22 A. Yeah. That's correct.

23 Q. And you said you located all of those
24 dictionary definitions?

25 A. That's correct.

Page 22

1 Q. Did you look at any dictionaries that did
2 not include a definition of the word "interpose"?

3 A. That didn't have a definition?

4 Q. Right.

5 A. No.

6 Q. So every dictionary you looked at had a
7 definition for the word "interpose," right?

8 A. I don't remember that happening, that I
9 looked in a dictionary and there was no definition of
10 "interpose."

11 Q. Is it true that all of the definitions you
12 include are of the verb "interpose"?

13 A. Oh, I see. I didn't realize you were
14 drawing that distinction.

15 Q. No; I wasn't, before. This is a new
16 question.

17 A. Okay. Well, I can just look at those. So
18 Exhibit 3, the definition is for "interpose," but
19 it -- you know, it uses the "interposed" in the
20 explanation.

21 So the Exhibit 4 -- I mean, as typical,
22 it's the verb in present tense, or however you want to
23 put it, "interposed." But then it has, like, a dash
24 "pose," you know, to show that's included, I guess.

25 Exhibit 5, it just says "interpose." It

Page 23

1 doesn't make an additional mention of the -- with the D.

2 Same thing with Exhibit 6. It doesn't --
3 it has "interpose." It doesn't specifically have the D.

4 Q. Okay. I'm not an English major. I was an
5 engineer as well.

6 Do you know what kind of speech the word
7 "interposed" is with the e-d at the end?

8 A. I don't know what you would call that.

9 Q. Okay.

10 A. Yeah.

11 Q. If you would look for me at Exhibit 3, as
12 an example.

13 A. Yeah.

14 Q. Are you there?

15 A. Yeah.

16 Q. And you see at the top of the last page of
17 Exhibit 3 there is the definition of "interpose," right?

18 A. Yeah.

19 Q. And the first example -- definition that's
20 given is "place or insert between one thing and another,"
21 right?

22 A. Yeah.

23 Q. And the example of that is: "She
24 interposed herself between the newcomers," right?

25 A. Yes.

Page 24

1 Q. The next definition is "say words as an
2 interruption," right?

3 A. That's right.

4 Q. And the example given there is: "If I
5 might interpose a personal remark here," right?

6 A. Yes.

7 Q. And you agree that in that second example
8 there is no specification or identification of two things
9 into which something is being interposed, right?

10 A. Well, I mean, I guess how I understand
11 that definition would be that there's some talking going
12 on, and then you're interrupting. So, like, saying words
13 as an interruption. I guess it doesn't specifically say
14 it there, if you want to be hyper technical. But I think
15 when you read that definition, it would be understood
16 that you're -- it would be between other -- other
17 peoples' words.

18 So like it says, say words as an
19 interruption, and then the colon, it says, "If I might
20 interpose a personal remark here." So it would be like
21 some other words were going on, and then you put your
22 personal remark in between the other words.

23 So I think that's -- I don't know. To me,
24 that is clear from that, yeah.

25 Q. Right. But at least in that example, the

Page 25

1 thing into which something is being interposed is implied,
2 right?

3 A. Yeah, you could think of it as implied, I
4 guess. I mean, I think here it would be clear that
5 you're interposing between words because it says, "say
6 words as an interruption."

7 Q. But it doesn't say the word "between,"
8 right?

9 A. That's right. It doesn't have the
10 specific word "between," yes.

11 Q. If you would go for me back to your
12 declaration quickly, a little bit more in the vein of sort
13 of housekeeping.

14 A. Sure.

15 Q. I think it's the document you have that's
16 labeled Exhibit A.

17 A. Yeah.

18 Q. Okay. If you would look for me at the
19 table of contents.

20 A. I'm there.

21 Q. Okay. Do you see that in Letter D, it
22 says, "Channeling means..."?

23 THE REPORTER: I'm sorry. I just don't --
24 I don't know what -- there's something going on in the
25 room where I'm not hearing everybody as loud as --

Page 26

1 MR. WEED: Yeah.

2 (Discussion off the record.)

3 Q. (By Mr. Weed) Do you see on the table of
4 contents there's an Item D. It says, "Channeling
5 means..."?

6 A. I do.

7 Q. And then to the right, it says, "Error,
8 bookmark not defined," right?

9 A. That's right.

10 Q. Was there a point in time where you were
11 planning to offer an opinion about the phrase "channeling
12 means"?

13 A. Is that not in here?

14 Q. No.

15 A. Oh. I think -- I'm trying to remember. I
16 think that I maybe was planning on opining on that at one
17 point. But then possibly what happened was the parties
18 agreed on the meaning of that term, so then I didn't
19 submit an opinion.

20 That's just a speculation, but I think
21 that might have been what happened

22 Q. Okay. But you are not, in this
23 declaration, offering any opinions about the phrase
24 "channeling means," right?

25 A. I just want to make 100 percent sure.

Page 27

1 Q. Sure.

2 A. Yeah. That seems correct. Yes.

3 Q. And is it fair to say that your declaration
4 contains the full set of your opinions about
5 indefiniteness for the '808 patent?

6 A. It should, yes.

7 Q. So you are not opining that the "channeling
8 means" term is indefinite, correct?

9 A. Well, so as part of the construction that
10 I think the parties agreed on for "channeling means,"
11 that does have some of the other phrases that I opined
12 on. So, I mean, only with respect to that link being
13 there, not outside of that. Yeah.

14 Q. But just so I'm reading this correctly,
15 there are no opinions about the phrase "channeling means,"
16 correct?

17 A. So again, I'm not opining on the -- on
18 the -- what the construction or something like this
19 should be of "channeling means." I just want to note,
20 though, of course, that some of the terms I do opine on
21 that I opined are indefinite are also part of the
22 parties' agreed construction for "channeling means." So,
23 you know, to the extent there's that link, but not beyond
24 that.

25 Q. Okay. You also talked in various points in

Page 28

1 the declaration about Claim 19 of the '808 patent, right?

2 A. I think that's one of the claims I talk
3 about, yes.

4 Q. And is it your understanding that Claim 19
5 is not being asserted in this case?

6 A. I actually don't know that one way or the
7 other.

8 Q. Okay. When you read -- I assume you read
9 the '808 patent, right?

10 A. I did, yes.

11 Q. Do you have any trouble understanding the
12 compact wallet that was described in the '808 patent?

13 A. Like the embodiment?

14 Q. Yeah.

15 A. No. I think I understand how that
16 embodiment works.

17 Q. And have you ever seen a Ridge wallet?

18 A. I don't -- I don't think I have.

19 Q. Have you ever seen a wallet made by either
20 SWZA or ARW?

21 A. I have, yes.

22 Q. And have you seen that physically in real
23 life?

24 A. I have, yes.

25 Q. Have you ever taken it apart?

Page 29

1 A. I have.

2 Q. Let's talk a little bit about your opinions
3 about a person of skill in the art, if we could. You have
4 a section in your report about the concept of a person of
5 skill in the art, right?

6 A. I do, yes.

7 Q. And that's paragraphs 11 to 13, correct?

8 A. Yes, that's correct.

9 Q. Have you read the report submitted by
10 Dr. Curkas [phonetic] on Ridge's behalf?

11 A. I haven't said, but I did look briefly
12 through it, yes.

13 Q. And obviously, you didn't have that when
14 you submitted your report.

15 Do you have any disagreement -- well,
16 strike that.

17 Do you understand there to be an agreement
18 between yourself and Dr. Curkas about what the level of
19 ordinary skill in the art is here.

20 A. Did you say "agreement"? I just don't
21 remember offhand what he wrote in there. Yeah.

22 Q. Okay. But as you sit here today, nothing
23 that you recall stuck out to you as being radically wrong,
24 right?

25 A. I don't remember if I was focused on

Page 30

1 looking at that or not. I mean, if you want to show it
2 to me, it's probably pretty quick, I can look at it. But
3 I don't -- I don't remember there being some huge
4 problem, but I also don't remember if I really looked at
5 that very carefully.

6 Q. Okay. In paragraph 13 -- well, strike
7 that.

8 In paragraphs 12 and 13, I think it would
9 be fair to say that you give the description of what a
10 person of skill in the art would have to have had as far
11 as experience; is that right?

12 A. Sorry. I'm sorry. What's your question
13 again?

14 Q. That's okay. Paragraphs 12 and 13 outline
15 the experience that you believe a person of skill in the
16 art would have had, correct?

17 A. Yes.

18 Q. And is it your opinion that a person of
19 skill in the art would have to have had experience
20 designing compact wallets?

21 A. No, I don't think you would necessarily
22 have to have experience designing wallets per se. But
23 maybe just some general design experience, yeah.

24 Q. Do you have any experience designing
25 compact wallets?

Page 31

1 A. I do not.

2 Q. Would you say that you were at least a
3 person of ordinary skill in the art as of May of 2015?

4 A. Yes, I would.

5 Q. Would you say that you are at least of
6 ordinary skill in the art as of February of 2017?

7 A. Yes.

8 Q. Would you say that you were a person of
9 extraordinary skill in the art in May of 2015?

10 A. Yeah, I don't know what the definition of
11 "extraordinary" would be, but I would say that I have
12 qualifications well beyond a person of ordinary skill in
13 the art, yes.

14 Q. And the same would have been true as of
15 February of 2017, right?

16 A. I would agree with that, yes.

17 Q. Do you know anything about the background
18 of the inventor of the '808 patent?

19 A. I don't.

20 Q. Would you agree that this technology is
21 relatively straightforward?

22 A. Yes.

23 Q. Okay. Let's talk about paragraph 26, if we
24 could.

25 A. Yes.

Page 32

1 Q. And your opinion about the term "minimal
2 silhouette" is contained entirely within paragraph 26,
3 right?

4 A. Well, and also for the discussion on
5 minimize the profile.

6 Q. But you would agree with me that your
7 discussion of the phrase "minimize the profile" doesn't
8 use the word "silhouette" at all, right?

9 A. Sorry. Repeat that?

10 Q. Your discussion of the phrase "minimize the
11 profile" does not use the word "silhouette" at all,
12 correct?

13 A. No, I mean, obviously "profile" is not the
14 same word as "silhouette." But the discussion of the
15 different dimensions and things like that are kind of
16 applicable to both terms within the spec. That's why I
17 don't want to just repeat everything you've heard before.
18 So that's why, you know, I just have this sentence here,
19 because minimal silhouette has the same issues, and the
20 same things that I talked about in minimize the profile
21 apply to the minimal silhouette as well.

22 Q. So is it your opinion that "silhouette" and
23 "profile," while not the same word, mean the same thing in
24 the context of the '808 patent?

25 A. Well, I don't know that. But they're --

Page 33

1 they're in the same ballpark, and both of them I don't
2 think provide guidance as to what they actually
3 specifically mean, yeah.

4 Q. So what do you mean when you say that
5 they're in the same ballpark?

6 A. I would say you would be thinking about
7 things like the size or like that. But like I said, for
8 both of those terms, it's not particularly clear whether
9 that means in all -- in all of the dimensions or just
10 in --

11 THE REPORTER: I'm sorry. The last --

12 THE DEPONENT: Just in a subset.

13 Q. (By Mr. Weed) Okay. So it's your opinion
14 that the problem with the phrase "silhouette" and
15 "profile" is that it's not clear from the patent, in your
16 opinion, what dimensions of the product are being
17 discussed there? Is that a fair summary?

18 A. Which -- mostly like which -- you know,
19 by -- by "dimensions" I mean, like, which -- which
20 direction are -- yeah. Okay.

21 Q. So maybe this will help. So when I think
22 about it -- maybe you think about it differently -- I
23 think about it kind of on a 3D axis, where X and Y are the
24 credit-card-size dimensions, and Z is coming out of the
25 page.

Page 34

1 Is that how you think of it?

2 A. We can go with that, sure.

3 Q. All right. So is it your testimony that
4 under that context you believe "profile" and "silhouette"
5 are in the same ballpark in the sense that they refer, at
6 least somewhat, to the X and Y dimensions?

7 A. No, I wouldn't say that. I would say
8 like -- I would say they could be some subset of, like,
9 all three. Both of them could be a subset of all three,
10 yeah.

11 Q. Okay. But it's your understanding that the
12 band described in the '808 patent is an elastic band,
13 right?

14 A. Sure.

15 Q. And the idea is that you can add more or
16 fewer credit cards because the band is elastic, correct?

17 A. The idea for what these terms mean or
18 just --

19 Q. The idea for the elastic band being
20 elastic.

21 A. So we're not talking about profile or
22 silhouette. You just mean -- sure, I would agree that in
23 some cases an elastic band could allow you to put more
24 contents.

25 Q. Have you ever -- you said you had seen the

Page 35

1 SWZA and ARW product, right?

2 A. That's true.

3 Q. When you saw it, did you put credit cards
4 into it?

5 A. I did not.

6 Q. Is it -- did you -- did you stick your
7 finger in between the two plates to confirm that it can
8 expand in the Z direction, as we talked about before?

9 A. Yes.

10 Q. Okay. Do you have any recollection as far
11 as how much it was able to expand?

12 A. I was able to put my finger in there, at
13 least. I don't remember what the max -- max stretch was.

14 Q. And as you sit here, I know you didn't put
15 cards into it, but do you have a sense for how many credit
16 cards you think could have been put into the wallet in the
17 space of your finger?

18 A. I don't remember exactly.

19 Q. Well, you never did it, right?

20 A. I didn't put any cards in there. That's
21 correct.

22 Q. Fair to say it was able to expand at least
23 a centimeter or so?

24 A. That seems fair, yes.

25 Q. But you don't know how far it was able to

Page 36

1 expand, right?

2 A. That's correct.

3 THE DEPONENT: Could I get more tea?

4 MR. WEED: Actually, why don't we take a
5 break.

6 (Recess from 9:56 a.m. to 10:03 a.m.)

7 Q. (By Mr. Weed) All right. Dr. Cameron, if
8 you would please pull out Exhibit 1 to your report, which
9 should be a copy of the '808 patent, right?

10 A. Yeah.

11 Q. You considered the abstract in offering
12 your opinions, correct?

13 A. I did, yes.

14 Q. And if you would look at the second
15 sentence of the abstract. It starts with, "Novel
16 features."

17 A. I see that sentence.

18 Q. Will you just read that into the record for
19 me, please, that sentence?

20 A. "Novel features hold a silhouette to the
21 minimal dimensions of a credit card while affording
22 maximal expandability for contents, storage, and
23 accessibility."

24 Q. And so in that sentence you would agree
25 with me that the minimal dimensions of a credit card refer

Page 37

1 to the X and Y axis as we were talking about it before the
2 break, right?

3 A. I would agree with that, yes.

4 Q. And then you would agree with me that the
5 maximal expandability that's being discussed in that
6 sentence is the Z direction, right?

7 A. I agree with that, yes.

8 Q. And that maximal expandability concept is
9 what you saw when you put your finger in between the
10 plates of the SWZA and ARW product, right?

11 A. I haven't really thought about, like,
12 maximal expandability, but certainly you can move the
13 plates apart, yes.

14 Q. Fair enough. The expandability concept is
15 what you saw when you put your finger in between the
16 plates, right?

17 A. I would agree with that, yes.

18 Q. And would you agree with me that in
19 Figure -- well, even that figure on the front -- on the
20 front cover of the patent, which is an exploded view of a
21 compact wallet, you would agree with me that the only
22 thing that extends outside of the footprint, if you will,
23 of the plate numbered 10 is the thickness of the elastic
24 band numbered 4, right?

25 A. If you just mean the X-Y direction, then I

Page 38

1 would agree with that, yes.

2 Q. Yes.

3 A. Well, I guess that's not quite true
4 because it shows here a credit card also expanding past,
5 yeah.

6 Q. But the credit card, to your understanding
7 of what's described, is something that's insertable into
8 the wallet, right?

9 A. Right. Correct.

10 Q. So in a situation where we were looking at
11 a patent figure that didn't have a credit card, the band
12 would be the only thing that extends in the X-Y direction
13 outside of the footprint of the Plate 10, right?

14 A. From -- yeah, from this figure, I would
15 agree with that. I mean, obviously, there could be
16 something very small there, but generally speaking, I
17 would agree with that.

18 Q. And just so that the record is clear on
19 this point, if you will, if you want to call the X
20 direction sort of the longer direction, the band's
21 thickness actually adds to that X direction twice, right?

22 A. I would agree with that, yes.

23 Q. And if you refer to Y as the shorter of the
24 two dimensions, the band's thickness adds to that
25 direction once, right?

Page 39

1 A. That's -- that seems correct, yes.

2 Q. And you would agree with me that when the
3 wallet is expanded, the thickness of the band actually
4 decreases, right?

5 A. Well, I -- I do agree, in general, you can
6 have an elastic material that when you pull on it
7 uniformly, it will decrease the thickness.

8 However, here you have a band that's going
9 all the way around. It's not entirely clear whether the
10 stretch would be uniform around the length. So -- it's
11 possible there could be, you know, some thinning and --
12 some minimal thinning in some places but maybe not in
13 others. It would just depend on probably how you pried
14 it open.

15 Q. Okay. But at least to some extent the band
16 thickness would decrease when you pried it open, right,
17 even if it's not uniform?

18 A. I would say that would be typical, that
19 there would be some decrease in thickness at some point
20 for most of the materials that you would use for that.
21 Yeah.

22 Q. And you would agree that the extent of that
23 thinning would depend -- depend upon the material selected
24 for the band, right?

25 A. I agree with that, yeah.

Page 40

1 Q. Do you recall giving testimony in a case
2 called Hoya Medical v. Alcon [sic]?

3 A. I do, yes.

4 Q. And do you recall giving testimony about
5 claim construction in that case?

6 A. I believe I did give testimony. I'm not
7 recalling the specifics right now, yeah.

8 Q. Do you recall giving testimony about what
9 it meant to be a slot opening or a groove?

10 A. Oh, yes, yes, I do. I work on a lot of
11 different things. Sorry.

12 Q. No worries. No worries.

13 A. Yeah, I do recall that, yes.

14 Q. And do you recall that in that case the
15 Court found that the testimony that you gave actually
16 contradicted the plaintiff's position in that case?

17 A. I don't -- I don't remember -- I don't
18 remember the specifics, but I think I was actually
19 working for plaintiffs in that -- in that case.

20 Q. Right.

21 Do you remember if you read the claim
22 construction order in that case?

23 A. Yes, I most likely did, but I'm not -- I
24 do recall parts of it. I don't recall -- I don't recall
25 my testimony, specifically. But I do remember reading

Page 41

1 that claim construction order.

2 Q. Okay. Can you see what I'm sharing on the
3 screen right now?

4 A. I have, like, a search thing up.

5 Q. Yeah, there's probably some overlapping.
6 How is that?

7 A. I don't want to be -- yeah. I can see
8 that, yeah.

9 Q. Okay. So let me just give you some context
10 for you. If we go to the top page -- and if you want me
11 to scroll to other parts of the document, let me know.

12 A. Sure.

13 Q. But can you see the caption on the first
14 page of this document, right?

15 A. Mm-hmm. Yes.

16 Q. And this is a case involving Hoya Medical
17 [sic] and Alcon, right?

18 A. That's correct.

19 Q. This is a claim construction order from the
20 Northern District of Texas, correct?

21 A. That's what it looks like, yes.

22 Q. And just looking at this, do you recall if
23 you've seen this before?

24 A. Just from this first paragraph, that
25 doesn't do anything for me. But I know that I have read

Page 42

1 this order.

2 Q. Okay. And you represented Hoya Medical in
3 this case, right?

4 A. I was retained by Hoya Medical, yes.

5 Q. And they were the plaintiff, right?

6 A. They were the plaintiff, that's correct.

7 Q. So if we go down to this page, which is
8 page 17, it says here, "Plaintiff proposes construing the
9 term 'slot' to mean 'opening,'" right?

10 A. Yes.

11 Q. And in the third sentence, the Court
12 writes, "Moreover, Plaintiff's expert, Dr. Cameron,
13 testified that 'slot,' 'opening' and a 'groove' are not
14 coextensive in scope, and that a 'slot' may be made up of
15 both an 'opening' and a 'groove.'"

16 Do you see that?

17 A. I see that, yes.

18 Q. Do you recall giving that testimony?

19 A. Yes, I do. I remember that I disagreed
20 with -- yeah, I disagreed with -- I guess Hoya, yeah,
21 wanted to say that "slot" and "opening" were just the
22 same. But I didn't really agree with that. That's
23 right.

24 Q. Okay. So your -- your opinion here was, in
25 your view, the correct technical opinion, that it was not

Page 43

1 in line with what the plaintiff wanted to propose, right?

2 A. I don't -- let me just refresh my memory.

3 What I -- I'm going to read this. What I
4 remember right at this second is I had a bit of a
5 disagreement with Hoya on -- on the term "slot." And I
6 just -- I don't remember what happened after that. So
7 let me refresh my memory real quick, and let me read
8 this.

9 Q. Sure.

10 A. Yeah. Okay. I read that. So I have a
11 little bit better memory now.

12 Q. So what happened in that case is you gave
13 an opinion that was, in your view, technically correct,
14 but that contradicted the plaintiff's proposed
15 construction, right?

16 A. That is correct, yeah.

17 Q. So in your view, the Court got it right
18 when they found that your testimony contradicted what the
19 plaintiff advocated as a construction, right?

20 A. That's generally how I remember it, yes.

21 Q. Okay. All right. Let me show you another
22 document.

23 I don't think we talked about this one
24 before, but have you ever done work in a case between
25 SharkNinja and Flexible Technologies?

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1 A. Vacuum cleaners? Maybe.

2 Q. Let me -- let me show you a document here.

3 A. Oh, no, that was the whole -- yeah, yeah.

4 Yes, I have.

5 Q. Okay. So can you see my screen again?

6 A. Yes, I do.

7 Q. And what I've got on the screen is titled

8 Declaration of Kimberly K. Cameron Regarding Preliminary

9 Response To Petition For Inter Partes Review in Case

10 IPR2018-00903.

11 Do you see this?

12 A. I do see that, yes.

13 Q. And again, I can scroll around if you'd

14 like. But I think if we show the bottom.

15 Is that your signature on page 74 of the

16 document?

17 A. That certainly looks like my signature,

18 yes.

19 Q. Okay. Do you recall signing this document

20 around July 19th of 2018?

21 A. I don't remember that, but it wouldn't

22 surprise me.

23 Q. You have no reason to doubt that this is a

24 declaration you submitted, right?

25 A. I don't have any reason to doubt that. I

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1 just don't remember the date being July 19th, for
2 example.

3 Q. No, understood. Understood.

4 In this document, paragraph 39, can you see
5 it on the screen there?

6 A. Yes.

7 Q. And in paragraph 39 of your declaration
8 you're talking about what the applicant said regarding a
9 reference called Fujimoto, right?

10 A. To be clear, I don't really remember the
11 details of this. But I can obviously read what's on the
12 screen.

13 Q. Right. And in paragraph 39 what you say in
14 this declaration is: They explained that the hose in
15 Fujimoto, quote, is composed of a hose wall 1 comprising
16 an inner wall 2 and an outer wall 3, and a spiral
17 reinforcement 4 interposed between the inner wall 2 and
18 the outer wall 3, right?

19 A. I see that, yes.

20 Q. And in writing this declaration -- and you
21 can -- I can scroll through it if you'd like, but you
22 didn't have any trouble understanding what was meant by
23 the word "interposed" in that statement, right?

24 A. Yeah, to be clear, I know exactly what
25 "interposed" means. The problem here -- and by "here" I

Page 46

1 mean in the '808 patent -- that that word is not used in
2 accordance with the normal definition or how you would
3 use it.

4 Here in this exhibit that you're
5 showing -- I don't think "interposing," of itself, is
6 like a problem word, to be clear. It's the usage in the
7 '808 patent that is the issue.

8 But having said that, in this document
9 you're showing me now, yeah, "interposed" is used exactly
10 how you would expect. So spiral reinforcement is
11 between -- is interposed between inner wall 2 and outer
12 wall 3.

13 And I suspect if you look at the figure,
14 it will -- it will show the arrangement where the inner
15 and outer wall are outside of this spiral
16 reinforcement 4.

17 Q. And the figure is here, I think, on the
18 next page.

19 A. Yeah. So again, I don't remember all the
20 technical details of this case, but that's generally what
21 it's showing.

22 Q. Okay. Would you agree that it would be
23 fair to describe in the '808 patent a credit card as being
24 interposed between the two plates of the compact wallet?

25 A. Yeah, that, I think, would be the

Page 47

1 normal -- the normal usage of "interpose."

2 Q. And you took -- you said you used or
3 physically handled a SWZA and ARW wallet, right?

4 A. Yes.

5 Q. Would you agree that the band of that
6 wallet is interposed between two flat plates on each side
7 of the wallet?

8 A. Well, you know, when you're using that
9 term in a context of an '808, that's where I think it
10 gets a little bit confusing. Because if you don't use
11 "interpose" how everybody uses it, like, the same way
12 you're seeing in this declaration that I -- I think I
13 wrote some time ago, you know, maybe if you're
14 consistently using it some other way, you could figure it
15 out, I suppose. But when you look at the other claim
16 that's -- "interposed" was using, that's where the
17 trouble is because, you know, in Claim 1 it's backwards.
18 And then in a later claim it's not really clear what they
19 mean by "interposed."

20 Obviously, you can look at the -- you can
21 know the exact structure of that preferred embodiment,
22 but the problem is you need to know not just for that
23 embodiment but for other devices to know whether they
24 infringe or not.

25 So, to me, that's the only reason that I

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1 say it's indefinite comes in is not because -- if you
2 were to take away the '808 patent -- I know what
3 "interposed" means. Everybody knows what "interposed"
4 means. The problem is when you start to look at how that
5 term is used in the '808 patent, it becomes an issue, in
6 my view.

7 Q. I understand your opinion. I'm just asking
8 you in the wallets you looked at from SWZA and ARW, was
9 the band interposed between an outer plate -- if you want
10 to call it that -- and an inner plate on each side of the
11 wallet?

12 A. Yeah. So again, I don't -- like, in terms
13 of how that's used in the '808 patent, I think that's,
14 like, a little bit harder to know what that means. But
15 in general, the -- the band, you know, it goes in a
16 groove on each of the two plates. So in some sense, you
17 can think of that as being between the two plates, you
18 know, so you can possibly look at it that way.

19 But again, it is a bit unclear because of
20 how it's used in the first claim as well.

21 Q. And the record can be as clear as you want,
22 but this is outside of the context of the claim. I'm just
23 saying, in the product you looked at, you would agree with
24 me that the band is interposed between two plates on each
25 side of the wallet, right?

Page 49

1 A. You know, I'm not sure that I actually
2 would use the word like that. But I could -- if you
3 wanted to use that term, I would be, like, okay, I think
4 I know what you mean. But -- but it's not -- it's not, I
5 would say, as clear as, you know, the credit card being
6 between the two plates example.

7 Q. Okay. I think I understand.

8 A. Yeah.

9 Q. Okay. Let me look -- let me show you
10 another document here.

11 A. But, you know, just to add that, like, I
12 already know -- in that instance, it's like I already
13 know the structure of the band and the plates, so it's
14 like I already have a clear idea in my mind. And then if
15 we want to say, okay, that relationship is going to be
16 what interpose is, then, okay, then that's fine.

17 But the problem is, like, you need to know
18 beyond -- beyond that. So you need to be consistent with
19 Claim 1, and you need to know, like, for other structures
20 is that also going to fall within that. So I think
21 that's where the difficulty lies, at least.

22 Q. Let me show you -- let me show you a
23 document here. But before I do, do you recall working on
24 an IPR between a company called CircusTrix and Cherokee
25 Gray Eagle?

Page 50

1 A. I do, yes.

2 Q. Was that about trampolines?

3 A. It was.

4 Q. I'll share my screen with you here.

5 A. I forgot I worked on all these things.

6 Q. I know. As a mechanical engineer, you get

7 to see a lot of different stuff.

8 A. That's true.

9 Q. Popsockets?

10 A. That's true.

11 Q. I'm sorry?

12 A. Yes, Popsockets. The little things that

13 go to the back of your brain.

14 Q. All right. So on the screen here I've got

15 a document, the title of which is "Declaration of Kimberly

16 Cameron" in connection with IPR2019-00263.

17 Do you see that?

18 A. I see that, yes.

19 Q. And do you recall submitting this

20 declaration in this IPR?

21 A. I recall generally working on that. I

22 don't recall the specific act of putting this

23 declaration in, but I know -- I know I worked on this

24 case.

25 Q. Okay. Let's just confirm on page 105, does

Page 51

1 that look like that's your signature?

2 A. Yes.

3 Q. Okay. Now, in this one I'd like to go to
4 paragraph 36. And just for some orientation, paragraph 36
5 is in a section of your report called Frame Elements.

6 Do you see this?

7 A. I see that, yes.

8 Q. Okay. And in paragraph 36 you start out by
9 saying, "Mechanical engineers are also taught that for
10 structural members that will only be loaded in tension and
11 not in compression, more options exist for the structural
12 elements," right?

13 A. Yeah, I see that sentence.

14 Q. And that's a general statement about what
15 mechanical engineers might know, right?

16 A. I mean, I would say in the context of this
17 declaration, yes.

18 Q. Okay. And the next sentence there says,
19 "In fact, in many applications, the structure is designed
20 to minimize the number of compressive elements to minimize
21 the overall structural profile."

22 Do you see that?

23 A. Yes.

24 Q. And you agree that's an accurate statement?

25 A. I would assume that the things that I

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1 write in my declaration are accurate, in general.
2 However, I don't have, like, a specific recollection of
3 how that sentence relates to the rest of the context
4 here.

5 Q. Sure. But at least in writing this
6 sentence, you didn't have any trouble writing down the
7 phrase "minimize the overall structural profile," right?

8 A. Right. This sentence says, "minimize the
9 overall structural profile." I don't remember the rest
10 of this declaration or, you know, exactly how that
11 relates, but...

12 Q. And again, as you sit here today, you're
13 not aware of anything about this declaration that was
14 incorrect, right?

15 A. I don't -- I don't remember that one way
16 or the other.

17 Q. Okay. All right. Just one more. We
18 talked about it.

19 You worked on a case about popsockets,
20 right?

21 A. Yes, I did.

22 Q. And that was between PopSockets and
23 Flygrip, right?

24 A. That's correct.

25 Q. And do you recall working on an IPR

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1 declaration in that case?

2 A. I do.

3 Q. I'll show it to you here. Do you see the
4 first page of a document entitled Declaration of
5 Dr. Kimberly Cameron?

6 A. I do, yes.

7 Q. And then if we go to the bottom, just to
8 verify, that is your signature on page 142, correct?

9 A. That's correct.

10 Q. And in this document, in paragraph 62,
11 you're talking about a modification to a reference called
12 Nakai, N-a-k-a-i, right?

13 A. Again, I don't remember everything that's
14 in this declaration, but I see Nakai there, yes.

15 Q. Okay. And there's a sentence in here, what
16 you can see on the screen, that starts out "In the
17 context."

18 Do you see that?

19 A. Yes, I do see that.

20 Q. And that sentence says, "In the context of
21 Nakai, an overall thinner profile would be achieved, as
22 can be seen by comparing the cavity depths of FIGs. 2-3
23 (with rigid shaft 21) to the cavity depths of FIGs. 8-9,
24 (rubber shaft 29)." Right? And it goes on.

25 A. Yes, I see that.

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1 Q. And this is language that you wrote in a
2 declaration several years ago, right?

3 A. Yes. I mean, I think this is part of my
4 point, is that profile can be used -- like, here I'm
5 talking about the cavity depth here. And I think this is
6 part of my point, is how you might understand "profile"
7 is not -- it's not clear in the context of '808 if they
8 just mean, generally, any -- any of the dimensions or
9 directions, or if it's more specific as -- as it seems to
10 be in some of the parts of the specification. I think
11 that's really -- that's really the issue here.

12 It's, again, not that people don't know
13 how to use the word "profile." It's the way it's being
14 used in the '808 by -- in some places it seems like it's
15 trying to give a definition of only two defini- -- two
16 dimensions, and then in other places it seems like it's
17 more general, as you might expect in other contexts. And
18 I think that, for me, again, is the issue.

19 It's not that I wouldn't, outside of the
20 '808 patent, know how to use "profile" or -- or
21 "interposed," for example. They're not -- they're not
22 crazy words in and of themselves. The problem is the way
23 that they're used in the '808 patent.

24 Q. In the context of what you wrote in the
25 PopSockets case, the last part of that sentence says,

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1 "thereby increasing portability of the device," right?

2 A. That's correct, yes.

3 Q. You don't talk in this section of the
4 document about how much thinner the profile would be of
5 the modification you're talking about, right?

6 A. No, I do. So if you look at the -- I
7 think I have a figure in here that shows you --

8 Q. Tell me where you want me to scroll to. I
9 can --

10 A. Okay, yeah. Yeah. So if you scroll down,
11 I'm pretty sure I remember having a picture in here that
12 it shows you -- oh, maybe it might be up. Yeah, here it
13 is. Exactly.

14 So it shows you -- it shows you the
15 difference in the thickness here. So, like, in the
16 direction across the page, if you were to
17 change -- change that structure that you have there -- so
18 that's why I said it would increase the portability
19 because of the -- I mean, you can see specifically the
20 difference in that figure.

21 Q. But you don't say, for example, how many
22 millimeters thinner the modified device would be, correct?

23 A. Oh, I don't remember. I doubt that I
24 would have put exact measurements on that. I think I was
25 trying to illustrate the concept of if you use this

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1 different type of structure in that cavity, then you
2 don't need to have it be as deep.

3 Q. So in this context, it wasn't important to
4 have the exact dimensions in terms of millimeters or
5 centimeters, right?

6 A. I would have to refresh my memory if that
7 was important here or not. Just to be clear, you know,
8 there's a lot of terms that are used, like, in patent
9 claims. Sometimes it can be an issue that you don't know
10 kind of what the boundary is in terms of, like, the
11 actual numerical values. I think that's actually, like,
12 a lot less common.

13 Usually it's, like, pretty clear from the
14 context. But for me, it's not really about what the
15 number are, but like I said, it's more general than that.
16 It's like you don't know how to really evaluate that
17 because you don't know whether that just means any
18 decrease in size at all, or if it has to be in the
19 direction of the plane of the credit card or if it can be
20 out of the plane of the credit card. I think those are,
21 to me, what the -- what the issues are. Yeah.

22 Q. But you would agree with me that in the
23 context of this declaration in the PopSockets case, you
24 talk about space in a user's pocket or handbag being at a
25 premium, right?

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1 A. I agree with that, yes.

2 Q. And the same concept applies for contact
3 law and TechBox?

4 A. If you're asking me, yes, I would agree.
5 Yes, I would agree that -- you know, I would agree that
6 space, in general, like when you're thinking of a volume,
7 would be at a premium. Again, that's why I think that
8 this is -- that term is indefinite because it's not
9 particularly clear whether it's that understanding or
10 any, you know, change in the size is going to be
11 important, or whether they only are worried about in the
12 plane of a credit card, for example, yeah.

13 Q. Yeah. But my question is just, do you
14 agree with me that the same consideration about space
15 being at a premium applies for a popsocket device as it
16 does for a compact wallet? Correct?

17 A. Well, just answering from my own
18 perspective, outside of the -- outside of the '808
19 patent, for me, yes. For a phone or for a popsocket or
20 for any of those kinds of consumer devices, I think the
21 volume generally is sort of a design factor that it is
22 often desirable for it to be smaller volume-wise. So
23 that would be kind of how I view it.

24 It's -- again, when I read the '808
25 patent, it doesn't -- it's not clear whether it's that

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1 kind of understanding when it talks about minimizing
2 profile or minimizing silhouette, or whether there are
3 places in the '808 spec where it seems like it's not so
4 much worried about the volume, it's really worried about
5 what the area is in the plane of the credit card, for
6 example.

7 Q. What do you mean when you say "plane of the
8 credit card"?

9 A. So, like we were talking before, we're
10 kind of using X and Y for being in the plane of the
11 credit card. That's kind of what I had in mind.

12 Q. Okay. Let's go back to the '808 patent
13 real quick, if you would. Do you have that in front of
14 you?

15 A. Yes, I still have that open.

16 Q. Okay. So if you would look, please, at
17 Claim 1 of the '808 patent.

18 Are you there?

19 A. I am, yes.

20 Q. Toward the bottom of that claim, starting
21 at line 62-ish, there's a sentence or a phrase that starts
22 with the word "Whereby."

23 Do you see that?

24 A. I see that, yes.

25 Q. And that -- that phrase is where

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1 you -- where the term "minimal silhouette" shows up in
2 Claim 1, right?

3 A. That's correct.

4 Q. You would agree with me, though, that that
5 phrase continues by saying, "While allowing expandable
6 capacity and ready access to individual contents from
7 between the at least two rigid plates," correct?

8 A. Yes.

9 Q. And you would agree with me that expandable
10 capacity is the Z direction we talked about earlier today,
11 correct?

12 A. I think that would be fair, yes.

13 Q. And it was that expandable capacity that
14 allows -- allowed you to put your finger in between the
15 plates of the SWZA and ARW product, right?

16 A. I think that would be one way of talking
17 about expanding, yes.

18 Q. And then just to complete the thought, if
19 you would look at Claim 14 as well, which is on the next
20 page. On 64.

21 A. Sorry. I'm at Claim 14 now.

22 Q. Okay. You see line 64, there's another
23 whereby clause?

24 A. Yes.

25 Q. I think it's identical. But in any event,

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1 that clause does say, "While allowing expandable capacity
2 and ready access to individual contents from between the
3 at least two rigid plates," correct?

4 A. Yes, it does. But, of course, the -- the
5 wallet and the plates themselves have thickness in that
6 dimension.

7 Q. Right. But the expandable capacity that's
8 being discussed there is the ability of the wallet to
9 expand in that Z direction, correct?

10 A. Yes. So that's giving you a constraint on
11 the rest of your design, because, obviously, you'd be
12 able to do other things if you don't have the ability to
13 put contents in there.

14 Q. Right. And that expandable capacity would
15 vary depending on the number of credit cards, for example,
16 in the wallet, right?

17 A. It would vary, but the minimum would be at
18 least partly controlled by the thickness of other plates
19 on the other structures that you have that are part of
20 the wallet itself.

21 Q. And the maximum would be constrained by the
22 elasticity of the elastic, right?

23 A. The maximum would be a combination of
24 the -- yeah, how far you can expand the elastic, plus the
25 actual thickness of the parts of the wallet itself.

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1 MR. WEED: Okay. I don't have any further
2 questions for you. Thank you.

3 MR. YAO: Take a five-minute real quick?

4 MR. WEED: Yeah. So let's go off the
5 record real quick.

6 (Discussion off the record.)

7 (Recess from 10:34 a.m. to 10:45 a.m.)

8 EXAMINATION

9 BY MR. YAO:

10 Q. Good morning, Dr. Cameron.

11 A. Good morning.

12 Q. So have you looked over Dr. Curkas'
13 rebuttal report?

14 A. I did, yes.

15 Q. What is your thought on the rebuttal report
16 regarding claim construction?

17 A. It didn't change any of my opinions.

18 Q. Okay. Could you elaborate more on what the
19 person of ordinary skill --

20 THE REPORTER: I'm sorry. Could you
21 repeat the question, please?

22 Q. (By Mr. Yao) Yes. Could you elaborate
23 more on what the person of ordinary skill in the art is?

24 A. Sure. I think I laid that out in
25 paragraphs 11 through 13 of my declaration. So I kind of

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1 understand the, I guess, more legal definition of "a
2 person of ordinary skill in the art," and that they're
3 presumed to be aware of the pertinent art, and then, you
4 know, that's inconsistent with conventional wisdom in the
5 art, things likes that.

6 And, you know, it just has the normal
7 level, ordinary creativity. And then because of my
8 experience, people have kind of also talked about what
9 the general sort of education and experience would be
10 the POSIC [phonetic]. I kind of laid out what I thought
11 that would be as well.

12 So I just talked about how, typically, you
13 might have like some kind of technical degree, and then
14 some -- some -- accompanied with some experience in
15 design.

16 Q. Okay. Have you read the staffs' claims
17 construction report?

18 A. Yes, I have.

19 Q. And in the -- in the -- in staffs' report,
20 it talks about minimizing the profile in all three
21 directions, correct?

22 A. That's correct, yes.

23 Q. What is your thought on that?

24 A. I mean, I agree in some sense that that
25 could be one interpretation of it. The problem is that

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1 there's -- it's also possible that you can read the '808
2 specification and think that it's not all three
3 dimensions; it's only in what we were talking about
4 before, in the X or Y, or in the direction -- kind of in
5 the plane of a credit card if you think about it that
6 way.

7 So I think, to me, that really kind of
8 gets at the heart of the matter, which is, like, yeah, if
9 you're -- if it's clear and you're told it's in three
10 dimensions, then, of course, it's easy to understand that
11 term.

12 But the problem is, is that while that
13 would be one normal interpretation of "profile," it's not
14 the only interpretation that would be reasonable when you
15 read the '808 patent.

16 Q. And we just, here earlier, talked about the
17 complainant thinks there's only -- in two directions,
18 correct?

19 A. Yeah, that's right.

20 Another reasonable interpretation would be
21 that it's only kind of in the plane of a credit card and
22 not in the thickness direction. And there's another
23 party and expert that thinks that that's the correct
24 interpretation. To me, that just illustrates exactly
25 what I'm saying, which is, either of those two, you know,

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1 it's not unreasonable, but the problem is when you then
2 go to see what products infringe, you need to know which
3 it is.

4 Q. Have you also looked at the Ridge claim
5 construction brief?

6 A. Yes.

7 Q. What is your thought on that?

8 A. Yes. The same thing. It didn't change
9 any of my opinions.

10 MR. YAO: That's all the questions I have.

11 MR. WEED: I have nothing further.

12 Linda or Josh?

13 MS. CHANG: Nothing further from me.

14 MR. OSBORN: Nothing for me.

15 (Discussion off the record.)

16 THE REPORTER: Before we go off the
17 record, I need to ask the parties present and on Zoom,
18 your orders for transcript, please.

19 So, Mr. Weed.

20 MR. WEED: Rough and expedited final,
21 please.

22 MR. YAO: We have rough, and we have, I
23 believe, the two-day -- two-day final, yeah.

24 THE REPORTER: And anybody on Zoom
25 ordering?

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MS. VERMILLION: I'm with Ben.

MS. CHANG: No, the staff won't be
ordering the transcript.

THE REPORTER: And who's handling
signature?

MR. YAO: That would be me. Okay.

* * * * *

WHEREUPON, the foregoing deposition was
concluded at the hour of 10:50 a.m. Total time on the
record was 1 hour and 19 minutes.

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I, KIMBERLY CAMERON, Ph.D., the deponent
in the above deposition, do hereby acknowledge that I
have read the foregoing transcript of my testimony and
state under oath that it, together with any attached
Amendment to Deposition pages, constitutes my sworn
testimony.

_____ I have made changes to my deposition

_____ I have NOT made any changes to my deposition

KIMBERLY CAMERON, Ph.D.

Subscribed and sworn to before me this _____
day of _____, 20____.

My commission expires: _____

Notary Public

Address

REPORTER'S CERTIFICATE

I, Laurel S. Tubbs, a Registered Professional Reporter and Notary Public within the State of Colorado, do hereby certify that previous to the commencement of the examination, the deponent was duly sworn by me to testify to the truth.

I further certify that this deposition was taken in shorthand by me at the time and place herein set forth and thereafter reduced to a typewritten form; that the foregoing constitutes a true and correct transcript.

I further certify that I am not related to, employed by, nor of counsel for any of the parties or attorneys herein, nor otherwise interested in the result of the within action.

My commission expires September 1, 2023.



LAUREL S. TUBBS

Registered Professional Reporter
Registered Merit Reporter
Certified Realtime Reporter
and Notary Public

Date: June 11, 2023

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[accessibility - ballpark]

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[claim - continuation]

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