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Transcript of Jean Renard Ward

Date: September 24, 2024

Case: Valve Corporation -v- Immersion Corporation (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Valve Corp. v. Immersion Corp.

IPR2024-00477

Immersion Exhibit 2010

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Conducted on September 24, 2024

1 (1 to 4)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 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	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 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
UNITED STATES PATENT AND TRADEMARK OFFICE ----- BEFORE THE PATENT TRIAL AND APPEAL BOARD ----- VALVE CORPORATION Petitioner, vs. IMMERSION CORPORATION Patent Owner ----- IPR2024-00477 PATENT NO. 7,336,260 ----- STENOGRAPHIC DEPOSITION OF JEAN RENARD WARD BOSTON, MASSACHUSETTS TUESDAY, SEPTEMBER 24, 2024 (Reported Remotely) REPORTED BY: TANYA L. VERHOVEN-PAGE, CCR-B-1790 (GA), CSR-12254 (TX), LCR-991 (TN) FILE NO. 553107	APPEARANCES OF COUNSEL On behalf of the Petitioner: WOLF, GREENFIELD & SACKS, P.C. 600 Atlantic Avenue 23rd Floor Boston, Massachusetts 02210 (617) 646-8000 BY: ADAM R. WICHMAN, ESQ., PH.D. e-mail: Adam.Wichman@WolfGreenfield.com BY: NATHAN R. SPEED, ESQ. e-mail: Nathan.Speed@WolfGreenfield.com (Via Zoom) On behalf of the Patent Owner: FOLIO LAW GROUP, PLLC 1200 Westlake Avenue North Suite 809 Seattle, Washington 98109 (206) 880-1802 BY: RYAN MEYER, ESQ. e-mail: ryan.meyer@foliolaw.com BY: MOSES XIE, ESQ. e-mail: moses.xie@foliolaw.com (Via Zoom) - - -		
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 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	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22
September 24, 2024 10:27 a.m. Stenographic deposition of JEAN RENARD WARD, held in Boston, Massachusetts before Tanya L. Verhoven-Page, Certified Court Reporter (GA), Licensed Court Reporter (TN) and Certified Shorthand Reporter (TX).	INDEX WITNESS: JEAN RENARD WARD Examination BY MR. MEYER Page 6		

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2 (5 to 8)

5			7
1	EXHIBITS INDEX:		1 themselves, could you please close them, confirm that
2			2 they are closed and agree that you will not open
3	Ward Deposition Exhibit	Description	3 anything else during the deposition?
4		Page	4 A I don't see anything else open on the
5	Exhibit 1001	United States Patent Patent No.: US 7,336,260 B2	5 desktop. So --
6		13	6 Q Okay. Thank you.
7	Exhibit 1003	Declaration of Jean Renard Ward	7 MR. WICHMAN: I'm sorry, Mr. Meyer.
8		11	8 He has a hard copy of his declaration in
9	Exhibit 1005	United States Patent Application Publication Pub. No.: US 2001/0008849 A1	9 front of him and may refer to that. It's
10		14	10 a clean copy.
11	Exhibit 1007	Japanese Unexamined Patent Application Publication Pub. No.: 11-212725 (Tsuji)	11 MR. MEYER: Okay. As long as it is
12		15	12 exactly the same as, I believe, Exhibit
13	Exhibit 1008	International Application Published Under the Patent Corporation Treaty (PC) International Publication Number: WO 99/66997 (Rosenberg)	13 1003 from the IPR, then that's fine.
14		16	14 MR. WICHMAN: It has -- there is
15			15 one difference. It has a table of
16			16 contents, which I could send you if you
17			17 wish.
18			18 MR. MEYER: Okay. As long as it's
19			19 just the table of contents, that's fine.
20			20 MR. WICHMAN: That's it, yep.
21			21 MR. MEYER: Okay.
22			22 BY MR. MEYER:
6			8
1	BOSTON, MASSACHUSETTS; TUESDAY, SEPTEMBER 24, 2024		1 Q Mr. Ward, approximately how many times
2	10:27 A.M.		2 have you been deposed as an expert witness?
3			3 A I'm not sure. Fifteen or more.
4	Thereupon --		4 Q And about how many of those were in the
5	JEAN RENARD WARD,		5 context of an IPR?
6	called as a witness, having been first duly sworn,		6 A I'd have to count, but I'd say at least
7	was examined and testified as follows:		7 half. If you can let me refer to my CV, I can count
8			8 them up.
9	EXAMINATION		9 Q Sure. I'm just looking for a rough -- a
10	BY MR. MEYER:		10 rough number. So that's fine.
11	Q	Good morning, Mr. Ward.	11 A The process or procedure has changed a
12		Could you please state your name for the	12 little bit from time to time. If you could just go
13		record.	13 over the ground rules for today quickly, that might
14	A	Jean Renard Ward.	14 be helpful.
15	Q	And do you understand that you are under	15 Q Sure. So I don't think anything will be
16		oath today?	16 that different from any other deposition you've been
17	A	Affirmation, yes, sir.	17 in. I'll ask questions.
18	Q	Is there any reason that you cannot give	18 All I ask is that you wait until I've
19		truthful, complete and accurate testimony today?	19 finished with the question and then you respond with
20	A	Not that I'm aware of, no, sir.	20 a complete and true answer, answering just the
21	Q	If you have anything open besides Zoom	21 question that I've asked, and as long as we don't
22		and the folder with exhibits or the exhibits	22 talk over each other, that will make things easier

9 1 for the court reporter, and I will wait until you've 2 finished answering to ask another question. 3 From time to time, your attorney might 4 object after I ask a question. As long -- if you 5 understand the question, you can go ahead and answer, 6 unless he specifically instructs you not to answer, 7 or I might rephrase the question in response to his 8 objection. 9 As we go along -- I don't think that this 10 deposition will take the whole day, but it may take, 11 you know, a few hours. We will probably have a break 12 every 60 to 90 minutes just to use the restroom, grab 13 water or whatever you need. 14 If you need a break at any time, just 15 tell me. All I ask is that you -- if there's a 16 question pending, you finish answering the question 17 before we go on break. 18 Do you have any specific questions about 19 procedure or -- 20 A I sometimes use hearing aids, and I'm not 21 wearing them today because they are uncomfortable to 22 wear for an extended period of time.	11 1 (Ward Deposition Exhibit No. 1003 2 was identified for the record.) 3 BY MR. MEYER: 4 Q Could you please -- and this is actually 5 the same as the hard copy of your declaration. So 6 you can refer to that if it's easier, but could you 7 please look at the document that's marked -- it has 8 EX 1003 in the file name, and it should be your 9 declaration for this proceeding. 10 Let me know when you have that open. 11 A Yes, sir. 12 Q Are you familiar with Exhibit 1003? 13 A This appears to be a copy of my 14 declaration in this matter. 15 Q Could you please confirm -- so this is 16 the declaration submitted in connection with IPR 17 2024-00477? 18 A Right now I don't see the IPR number on 19 this copy. It does refer to patent 7,336,260. 20 Q Okay. Which is the patent at issue with 21 IPR 2024-00477? 22 MR. WICHMAN: Objection.
10 1 I think we're okay, but given that -- and 2 also, sometimes there's some audio distortion, and I 3 may need you to repeat a question. If you think I 4 may have misunderstood or misheard something, if you 5 could point that out, I'd greatly appreciate it. 6 Q I see. I would be happy to try to speak 7 as clearly as possible and repeat as necessary. Just 8 let me know. 9 A Speaking up probably won't help. 10 Enunciating clearly will. 11 Q Okay. I will do my best. 12 A I also had -- 13 Q Oh, go ahead. 14 A I also have a minor medical condition 15 that may mean I will need to take breaks more 16 frequently than someone else. 17 Q That's fine. Whatever you need is -- you 18 know, we will do. 19 Could you please go into the -- I believe 20 you had a folder of -- with several PDFs in it shared 21 with you on your computer? 22 A This here?	12 1 THE WITNESS: I would need to refer 2 to something else right here. It just 3 says case number TBD. 4 BY MR. MEYER: 5 Q Okay. But in any case, the declaration 6 Exhibit 1003 that you're looking at that relates to 7 the IPR of U.S. Patent 7,336,260? 8 A This appears to be my declaration about 9 the patent, yes. 10 Q Okay. How long did you spend preparing 11 this declaration? 12 A I think we started sometime last summer. 13 It was intermittent, and it was submitted at the 14 beginning -- toward the beginning of this year. 15 Q Let me direct you to Paragraph 20 of 16 Exhibit 1003, which is on Page 10 of 159. 17 Let me know when you're there. 18 A Yes, sir. 19 Q Do you see that this paragraph includes a 20 table that includes what I'll represent to you are 21 about 56 exhibits? 22 MR. WICHMAN: Objection.

13 1 THE WITNESS: I see the table, yes, 2 sir. 3 BY MR. MEYER: 4 Q And are these the only materials that you 5 relied on for your declaration? 6 A As I explain in Paragraph 20, it's also 7 based on my years of education, experience, research 8 and background in the fields I lay out here. 9 So it would have been other things that I 10 would have known that I would have used in preparing 11 this declaration. 12 (Ward Deposition Exhibit No. 1001 13 was identified for the record.) 14 BY MR. MEYER: 15 Q Okay. And do you see that exhibit -- the 16 table lists Exhibit 1001 as U.S. Patent No. 17 7,336,260? 18 A Yes, sir, I see that. 19 Q Were you familiar with Exhibit 1001 prior 20 to your work in this IPR? 21 A I have to check. I don't remember being 22 familiar with it offhand, but I keep a bibliography	15 1 that before, but, again, there is an extensive list 2 of materials that are listed in the bibliography that 3 I mentioned in the declaration. So it's possible I 4 may have seen some version of it before that. I may 5 have seen the patent before that. 6 Q And Komata, do you understand that to be 7 the name of one of the listed inventors of that 8 application? 9 A Without referring to it right now, sir, 10 that's my recollection. 11 Q And if we refer to this reference as 12 Komata, would that be okay? 13 A Yes. 14 Q And Komata is spelled K-O-M-A-T-A; is 15 that correct? 16 A That's what's listed here, sir, yes. 17 (Ward Deposition Exhibit No. 1007 18 was identified for the record.) 19 BY MR. MEYER: 20 Q Okay. And then there's an Exhibit 1007, 21 which is described as Japanese Unexamined Patent 22 Application Publication No. 11-212725, and then in
14 1 that's mentioned in this declaration, and I would 2 have to check to see whether, perhaps, it was 3 something I had looked at in the past. 4 Q That's the '260 patent, correct? 5 A Yes, sir. 6 Q So if we refer to the '260 patent, we'll 7 both understand that we're talking about Patent 8 7,336,260? 9 A Yes, sir. I'll accept that, yes, sir. 10 (Ward Deposition Exhibit No. 1005 11 was identified for the record.) 12 BY MR. MEYER: 13 Q And also, in the table, it lists an 14 Exhibit 1005, and it's described as the U.S. Patent 15 Application Publication No. 2001/0008849, and then in 16 parentheses and in quotation marks it says Komata. 17 Do you see that exhibit? 18 A Yes, I see that. I'm sorry. 19 Q Sorry. Go ahead. 20 Were you familiar with Exhibit 1005 prior 21 to your work in this IPR? 22 A I do not recall specifically going over	16 1 parentheses and then quotation marks, it says Tsuji, 2 answer via translation of same. 3 Do you see that exhibit listed? 4 A Yes, sir. 5 Q And, in your declaration, this exhibit is 6 sometimes referred to just as Tsuji; is that correct? 7 A That's my recollection, yes, sir. 8 Q Had you been familiar with this exhibit 9 prior to this IPR? 10 A I don't think I had seen this translation 11 before last summer. I'm not sure when I first saw 12 the translation. 13 Q And Tsuji is spelled T-S-U-J-I, correct? 14 A That's what's given here, sir. I have no 15 idea how it's spelled in Japanese. 16 (Ward Deposition Exhibit No. 1008 17 was identified for the record.) 18 BY MR. MEYER: 19 Q Sure. And then one more exhibit that 20 we'll look at. It's Exhibit 1008, and its 21 description is WO99/66997, and then in parentheses 22 and quotation marks, Rosenberg.

17 1 Do you see that one listed? 2 A Yes, sir. 3 Q Were you familiar with this application 4 prior to this IPR? 5 A Again, I don't remember off the top of my 6 head whether I had seen this or some other part -- 7 some other patent, perhaps, used the same 8 specification -- before working on this. 9 So it's possible I may have seen 10 something like it before. 11 Q And in your declaration, you sometimes 12 refer to Exhibit 1008 as just Rosenberg, correct? 13 A I believe so, yes, sir. 14 Q Did you perform a prior art search to 15 find Exhibits 1005, 1007 and 1008, or were they 16 provided to you? 17 MR. WICHMAN: Objection. Form. 18 THE WITNESS: I believe these may 19 have been provided to me. I did my own 20 prior art search, but I think these may 21 have been provided. 22 BY MR. MEYER:	19 1 question, please? 2 BY MR. MEYER: 3 Q In your previous response regarding 4 preparing for this deposition, you mentioned that you 5 looked at some documents; is that correct? 6 A Yes, sir. 7 Q And were those documents the documents 8 that are in -- listed in the table in Paragraph 20 of 9 your declaration for this deposition or for this IPR? 10 A I was also reviewing for another matter 11 that has some similarity and subject matter. So 12 there may have been documents from that. I'm not 13 sure how that specifically relates to your question. 14 Q Okay. So other than -- so I -- the other 15 proceeding that you're preparing for is it the 16 deposition that you are -- will be doing tomorrow 17 relating to another IPR? 18 A Yes. There was also some other things 19 that I was doing during that time period. 20 Q But for this deposition, were there any 21 specific documents, other than the ones listed in 22 Paragraph 20 of your declaration, that you reviewed
18 1 Q Okay. About how much time did you spend 2 preparing for this deposition? 3 A What should be included in the 4 preparation for the deposition? 5 Q Specific meetings or communications, 6 reading specific documents, that sort of thing and 7 specific in anticipation of this deposition? 8 MR. WICHMAN: Objection. 9 THE WITNESS: I don't recollect how 10 many hours it was that I spent preparing 11 for this. 12 There were some meetings with 13 counsel in a study I did on some of the 14 documents related to this in another 15 matter in the last two or three weeks. 16 BY MR. MEYER: 17 Q And when you just referred to documents, 18 are you referring to some or all of the documents 19 listed in the table in Paragraph 20 of your 20 declaration? 21 MR. WICHMAN: Objection. Form. 22 THE WITNESS: Could you repeat the	20 1 specifically for this deposition? 2 A Specific documents, none that I can 3 recall at the moment, sir. 4 Q Okay. Could you please go down to 5 Paragraph 45 on Page 21 of your declaration, and let 6 me know when you're there. 7 A Yes, sir. 8 Q So you see that this Paragraph 45 of your 9 declaration has a table that lists shorthand names of 10 the Komata, Tsuji and Rosenberg references? 11 A Yes, sir, I see that. 12 Q Now, we just talked about the exhibit 13 numbers, and I believe that the correct exhibit 14 numbers for Tsuji is Exhibit 1007, and the correct 15 exhibit number for Rosenberg is 1008; is that your 16 understanding? 17 A I'd want to check the exhibits, but I'll 18 accept that this could be a typo. Yes, sir. 19 Q Okay. I just wanted to make sure that 20 this is likely a typo, and that we're not talking 21 about some different Tsuji and Rosenberg documents, 22 but as far as you know, these are the same Tsuji and

21 1 Rosenberg references that we discussed a little bit 2 earlier? 3 A Yes, sir. Without checking, I'll accept 4 that. 5 Q All right. Could you now turn to Page 61 6 of your declaration. 7 A Excuse me. Could you say that number 8 again, please? 9 Q Sixty-one -- Page 61 of your declaration. 10 Okay. So do you see, just above Paragraph 133 of 11 your declaration, there is a graphic that has a label 12 Figure 2? 13 A Yes, sir. 14 Q And that's specifically Figure 2 of the 15 Komata reference, correct? 16 A I believe so, yes, sir. 17 Q Is it your understanding that the left 18 column that's labeled Pressure-Sense Value represents 19 zero to 255 possible Pressure-Sense Values? 20 A If you look at Paragraph 134, I state: 21 As Figure 2 illustrates, Komata teaches 256 different 22 pressure levels 0 to 255. Yes, sir.	23 1 A Sir, do you have a searchable copy of the 2 Komata reference? The one I have up here does not 3 appear to be word searchable. 4 Q That's the only one that I have 5 immediately available but -- unfortunately. Let me 6 just check. 7 Yeah, it doesn't appear to be word 8 searchable, but based on your understanding of 9 Komata, as you sit here now, does Figure 2 disclose 10 the Pressure-Sense Value zero to 255 must be detected 11 in order? 12 A Again, Paragraph 134 of Figure 2 13 illustrates sensing 256 different pressure levels and 14 generating 256 corresponding drive signals, and I see 15 nothing in the figure right now that would -- goes in 16 order. 17 Q Let's go to Paragraph 165 of your 18 declaration, which is on Page 75. I'm sorry. 166, 19 which is on Page 75. 20 Now, as I read this paragraph, it looks 21 like you're providing an example in the context of 22 Komata where there's additional Pressure-Sense Value
22 1 Q Okay. And also looking at Figure 2, in 2 the right-hand column that is titled drive signal, do 3 you understand these to be drive signals that 4 correspond to each of the pressure-sense values 5 listed in the column on the left-hand side? 6 A Again, looking at Paragraph 134, it goes 7 on to say: And generating 256 corresponding drive 8 signals (P0 to P255), yes, sir. 9 Q Now, a drive signal, as that term is used 10 here, is a signal that causes a force output; is that 11 correct? 12 A As I say in 134, the drive signals cause 13 the controllers to vibrate, and vibrate is a force, 14 yes, sir. 15 Q Now Figure 2 on Page 61 of your 16 declaration, does not disclose the Pressure-Sense 17 Value 0 to 255 must be detected in order, does it? 18 A The first part of your question I didn't 19 catch, sir. Could you repeat it. 20 Q Sure. So Figure 2 of Komata does not 21 disclose that the Pressure-Sense Values 0 through 255 22 must each be detected in order, correct?	24 1 1 and another digital Pressure-Sense Value 10; is 2 that accurate? 3 MR. WICHMAN: Objection. Form. 4 THE WITNESS: As it says here: As 5 an example, and as discussed for 6 limitation [1A], the CPU can detect 7 digital Pressure-Sense Value 1, 8 parentheses, "the first pressure". The 9 CPU can also detect Pressure-Sense Value 10 10, parentheses, "a second pressure", 11 when a user has pushed down -- button 221 12 down with greater pressure (i.e., either 13 farther down during a single contact with 14 a button or on a separate press of the 15 button), and it continues from there. 16 BY MR. MEYER: 17 Q Okay. And then in Paragraph 166, in the 18 second line where it says in quotations and in 19 italics "the first pressure", is "the first pressure" 20 there because you mean to show that it corresponds to 21 the term the first pressure recited in the claims of 22 the '260 patent?

25 1 A Can I look at the paper copy of the '260 2 patent? 3 Q Go ahead. Yeah, sure. Can you just 4 confirm that that version of the patent that you're 5 looking at in hard copy is a full and complete 6 version of the '260 patent? 7 A I believe it is. If you would like me to 8 compare it page by page, I will, but I believe it is. 9 Q Sure. Your confirmation is enough for 10 me. 11 A Yes. I believe that's a reference to -- 12 a parenthetical reference to the first pressure in 13 Limitation 1A. 14 Q And in the third line of Paragraph 166, 15 digital Pressure-Sense Value 10 has a parenthetical 16 after it with a "second pressure" in italics and 17 quotation marks, and my question is: Is a second 18 pressure meant to show that digital Pressure-Sense 19 Value 10 is the same as or equivalent to or meets the 20 term "the second pressure" or a second pressure in 21 the claims of the '260 patent? 22 MR. WICHMAN: Objection. Form.	27 1 digital Pressure-Sense Value 1? 2 A For the purposes of this example, that 3 was what is intended in this example, but I do not 4 see that the table necessarily places an order on 5 that values. The table just says that there are 6 pressure values. 7 Q Okay. So there could be an example -- 8 no, strike that. 9 Please go to Paragraph 175 at the bottom 10 of Page 78 of your declaration. 11 Now, here it looks like you've given 12 another example that is similar to the last one 13 because it has -- that we discussed with reference to 14 Paragraph 166 because it, again, mentions a 15 Pressure-Sense Value 1 and a Pressure-Sense Value 10, 16 but you now it adds a Pressure-Sense -- a digital 17 Pressure-Sense Value 100. 18 Is that an accurate view of -- or an 19 accurate description of the example provided in 20 Paragraph 175? 21 MR. WICHMAN: Objection. Form. 22 THE WITNESS: Could you repeat the
26 1 THE WITNESS: As it says in -- at 2 Paragraph 166, it says: As an example. 3 This is intended as an example, sir. Not 4 exact correspondence. 5 BY MR. MEYER: 6 Q Is it your view that digital 7 Pressure-Sense Value 10 is -- has a greater pressure 8 than digital Pressure-Sense Value 1? 9 MR. WICHMAN: Objection. Form. 10 BY MR. MEYER: 11 Q If you'll let me withdraw that question, 12 and I'll ask you a couple simpler ones. 13 So digital Pressure-Sense Value 1 would 14 correspond to a specific pressure, correct? 15 A Yes, sir. 16 Q And, likewise, digital Pressure-Sense 17 Value 10 would also correspond to a specific 18 pressure, correct? 19 A Yes, a small range of pressures. 20 Q And is it your understanding that the 21 pressure represented by digital Pressure-Sense Value 22 10 would be greater than the pressure represented by	28 1 question, please, sir? 2 BY MR. MEYER: 3 Q Sure. So let me rephrase it. So 4 Paragraph 175 of your declaration it has -- it 5 describes another example involving digital 6 Pressure-Sense Values, correct? 7 A Yeah, another or further examples, yes. 8 Q And like the example discussed in 9 Paragraph 166, the example in 175 involves a digital 10 Pressure-Sense Value 1 and a digital Pressure-Sense 11 Value 10, correct? 12 A Yes, sir. 13 Q And -- but the example in Paragraph 175 14 also adds a digital Pressure-Sense Value 100, 15 correct? 16 A Paragraph 175, yes, sir, that's here. 17 Q And digital Pressure-Sense Value 100 18 would correspond to a specific pressure; is that 19 correct? 20 A I believe that's a fair description of 21 the table, yes, sir. 22 Q Is the pressure that corresponds to

29 1 digital Pressure-Sense Value 100 greater than the 2 pressure that corresponds to digital Pressure-Sense 3 Value 10 in the example at Paragraph 175? 4 A In this example, yes, sir. 5 Q And in this example at Paragraph 175, is 6 digital Pressure-Sense Value 10 -- sorry. Let me 7 withdraw that question. 8 In the example at Paragraph 175, is the 9 pressure that corresponds to digital Pressure-Sense 10 Value 10 meant to be greater than the pressure 11 represented by digital Pressure-Sense Value 1? 12 A In this example, yes, sir, I believe so. 13 Q Does Komata disclose that its processor 14 must detect either digital Pressure-Sense Values 1 or 15 10 before detecting digital Pressure-Sense Value 100? 16 A Again, this appears not to be a 17 searchable copy of Komata, and I think you said you 18 have word searchable copies? 19 Q Correct. 20 A All right. 21 MR. WICHMAN: Sorry, Mr. Meyer, is 22 there a question pending?	31 1 (Brief pause.) 2 THE WITNESS: Mr. Meyer, could we 3 go back to the previous questions? I 4 want to make sure I didn't mishear 5 something. 6 BY MR. MEYER: 7 Q Go back to all of the previous questions 8 or -- 9 A No. I think it's just the previous one 10 10 or two, if they could just be read back. 11 MR. MEYER: Ms. Page, could you 12 please read back the last two questions 13 that I asked Mr. Ward. 14 (The last two questions were read back into the 15 record as follows: 16 THE COURT REPORTER: I'm going to 17 start with the first of the last two, and 18 that question is: 19 Well, Mr. Wichman asked Mr. Meyer: 20 MR. WICHMAN: Is there a question 21 pending? 22 MR. MEYER: Yes, and I thought that
30 1 BY MR. MEYER: 2 Q Yes, and I thought that Mr. Ward was 3 trying to determine if the processor of Komata must 4 detect either digital Pressure-Sense Values 1 or 10 5 before detecting digital Pressure-Sense Value 100? 6 A If that is the question before me, I 7 don't see that right now, sir. 8 Is there something you want to draw my 9 attention to? 10 Q No. My question is just based on your 11 understanding of Komata as you're sitting here now. 12 Okay. Let's go to a new exhibit, which 13 is Exhibit 1007, and let me know once you have that 14 open. 15 A Yes, sir. 16 THE WITNESS: Before you ask your 17 question, could we take a short break? 18 MR. MEYER: Absolutely. How long 19 do you need? 20 THE WITNESS: Just a few minutes. 21 MR. MEYER: Okay. That's fine. 22 Let's go off the record.	32 1 Mr. Ward was trying to determine if the 2 processor of Komata must detect either 3 digital Pressure-Sense Values 1 or 10 4 before detecting digital Pressure-Sense 5 Value 100?) 6 THE COURT REPORTER: Do you want me 7 to read the answer, or do you want me to 8 just go to the next question? 9 THE WITNESS: I think it's just 10 that. It's just that it could -- can 11 detect in that order, but it did not. 12 I just wanted to make sure that I 13 understood the question to include the 14 word must. 15 BY MR. MEYER: 16 Q So you -- did you need Ms. Page to read 17 the other question to you, or does that cover what 18 you were concerned about? 19 A Sure. She can read it just to be sure. 20 (The requested question was read back into the record 21 as follows: 22 Q No. My question is just based on your

33 1 understanding of Komata as you're sitting here now. 2 Okay. Let's go to a new exhibit, which 3 is Exhibit 1007, and let me know once you have that 4 open.) 5 BY MR. MEYER: 6 Q Oh, okay. Mr. Ward, before we go onto 7 Exhibit 1007, going back to Komata for a little bit, 8 I think -- let me know if this is correct. 9 But I think you just said that Komata or 10 that the invention of Komata could detect 11 Pressure-Sense Value 1 and 10 before it detects 12 Pressure-Sense Value 100; is that correct? 13 A Yes. Yes, sir, I believe that's a fair 14 statement. 15 Q Does it expressly disclose detecting the 16 digital Pressure-Sense Values in that order? 17 A I believe that is how I -- 18 Excuse me. Before I respond, could I 19 have the question read back to me, please. 20 MR. MEYER: Could you please read 21 it back, Ms. Page? 22 THE COURT REPORTER: Yes.	35 1 be happy to take a closer look for you. 2 Q That's fine. Let's instead move on to 3 Exhibit 1007, which is the Tsuji reference. 4 Okay, and then you discuss the Tsuji 5 reference in your declaration, correct? 6 A I believe so, yes, sir. 7 Q Okay. If we go to Paragraph 252 at the 8 top of Page 110 of your declaration, let me know when 9 you are at that paragraph. 10 A Yes, I am. 11 Q Okay. And this paragraph is discussing 12 the Tsuji reference, right? 13 A Yes, sir, that's what I see here. 14 Q And Paragraph 252 is discussing Figure 13 15 of Tsuji; is that correct? 16 A Yes, sir, with annotations added. 17 Q Now did you add those annotations? 18 A Yes, sir, I believe I did, but -- that's 19 my recollection. 20 Q And the annotations you're referring to 21 are two red arrows and a red box around S11; is that 22 correct?
34 1 (The last question was read back into the record as 2 follows: 3 Q Does it expressly disclose detecting the 4 digital pressure-sense values in that order?) 5 THE WITNESS: I do not see here 6 where it expressly states those three 7 Pressure-Sense Values being detected in 8 that order, but I believe that is how a 9 person of ordinary skill in the art to 10 understand this device to work. 11 BY MR. MEYER: 12 Q But -- let me make sure I understand. 13 Komata itself does not expressly disclose that the 14 digital Pressure-Sense Values would be detected in 15 order of -- well, in any order, does it? 16 A I believe a person of ordinary skill in 17 the art reading this would believe that it could 18 detect them in any order. 19 Q But Komata doesn't disclose detecting the 20 pressure -- the digital Pressure-Sense Values in any 21 particular order, correct? 22 A I don't see that right now, sir, but I'd	36 1 A Yes, sir. 2 Q In Figure 13 of Tsuji, what do the -- 3 what do F1, F2, F3 and F4 in the top row mean? 4 A If I can refer you to Paragraph 249 -- 5 Q 249 of your declaration? 6 A Yes, sir. 7 Q Okay. 8 A And it says that Tsuji further explains 9 that the microcomputer compares the operating force F 10 to a "plurality of thresholds Fh1 through Fh4" to 11 determine whether the operating force, parentheses, 12 (i.e., the pressure exerted on the piezoelectric 13 elements) falls into one of five "force 14 classifications": F0 through F4, and it continues 15 from there. 16 Q So is it your understanding that F1, F2, 17 F3, and F4 represent force values? 18 A Continuing in that paragraph of my 19 declaration, 249, it says: As shown in Tsuji's 20 Figure 11 (below), the force classifications go up as 21 the amount of force (i.e., pressure) increases with 22 F0 being the lowest classification and F4 being the

37 1 highest classification, and then there's the 2 reproduction of Figure 11. 3 Q Going back to Figure 13 in Paragraph 252 4 of your declaration, what -- in the left-hand column, 5 what do R1, R2 and so on represent? 6 A I believe the -- this may be covered in 7 my declaration in Paragraph 245 where it says: 8 Specifically, both, parentheses, (a) Tsuji's overall 9 display device 100 and also (b) its operating 10 regions, parentheses, (e.g., R1-R7 for the ATM 11 embodiment and R1-R4 for its gaming-system 12 embodiment) are "input devices" because each is used 13 to interact with an electronic device. 14 It continues: Tsuji at [0046] (clicking 15 the "Deposit" region "notifies the bank host 16 computer" that the user wants to deposit money), 17 citing to Paragraph 46: ("Regions R1 through R7, 18 ellipses, serve as operating regions for bank 19 users.") 20 It goes on to cite Paragraph 145 through 21 147 (game device operator "performs operations by 22 pressing these operating regions R1 through R4").	39 1 Figure 14, depicts exemplary drive modes, 2 each providing a different form of 3 vibration, and it states that the 4 vibration provides, quote, "a tactile 5 action intended to notify the operator 6 that the operation was received." 7 BY MR. MEYER: 8 Q Okay. Figure 13 doesn't show that Tsuji 9 requires the forces to be -- to be detected in order 10 of magnitude, correct? 11 A I do not see that Figure 13 in itself 12 states an order of detection. Is there any 13 particular order or any other order. 14 Q And Tsuji, in general, doesn't require 15 forces to be detected in any particular order, does 16 it? 17 MR. WICHMAN: Objection. Form. 18 BY MR. MEYER: 19 Q Mr. Ward, you've probably already 20 determined this, but if it helps, it looks like this 21 version of the Tsuji reference is word searchable. 22 A Can I have the question read back to me
38 1 Q Okay. So let me see if I -- based on 2 what you've told me about F1 through F4 and R1, R2, 3 et cetera, in Figure 13 of Tsuji, is this table 4 showing that when a force corresponding with F1 is 5 detected in operating region one it results in a 6 signal S11? Is that accurate? 7 A Yes, sir. That's in -- if you look at 8 paragraph, for example, 235 in my declaration, it 9 says: For example, if "force classification" F1 were 10 detected in region R1, then signal S11 would be 11 selected and define a drive mode to drive the 12 piezoelectric elements. 13 Q And signal S11 would then cause some 14 feedback effect? 15 MR. WICHMAN: Objection. Form. 16 THE WITNESS: I can refer you to a 17 discussion, for example, starting at 18 Paragraph 235, which I just read. It 19 says: Signal 11 would be selected and 20 define a drive mode to drive the 21 piezoelectric elements. Citation to 22 Tsuji. Continuing in 236, referring to	40 1 please before I respond. 2 Q Sure. The disclosure of Tsuji, in 3 general, doesn't require that the forces must be 4 detected in any particular order, does it? 5 MR. WICHMAN: Objection. Form. 6 THE WITNESS: I don't see that 7 right now, no, sir. 8 BY MR. MEYER: 9 Q Thank you. Let's move on. We'll still 10 be talking about your declaration, but now we'll be 11 talking about Exhibit 1008, which is the Rosenberg 12 reference. 13 THE WITNESS: Yes, but could we 14 also take -- again, take another very 15 short break? 16 MR. MEYER: Yes, that's fine. 17 Let's go off the record. 18 (Brief pause.) 19 BY MR. MEYER: 20 Q Okay. So the next exhibit I'd like us to 21 look at is Exhibit 1008, which is the Rosenberg 22 reference. Let me know if you have that up.

41 1 A Yes, I do. 2 Q And going to your declaration at 3 Paragraph 309. 4 A I apologize. The mouse seems to be 5 skipping on the table surface here. 6 Q I can wait a little bit. 7 A Paragraph 309, yes, sir. 8 Q Yes, sir. And Paragraph 309 discusses 9 the Rosenberg reference, correct? 10 A Yes, sir. I believe so. 11 Q Now according to 309, it says: Rosenberg 12 discloses a mouse with pressure-sensitive buttons, 13 and then it has more language. 14 So is it fair to say that this embodiment 15 of Rosenberg discussed in 309 is, like, a computer 16 mouse? 17 A That's a fair statement, yes, sir. 18 Q And would it be a mouse with two buttons 19 or -- 20 A In Paragraph 309, in the last sentence, 21 it says: An exemplary mouse with two buttons (316a, 22 316b) and an actuator (318) is shown below in Figure	43 1 Q Okay. Well, let's go to Paragraph 310 of 2 your declaration, and do you see the first sentence 3 of Paragraph 310 says: As with a conventional mouse, 4 a user pushes button 316a (or 316b) "down (in the 5 degree of freedom of the button approximately along 6 axis Z) toward actuator 318 to provide a command for 7 the computer," for example, to select an item. 8 Did I read that correctly? 9 A Yes, sir. 10 Q What do you mean by a conventional mouse 11 in that paragraph? 12 A Sorry. I'd just like to note. There 13 seems to be a problem with word searching on this 14 copy of the Rosenberg reference. The searching is 15 not returning exactly on the text that is searched 16 for. 17 Can I have the question read back to me, 18 please. 19 Q Yeah, so in Paragraph 310, you started 20 that paragraph with: As with a conventional mouse, 21 and the question is: What do you mean by the phrase 22 conventional mouse in that paragraph?
42 1 8 from Rosenberg. 2 Q Now, take a look at the first page, the 3 cover page of Rosenberg, and do you see that it 4 lists -- there's a section that says priority data? 5 A Yes, sir. 6 Q And do you see that the earliest date for 7 the priority data is June 23rd, 1998? 8 A Yes, sir, I see that. 9 Q And then the filing date of this 10 application is June 22nd or the -- I'm sorry. The 11 international filing date for this reference is 12 June 22, 1999; is that correct? 13 A Yes, sir. It lists it, in your form, 14 with the dates first, but yes, sir. 15 Q Right. So are we talking about a mouse 16 from the 1998/1999 time period? 17 MR. WICHMAN: Objection. Form. 18 THE WITNESS: I can check, but I 19 don't recollect that they cited a 20 particular model of mouse from that time 21 frame. 22 BY MR. MEYER:	44 1 A A mouse that would have been conventional 2 at the time of this -- this reference. 3 Q And the time of this reference, depending 4 on the filing date and priority date used, would be 5 in 1998 or 1999, correct? 6 A Approximately that, yes, sir. 7 Q So we're talking about a conventional 8 mouse from 1998 or 1999, that time period? 9 A Yes, sir. 10 Q Also, in that sentence or in the first 11 sentence of Paragraph 310, that sentence ends: For 12 example, to select an item. In that sentence, 13 what -- what is -- what do you refer to by the word 14 "item"? 15 A I would refer to graphical objects or 16 information in a graphical user interface or in a 17 text user interface. 18 Q So would -- would an icon representing a 19 computer application, for example, qualify as an item 20 in that context? 21 MR. WICHMAN: Objection. Form. 22 THE WITNESS: To the extent that

45 1 the icon is understood as a graphical 2 object, yes, sir. 3 BY MR. MEYER: 4 Q And with a conventional mouse, do you 5 press down on the -- on a button to select an item? 6 MR. WICHMAN: Objection. Form. 7 THE WITNESS: I believe at the time 8 that that -- my recollection is that 9 would have depended on the particular 10 user interface you were using. The 11 selection could be done by pressing down. 12 A selection could also be done by a brief 13 click, which involves a press but the 14 button is not held down. A selection 15 could also be based on a dwell. 16 BY MR. MEYER: 17 Q So you used a few terms there. 18 What was the last thing that you said? 19 It could be done how? 20 A Dwell. 21 Q Dwell, and what does that mean? 22 A One use of the word is that you point by	47 1 THE COURT REPORTER: Sure. Yes, 2 one moment. 3 His answer -- yeah, do you want the 4 question or the answer? 5 MR. MEYER: Let's have both so we 6 have the whole context. 7 (The last two questions were read back into the 8 record as follows: 9 BY MR. MEYER: 10 Q And with a conventional mouse, do you 11 press down on the -- on a button to select an item? 12 MR. WICHMAN: Objection. Form. 13 THE WITNESS: I believe at the time 14 that that -- my recollection is that 15 would have depended on the particular 16 user interface you were using. The 17 selection could be done by pressing down. 18 A selection could also be done by a brief 19 click, which involves a press but the 20 button is not held down. A selection 21 could also be based on a dwell.) 22 MR. MEYER: Mr. Ward, is that the
46 1 some means to something for a period of time. That 2 is used in a particularly user interface to enact the 3 selection. 4 Q Okay. And you also used the term -- you 5 talked about pressing a button, but then you also 6 talked about clicking a button. 7 What is the difference between clicking a 8 button and pressing a button on a mouse? 9 A Your question broke up in the middle 10 there, sir. Could you repeat it? 11 Q Sure. You also referred to pressing a 12 button or clicking a mouse button, and what I want -- 13 what I wanted to know is what is the difference 14 between pressing a mountain -- or pressing a mouse 15 button and clicking a mouse button? 16 A I believe I may have answered that in 17 responding to the previous question, a recent 18 previous question. 19 Could I have that answer read back to me, 20 please. 21 MR. MEYER: Ms. Page, are you able 22 to read his answer back?	48 1 previous answer that you were looking 2 for? 3 THE WITNESS: Yes, sir. 4 BY MR. MEYER: 5 Q So let me know if I understand this 6 correctly. As you described it in the context of a 7 conventional mouse, a button press is holding the -- 8 Just to make sure I understand. When 9 you're describing pressing a mouse button, you were 10 distinguishing between pressing and holding it down 11 and clicking, which would be pressing but not holding 12 it down; is that correct? 13 A Not holding down for very long, yes, sir. 14 MR. MEYER: Why don't we stop there 15 before going onto another question and 16 break for lunch and then meet back, say, 17 at 12:40. 18 Would that work for Counsel and 19 Mr. Ward? 20 MR. WICHMAN: 12:40, that works for 21 Valve, yes. 22 MR. MEYER: Okay.

49 1 (Lunch recess.) 2 BY MR. MEYER: 3 Q Mr. Ward, we just broke for lunch, but do 4 you understand that you're still under oath? 5 A Affirmation, yes, sir. 6 Q And when you say affirmation, is -- I 7 guess I'm -- you're understanding that you are under 8 oath; is that correct? 9 A It's a matter of personal faith, sir. I 10 would prefer to state that I affirm rather than state 11 that I make an oath. 12 Q Okay. Let's continue on with talking 13 about your declaration and within Rosenberg, and do 14 you remember we were talking about a particular 15 embodiment of Rosenberg that is -- it's like a sort 16 of conventional two-button mouse from 1998, slash, 17 1999. 18 Do you remember that's what we were 19 discussing? 20 MR. WICHMAN: Objection. 21 THE WITNESS: I remember we were 22 discussing things like a conventional	51 1 say that there would be pressure. There would be 2 hemisphere pressure on the button. There would be 3 weight of the button itself pressing on whatever 4 part -- portion of the mouse is alone, but if you're 5 saying that, when one is not pressing with a finger, 6 there is no pressing from a finger -- no pressure 7 from the finger, that may be a fair characterization, 8 yes, sir. 9 Q And before the button is even pressed, 10 would a mouse detect any pressure on the button? 11 A That would depend on the calibration of 12 whatever sensor you're using to detect force or 13 pressure, sir. 14 Q But before you touch it, would it be fair 15 to say that -- would it be accurate to say, rather, 16 that the mouse would not be registering any pressure 17 from your finger or some other object you're using to 18 press the button? 19 A I think, in part of your question, you 20 said finger and, in part of your question, you said 21 finger or other object, if you could just rephrase it 22 to be a little more clear.
50 1 mouse, yes, sir. 2 BY MR. MEYER: 3 Q Sure. So when you have a mouse with, you 4 know, one or two buttons, there's -- is -- would it 5 be correct to say that there's -- the button is at a 6 rest position before you press down on it? 7 MR. WICHMAN: Objection. Form. 8 THE WITNESS: I would assume it's 9 at some position, sir. 10 BY MR. MEYER: 11 Q Okay. Well, when you're -- if you are 12 not -- if your finger is not even in contact with the 13 button and you're not contacting the button with 14 anything else, would there be zero pressure on the 15 button? 16 A Could I hear that question again, please, 17 exactly how it's phrased. 18 Q Sure. And maybe I can try to be clearer. 19 Before you contact a mouse button with 20 your finger or some other object, would the amount of 21 pressure on the mouse button be zero? 22 A Typically speaking, I suppose you could	52 1 Q Sure. So in talking about -- about a 2 mouse, typically a user would use their finger to 3 press on the mouse, correct? 4 A That's probably how most people would use 5 a mouse, yes. 6 Q But one could use some other object like 7 a pencil or a pointer or a book or whatever to press 8 on an object -- on the mouse button, as well, right? 9 A Yes, sir. 10 Q And before a user presses on the mouse 11 button with their finger or anything else, the mouse 12 would not be detecting pressure from a press, 13 correct? 14 MR. WICHMAN: Objection. Form. 15 THE WITNESS: It would not be -- if 16 it's before a finger or other object is 17 even in contact with the button, it would 18 be fair to say it's not detecting any 19 pressure from the finger or other object. 20 BY MR. MEYER: 21 Q Does Rosenberg disclose that the mouse 22 provides a tactile sensation before a user presses

53 1 the button? 2 MR. WICHMAN: Objection. Form. 3 THE WITNESS: Again, there's a -- 4 seems to be a problem with word searching 5 this copy of Rosenberg. 6 So you have to bear with me a 7 little bit. 8 BY MR. MEYER: 9 Q Sure. 10 A Repeat the question before I continue. 11 Q Right. Does Rosenberg disclose providing 12 a tactile sensation -- let me start over. I'll 13 withdraw that. 14 Does Rosenberg disclose that its mouse 15 button -- or its mouse embodiment detects a -- or 16 provides a tactile sensation before a user even 17 presses the mouse button? 18 MR. WICHMAN: Objection. Form. 19 THE WITNESS: Could I hear the 20 question one more time, please. 21 BY MR. MEYER: 22 Q Sure, and I'll try to be a little bit	55 1 THE WITNESS: Could you rephrase 2 the question, sir? 3 BY MR. MEYER: 4 Q Does the two-button mouse embodiment of 5 Rosenberg that we've been discussing provide a 6 tactile sensation when a user presses down on the 7 button, on the mouse button? 8 MR. WICHMAN: Objection. Form. 9 THE WITNESS: If I can refer you, 10 for example, to Paragraph 329 in my 11 declaration. 12 Before I continue, could I have 13 your last rephrased question read back, 14 please. 15 MR. MEYER: Ms. Page, could you ask 16 the last question or repeat the last 17 question that I asked Mr. Ward. 18 (The last question was read back into the record as 19 follows: 20 Q (Does the two-button mouse embodiment of 21 Rosenberg that we've been discussing provide a 22 tactile sensation when a user presses down on the
54 1 clearer. 2 With respect to the two-button mouse 3 embodiment described by Rosenberg, Rosenberg doesn't 4 disclose providing a tactile sensation before one 5 even touches the button, does it? 6 MR. WICHMAN: Objection. Form. 7 BY MR. MEYER: 8 Q Mr. Ward, it's possible that -- oh, go 9 ahead. 10 A It's difficult searching this document. 11 So -- 12 Q Sure. It's possible -- oh, go ahead. 13 A No, you first. 14 Q It's possible that I've asked this 15 question in a way that makes it -- in a way that 16 makes it sound more complicated than it is. 17 My understanding of this Rosenberg 18 two-button mouse embodiment is that pressing the 19 mouse button at some point gives the user a feedback 20 sensation; is that your understanding? 21 MR. WICHMAN: Objection. Form. 22 Calls for speculation.	56 1 button, on the mouse button?) 2 MR. WICHMAN: Objection. Form. 3 THE WITNESS: To the extent that I 4 understand the question, I believe one 5 place that it's discussed is at Paragraph 6 329 in my declaration. 7 BY MR. MEYER: 8 Q Okay. 9 A It says: Rosenberg's mouse include, 10 quote, an "actuator 318 which is operative to produce 11 forces on one or more buttons of the mouse, 12 parentheses, (emphasis added) for example, button 13 316a, and it goes on to state: The "force 14 sensations", in quotes, that the actuator produces 15 are "tactile sensations". 16 Q My question is: Does Rosenberg disclose 17 that these force sensations or tactile sensations are 18 caused by a user pressing the mouse button? 19 A One place in my declaration I might refer 20 you to is the next paragraph. I believe it's the 21 next paragraph, 330, where it states: Rosenberg 22 teaches that the force sensation(s) the actuator

57 1 produces on button 316a is -- are -- maybe it's a 2 grammatical error. I apologize -- "based on" the 3 "position of the button". He goes on to say: ("the 4 output force is dependent, at least in part, on said 5 position of said button in said degree of freedom"). 6 Q So is -- are you -- are you saying in 7 Paragraph 330 of your declaration that, for a mouse, 8 the position of the button changes or can change? 9 MR. WICHMAN: Objection. Form. 10 THE WITNESS: What I'm saying here 11 is that the force sensation is based on 12 the position of the button, and I go on 13 to say: ("that the output force is 14 dependent, at least in part, on said 15 position of said button in said degree of 16 freedom"). To -- 17 BY MR. MEYER: 18 Q And for -- go ahead. 19 A It says here that Rosenberg teaches, for 20 example, a force sensation that the actuator provides 21 that mimics or simulates a mechanical spring. He 22 goes on to state that -- explain that no physical	59 1 Rosenberg provide a tactile sensation? 2 MR. WICHMAN: Objection. Form. 3 THE WITNESS: In Rosenberg, at the 4 top of Page 2, this is one place in 5 Rosenberg. 6 BY MR. MEYER: 7 Q At the top of Page 2 of Rosenberg? 8 A Yes. In the copy I have here. 9 Q Okay. And was there more to your answer? 10 A It says: For example, when the user 11 moves the manipulatable object and causes a displayed 12 cursor to interact with a different displayed 13 graphical object, the computer can issue a command 14 that causes the actuator to output a force on the 15 physical object, conveying a feel sensation to the 16 user, and I note here that this is not -- it does not 17 state that the user must press on the button for the 18 object to convey a feel sensation to the user. 19 Q But in this -- in this example from 20 Rosenberg, the feedback is the result of the position 21 of the cursor on a graphical interface, not due to 22 any pressure on the button, correct?
58 1 spring is required because the, quote, ("spring 2 force" may be provided by the actuator "rather 3 than...by a mechanical spring"), and it goes on 4 saying that Rosenberg explains that: "The magnitude 5 of this force sensation is dependent on the distance 6 to the button from the origin of the spring". 7 Q Would -- in this example described in 8 Paragraph 330 of your declaration, would a user have 9 to press on the mouse button to change the position 10 of the button? 11 A I suppose there could be other ways a 12 user could change the position of a button. 13 Q Like how? 14 A Wack it down on a desk. 15 Q But the user has to do something to 16 change the position of the button, correct? 17 A If the user is changing the position of 18 the button, the user logically would have to do 19 something to change the position of the button, yes. 20 Q And so my question is: If -- in this 21 embodiment, if -- of Rosenberg, if the user hasn't 22 even touched the button with anything, would	60 1 A Can I have your previous question read 2 back to me? 3 Q The one I just asked? 4 A No, sir, the previous question. 5 Q Okay. 6 MR. MEYER: Ms. Page, could you 7 please -- my previous question to 8 Mr. Ward. 9 (The last question was read back into the record as 10 follows: 11 Q And so my question is: If -- in this 12 embodiment, if -- of Rosenberg, if the user hasn't 13 even touched the button with anything, would 14 Rosenberg provide a tactile sensation?) 15 THE WITNESS: If I can draw your 16 attention to the same spot in Rosenberg, 17 there -- I do not see a statement here 18 that the user needs to be touching the 19 button with the computer to issue the 20 command -- a command that causes the 21 actuator to output a force on the 22 physical object, conveying a feel

61 1 sensation to the user. 2 BY MR. MEYER: 3 Q So I think we're -- we're discussing two 4 different embodiments here, and the one I'm 5 discussing is where the mouse button provides 6 feedback in response to detecting a particular 7 position of the mouse button. 8 In the embodiment of Rosenberg that 9 involves detecting or providing feedback or a tactile 10 sensation based on the position of the mouse button, 11 it doesn't provide a tactile sensation if there is no 12 pressure detected on the mouse button, does it? 13 MR. WICHMAN: Objection. 14 THE WITNESS: The paragraph -- if 15 you back up on the paragraph I just 16 pointed to, does say that -- it says -- 17 this is around Line 32 on Page 1. It 18 says: The computer system controls 19 forces on the joystick or mouse in 20 conjunction and coordinated with 21 displayed events and interactions by 22 sending control signals or commands to	63 1 MR. WICHMAN: Objection. Form. 2 THE WITNESS: Could you rephrase 3 the question, sir? 4 BY MR. MEYER: 5 Q Okay. Let's focus on the -- the first 6 full sentence at the top of Page 2 of Rosenberg. It 7 says: For example, when the user moves the 8 manipulatable object and causes a displayed cursor to 9 interact with a different displayed graphical object, 10 the computer can issue a command to cause the 11 actuator to output a force on the physical object, 12 conveying a feel sensation to the user? 13 A Yes, sir, I believe you've read that 14 correctly. 15 Q Okay. 16 MR. WICHMAN: Wait for the 17 question. 18 BY MR. MEYER: 19 Q That would have been my question, but -- 20 so that's good, but my next question is: In that 21 embodiment of Rosenberg, is the mouse providing a 22 tactile sensation based on position of a cursor or is
62 1 the actuators. 2 A person of ordinary skill in the 3 art would understand, therefore, this 4 paragraph but also apply it to a mouse 5 which had force actuators under the 6 buttons. 7 BY MR. MEYER: 8 Q Can we agree that Rosenberg discloses 9 providing tactile sensations in response to at least 10 a couple different things, one of which is detecting 11 a particular position of the mouse button? 12 MR. WICHMAN: Objection. 13 THE WITNESS: Could you be more 14 specific, sir? 15 BY MR. MEYER: 16 Q So it looks to me like this paragraph 17 that runs from Page 1, Line 24 to Page 2, Line 4 is 18 disclosing providing a tactile sensation in response 19 to the position of the cursor on a graphical 20 interface. 21 Is that an accurate description of this 22 paragraph?	64 1 it detecting -- or is it providing a tactile 2 sensation based on the position of the mouse button? 3 MR. WICHMAN: Objection. Form. 4 THE WITNESS: What it says, for 5 example, when the user moves the 6 manipulatable object and causes a 7 displayed cursor to interact with a 8 different displayed graphical object, the 9 computer can issue a command which causes 10 the actuator to output a force on the 11 physical object, conveying a feel 12 sensation to the user. 13 A person of ordinary skill in the 14 art would understand that this is 15 providing an output force of a physical 16 object causing a feel sensation in a 17 circumstance that includes when the user 18 is not pressing the button, as you put 19 it. 20 BY MR. MEYER: 21 Q Okay. 22 A It states here -- I do not see where it

65 1 excludes also pressing a button. 2 Q Ah, okay. I think that answers my 3 question sufficiently. 4 A If you -- 5 Q Let's go to -- oh, go ahead. 6 A Excuse me. We're speaking over each 7 other. So -- 8 Q I think -- I think we both have a 9 tendency to pause when we're talking, and that's 10 causing us problems. So -- but I'll try not to 11 interrupt you, and did you finish your answer, or 12 should I go on to the next question? 13 A Just a moment, please. 14 I just would like to point out that the 15 sentence starts -- states -- that we've just been 16 talking about -- starts out for example, and this is 17 part of a discussion of a computer system controls 18 forces on the joystick or mouse in conjunction and 19 coordinated with displayed events and interactions, 20 and the sentence you're referring to is -- starts 21 with for example. 22 Q Okay. Let's move on from that topic, and	67 1 Paragraph 347 that starts on Page 145 of your report. 2 Let me know when you're looking at that paragraph. 3 A I believe it's called declaration in this 4 proceeding, but yes, sir. 5 Q Did I say report? Declaration is what I 6 meant. 7 Are you at Paragraph 347? 8 A Yes, sir. 9 Q Okay. So 347 continues on to Page 146, 10 and there -- do you see that there's a sentence that 11 starts at about the middle of the first line on Page 12 146, and it says: Rosenberg also refers to, quote, 13 "games or simulations where the mouse 312 is used as 14 the primary input device", end quote, in which a user 15 naturally would be pressing continually and varying 16 the pressure, while receiving tactile sensations, 17 such as outputting, quote, "vibration, ellipses, when 18 a user-controlled racing car is driving on a dirt 19 shoulder", end quote. 20 Do you see where it says that? 21 A Yes, sir. 22 Q And parts of that sentence are quoting
66 1 let's go to -- well, still -- still related to that 2 topic, but let's go to 347 of your declaration, which 3 starts on Page 145. 4 MR. WICHMAN: Do you mind before 5 we -- if we can take a break at some 6 point, maybe after this question? 7 THE WITNESS: I was about to ask 8 the same thing. 9 MR. MEYER: So I haven't asked a 10 question. 11 MR. WICHMAN: There's no question 12 pending. 13 MR. MEYER: We can take a break, 14 and then when we can come back, we can 15 talk about Paragraph 347. 16 MR. WICHMAN: So it's okay to break 17 now and come back in five minutes? 18 MR. MEYER: Yes, let's do that. 19 MR. WICHMAN: Thanks. 20 (Brief pause.) 21 BY MR. MEYER: 22 Q Okay. Returning to your declaration and	68 1 directly from a passage in Rosenberg, correct? 2 A I believe so, yes, sir. 3 Q Now, in the example from that sentence 4 where it talks about outputting vibration, dot, dot, 5 dot, when a user-controlled racing car is driving on 6 a dirt shoulder, in that example, the vibration is 7 provided because of the position of the racing car, 8 correct? 9 A I'm noticing there's a typo right here in 10 the question, and it's not my response to your 11 question. I'm just making a note. 12 Q Okay. What is the typo that you see? 13 A I think it says 28-20, and then it has 14 the larger line number first. 15 Q Oh, I see. It looks like it may be 16 quoting Page 31, Lines 28 to 35. 17 Would you agree with that? 18 A I think -- no, just a moment. Can I have 19 the question read back to me, please, before I 20 respond. 21 MR. MEYER: Ms. Page, could you 22 read back the last question that I asked

69 1 Mr. Ward, please. 2 (The last question was read back into the record as 3 follows: 4 Q Now, in the example from that sentence 5 where it talks about outputting vibration, dot, dot, 6 dot, when a user-controlled racing car is driving on 7 a dirt shoulder, in that example, the vibration is 8 provided because of the position of the racing car, 9 correct?) 10 THE WITNESS: Let me draw attention 11 to some of the context of that paragraph. 12 If you'll look up at Line 13, it says: 13 Further the output forces can depend on 14 the event or interaction in the graphical 15 environment. 16 Interactions in the graphical 17 environment could also -- would be 18 understood to include how hard someone is 19 pressing on the button to put force, and 20 it gives -- then in Line 28 it says: The 21 above-described force sensations can also 22 be used in games or simulations where the	71 1 interaction with the graphical environment, which 2 would include interacting by pressing the mouse -- 3 excuse me -- pressing the mouse button. 4 Q But in this specific example from the 5 sentence 29 to 31 on Page 31, the vibration is caused 6 by the race car driving on a dirt shoulder or 7 colliding with another object, correct? 8 A Yes, it does -- 9 MR. WICHMAN: Objection. Form. 10 THE WITNESS: Sorry. 11 MR. WICHMAN: Objection. Form. 12 THE WITNESS: Could you restate the 13 question, please? 14 As far as us talking over each 15 other, there's also a time delay on this 16 connection, which I believe is making the 17 situation even more pronounced. 18 BY MR. MEYER: 19 Q Okay. In the example given in the 20 sentence on Page 31 from Lines 29 to 31, the 21 vibration is output because of the car -- racing car 22 being on the dirt shoulder or the jolt is -- and the
70 1 mouse is used as the primary input 2 device. It gives an example: A 3 vibration can be output when a 4 user-controlled racing car is driving on 5 a dirt shoulder of a displayed road and a 6 jolt can be output when the car collides 7 with another object. 8 So, in this example, it is output 9 when a user-controlled racing car is 10 driving on a dirt shoulder of a displayed 11 road and a jolt can be output when the 12 car collides with another object. 13 That is the example given there, 14 yes, sir. 15 BY MR. MEYER: 16 Q And in that example, from Rosenberg that 17 you've just read, it doesn't say that the vibration 18 is also caused by the position of the mouse button, 19 does it? 20 A In that paragraph, it says what it says. 21 In the context of that paragraph, it says the 22 magnitude of output forces can depend on the event or	72 1 jolt is caused by a car colliding with another 2 object; is that correct? 3 MR. WICHMAN: Objection. Form. 4 THE WITNESS: That's not quite what 5 it says, sir. 6 BY MR. MEYER: 7 Q In that example, does it say that the 8 vibration is caused by anything other than the racing 9 car being on the dirt shoulder or colliding with 10 another object? 11 A It says, for example, a vibration can be 12 output, and it says a jolt can be output when the car 13 collides with another object. Those are examples. 14 Q On Exhibit 1008, could you -- that's 15 Rosenberg that we've been looking at -- could you 16 please go to Page 19, and let me know when you're 17 there. 18 A Yes, sir. 19 Q Okay. So starting at Line 36, I'm going 20 to read two sentences. The jolts and vibrations -- 21 and here they are: The jolts and vibrations can 22 indicate various features of the graphical

73 1 environment on the host computer to the user. For 2 example, a vibration can be output while a 3 user-controlled cursor is positioned inside the 4 boundary of an icon or other graphical object in a 5 graphical user interface. 6 Do you see those two sentences on Pages 7 19 and 20 of Rosenberg? 8 A Yes, sir. 9 Q Now, in that example, the jolts and 10 vibrations are based on the graphical environment 11 of -- on a host computer, not the position of the 12 mouse button, correct? 13 A What I see it says: For example, a 14 vibration can be output while a user-controlled 15 cursor is positioned inside the boundary of an icon 16 or other graphical object in a graphical user 17 interface. Among other things, that would -- but 18 it's stating here is it controls whether the 19 vibration is output. The vibration could -- it does 20 not say that other aspects of the vibration must be 21 controlled only by the position. 22 Q But the only thing here that is -- it's	75 1 be rephrased, for example, so that it's 2 not phrased in a negative because that 3 can be quite confusing. 4 BY MR. MEYER: 5 Q Okay. These two -- the example described 6 in these two sentences is the vibration provided 7 based on position in a virtual space? 8 MR. WICHMAN: Objection. Form. 9 THE WITNESS: I do not see the 10 words virtual space in here at the 11 moment, sir. 12 Could you point them out to me? 13 BY MR. MEYER: 14 Q Let's use the word graphical user 15 interface instead. 16 Don't these sentences describe an example 17 where a vibration is output based on position in a 18 graphical user interface? 19 A That's phrased in the negative. Could 20 you -- just to speed -- move things along, could you 21 please rephrase it without phrasing it in the 22 negative?
74 1 attributing vibration to in these two sentences is 2 the graphical environment of the host computer and 3 the position of the cursor, correct? 4 MR. WICHMAN: Objection. Form. 5 THE WITNESS: I believe you may be 6 misquoting this part of the spec here. 7 Could you rephrase the question? 8 BY MR. MEYER: 9 Q So I see this says: The jolts and 10 vibrations can indicate various features of the 11 graphic environment -- graphical environment on the 12 host computer to the user. Second sentence: For 13 example, a vibration can be output while a 14 user-controlled cursor is positioned inside the 15 boundary of an icon or other graphical object in a 16 graphical user interface. 17 In these -- the example described in 18 these two sentences, isn't it true that the vibration 19 is delivered based on position in a virtual space 20 rather than the position of the mouse button? 21 MR. WICHMAN: Objection. Form. 22 THE WITNESS: Could that question	76 1 Q In these two sentences -- let me back up. 2 Does the example described in these two 3 sentences state that vibration is provided based on 4 position in a graphical environment? 5 A It says: A vibration can be output while 6 a user cursor -- user-controlled cursor is positioned 7 inside the boundary of an icon or other graphical 8 object in a graphical user interface. It says that 9 the output of the vibration can be output -- can be 10 controlled. That's what it says, sir, yes. 11 Q And these two sentences don't -- don't 12 say anything specific about pressing a mouse button, 13 do they? 14 A It says nothing either way. It does not 15 say it is. It does not say it may not be. 16 Q Those two sentences don't say anything 17 about providing vibrations in response to detecting a 18 pressure on a mouse button, do they? 19 A I do not see that here, sir, no. 20 Q Okay. Let's now talk about Exhibit 1001, 21 which is the '260 patent at issue in this IPR. 22 Now referring back to your --

77 1 A Did you say Exhibit 2001? 2 Q No, 1001. 3 A Sorry. I misheard you. 4 Q Okay. Let's go to the relevant section 5 of your declaration, specifically Paragraph 109 of 6 your declaration, and let me know when you're there. 7 A Yes, sir. 8 Q So Paragraph 109 of your declaration 9 contains a reproduction of Claim 1 of the '260 patent 10 with some labels added, correct? 11 A Yes, sir. 12 Q And the labels are for the preamble and 13 each limitation of Claim 1, right? 14 A I believe so, yes, sir. 15 Q Okay. Now, looking at Limitation 1A, 16 detect a first pressure on a first input device, you 17 see that it recites the term a first pressure? 18 A Yes, sir. 19 Q And looking at Limitations B and C, do 20 you see that they both have -- recite the elements 21 the first pressure? 22 A Yes, sir.	79 1 could I have the question read back to 2 me, please, before I respond? 3 MR. MEYER: Sure. 4 Ms. Page, could you please repeat 5 the question that I had just asked 6 Mr. Ward. 7 (The last question was read back into the record as 8 follows: 9 Q Is it your understanding that the 10 actuators disclosed in the '260 patent cause 11 vibrations?) 12 MR. WICHMAN: Objection. Form. 13 THE WITNESS: I believe the '260 14 patent discloses multiple kinds of 15 actuators, sir. 16 They give -- some of the examples 17 they give are for actuators that produce 18 vibrations. 19 Could you rephrase the question? 20 BY MR. MEYER: 21 Q Well, I think you've answered that 22 question, but I have a related question.
78 1 Q Is it your understanding that the term 2 the first pressure in Limitations 1B and 1C refer to 3 the element a first pressure from Limitation 1A? 4 A That's the antecedent, yes, sir. 5 Q Okay. Now, let's go to Paragraph 92 of 6 your declaration at the top of Page 42. 7 Do you see that the first sentence of 8 Paragraph 92 says: In addition to providing control 9 signals to an electronic device, the detected 10 pressure levels are also used to provide tactile 11 feedback in the form of vibrations to the user? 12 A Yes, sir, I see that. 13 Q Okay, and then in Paragraph 93, do you 14 see that the first sentence says: The signal sent to 15 the actuator 61 are called "output control signals", 16 and they cause the actuator to vibrate? 17 A Yes, sir, I see that. 18 Q Is it your understanding that the 19 actuators disclosed in the '260 patent cause 20 vibrations? 21 MR. WICHMAN: Objection. Form. 22 THE WITNESS: Could you please --	80 1 In fact, the only type of tactile 2 sensations described as suitable in the '260 patent 3 are vibrations, correct? 4 MR. WICHMAN: Objection. Form. 5 THE WITNESS: Could you repeat the 6 question, please, before I respond? 7 BY MR. MEYER: 8 Q Isn't it true -- 9 MR. MEYER: Oh, I'm sorry. Were 10 you about to say something, Adam? 11 THE WITNESS: Or have it read back. 12 BY MR. MEYER: 13 Q I can just repeat it. 14 The only type of tactile sensations 15 described as suitable in the '260 patent are 16 vibrations, correct? 17 MR. WICHMAN: Objection. Form. 18 THE WITNESS: I don't believe I 19 find any such statement here in the 20 patent, sir. Is there something you wish 21 to draw my attention to? 22 BY MR. MEYER:

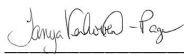
81 1 Q Yes. In the patent, Exhibit 1001, please 2 go to Column 3, Lines 48 to 51, and do you see there 3 it says: Suitable tactile sensations include 4 vibrations, for example, jolts and textures, and a 5 plurality of distinct tactile sensations can be 6 created by varying the frequency, amplitude and 7 waveform output by the actuator 6. 8 Do you see where it says that? 9 A Yes, sir. 10 Q Now, isn't it true that no other kind of 11 tactile sensations, other than vibrations, are 12 described as suitable by the 200- -- by the '260 13 patent? 14 A Sir, that was phrased in the negative. I 15 will answer the question as if it had been phrased in 16 the positive, unless you'd like to restate the 17 question. 18 Q Sure. I can restate it. 19 Does the '260 patent expressly describe 20 any other kind of tactile sensations, other than 21 vibrations, as suitable? 22 A It says it's suitable tactile sensations	83 1 said, that would teach that other sensations are 2 suitable also. You're asking what it lists here. It 3 says vibrations, for example, jolts and textures, 4 yes, sir. 5 Q So, in this in example, the jolts and 6 textures are an example of types of vibrations, 7 correct? 8 A It's saying those can be produced by 9 vibration, yes, sir. 10 Q Right, but other than vibrations, this 11 isn't disclosing any other kind of tactile 12 sensations, correct? 13 A There are other types of tactile 14 sensations and actuators disclosed in this document, 15 yes, sir. There are other types disclosed in this 16 document. 17 Q But it does not describe any other kind 18 as suitable, does it? 19 MR. WICHMAN: Objection. Form. 20 THE WITNESS: Sir, I believe I've 21 already responded to a question like that 22 or, perhaps, the same question. I
82 1 include vibrations, and since those are included, it 2 would teach that other kinds of suitable -- tactile 3 sensations are suitable also, and I'll note that in 4 Column 4, Line 10, it says: Various arrangements of 5 actuators in combination with input devices are 6 suitable, and I will note that elsewhere in the 7 patent it discloses other types of actuators. 8 Q But in the sentence -- 9 A So -- 10 Q Go ahead. 11 A So a person skilled in the art reading 12 this would certainly understand that other types of 13 sensations are suitable, but that is what is -- this 14 intends to convey. 15 Q But in the list of suitable tactile 16 sensations at Column 3, Line 48 to 51, doesn't the 17 list include only vibrations? 18 A It says vibrations, for example, jolts 19 and textures. Jolts and textures, for that matter, 20 can also be produced -- those sensations can be 21 produced by something other than a strict vibration. 22 It says include vibrations, and as I	84 1 believe my response earlier was that by 2 saying that suitable tactile sensations 3 include vibrations, it's teaching that 4 other types of sensations are also 5 suitable. 6 BY MR. MEYER: 7 Q Well, let's move onto Paragraph 112 on 8 Page 50 of your report, and let me know when you're 9 there. 10 A Okay. Yes, sir. 11 Q Okay. Starting on the second line from 12 the top of that page, do you see that you stated: I 13 note that the patent describes an embodiment in which 14 a controller periodically, quote, "monitors", end 15 quote, an input device, i.e., Input Device 5 (see 16 Figure 9), over several, quote, "passes", end quote 17 to detect whether pressure is being applied to the 18 input device during a particular pass. 19 Did I read that correctly? 20 A Yes, sir, I believe you did. 21 Q Okay. Now, let's go back to -- well, 22 let's go to Exhibit 1001, which is the '260 patent,

85 1 and scroll down to page -- it's the 24th page of the 2 PDF, and I want you to look at Claim 1, and let me 3 know when you're there. 4 A Yes, sir. 5 Q Okay. 6 A If you'll give me just a -- this is a 7 little hard to read. I want to zoom it up. 8 Q Go for it. 9 A Yes, sir. 10 Q Okay. Now, this question is actually 11 about Claim 1, as well as the other claims at issue. 12 So claims -- well, all the claims. 13 None of them recite the word monitor or 14 any form of that word; such as, monitors, monitoring, 15 et cetera, correct? 16 MR. WICHMAN: Objection. Form. 17 It's also beyond the scope. The 18 witness has only provided opinions on 19 Claims 1 through 7. 20 MR. MEYER: Well, then let's limit 21 it to 1 through 7. 22 THE WITNESS: I do not see the word	87 1 that the controller does not detect Pressure 2, does 2 it? 3 MR. WICHMAN: Objection. Form. 4 BY MR. MEYER: 5 Q Let me rephrase that question. 6 Does the '260 patent expressly state that 7 the controller does not detect Pressure 2? 8 A Would you like me to look at the entire 9 patent, or can we confine this to the sections in 10 here? 11 Q I think we can confine it to the 12 embodiment at Column 14, Lines 43 to 63 and Figure 9. 13 A Here it's referring to Pressure 1 and 14 Pressure 3, and I do not see a reference to Pressure 15 2 in here, sir, either way. 16 Q So the disclosure regarding the 17 embodiment at Columns 14, Lines 43 to 63 in Figure 9 18 does not state whether or not Pressure 2 is detected? 19 A I believe that's the case, if you're 20 referring specifically to Pressure 2, Pressure 1 and 21 Pressure 3. 22 Q But, in any case, it doesn't expressly
86 1 monitor here, sir. 2 BY MR. MEYER: 3 Q In Claims 1 through 7 of the '260 patent, 4 do you see if any of the -- if Claims 1 through 7 5 recite the word passes or any form of that word; such 6 as, pass, passing, et cetera? 7 MR. WICHMAN: Objection. Form. 8 THE WITNESS: I do not see the word 9 pass or passes here, no, sir. 10 BY MR. MEYER: 11 Q Okay. Well, let's go to Paragraph 114 of 12 your declaration, and do you see, in about the middle 13 of the paragraph, there's a sentence that says: 14 Notably, the controller does not detect intermediate 15 Pressure 2 nor whether the pressure on Input Device 5 16 falls to zero between monitoring passes? 17 A Yes, sir, I see that sentence. 18 Q And in that sentence, is it referring to 19 the embodiment disclosed by the '260 patent at Column 20 14, Lines 43 to 63 and Figure 9? 21 A Yes, sir, I believe it is. 22 Q So the '260 patent doesn't actually state	88 1 state that Pressure 2 is not detected, right? 2 A That's correct. I also do not see a 3 reference to Pressure 1, Pressure 2 or Pressure 3 in 4 the claim. 5 Q And in the sentence that I quoted from 6 Paragraph 114, it says: Notably, the controller does 7 not detect intermediate Pressure 2 nor whether the 8 pressure on Input Device 5 falls to zero between 9 monitoring passes. 10 The '260 patent doesn't state whether or 11 not the pressure on Input Device 5 falls to zero 12 between monitoring passes, correct? 13 Let me rephrase it. With respect to this 14 embodiment in Columns 14 -- or Column 14, Lines 43 to 15 63 in Figure 9, the '260 patent doesn't expressly 16 state that the pressure on Input Device 5 does not 17 fall to zero between monitoring passes, correct? 18 A I believe that's correct. It does not 19 disclose the controller detecting or not detecting 20 Pressure 2, for example. 21 Q Okay. 22 THE WITNESS: Before we go on,

89 1 could we take a short break again, 2 please? 3 MR. MEYER: Yes. How long do you 4 need? Five to ten minutes? 5 THE WITNESS: Probably less. 6 MR. MEYER: Okay. 7 MR. WICHMAN: Say five minutes. 8 Does that work? 9 MR. MEYER: Yes, great. 10 (Brief pause.) 11 BY MR. MEYER: 12 Q Please go to Paragraph 109 of your 13 declaration where you've reproduced Claim 1 with the 14 different limitations labeled, and let me know when 15 you're there. 16 THE WITNESS: Excuse me, sir. 17 There was a cut out when you were just 18 speaking, and I missed part of what you 19 just said. 20 THE COURT REPORTER: And same here. 21 BY MR. MEYER: 22 Q Please go back to Paragraph 109 of your	91 1 language there. If I understand your question 2 correctly, you're referring to the first tactile 3 sensation, not necessarily based at least in part on 4 the first pressure. 5 So the answer would be, yes, I suppose it 6 could be. 7 Q If it's based at least on the first 8 pressure, you're saying that it -- that the first 9 tactile sensation could be provided before the first 10 pressure -- a first pressure is detected? 11 MR. WICHMAN: Objection. 12 THE WITNESS: I don't think that 13 was my response. 14 BY MR. MEYER: 15 Q Maybe I misunderstood. 16 A Perhaps, I misunderstood your question. 17 Q My question is basically this: In the 18 context of Claim 1, could the invention provide a 19 first tactile sensation before detecting a first 20 pressure? 21 A Again, you're leaving out part of the 22 claim language there, but in the interest of moving
90 1 declaration, and it's the paragraph that reproduces 2 Claim 1 but adds labels for each of the -- of the 3 limitations, and let me know when you're there. 4 A Yes, sir, I'm there. 5 Q Okay. So do you see that 1A -- 6 Limitation 1A is: Detect a first pressure on a first 7 input device, and then the next limitation is: 8 Provide a first tactile sensation to the first input 9 device, the first tactile sensation based at least in 10 part on the first pressure. 11 Do you see that? 12 A Yes, sir. 13 Q So my question is: Can you provide a 14 first tactile sensation without first detecting a 15 first pressure? 16 MR. WICHMAN: Objection. Form. 17 BY MR. MEYER: 18 Q Let me rephrase that. 19 Does Claim 1 -- in Claim 1, would a first 20 tactile sensation be provided before that first 21 pressure is detected? 22 A You're not quoting the entire claim	92 1 ahead, a first tactile sensation based at least in 2 part on the first pressure would be in response to 3 the first pressure because it must be based at least 4 in part on it. 5 Q And would that mean that the first 6 pressure must be -- or a first pressure must be 7 detected before a first tactile sensation based at 8 least in part of that pressure would be provided? 9 A I mean, that's logic, yes, sir. 10 MR. MEYER: Okay. That is my last 11 question. 12 Counsel, do you have your own 13 questions? 14 MR. WICHMAN: I'm sorry. Are you 15 tendering the witness? 16 MR. MEYER: Yes. 17 MR. WICHMAN: Okay. Valve has no 18 questions. 19 The witness will read and sign, and 20 let me thank you for the deposition, and, 21 Ms. Page, let me thank you for your work 22 here, as well.

Transcript of Jean Renard Ward
Conducted on September 24, 2024

24 (93 to 96)

93 1 MR. MEYER: Thank you very much, 2 Mr. Ward, and thank you, Ms. Page. 3 4 (Thereupon, the deposition was 5 concluded at approximately 2:12 p.m.) 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	95 1 I further certify that I am not related to any 2 of the parties to this action by blood or marriage, I 3 am not employed by or an attorney to any of the 4 parties to this action, and that I am in no way 5 interested, financially or otherwise, in the outcome 6 of this matter. 7 IN WITNESS WHEREOF, I have hereunto set my hand 8 this 5th day of September, 2024. 9 My commission expires: 10 April 31, 2025 11 12 13  14 NOTARY PUBLIC IN AND FOR THE 15 STATE OF GEORGIA 16 17 18 19 20 ` 21 22
94 1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC 2 I, Tanya L. Verhoven-Page, Reporter and Notary 3 Public within and for the State of Georgia do hereby 4 certify: 5 That Jean Renard Ward, the witness whose 6 deposition is hereinbefore set forth, was duly sworn 7 by me before the commencement of such deposition and 8 that such deposition was taken before me and is a 9 true record of the testimony given by such witness. 10 I further certify that the adverse party, 11 Petitioner, was represented by counsel at the 12 deposition. 13 I further certify that the deposition of Jean 14 Renard Ward occurred via Zoom conference (Boston, 15 Massachusetts), on Tuesday, September 24, 2024, 16 commencing at 10:27 a.m. to 2:12 p.m. 17 18 19 20 21 22	

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Transcript of Jean Renard Ward
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