

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners,

v.

MAXELL, LTD.,

Patent Owner

Case: IPR2024-00717
U.S. Patent No. 11,223,757

WITNESS: R. MICHAEL GUIDASH
DATE: February 17, 2025
TIME: 9:00 a.m.
LOCATION: Brownwood Hotel
3003 Brownwood Boulevard
The Villages, Florida

Taken before RHONDA S. SANSOM, RPR, CRR, CRC,
FPR-C, Court Reporter and Notary Public in and for
the State of Florida at Large, pursuant to Notice of
Taking Deposition filed in the above-styled cause.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2 Attorneys on Behalf of the Petitioners:</p> <p>3 JAMES M. HEINTZ, ESQUIRE</p> <p>4 DLA Piper, LLP</p> <p>5 11911 Freedom Drive, Suite 300</p> <p>6 Reston, Virginia 20190-5602</p> <p>7 703-773-4148</p> <p>8 jim.heintz@us.dlapiper.com</p> <p>9 Attorney on Behalf of the Patent Owner:</p> <p>10 ROBERT G. PLUTA, ESQUIRE</p> <p>11 Mayer Brown LLP</p> <p>12 71 South Wacker Drive</p> <p>13 Chicago, Illinois 60606</p> <p>14 312-701-8641</p> <p>15 rpluta@mayerbrown.com</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 P R O C E E D I N G S</p> <p>2 (The following proceedings were had:)</p> <p>3 R. MICHAEL GUIDASH,</p> <p>4 Having been first duly sworn, was examined and</p> <p>5 testified as follows:</p> <p>6 CROSS-EXAMINATION</p> <p>7 BY MR. PLUTA:</p> <p>8 Q. Good morning, Mr. Guidash.</p> <p>9 A. Good morning.</p> <p>10 Q. You understand this deposition is being</p> <p>11 taken in IRP2024-00757?</p> <p>12 A. Yes.</p> <p>13 Q. I know you're fairly familiar with the</p> <p>14 deposition process. Is this any reason you can't</p> <p>15 testify truthfully today?</p> <p>16 A. No.</p> <p>17 Q. I've handed Exhibits 1003, 1008, 1009, and</p> <p>18 1011.</p> <p>19 That first one, Exhibit 1003, do you recognize</p> <p>20 that as your declaration in this matter?</p> <p>21 A. Yes.</p> <p>22 Q. And do you recognize the other three</p> <p>23 exhibits as Kim, Yamamoto, and Thorn, respectively?</p> <p>24 A. Yes.</p> <p>25 Q. I'd like to talk about Kim first a little</p>
<p style="text-align: right;">Page 3</p> <p>1 I N D E X</p> <p>2 WITNESS PAGE</p> <p>3 R. MICHAEL GUIDASH</p> <p>4 Cross-Examination by Mr. Pluta..... 4</p> <p>5 Redirect Examination by Mr. Pluta..... 59</p> <p>6 Recross-Examination by Mr. Pluta..... 67</p> <p>7 Certificate of Oath..... 68</p> <p>8 Reporter's Certificate..... 69</p> <p>9 E X H I B I T S</p> <p>10 (Originals Premarked and Retained by Counsel)</p> <p>11 NO. DESCRIPTION</p> <p>12 1001 United States Patent Application</p> <p>13 Publication, US 11,223,757 B2</p> <p>14 Yoshizawa</p> <p>15 1003 Declaration of R. Michael Guidash</p> <p>16 In Support of Petition for Inter</p> <p>17 Partes Review of U.S. Patent No.</p> <p>18 11,223,757</p> <p>19</p> <p>20 1004 United States Patent Application</p> <p>21 Publication, US 2014/0247368 AI</p> <p>22 Chinn</p> <p>23 1005 Japanese Unexamined Patent</p> <p>24 Application Publication</p> <p>25 Takahashi</p> <p>1008 United States Patent Application</p> <p>Publication, US 2010/137026 AI</p> <p>Kim</p> <p>1009 United States Patent Application</p> <p>Publication, US 2010/0026815 AI</p> <p>Yamamoto</p> <p>1011 United States Patent Application</p> <p>Publication, US 11,223,757 B2</p> <p>Thorn</p>	<p style="text-align: right;">Page 5</p> <p>1 bit. So Kim, would you agree, discloses a mobile</p> <p>2 terminal?</p> <p>3 A. That's the title of the patent. It</p> <p>4 discloses many things associated with a mobile</p> <p>5 device and which includes components like cameras</p> <p>6 and displays, et cetera.</p> <p>7 Q. Right. And Kim discloses a mobile</p> <p>8 terminal equipped with a projector module for</p> <p>9 projecting an image on an external screen?</p> <p>10 A. That's one aspect of Kim, correct.</p> <p>11 Q. And you'd agree that Kim discloses two</p> <p>12 cameras?</p> <p>13 A. Yes.</p> <p>14 Q. If you could turn to Paragraph 156 of your</p> <p>15 declaration, Exhibit 1003.</p> <p>16 A. Okay.</p> <p>17 Q. In that first sentence, you state:</p> <p>18 "Kim and Yamamoto both relate to imaging</p> <p>19 devices with manual and voice activated</p> <p>20 commands, including commands for</p> <p>21 commanding a camera to capture an image."</p> <p>22 Did I read that correctly?</p> <p>23 A. Yes.</p> <p>24 Q. And that's still your opinion today?</p> <p>25 A. Yes, it's still my opinion today.</p>

<p style="text-align: right;">Page 6</p> <p>1 Q. And after that sentence you cite Exhibit 2 1008, which is Kim and several paragraphs; is that 3 right?</p> <p>4 A. Could you repeat that question, please?</p> <p>5 Q. Sure. After that first sentence in 6 Paragraph 156 you cite Kim, Exhibit 1008, and you 7 cite paragraphs 54, 56, 64, 66, and 160 through 165; 8 is that right?</p> <p>9 A. Yes.</p> <p>10 Q. Let's take a look at Paragraph 54 of Kim. 11 Rather than reading it, I'll just ask you to read 12 that paragraph to yourself, please, and let me know 13 when you're done.</p> <p>14 A. I have finished.</p> <p>15 Q. Okay. Does Paragraph 54 say anything 16 about voice activation commands?</p> <p>17 A. No, that is disclosing there is a camera 18 and that there's an audio and video input to the 19 mobile terminal.</p> <p>20 Q. If you take a look at Paragraph 56 and 21 read that to yourself, please. Let me know when 22 you're finished.</p> <p>23 A. Okay.</p> <p>24 Q. Does Paragraph 56 say anything about voice 25 activated commands?</p>	<p style="text-align: right;">Page 8</p> <p>1 you're done.</p> <p>2 A. Okay.</p> <p>3 Q. Does Paragraph 66 say anything about voice 4 activated commands, including commands for 5 commanding a camera to capture an image?</p> <p>6 A. This was done -- this 66 was included to 7 show that there was a touch control -- there was a 8 touch control associated with a touch screen.</p> <p>9 Q. Okay. So you'd agree that Paragraph 66 10 doesn't say anything about voice activated commands?</p> <p>11 A. 66 does not.</p> <p>12 Q. Okay. Let's take a look at Paragraph 160, 13 and if you could read that to yourself and let me 14 know when you're done.</p> <p>15 A. I've done that.</p> <p>16 Q. All right. Does Paragraph 160 say 17 anything about voice activated commands, including 18 commands for commanding a camera to capture an 19 image?</p> <p>20 A. It says it's related to a voice command 21 that can be used to change the size or position of 22 the area that's being displayed.</p> <p>23 Q. Okay. So the voice commands disclosed in 24 160 do not -- they're not voice activated commands 25 for commanding a camera to capture an image.</p>
<p style="text-align: right;">Page 7</p> <p>1 A. Paragraph 56 is used to show that there -- 2 the device is capable of voice recognition.</p> <p>3 Q. It says nothing about voice activated 4 commands including commands for commanding a camera 5 to capture images, correct?</p> <p>6 A. That particular paragraph does not. It 7 just is identifying the devices capable and has 8 voice recognition.</p> <p>9 Q. Would you take a look at Paragraph 64 and 10 read that to yourself and let me know when you're 11 done, please.</p> <p>12 A. I'm done.</p> <p>13 Q. Paragraph 64, does that say anything about 14 voice activated commands, including commands for 15 commanding a camera to capture an image?</p> <p>16 A. Paragraph 64 was cited to show that Kim 17 comprises a touch sensor and a touch -- such as a 18 touch screen.</p> <p>19 Q. So you would agree that Paragraph 64 says 20 nothing about voice activated commands, including 21 commands for a camera to capture an image?</p> <p>22 A. It does not. As I said before, it was 23 used to show a touch screen.</p> <p>24 Q. If you could take a look at Paragraph 66. 25 Read that to yourself, please, and let me know when</p>	<p style="text-align: right;">Page 9</p> <p>1 Agreed?</p> <p>2 A. Yes, in that particular example it's shown 3 that voice commands are recognized and processed by 4 the controller to perform the function of --</p> <p>5 Q. In Paragraph --</p> <p>6 A. -- the size and position of the screen, 7 yeah.</p> <p>8 Q. In Paragraph 160, continuing with that, 9 does the mobile terminal 100 include a microphone 10 122 for receiving an input of a speech signal for an 11 area setting control? Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. And do you agree Kim defines what an area 14 setting control is in Paragraph 132?</p> <p>15 A. Yes, I would agree that 132 describes the 16 use of a -- or what the area setting control 17 comprises.</p> <p>18 Q. And Paragraph 132 says the area setting 19 control refers to a signal for controlling a size or 20 portion of the external screen area, hereinafter 21 called "area?"</p> <p>22 A. Yes.</p> <p>23 Q. Turn back to Paragraph 161, please, and 24 read that to yourself and let me know when you're 25 done.</p>

<p style="text-align: right;">Page 10</p> <p>1 A. I'm done, yes.</p> <p>2 Q. Paragraph 161, does it say anything about</p> <p>3 voice activated commands including commands for</p> <p>4 commanding a camera to capture an image?</p> <p>5 A. No, this is further describing how the</p> <p>6 speech signals can be used to adjust something in</p> <p>7 the mobile device; in this case, the screen area.</p> <p>8 Q. In fact, Kim is describing receiving</p> <p>9 speech input and the mobile terminal displays a</p> <p>10 default image on the external screen area, right?</p> <p>11 A. Correct.</p> <p>12 Q. Can you take a look at Paragraph 162, read</p> <p>13 that to yourself and let me know when you're done?</p> <p>14 A. I'm done.</p> <p>15 Q. All right. Does Paragraph 162 say</p> <p>16 anything about voice activated commands including</p> <p>17 commands for commanding a camera to capture an</p> <p>18 image?</p> <p>19 A. It's showing again the voice activated</p> <p>20 command, how -- and how it can be used to control</p> <p>21 settings of the screen.</p> <p>22 Q. Okay. And Paragraph 162 doesn't say</p> <p>23 anything about the voice activated commands</p> <p>24 commanding a camera to capture an image, correct?</p> <p>25 A. The 162 paragraph does not.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Correct.</p> <p>2 Q. Please take a look at Paragraph 165. Read</p> <p>3 that to yourself and let me know when you're done,</p> <p>4 please.</p> <p>5 A. I'm done.</p> <p>6 Q. All right. Does Paragraph 165 say</p> <p>7 anything about voice activated commands, including</p> <p>8 commands for commanding a camera to capture an</p> <p>9 image?</p> <p>10 A. Again, this is describing how voice</p> <p>11 commands can be used to manipulate the size and area</p> <p>12 settings of the external screen.</p> <p>13 Q. All right. In fact, Kim doesn't disclose</p> <p>14 receiving a voice command to be used to activate a</p> <p>15 camera. Do you agree?</p> <p>16 A. I would not agree with that.</p> <p>17 Q. In Paragraph 156, you cited the paragraphs</p> <p>18 we just discussed, you'd agree, for the proposition</p> <p>19 that Kim -- Kim includes commands for commanding a</p> <p>20 camera to capture an image?</p> <p>21 A. Those were the paragraphs cited. And --</p> <p>22 but I wouldn't arrive at the conclusion you stated</p> <p>23 because Paragraph 149, as one example, discloses</p> <p>24 including a camera 121 for receiving an input image</p> <p>25 of an image, including an area setting operation for</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. All right. Take a look at Paragraph 163,</p> <p>2 please, and read that to yourself and let me know</p> <p>3 when you're done.</p> <p>4 A. I'm done.</p> <p>5 Q. All right. Does 163 say anything about</p> <p>6 voice activated commands, including commands for</p> <p>7 commanding a camera to capture an image?</p> <p>8 A. It does not. Again, it's describing how</p> <p>9 voice command can be used for the screen settings.</p> <p>10 Q. Please read Paragraph 164 and let me know</p> <p>11 when you're done.</p> <p>12 A. Okay.</p> <p>13 Q. Does Paragraph 164 say anything about</p> <p>14 voice activated commands, including commands for</p> <p>15 commanding a camera to capture an image?</p> <p>16 A. Paragraph 164 does not specifically -- or</p> <p>17 does not include -- does not describe a camera.</p> <p>18 Q. It doesn't describe voice activated</p> <p>19 commands for commanding a camera to capture an</p> <p>20 image, right?</p> <p>21 A. It describes how voice commands can be</p> <p>22 used, again, for controlling something in that</p> <p>23 mobile terminal. In this particular case, part of</p> <p>24 this, the -- what's displayed on the screen.</p> <p>25 Q. The external screen?</p>	<p style="text-align: right;">Page 13</p> <p>1 an external screen.</p> <p>2 And it was known that voice commands are used</p> <p>3 in the mobile terminal of Kim and that the camera</p> <p>4 is also part of the image driving the area and the</p> <p>5 screen, so that it would have been known -- at least</p> <p>6 known to a POSITA -- or a person of ordinary skill</p> <p>7 in the art -- that voice command could be used --</p> <p>8 would be used to control camera 121.</p> <p>9 Q. You didn't cite that paragraph in your</p> <p>10 declaration, did you?</p> <p>11 A. I don't see that in Paragraph 156.</p> <p>12 Q. Okay. Why don't you turn to 171, please,</p> <p>13 Paragraph 171 of your declaration. Halfway down</p> <p>14 that paragraph, you say "Kim discloses 'voice</p> <p>15 recognition.'"</p> <p>16 And then you cite Kim at Paragraph 56, "and</p> <p>17 implementing various voice commands." And you cite</p> <p>18 paragraphs 160 to 164, "but does not explicitly</p> <p>19 disclose receiving a command voice to be used to</p> <p>20 activate a camera."</p> <p>21 A. I do see that, yes.</p> <p>22 Q. Is that still your opinion today?</p> <p>23 A. My opinion is it does not explicitly</p> <p>24 disclose that, but it would be known to a person of</p> <p>25 ordinary skill in the art that if a camera is being</p>

<p style="text-align: right;">Page 14</p> <p>1 used for the area -- for what's being displayed in 2 the external display and that voice commands can be 3 used to control components in the mobile terminal, 4 the voice commands could be also used to control or 5 activate the camera. 6 That -- but in terms of my opinions regarding 7 validity of the '757, in this case the combination 8 Yamamoto has used for explicit evidence of a voice 9 command being able to activate a camera. 10 Q. Okay. If you could turn to Paragraph 157 11 of your declaration. 12 A. Okay. 13 Q. The second sentence in that paragraph 14 says: 15 "In my opinion, a POSITA would have 16 understood that one way to improve Kim's 17 images taken with a front facing camera 18 121 (e.g., selfie) would be to implement 19 the delay between the utterance of the 20 voice command and the taking of the image, 21 which would allow the photographer to pose 22 before the image is taken." 23 Is that your opinion? 24 A. Yes, that's my opinion. 25 Q. And Kim utilizes a front camera to expose</p>	<p style="text-align: right;">Page 16</p> <p>1 order to adjust what's being displayed. 2 BY MR. PLUTA: 3 Q. How so? 4 A. So it says: "The mobile terminal 100 can 5 recognize a finger motion or other pointer motion as 6 an example for the area setting operation for an 7 image inputted via camera 121" in Paragraph 151. 8 Q. So do you understand Kim to be disclosing 9 pictures that are on the mobile terminal are 10 projected onto the external screen? 11 A. Well, Kim discloses that images captured 12 by camera 121 can be displayed on -- displayed on 13 the external screen. 14 But that's just one example of what the camera 15 can be used for. It was well known in many pieces 16 of prior art that a front camera was commonly used 17 to take what is a so-called -- a so-called selfie. 18 Q. All right. Please turn to Paragraph 176 19 of your declaration. 20 A. Okay. 21 Q. You state that "Kim discloses a touch 22 display arranged on a first surface of the image 23 recording device and configured to display an image 24 signal and receive a touch operation instruction." 25 Do you see that?</p>
<p style="text-align: right;">Page 15</p> <p>1 an image on an external screen. Is that your 2 understanding? 3 A. That's one use of the front camera. 4 Q. Okay. And if you can return to Paragraph 5 150 -- 151 and 152, but feel free to look at 150 for 6 context. 7 A. Of? 8 Q. I'm sorry, of Kim. Thank you. 9 And in these paragraphs, and feel free to read 10 them yourself, Kim is relating a situation where a 11 finger motion or other pointer motion is occurring 12 as an example for the area setting operation. 13 MR. HEINTZ: Objection, form. 14 THE WITNESS: I see in 150 and 151 of Kim 15 it's describing that by use of the camera 121, 16 finger motion can be used to adjust what's 17 being displayed. 18 BY MR. PLUTA: 19 Q. Okay. So is Kim describing here the 20 camera processing the image and projecting it out on 21 the external screen area? 22 MR. HEINTZ: Objection to form. 23 THE WITNESS: No, I would read this as 24 images from the camera can be processed to 25 understand or interpret the finger motion in</p>	<p style="text-align: right;">Page 17</p> <p>1 A. Yes. 2 Q. In the context of the '757 patent, what 3 does "touch operation instruction" mean? 4 A. Touch operation instruction would mean 5 touching a particular area on the touch display that 6 contains a GUI element -- G-U-I. And placing a -- 7 touching that particular GUI element would perform 8 an instruction; for example, in context of the '757 9 patent, selecting whether the front or rear camera 10 is enabled. 11 Q. Would you agree that touch operation 12 instruction might require a few touches on the GUI? 13 A. No, I'd say a touch operation instruction 14 would -- a single instruction would be a single 15 touch. It may require multiple touches to get down 16 through a series of GUI screens, but a first 17 instruction is a single touch. 18 Q. Well, when we were just talking about 19 touch operation instruction generally, would those 20 subsequent GUI screens be part of that same touch 21 operation instruction? 22 A. No. 23 Q. Okay. So just to be clear, 24 your understanding of a touch operation instruction 25 in Element [1b] of the '757 patent is only one</p>

<p style="text-align: right;">Page 18</p> <p>1 touch?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. All right. Let's turn to Paragraph</p> <p>4 179 of your declaration, please.</p> <p>5 A. Okay.</p> <p>6 Q. In that paragraph, you state:</p> <p>7 "Kim discloses or renders obvious a first</p> <p>8 camera arranged on the same side of the</p> <p>9 touch display and configured to photograph</p> <p>10 an object and acquire a first image</p> <p>11 signal."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And then towards the bottom of that</p> <p>15 paragraph, you state: "A touch display 151 and a</p> <p>16 first camera 121 are located in the front case 101."</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. What do you mean by a display in camera</p> <p>20 located in the front case?</p> <p>21 A. I think that may be a typo. It should be</p> <p>22 "on the front case."</p> <p>23 Q. Okay. So it should read: "A touch</p> <p>24 display 151 and a first camera 121 are located on</p> <p>25 the front case 101?"</p>	<p style="text-align: right;">Page 20</p> <p>1 court's construction in the case of Kim, is the</p> <p>2 camera arranged on a same side of the touch display?</p> <p>3 MR. HEINTZ: Objection, form.</p> <p>4 THE WITNESS: I -- I would have to think</p> <p>5 about that further regarding whether it</p> <p>6 explicitly shows that in Kim. But it at least</p> <p>7 is obvious with respect to Kim, and I've</p> <p>8 stated that in several instances in my</p> <p>9 declaration.</p> <p>10 BY MR. PLUTA:</p> <p>11 Q. Okay. Well, does the phrase "of the touch</p> <p>12 display" refer to the surface of the touch display</p> <p>13 itself?</p> <p>14 MR. HEINTZ: Objection to form.</p> <p>15 THE WITNESS: In terms of the court's</p> <p>16 construction that we're discussing on a same</p> <p>17 side of the touch display, I have rendered an</p> <p>18 opinion on that in my opening report.</p> <p>19 And in the context of that court's</p> <p>20 construction, it's my opinion that Kim renders</p> <p>21 at least that it is obvious for camera 121 to</p> <p>22 be on the same side of the touch display.</p> <p>23 BY MR. PLUTA:</p> <p>24 Q. Would a first camera arranged adjacent of</p> <p>25 the touch display meet Limitation [1c]?</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Yes.</p> <p>2 Q. Okay. In the case of Kim, is the first</p> <p>3 camera arranged on a same side of the touch display?</p> <p>4 A. I -- so in the context of my IPR</p> <p>5 declaration, and I believe I state this in the claim</p> <p>6 construction portion of my declaration that these</p> <p>7 opinions are given with respect to Maxell's proposed</p> <p>8 construction, which without reciting exactly from</p> <p>9 memory is related to or states that the camera, the</p> <p>10 front camera, is arranged on the same face of the</p> <p>11 device as that of the touch display.</p> <p>12 And in this case, the front case would be the</p> <p>13 same face that the display -- touch display and</p> <p>14 first camera are arranged on.</p> <p>15 Q. Do you understand that the court in the</p> <p>16 district court litigation construed the phrase "on</p> <p>17 the same side of the touch display?"</p> <p>18 A. Yes, I am aware of that, and my opinions</p> <p>19 regarding that were stated in my opening report.</p> <p>20 At the time this declaration was prepared and</p> <p>21 provided that court's construction was not known,</p> <p>22 and as a result in this case took the construction</p> <p>23 to mean what I just explained as Maxell's proposed</p> <p>24 construction.</p> <p>25 Q. So if the board adopts the district</p>	<p style="text-align: right;">Page 21</p> <p>1 MR. HEINTZ: Objection, form.</p> <p>2 THE WITNESS: Limitation [1c] being?</p> <p>3 BY MR. PLUTA:</p> <p>4 Q. I'm sorry, let me rephrase that.</p> <p>5 So we're looking at Paragraph 179 of your</p> <p>6 declaration.</p> <p>7 A. Okay, I'm sorry. Thank you.</p> <p>8 Q. This is the limitation you've been</p> <p>9 discussing.</p> <p>10 So in that context of Limitation [1c], would a</p> <p>11 camera arranged adjacent of the touch display meet</p> <p>12 the limitation on a same side of the touch display?</p> <p>13 MR. HEINTZ: Objection, form.</p> <p>14 THE WITNESS: Yes, for at least the</p> <p>15 following reasons. If you look at the images</p> <p>16 of the front side of the camera in the '757</p> <p>17 patent, the front camera is arranged --</p> <p>18 according to the claim is arranged on a same</p> <p>19 side of the touch display.</p> <p>20 And that arrangement, camera arrangement,</p> <p>21 with respect to the touch display is</p> <p>22 essentially exactly the same as shown in Kim</p> <p>23 and other prior art references.</p> <p>24 So camera 121 could be on the same side of</p> <p>25 the touch display, even though it is placed in</p>

<p style="text-align: right;">Page 22</p> <p>1 this plainer diagram, as shown in Figure 2A of 2 Kim in Paragraph 179 of my declaration. 3 Even though it is placed what appears -- 4 what is above the touch display, it can still 5 be on the same side of the touch display. 6 And if it would be -- I also describe 7 where it would be obvious to make it in that 8 location, which would be it is in front of 9 and, if we're looking in a plane into the 10 picture, orthogonal to the touch display. It 11 is ahead of some portion or even with some 12 portion of that touch -- front side of the 13 touch display. 14 BY MR. PLUTA: 15 Q. Okay. Do you describe that in your 16 declaration? 17 MR. HEINTZ: Objection, form. 18 THE WITNESS: I've at least rendered an 19 opinion on what "on the same side of the touch 20 display" means in my opening report. As I 21 said, when I wrote this declaration the 22 court's construction was not known and I used 23 Maxell's proposed construction. 24 I will have -- I would have to 25 double-check if I made any comments with</p>	<p style="text-align: right;">Page 24</p> <p>1 the opposite side of the touch display 151? 2 A. Yes. 3 Q. Okay. Turn to 190, please, which is your 4 discussion of Claim Element [1g]. 5 A. Okay. 6 Q. I'm sorry, let's go to 191. 7 A. 191? 8 Q. It's right next to it, yes. 9 A. Okay. 10 Q. It says -- you say: "Kim does not 11 disclose receiving a command voice for activating 12 the front camera 121" -- I'm sorry, strike that. 13 You state: 14 "Kim does not explicitly disclose 15 receiving a command voice for activating 16 the front camera 121, such as would be 17 performed for a selfie." 18 Do you agree with that statement you made? 19 A. Yes. And I think this is similar to what 20 we discussed before, stating that the prior -- 21 pieces of prior art that are combined with Kim 22 disclosed it explicitly. And a POSITA, or a person 23 of ordinary skill in the art, would understand that 24 that could also be the case with Kim, given that it 25 already had the capability of voice recognition and</p>
<p style="text-align: right;">Page 23</p> <p>1 respect to "on the same side of the touch 2 display" in this declaration. 3 But I would -- it is my opinion -- was my 4 opinion at the time of writing this 5 declaration and still is my opinion that it 6 would at least be obvious for all of these 7 prior art references to have a front camera on 8 the same side of the touch display, as just 9 explained. 10 BY MR. PLUTA: 11 Q. Okay. Please take a look at Paragraph 12 182, which is your discussion, I believe, of 13 Limitation [1d]. 14 A. Okay. 15 Q. And one question. I think I know the 16 answer, in light of your previous testimony. But 17 the last sentence, you state: "Kim also discloses 18 that camera 121 prime is provided in the rear case 19 102." 20 Is that also a typo? 21 A. Yes. 22 Q. Okay. So it should be -- 23 A. On. 24 Q. -- on? 25 Okay. And is the camera 121 prime arranged on</p>	<p style="text-align: right;">Page 25</p> <p>1 being able to control elements in the device. 2 Q. In Paragraph 191, in the middle and the 3 end, you include a discussion regarding Chinn. 4 You didn't offer an opinion for Ground 3 5 combining Kim-Yamamoto with Thorn and Chinn, did 6 you? 7 A. Yes, I think that's also a typo. I'll 8 check. 9 Q. It seems that it definitely was imported 10 over from somewhere else. 11 A. I think so. I'll check Paragraph 23 of 12 Yamamoto. 13 Yeah, I'm certain that it's a typo. Yes, that 14 should have been referring to Yamamoto. 15 Q. Okay. So from the sentence, "For example, 16 Chinn at 23," all the way down to the end of the 17 paragraph that ends in "some embodiments" should all 18 be stricken from your opinion? 19 MR. HEINTZ: Objection, form. 20 BY MR. PLUTA: 21 Q. Or stricken from your declaration in 22 Ground 3? 23 MR. HEINTZ: Objection to form. 24 THE WITNESS: It shouldn't be stricken. 25 I'm not sure if that's the right term. It</p>

<p style="text-align: right;">Page 26</p> <p>1 should be modified to the Yamamoto references 2 that are referred to in Paragraph 192. 3 BY MR. PLUTA: 4 Q. Okay. So just to clarify, though, you're 5 not offering any opinions for Ground 3 with respect 6 to the combination of Kim-Yamamoto-Thorn with Chinn? 7 A. No, I am not. 8 Q. Okay. Let's continue with Element [1g]. 9 Is it your understanding in the claims of the '757 10 patent that when the audio input interface receives 11 a command voice giving a first instruction to start 12 a recording of an image signal the recorder starts a 13 recording? 14 MR. HEINTZ: Objection to form. 15 THE WITNESS: Could you repeat that 16 question, please? 17 BY MR. PLUTA: 18 Q. Sure. And I'm referencing Claim 1 19 generally. There might be a couple of limitations 20 that you would want to refer back to. 21 But is it your understanding that when the 22 audio input interface receives the command voice 23 giving a first instruction to start a recording of 24 an image signal the recorder starts a recording? 25 A. Yes, that's correct.</p>	<p style="text-align: right;">Page 28</p> <p>1 is started, image recording is started. 2 Q. Okay. Let's take a look at Element [1h], 3 which is paragraphs 195 through 199. 4 I'm going to focus on Paragraph 197. You 5 state in the second paragraph -- I'm sorry, in the 6 second sentence of Paragraph 197: 7 "Kim does not appear to explicitly 8 disclose activating the back camera 121 9 prime when the touch display receives a 10 touch operation instruction, giving a 11 second instruction to start a recording of 12 an image signal." 13 Is that your opinion? 14 A. Yes, that's my opinion stated there. And 15 further, it says a person of ordinary skill in the 16 art would have understood that. 17 And it was commonly done that the back camera 18 could be activated by a touch command, such as 19 touching the shutter button in the camera app. 20 Q. Let's take a look at your opinions 21 relating to Element [1i], Ground 3. Specifically, 22 let's look at Paragraph 201. You state in that 23 paragraph: 24 "Moreover, a person of ordinary skill in 25 the art would have also understood that</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Okay. And would you agree that the first 2 instruction has to come from the command voice? 3 MR. HEINTZ: Objection to form. 4 THE WITNESS: Yeah. In this case, Element 5 [1g] states that "A first instruction is from 6 the command voice." 7 BY MR. PLUTA: 8 Q. And once the command voice gives a first 9 instruction, the image signal becomes -- begins 10 recording; is that right? 11 MR. HEINTZ: Objection to form. 12 THE WITNESS: Yes, it's after receipt of 13 the first instruction or interpret -- 14 interpretation of the first instruction, which 15 is a command voice. At some point after that, 16 a recording of the image signal is started. 17 BY MR. PLUTA: 18 Q. The claim language says "Receive the 19 command voice giving a first instruction," right, 20 not the interpretation of the command voice? 21 I'm just confused by your answer. What did 22 you mean by interpretation of the command voice? 23 A. So a command voice instruction is 24 provided. The processor processes that command 25 voice, and at some point after that the image is --</p>	<p style="text-align: right;">Page 29</p> <p>1 because only the front camera is 2 activated, the back camera (i.e., second 3 camera) would remain disabled." 4 Do you see that? 5 A. Yes. 6 Q. You agree that Kim does not disclose that 7 when the front camera is enabled the back camera 8 remains disabled, right? 9 MR. HEINTZ: Objection, form. 10 THE WITNESS: Kim may not explicitly 11 disclose that; however, as stated, it was -- 12 it was commonly done. A person of ordinary 13 skill in the art would understand that when 14 one camera is operating the other camera is 15 disabled, primarily for the benefit of power 16 consumption. 17 In the relevant time of these -- the prior 18 art references, as well as the '757 patent, 19 one of the if not the biggest power-consuming 20 devices in a mobile phone were the cameras, 21 and battery life was severely degraded by 22 continuous operation of a camera. 23 And as a result it was commonly, if not 24 ubiquitously, done to have only one camera 25 enabled at a time.</p>

<p style="text-align: right;">Page 30</p> <p>1 BY MR. PLUTA:</p> <p>2 Q. Okay. But going back to -- I understand</p> <p>3 your -- your opinion on what somebody might</p> <p>4 understand in the art at the time.</p> <p>5 But Kim doesn't disclose having one camera</p> <p>6 enabled and the other camera being disabled. Do you</p> <p>7 agree?</p> <p>8 MR. HEINTZ: Objection, form.</p> <p>9 THE WITNESS: And typically, as -- as an</p> <p>10 inventor myself, typically an inventor does</p> <p>11 not include every detail of every component in</p> <p>12 the specification, such as one like that,</p> <p>13 because it was commonly done and of no import</p> <p>14 to the invention.</p> <p>15 So otherwise, it's not an expectation to</p> <p>16 disclose the status of every component in --</p> <p>17 in a device when you're writing a patent for a</p> <p>18 device with those components.</p> <p>19 BY MR. PLUTA:</p> <p>20 Q. Would you agree that Yamamoto does not</p> <p>21 disclose that when the front camera is enabled the</p> <p>22 back camera remained disabled?</p> <p>23 MR. HEINTZ: Objection, form.</p> <p>24 THE WITNESS: Yamamoto is a -- does not</p> <p>25 disclose when -- if one is enabled and the</p>	<p style="text-align: right;">Page 32</p> <p>1 being both enabled. Do you recall that?</p> <p>2 A. And it was similar to the</p> <p>3 picture-in-picture disclosure.</p> <p>4 Q. So you would agree that the '757 patent</p> <p>5 describes a situation where the front and back</p> <p>6 camera are both enabled?</p> <p>7 A. Yes, and my point is that it was the</p> <p>8 ubiquitous state in dual camera devices; that only</p> <p>9 one camera was enabled unless it was an application,</p> <p>10 such as described in the '757 patent, where image</p> <p>11 capture from both cameras was being used for another</p> <p>12 purpose.</p> <p>13 Q. Let's take a look at Paragraph 202 of your</p> <p>14 declaration. You say: "Likewise, Kim teaches</p> <p>15 activating the back camera 121 prime (i.e., second</p> <p>16 camera)." And you cite paragraphs 94 and 95 of Kim.</p> <p>17 Can you point to me where, in paragraphs 94</p> <p>18 and 95 of Kim, Kim states activating the back camera</p> <p>19 121 prime?</p> <p>20 A. In 94 and 95, Kim discloses a back camera</p> <p>21 on the rear case.</p> <p>22 MR. HEINTZ: I'm going to object to form</p> <p>23 on those questions, too.</p> <p>24 BY MR. PLUTA:</p> <p>25 Q. Let me -- let me rephrase it here.</p>
<p style="text-align: right;">Page 31</p> <p>1 other is disabled.</p> <p>2 As I mentioned before, it was commonly the</p> <p>3 case. The only reason to state something with</p> <p>4 respect to both cameras, enabled and disabled,</p> <p>5 would be in a case where you're using both</p> <p>6 cameras to capture images at the same time.</p> <p>7 BY MR. PLUTA:</p> <p>8 Q. Well, Yamamoto wouldn't disclose -- or</p> <p>9 couldn't disclose that one camera was enabled and</p> <p>10 the other was disabled because it's a one-camera</p> <p>11 system, right?</p> <p>12 A. Yes, that's true.</p> <p>13 Q. Do you agree that Thorn does not disclose</p> <p>14 that when the front camera is enabled the back</p> <p>15 camera remains disabled, because Thorn is a</p> <p>16 one-camera system as well?</p> <p>17 A. Of course, it would not disclose that.</p> <p>18 And as I've described, it was essentially ubiquitous</p> <p>19 in the relevant timeframe; that if one camera was</p> <p>20 enabled the other camera was disabled, unless it was</p> <p>21 a specific application where simultaneous image</p> <p>22 capture was used to create a combined image from the</p> <p>23 two cameras, as an example.</p> <p>24 Q. Well, there's an example in the '757</p> <p>25 patent that describes the front and back camera</p>	<p style="text-align: right;">Page 33</p> <p>1 In Paragraph 202, you state: "Likewise, Kim</p> <p>2 teaches activating the back camera 121 prime (i.e.,</p> <p>3 second camera)" -- and you cite paragraphs 94 and 95</p> <p>4 of Kim -- "in response to the user performing an</p> <p>5 image capture input on the display" -- "touch</p> <p>6 display" at 130.</p> <p>7 So my question was: You cite paragraphs 94</p> <p>8 and 95 of Kim for this proposition. Can you show me</p> <p>9 where in those paragraphs Kim supports that</p> <p>10 proposition?</p> <p>11 MR. HEINTZ: Objection, form.</p> <p>12 THE WITNESS: Yeah. In paragraphs 94 and</p> <p>13 95, Kim is disclosing a second camera on --</p> <p>14 arranged on the rear face of the device. And</p> <p>15 it was -- Kim also discloses a touch screen</p> <p>16 that can be used for inputting instructions.</p> <p>17 And it was common and potentially</p> <p>18 ubiquitous at the time that the camera and --</p> <p>19 and more commonly, the cameras were activated</p> <p>20 with a touch command on the touch screen.</p> <p>21 There's no shutter button on -- physical</p> <p>22 shutter button typically on mobile phones.</p> <p>23 And therefore, in order to capture an image</p> <p>24 one simply touches the appropriate area on the</p> <p>25 touch display or touch screen.</p>

<p style="text-align: right;">Page 34</p> <p>1 BY MR. PLUTA: 2 Q. Your testimony right there, that's not 3 disclosing Kim. That's you -- is that an opinion? 4 I'm confused. I was asking about paragraphs 94 and 5 95 that you cited in Paragraph 202. 6 A. So 94 and 95 were used to show that Kim is 7 disclosing the second camera, also the rear camera. 8 And it was commonly known to a person of 9 ordinary skill in the art, and in this case I would 10 say it's inherent in that there would have to be a 11 touch operation in order to activate the camera. 12 Otherwise, there's -- otherwise, there would be no 13 way to capture the image other than voice input. 14 MR. HEINTZ: And I would again object to 15 the form of the question. 16 BY MR. PLUTA: 17 Q. Let's take a look at Paragraph 205. In 18 Paragraph 205, you state: "Kim does not disclose 19 introducing any displays between the manual 20 selection and the taking/recording of an image with 21 the back facing camera 121 prime (second camera)." 22 Do you see that? 23 A. Yes. 24 Q. Is that your opinion still? 25 A. That's correct. And as I say further, to</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Yes, Thorn has a -- an intentional delay 2 used for the second camera. The intentional -- an 3 intentional delay for -- that Thorn is using to 4 intentionally put in place for Claim Element [1a], 5 Thorn is being used to disclose that, yes. 6 Q. And as you say, the intentional delay that 7 Thorn has, it's based on the blink history of the 8 individual; is that right? 9 A. It's based on that, and it's something 10 that would be programmable. It's -- but in the 11 range of 100 milliseconds to 300 milliseconds, with 12 a default of 250 milliseconds. 13 Q. Right. And it's programmable because 14 those values are calculated prior to the shutter key 15 being pressed in Thorn? 16 MR. HEINTZ: Objection, form. 17 THE WITNESS: The delay is intentionally 18 inserted and will be there. That delay is in 19 addition to what normally would happen -- 20 happen without -- with just a normal press of 21 a shutter button. So it would be not 22 immediate capture. There's some intentionally 23 inserted delay between pressing the shutter 24 button and the image being recorded. 25 BY MR. PLUTA:</p>
<p style="text-align: right;">Page 35</p> <p>1 the extent that the -- this limitation is satisfied 2 by a zero Second Standby Time, Kim and Yamamoto 3 disclose it or render it obvious. 4 Q. And you'd also agree that Yamamoto does 5 not disclose introducing any delays between the 6 manual operation of the shutter button 201 and the 7 taking or recording an image? 8 A. Yes, that is the case. And as further 9 described in this ground of my declaration, that 10 limitation is disclosed by Thorn. 11 Q. Okay. And you rely on Thorn for the 12 Second Standby Time; is that right? 13 A. In this ground I rely on Thorn, and 14 another ground I rely on Canon EX-V7. 15 Q. Right, we'll get to that. But in this 16 ground you're relying on Thorn for the Second 17 Standby Time, right? 18 MR. HEINTZ: Objection. 19 THE WITNESS: Yes, Paragraph 206 and 207 20 of my declaration, Thorn is the reference used 21 to disclose the Second Standby Time. 22 BY MR. PLUTA: 23 Q. And Thorn has predetermined values based 24 on blink history of an individual. Is that your 25 recollection?</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. Right. But the delay time in Thorn, based 2 on a user's blink history, is set prior to the 3 camera shutter being pressed. It's got to be stored 4 somewhere, right? 5 A. It's stored somewhere, yeah. 6 Q. And if you look at Figure 5 of Thorn, 7 which you have in Paragraph 207 of your declaration, 8 the blink delay is implemented only if the shutter 9 key is pressed if a blink by the subject is 10 detected, right? 11 MR. HEINTZ: Objection, form. 12 MR. PLUTA: Let me reask that question. 13 BY MR. PLUTA: 14 Q. The blink delay is implemented only if 15 after the shutter key is pressed a blink by the 16 subject is detected? 17 A. The intentional delay in Thorn is inserted 18 if the -- if a blink is detected. 19 Q. And if a blink isn't detected the delay is 20 bypassed in Thorn, correct? 21 A. That's correct, but it doesn't really have 22 any bearing on whether or not it's sufficient to 23 show what's in Claim Element [1i]. 24 Q. And you're applying this blinking delay to 25 Kim's rear camera 121 prime; is that right?</p>

<p style="text-align: right;">Page 38</p> <p>1 A. Yes.</p> <p>2 Q. And in Thorn, is there any control unit</p> <p>3 for multiple cameras?</p> <p>4 Let me strike that. I think we already --</p> <p>5 Thorn only has one camera, right?</p> <p>6 A. Thorn only has one camera. Thorn has a</p> <p>7 control -- a controller for a camera.</p> <p>8 Q. And Thorn's controller manages that camera</p> <p>9 and the flash based on its blink detection; is that</p> <p>10 fair?</p> <p>11 A. Among other things. It also manages the</p> <p>12 delay based on blink detention.</p> <p>13 So the processor is used to manage and insert</p> <p>14 an intentional delay for a camera, and that's what's</p> <p>15 required to modify the Kim device to have Element</p> <p>16 [1i].</p> <p>17 Q. And Thorn's controller doesn't disclose</p> <p>18 anything about adjusting standby times based on</p> <p>19 which camera is enabled; is that correct?</p> <p>20 A. Yes, Thorn isn't relied on for adjusting</p> <p>21 standby times. Thorn is relied on for showing that</p> <p>22 an intentional delay placed in a camera that is</p> <p>23 short, in a range of 150 to 300 milliseconds, for a</p> <p>24 camera that's used to take pictures other than the</p> <p>25 photographer.</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. Does Takahashi disclose a touch display?</p> <p>2 A. I don't believe so, but I'm not relying on</p> <p>3 Takahashi for a touch display.</p> <p>4 Q. Okay. And Takahashi only describes a</p> <p>5 one-camera system; is that right?</p> <p>6 A. That's correct. But in general, I think</p> <p>7 the '757 patent is directed to a process used to</p> <p>8 capture an image with -- with a camera, so I would</p> <p>9 say any reference that is directed to capturing an</p> <p>10 image with a camera is relevant.</p> <p>11 Q. Any reference that's directed to capturing</p> <p>12 an image with a camera is relevant to your analysis?</p> <p>13 A. Yes. The fact that a particular reference</p> <p>14 only has one camera or two I don't think is -- is of</p> <p>15 much import with respect to using it to show a Claim</p> <p>16 Element because it's directed to capturing an image</p> <p>17 with a camera.</p> <p>18 Q. Take a look at Paragraph 17 of Takahashi,</p> <p>19 please.</p> <p>20 A. Okay.</p> <p>21 Q. Here, Takahashi references a mode dial 20?</p> <p>22 A. Yes.</p> <p>23 Q. And the mode dial 20, the user can select</p> <p>24 manual photography mode, voice audio photography</p> <p>25 mode, and voice audio pattern registration mode; is</p>
<p style="text-align: right;">Page 39</p> <p>1 MR. PLUTA: Okay. Let's take a break.</p> <p>2 (Recess at 10:11 a.m. to 10:24 a.m.)</p> <p>3 BY MR. PLUTA:</p> <p>4 Q. Let's talk about your opinions relating to</p> <p>5 Ground 1. That's the ground you discussed Chinn and</p> <p>6 Takahashi and EX-V7; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Let's go to Paragraph 70. In this</p> <p>9 paragraph, you reference one of your patents in</p> <p>10 Exhibit 1007; is that right?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And am I correct in saying you're</p> <p>13 not relying on Exhibit 1007 as a base of -- basis</p> <p>14 for your opinions in Ground 1? Correct?</p> <p>15 A. It's not referenced. It's just a general</p> <p>16 comment to show that that concept was well known</p> <p>17 prior to the filing of the '757 patent.</p> <p>18 Q. Okay. Take a look at the Takahashi</p> <p>19 reference, which is Exhibit 1005. This is the</p> <p>20 translation of Takahashi.</p> <p>21 And Takahashi was filed on April 25th, 2000;</p> <p>22 is that right?</p> <p>23 A. I believe, yes.</p> <p>24 Q. And published on November 2nd, 2001?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 41</p> <p>1 that right?</p> <p>2 A. Yes.</p> <p>3 Q. And the next paragraph down, Takahashi</p> <p>4 also discloses a switch detection circuit 100; is</p> <p>5 that right?</p> <p>6 A. Yes.</p> <p>7 Q. And the switch detection circuit 100</p> <p>8 detects switching of the mode dial 20, pressing of</p> <p>9 the shutter release button 22, and pressing of the</p> <p>10 adjustment buttons 26 and 28; is that right?</p> <p>11 A. Yeah; as well as the shutter button, yes.</p> <p>12 Q. The shutter release button 22?</p> <p>13 A. Yes.</p> <p>14 Q. And in Paragraph 20 Takahashi references a</p> <p>15 timer circuit 102, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And the timer circuit, according to</p> <p>18 Takahashi, is a time measurement circuit which</p> <p>19 measures the time set by the self-timer in manual</p> <p>20 photography mode using the shutter release button 22</p> <p>21 and a prescribed shutter release standby time in</p> <p>22 voice, audio, and photography mode. Is that right?</p> <p>23 A. That's what's stated in Paragraph 20.</p> <p>24 Q. And Takahashi further describes the</p> <p>25 prescribed amount of time to set ahead of time for</p>

<p style="text-align: right;">Page 42</p> <p>1 voice audio photography mode, but the set amount of 2 time can be adjusted to be variably longer or 3 shorter by operating the adjustment buttons 26 and 4 28. 5 Do you agree that Takahashi discloses that? 6 A. Yes. 7 Q. And in Paragraph 22, Takahashi also 8 discloses -- discusses a voice recognition pattern 9 registration circuit 106; is that right? 10 A. Yes. 11 Q. And that's as described by Takahashi as: 12 "Storage circuit which stores voice 13 recognition patterns input from the voice 14 recognition input circuit 122 when the 15 mode dial 20 has been switched to the 16 position indicating voice audio 17 registration mode." 18 Does Takahashi disclose that? 19 A. Yes. 20 Q. If you go down to Paragraph 29 of 21 Takahashi, it describes a voice audio input circuit, 22 122? 23 A. Yes. 24 Q. And that's an input circuit for converting 25 analog voice signals from the microphone 16 into</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Yes. 2 Q. And in 34, Paragraph 34 of Takahashi, 3 Takahashi describes operation during photography. 4 Agreed? 5 A. The first sentence in Paragraph 34 is 6 "Operation during photography is described next in 7 Figure 3." 8 Q. And the next sentence says: "The first 9 photographer" -- "First, the photographer turns the 10 main power of the camera on in step S10." 11 Do you see that? 12 A. Yes. 13 Q. The camera is enabled at that point, 14 correct? 15 A. Correct. 16 Q. Go down to Paragraph 35. The second 17 sentence says: 18 "If manual photography mode has been 19 selected, the main control circuit 126 20 moves to step test 18 and executes the 21 ordinary photography sequence triggered by 22 pushing the shutter release button 22." 23 Do you see that? 24 A. Yes. 25 Q. So is this describing Takahashi in a</p>
<p style="text-align: right;">Page 43</p> <p>1 digital signals and inputting digital signals? 2 A. Correct. 3 MR. HEINTZ: Objection to form. 4 BY MR. PLUTA: 5 Q. Okay. If you go down to Paragraph 32 of 6 Takahashi, the second sentence states: 7 "First, before taking any pictures the 8 photographer registers the first voice 9 audio pattern for adjusting focus and the 10 second voice audio pattern for taking a 11 picture." 12 Do you see that? 13 A. Yes. 14 Q. Then in Paragraph 33, the last sentence 15 states: 16 "Next the photographer speaks a phrase, 17 such as for example 'Take a picture' as 18 the second voice audio pattern. And the 19 second voice audio pattern for taking 20 pictures is registered in the voice 21 audio." I think that's a typo. 22 "Pattern registration circuit 106 as 23 described above. Photography using voice 24 audio input is thus made possible." 25 Do you see that in Paragraph 33?</p>	<p style="text-align: right;">Page 45</p> <p>1 situation where there is no voice audio input? 2 A. It describes using manual photography. 3 Q. Where there's no voice input? 4 A. Voice is not being used to capture a 5 photograph by manual photography. 6 Q. Okay. Next sentence states, though: 7 "If voice audio photography mode has been 8 selected the main circuit control 126 9 launches the voice audio input circuit 10 122, moves to step S20 and waits for the 11 first voice audio input." 12 Do you see that? 13 A. Yes, you read that correctly. 14 Q. Okay. And would you associate the first 15 voice audio input as a voice command? 16 A. Yes. 17 Q. Okay. And at that point the camera is 18 already enabled when the command voice is given, 19 right? 20 MR. HEINTZ: Objection to form. 21 THE WITNESS: The camera was powered on 22 manually, yes. 23 BY MR. PLUTA: 24 Q. Let's go to Paragraph 74 of your 25 declaration. And in this paragraph you reference</p>

<p style="text-align: right;">Page 46</p> <p>1 the EX-V7 manual; is that right?</p> <p>2 A. That's correct.</p> <p>3 Q. And in the last sentence, you state:</p> <p>4 "EX-V7 provides the motivation to</p> <p>5 implement such a delay in the</p> <p>6 Chinn-Takahashi device. The two-second</p> <p>7 delay is the time from a recognition of a</p> <p>8 manual activation instruction to the start</p> <p>9 of the image capture."</p> <p>10 Did I read that correctly?</p> <p>11 A. Yes.</p> <p>12 Q. And the motivation in EX-V7 is Page 77 of</p> <p>13 the manual?</p> <p>14 A. That's what I have in my declaration. I</p> <p>15 believe that's correct.</p> <p>16 Q. Okay.</p> <p>17 A. Which is the point is the two-second delay</p> <p>18 there is to prevent blur -- blur due to hand</p> <p>19 movement as a result of physically pressing the</p> <p>20 shutter button.</p> <p>21 Q. Okay.</p> <p>22 A. Or camera movement.</p> <p>23 Q. Would you agree that the EX-V7 user guide</p> <p>24 only discloses one camera?</p> <p>25 A. Yes, but I don't see -- I don't think</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Okay.</p> <p>2 Q. Chinn states about in the middle of that</p> <p>3 paragraph:</p> <p>4 "Example UI 200 comprises a display area</p> <p>5 220, multiple camera activation controls</p> <p>6 231, 232, and 233, and a control bar 210</p> <p>7 comprising setting controls 241, 242, 243,</p> <p>8 244, and 245."</p> <p>9 Do you see that?</p> <p>10 A. I see that.</p> <p>11 Q. In element 231, the activation is</p> <p>12 described by Chinn as listening initiation control;</p> <p>13 is that right?</p> <p>14 A. Yes, it is.</p> <p>15 Q. And 232 is timer initiation control?</p> <p>16 A. Correct.</p> <p>17 Q. And 233 is camera activation control?</p> <p>18 A. That's correct.</p> <p>19 Q. And in Paragraph 23, Chinn describes</p> <p>20 "Sound data received via microphone 150 in response</p> <p>21 to user activation of the listening control 231?"</p> <p>22 A. Yes.</p> <p>23 Q. Would you agree that a user activates</p> <p>24 listening control 231 by touch input?</p> <p>25 A. The camera is -- or the device is put into</p>
<p style="text-align: right;">Page 47</p> <p>1 that's relevant with respect to the combination or</p> <p>2 the element that is being -- or why that reference</p> <p>3 is being used to show a particular Claim Element.</p> <p>4 Q. Do you agree that EX-V7 does not have a</p> <p>5 touch display?</p> <p>6 A. It does not, but I'm not using that</p> <p>7 reference as a -- evidence of a touch display. It</p> <p>8 is -- the touch display in the case of the '757</p> <p>9 patent is relevant with respect to a touch operation</p> <p>10 to capture an image, meaning press a shutter button.</p> <p>11 And the EX-V7 has a shutter button and just</p> <p>12 happens to be a physical button rather than a touch</p> <p>13 screen.</p> <p>14 But the resulting issues associated with</p> <p>15 touching a device to capture an image, such as</p> <p>16 camera shake or hand shake, are the same regardless</p> <p>17 of whether it's a shutter button physically on a</p> <p>18 camera or a virtual button on a display screen.</p> <p>19 Q. And you agree that EX-V7 does not disclose</p> <p>20 voice activation?</p> <p>21 A. It does not, and it's not being used as a</p> <p>22 reference to show that Claim Element.</p> <p>23 Q. All right. Let's talk about Chinn for a</p> <p>24 little bit, Exhibit 1004. I'll direct your</p> <p>25 attention to Paragraph 22 of Chinn.</p>	<p style="text-align: right;">Page 49</p> <p>1 a listening mode by selecting the listening</p> <p>2 initiation control, which is a GUI.</p> <p>3 Q. And in order for that to be selected a</p> <p>4 user has to touch that part of the GUI, correct, to</p> <p>5 activate listening control 231?</p> <p>6 A. That's the -- that's the example shown,</p> <p>7 yes.</p> <p>8 Q. If you go to Paragraph 31, please, about</p> <p>9 halfway down that paragraph it states:</p> <p>10 "UI 200 may also comprise any number of</p> <p>11 quick settings controls such as 241, 242,</p> <p>12 243, and/or 244 for adjusting settings</p> <p>13 without navigating to settings menus."</p> <p>14 Is that right?</p> <p>15 A. Yes.</p> <p>16 Q. And you understand 241 to be flash</p> <p>17 control?</p> <p>18 A. Yes.</p> <p>19 Q. And 242 is camera selection control?</p> <p>20 A. Correct.</p> <p>21 Q. And 243 is multiple photographs control?</p> <p>22 A. Yes. And by that -- yes. And by those</p> <p>23 descriptions, those are GUIs that the user can set</p> <p>24 defaults for camera operation that are in the</p> <p>25 category associated with those descriptions.</p>

<p style="text-align: right;">Page 50</p> <p>1 Q. And camera selection control 242 changes 2 the settings between the front camera 110 and the 3 back camera 125; is that right? 4 A. Correct. 5 Q. And control 242 requires a touch input and 6 not a command voice; is that right? 7 A. There is a touch input for selecting 8 camera control. 9 Q. Camera control 242? 10 A. 242. 11 Q. It's your opinion that Chinn describes 12 standby times; is that right? 13 A. Yes. 14 Q. And does Chinn differentiate between a 15 first camera and a second camera in terms of its 16 operational standby times? 17 MR. HEINTZ: Objection, form. 18 THE WITNESS: Chinn provides -- Chinn 19 states that the settings that are set or 20 available to be set can apply to first, 21 second, or both cameras, meaning they -- they 22 can each be selected. 23 And then Chinn also describes specific 24 examples of -- by the GUI screens, what some 25 of those standby times may be.</p>	<p style="text-align: right;">Page 52</p> <p>1 screen display. 2 BY MR. PLUTA: 3 Q. Let's take a look at paragraphs 90 through 4 92 of your declaration. It's your discussion of 5 Claim Element [1d]. 6 A. Okay. 7 Q. In Paragraph 90, you state: 8 "As shown below, the back camera 125 is 9 arranged on an opposite side (i.e., back) 10 of the device 100 side (i.e., front) that 11 has the touch screen display 105." 12 A. That's correct. 13 Q. So is it your opinion that the back camera 14 125 is arranged on an opposite side of the touch 15 display 105? 16 A. Yes. And as we discussed before, this 17 declaration was written in the context of the Maxell 18 proposed instructions. And it's my opinion that it 19 would also apply to what was later stated as the 20 court's construction. 21 Q. Let's take a look at Paragraph 96 which 22 relates to your opinion on Claim Element [1g]. 23 A. Okay. 24 Q. Take a look at Paragraph 23 of Chinn in 25 that regard, which you cite in Paragraph 96.</p>
<p style="text-align: right;">Page 51</p> <p>1 And some of the examples in those GUI 2 screens -- for example, Figure 3 and Figure 3 4 -- show specific examples of what the 4 standby time could be for a shutter initiated 5 capture, as well as a voice initiated capture. 6 BY MR. PLUTA: 7 Q. Let's take a look at Paragraph 88 of your 8 declaration. Paragraphs 88 and 89 are your 9 discussion of Element [1c] with respect to Chinn. 10 A. Okay. 11 Q. Okay. You state: "As shown below, the 12 front camera 110 is arranged on the same (i.e., 13 front) side of the device, 100 having the touch 14 screen display 105." 15 Is that right? 16 A. Correct. 17 Q. So is it your opinion that the front 18 camera 110 is arranged on the same side of the touch 19 display 105? 20 MR. HEINTZ: Objection, form. 21 THE WITNESS: Yes, I -- as stated in the 22 sentence: "The front camera 110 is arranged 23 on the same side (i.e., front) of the device 24 having the touch screen display." 25 So it is on the same side as the touch</p>	<p style="text-align: right;">Page 53</p> <p>1 About midway down that paragraph, Chinn 2 states: 3 "The camera control system 175 may be 4 configured to activate the camera, which 5 may be either or both of camera 110 and/or 6 camera 125, to take a photograph or begin 7 recording a video in response to the 8 predetermined camera activation sound 9 pattern." 10 Do you see that? 11 A. Yes. 12 Q. Okay. So in that paragraph of Chinn, 13 Chinn is not precluding a situation where both 14 cameras are enabled. Would you agree? 15 A. So are you referring to the portion of 16 Paragraph 23 that you just read? 17 Q. Yes. 18 A. Does not preclude? 19 Q. Yes. The portion I just read, Chinn -- 20 Chinn's not precluding a situation where both 21 cameras are enabled. Would you agree with that? 22 A. Well, that section of Paragraph 23 23 describes "A voice command may be used to activate 24 and initiate capture with either or both cameras." 25 So that is stating that -- states both</p>

<p style="text-align: right;">Page 54</p> <p>1 cameras, that it may be used to enable and take 2 images with both cameras simultaneously, so it could 3 do either individually or together. 4 Q. And they're enabled, whether individually 5 or together, by the camera control system 175, 6 correct? 7 A. Yeah, a voice command which is interpreted 8 and electrically accomplishes controlling the 9 cameras. So the controller is listening, the device 10 is listening. Voice commands are received. 11 The control system is the electrical portion 12 that translates that voice command into the 13 appropriate signals to the one or both cameras. 14 Q. If you go to Paragraph 32 of Chinn, it 15 includes a discussion of camera selection control 16 242. 17 A. Okay. 18 Q. And camera selection control 242 allows a 19 selection of a camera by the user; is that right? 20 A. Yes. 21 Q. And that user selection of the camera 22 requires a touch input by the user? 23 A. This is describing the touch interface 24 that can be used to select which camera. I don't 25 know that that precludes a voice -- it's my opinion</p>	<p style="text-align: right;">Page 56</p> <p>1 is the only way that we can get to that state. 2 Q. Okay. The '757 patent, Claim 1, would you 3 agree that the command voice giving the first 4 instruction is linked with the First Standby Time? 5 MR. HEINTZ: Objection to form. Do you 6 have a copy of that? 7 MR. PLUTA: Yes, sure. That might help. 8 THE WITNESS: I was going to look at that. 9 MR. PLUTA: I'll hand you the '757 patent. 10 MR. HEINTZ: Which, for the record, is 11 Exhibit 100. 12 MR. PLUTA: Thank you. 13 BY MR. PLUTA: 14 Q. Let me -- 15 A. You can repeat the question. 16 Q. I'll rephrase the question. 17 A. Sure. 18 Q. Do you agree that Claim 1 of the '757 19 patent links the command voice giving the first 20 instruction to the First Standby Time? 21 MR. HEINTZ: Objection, form. 22 THE WITNESS: The part of the claim that 23 says "Control such when the audio 24 input referred" -- "the input interface 25 receives the command voice, giving a first</p>
<p style="text-align: right;">Page 55</p> <p>1 that does not preclude a voice operation being used 2 to enable both cameras -- one -- one or both 3 cameras, as we previously discussed. 4 Q. Let's take a look at Paragraph 100 of your 5 declaration, which is part of your discussion of 6 Claim Element [1i]. 7 A. Okay. 8 Q. Okay. And you state: 9 "Chinn discloses or renders obvious 10 activating the front camera 110 (i.e., 11 first camera) to output image signals when 12 the voice command is received and the 13 front camera is selected, via" -- for 14 example, "via the camera selection control 15 242." 16 Do you see that? 17 A. That's the first sentence of my -- first 18 sentence in Paragraph 100 of my declaration, yes. 19 Q. Okay. And you're stating that -- or your 20 opinion is that the voice command is received after 21 the camera selection control 242 is chosen by the 22 user? 23 A. I'm just stating an example disclosed in 24 Chinn where the first camera is enabled and the 25 second camera is disabled. I didn't state that that</p>	<p style="text-align: right;">Page 57</p> <p>1 instruction. 2 That is -- that first instruction is 3 directed to a first camera, which has a First 4 Standby Time. 5 BY MR. PLUTA: 6 Q. Can you agree that the First Standby Time 7 is where the first camera is enabled and the First 8 Standby Time is from a recognition of the first 9 instruction, which is generated by the command voice 10 given by the first instruction? 11 MR. HEINTZ: Objection, form. 12 THE WITNESS: The First Standby Time is -- 13 in Claim 1 is in a case where the first camera 14 is enabled and the second camera is disabled. 15 It also states in the last element of 16 Claim 1: 17 "Wherein the First Standby Time is a time 18 of the recognition from the first 19 instruction to a start of a recording of 20 the first image signal by the first 21 camera." 22 BY MR. PLUTA: 23 Q. Paragraph 103 of your declaration, this is 24 your opinion with respect to Claim Element [1j]? 25 A. Uh-huh.</p>

<p style="text-align: right;">Page 58</p> <p>1 Q. I just want to confirm that you cite back 2 to the reasons for limitation [1i] and then you cite 3 sections X.B, 10, and X.A. do you see that? 4 A. Yes. 5 Q. Okay. So other than those citations, 6 you're not providing any additional analysis for 7 Claim Element [1j]; is that correct? 8 A. That's correct; [1i] provides the details 9 of the two cases. The prior Claim Elements are 10 sufficient because they're discussing the cases of 11 the first camera enabled and the second disabled, 12 and vice versa, and the attendant delays. 13 And of course, the delay would have to occur 14 after the voice command is input and prior to the 15 image recording commencing. 16 Q. Mr. Guidash, do you know when the first 17 iPhone was released? Do you remember what year? 18 A. Roughly 2007. 19 Q. 2007? And that first iPhone release, did 20 that have one camera or two cameras on it? Do you 21 recall? 22 A. I don't recall. 23 Q. Do you know when the first iPhone was 24 released that had two cameras on it? 25 MR. HEINTZ: Objection, form.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Okay. And you say, "Chinn discloses a 2 camera device comprising a front camera 110." Do 3 you see that? 4 A. Yes. 5 Q. Then you say: "As shown below, the front 6 camera is arranged on the same (i.e., front) side of 7 the device, having a touch screen display 105." 8 Correct? 9 A. Correct. 10 Q. Okay. So is that opinion given with 11 respect to any particular understanding of the 12 construction of Limitation [1c]? 13 MR. PLUTA: Object to form. 14 THE WITNESS: It was given in the context 15 of the Maxell proposed construction. 16 BY MR. HEINTZ: 17 Q. Okay. 18 A. Which -- which is arranged on the same 19 face as that of the touch display. 20 Q. And actually, what you read there is -- 21 sorry, in your declaration in Paragraph 88, you say: 22 "Arranged on the same side of the device, having a 23 touch screen display 105." Correct? 24 A. Yes. 25 Q. All right. Let me ask you to turn to Page</p>
<p style="text-align: right;">Page 59</p> <p>1 MR. PLUTA: Let me rephrase that question. 2 BY MR. PLUTA: 3 Q. At some point in time, did the iPhone come 4 with two cameras on it? 5 A. Yes. 6 Q. Do you recall when that occurred? 7 A. I don't recall. I'm not sure how it's 8 relevant to my opinions. 9 MR. PLUTA: I'll pass the witness. 10 MR. HEINTZ: Why don't we go off the 11 record? No, we'll take a break. 12 (Recess at 11:13 a.m. to 11:29 a.m.) 13 REDIRECT EXAMINATION 14 BY MR. HEINTZ: 15 Q. Mr. Guidash, do you recall a discussion 16 about Paragraph 88 of your declaration, which is 17 Exhibit 1003, earlier from Mr. Pluta? 18 A. Yes. 19 Q. All right. Would you turn to Paragraph 88 20 of Exhibit 1003? 21 A. Okay. 22 Q. There, you say that "Chinn discloses or 23 renders obvious this limitation" in the first 24 sentence of Paragraph 88, correct? 25 A. Yes.</p>	<p style="text-align: right;">Page 61</p> <p>1 18 of your report, and I'll ask you to direct your 2 attention to Paragraph 43. 3 A. Okay. 4 Q. What are you discussing in Paragraph 43? 5 A. Maxell's proposed construction of the 6 first/front camera. 7 Q. Okay. 8 A. And its location. 9 Q. So is it correct, then, in Paragraph 88 of 10 your declaration where you say "Chinn discloses this 11 limitation," it would only disclose it under 12 Maxell's understanding of the construction of 13 Limitation [1c]? 14 A. No. And I thought I had mentioned this 15 during the deposition; but it would also apply to a 16 current court's construction, at least render it 17 obvious to -- with respect to the location of the 18 front camera being on the same side of the touch 19 display. 20 It would have been obvious, at least under 21 that construction. 22 Q. Okay. So I think you may have misspoken 23 in your answer. You said the same as the court's 24 construction. Do you know what the court's 25 construction is as you're sitting here today?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. It's my rec- -- yes, I do. It's my 2 recollection that it was plain and ordinary meaning: 3 The first camera is on a same side of the touch 4 display. 5 Q. And what about the court's construction of 6 Limitation [1d], which talks about the second 7 camera? 8 A. The second camera is then on an opposite 9 side of the touch display. 10 Q. Okay. 11 A. Of the first camera. 12 Q. So under your understanding of the court's 13 construction, can the first camera and the second 14 camera be on the same side of the touch display? 15 MR. PLUTA: Object to the form. 16 THE WITNESS: The first and second camera 17 have to be on opposite sides of the touch 18 display. 19 BY MR. HEINTZ: 20 Q. Okay. And so Chinn discloses or doesn't 21 disclose that limitation? Let me withdraw that. 22 Does Chinn disclose or render obvious 23 Limitation [1c] under that construction? 24 A. Under the court's construction, Chinn 25 discloses or renders obvious Claim Element [1c].</p>	<p style="text-align: right;">Page 64</p> <p>1 counsel about Chinn's disclosure concerning 2 activating a front or rear camera? 3 A. Yes. 4 Q. Okay. Let me direct your attention to 5 Paragraph 77 of Chinn, which is Exhibit 1004. 6 A. Okay. 7 Q. Okay. Paragraph 7- -- 77 has a first 8 sentence that reads: 9 "Example UI may comprise a user activated 10 face recognition setting 801 that 11 configures the camera control system 175 12 to detect, prior to camera 125 activation, 13 an image of a face in a camera display 14 220, and to automatically focus the camera 15 125 on a face when detected." 16 Do you see that sentence? 17 A. Yes. 18 Q. There's a reference in that sentence to 19 "prior to camera 125 activation," correct? 20 A. Yes. 21 Q. And this passage also discusses 22 automatically focusing the camera on the face when 23 detected, correct? 24 MR. PLUTA: Object to form, leading. 25 THE WITNESS: Paragraph 77 does that, yes.</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Are you able to determine from Chinn 2 whether the front camera is on the opposite side of 3 the touch display, as compared to the rear camera? 4 A. Yes. 5 Q. So you know, in looking for instance at 6 Figure 1 in Paragraph 88, that the front camera is 7 forward of the touch display? 8 MR. PLUTA: Object to form. Also leading. 9 THE WITNESS: I cannot ascertain the 10 position of the front camera with respect to 11 the front face of the -- the front side of the 12 touch display. 13 However, it would have been obvious to 14 move the front camera forward of the touch 15 display for at least the reason of increasing 16 the field of view of the first camera or 17 enabling an ultra close-up image with the 18 first camera. 19 So -- and from Figure 1, I can tell that 20 the back camera is on the back side of the 21 touch display based on its location, compared 22 to the view of the front. 23 BY MR. HEINTZ: 24 Q. Okay. Do you recall testimony earlier 25 today in response to questioning from opposing</p>	<p style="text-align: right;">Page 65</p> <p>1 BY MR. HEINTZ: 2 Q. What if anything does that tell you about 3 the meaning of activating camera 125, as that term 4 is used in Chinn? 5 A. In this particular example, it means -- 6 activation would mean capture of the image. So to 7 capture and then begin reading out the image, 8 because in order to detect the face the camera would 9 already have to be enabled. 10 So in this case, in this particular example 11 the camera is enabled and activation is the readout 12 of the image. 13 Q. And when you say "readout of the image," 14 what do you mean? 15 A. I mean to capture an -- capture the image 16 of what is in the scene and storing that. 17 Q. Does Chinn require the camera to be 18 enabled prior to its activation? 19 A. No. This particular example states that; 20 but, for example, Chinn discusses that various voice 21 commands can be used and provides examples of what 22 voice commands can do with a camera, one of which 23 could be enable a camera. 24 And additionally Claim 1 of Chinn, the element 25 that says:</p>

<p style="text-align: right;">Page 66</p> <p>1 "A sound recognition system configured to</p> <p>2 recognize a predetermined camera</p> <p>3 activation sound pattern wherein the</p> <p>4 camera system is configured to activate</p> <p>5 the camera and to take a photograph or</p> <p>6 begin recording a video in response to the</p> <p>7 predetermined camera activation pattern."</p> <p>8 Alternately, it would be known to a person of</p> <p>9 ordinary skill in the art that if listening was</p> <p>10 enabled or voice commands were enabled in a camera,</p> <p>11 and with that phone another application may have</p> <p>12 been in use -- i.e., a text message comes in -- in</p> <p>13 response to the voice command to take a picture the</p> <p>14 camera has to be enabled in order to take that</p> <p>15 picture.</p> <p>16 Chinn discloses that the camera app and</p> <p>17 control can be dispersed in the operating system,</p> <p>18 and the operating system in that case would know</p> <p>19 that the camera must be enabled in order for it to</p> <p>20 capture the image.</p> <p>21 MR. PLUTA: Object to that question. It's</p> <p>22 calling for a narrative response. I'm also</p> <p>23 going to move to strike the testimony other</p> <p>24 than "No" as nonresponsive to the question. I</p> <p>25 didn't want to interrupt you.</p>	<p style="text-align: right;">Page 68</p> <p>1 CERTIFICATE OF OATH</p> <p>2</p> <p>3 STATE OF FLORIDA)</p> <p>4)</p> <p>5 COUNTY OF MARION)</p> <p>6 I, Rhonda Sue Sansom, RPR, CRR, CRC,</p> <p>7 FPR-C, Shorthand Reporter and Notary Public,</p> <p>8 State of Florida, certify that R. MICHAEL</p> <p>9 GUIDASH personally appeared before me on the</p> <p>10 17th day of February, 2025, and was duly</p> <p>11 sworn.</p> <p>12 WITNESS my hand and official seal this</p> <p>13 18th day of February, 2025.</p> <p>14</p> <p>15</p> <p>16 </p> <p>17</p> <p>18</p> <p>19 RHONDA SUE SANSOM, RPR, CRR, CBC, FPR-C</p> <p>20 My Commission: HH577771</p> <p>21 Notary I.D.: 1818662</p> <p>22 Expires: 8/1/28</p> <p>23 Produced Identification: Florida Driver's License</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 67</p> <p>1 MR. HEINTZ: No further questions. Pass</p> <p>2 the witness.</p> <p>3 RECROSS-EXAMINATION</p> <p>4 BY MR. PLUTA:</p> <p>5 Q. Mr. Guidash, did you speak with counsel at</p> <p>6 all during the break about the substance of your</p> <p>7 testimony?</p> <p>8 A. No.</p> <p>9 Q. Including when you were preparing for</p> <p>10 redirect?</p> <p>11 A. I don't understand your question.</p> <p>12 Q. Did you speak about the content of your</p> <p>13 redirect testimony with counsel during the last</p> <p>14 break?</p> <p>15 A. We spoke about what the redirect would be</p> <p>16 directed to.</p> <p>17 MR. PLUTA: No further questions.</p> <p>18 MR. HEINTZ: Nothing further for me.</p> <p>19 (Thereupon, the deposition was concluded at</p> <p>20 11:43 a.m., with reading and signing having been</p> <p>21 waived.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 69</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2 STATE OF FLORIDA)</p> <p>3)</p> <p>4 COUNTY OF MARION)</p> <p>5 I, the undersigned authority, certify that R.</p> <p>6 MICHAEL GUIDASH personally appeared before me on</p> <p>7 February 17, 2025, and was duly sworn; that the</p> <p>8 foregoing testimony was taken by me in shorthand and</p> <p>9 thereafter reduced to typewriting by use of</p> <p>10 Computer-Aided Transcription; that the foregoing 67</p> <p>11 pages contain a full, true, and correct</p> <p>12 transcription of all the testimony of said witness,</p> <p>13 to the best of my ability; that I am not related to</p> <p>14 or in any way associated with any of the parties to</p> <p>15 said cause of action, or their counsel, and that I</p> <p>16 am not interested in the event thereof.</p> <p>17 WITNESS my hand and official seal on this</p> <p>18 18th day of February, 2025.</p> <p>19</p> <p>20 </p> <p>21</p> <p>22 RHONDA S. SANSOM, RPR, CRR, CRC, FPR-C</p> <p>23 Notary Public, State of Florida</p> <p>24 My Commission No.: HH 577771</p> <p>25 Notary ID No.: 1818662</p> <p>Expires: 8/1/2028</p>

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