

THE UNITED STATES INTERNATIONAL TRADE COMMISSION

Washington, D.C.

In the Matter of
CERTAIN FIBER-OPTIC
CONNECTORS, ADAPTERS, JUMP
CABLES, PATCH CORDS,
PRODUCTS CONTAINING THE SAME,
AND COMPONENTS THEREOF

Investigation No. 337-TA

THE DEPOSITION OF WITNESS, WILLIAM SINGHOSE,
Ph.D., produced, sworn and examined on August 6,
2024, between the hours of 8:00 in the forenoon and
5:00 in the afternoon of that day via Zoom, before
Suzanne Benoist, a Certified Court Reporter within
and for the States of Missouri, Kansas, Iowa,
Illinois and New Mexico, in a certain cause now
pending In the Matter of CERTAIN FIBER-OPTIC
CONNECTORS, ADAPTERS, JUMP CABLES, PATCH CORDS,
PRODUCTS CONTAINING THE SAME, AND COMPONENTS
THEREOF.

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<div>Page 3</div> <div>1 APPEARANCES</div> <div>2</div> <div>3 FOR THE COMPLAINANT:</div> <div>4 ALSTON & BIRD LLP</div> <div>5 MR. JOSHUA M. WEEKS</div> <div>6 MR. J. RAVINDRA FERNANDO</div> <div>7 One Atlantic Center</div> <div>8 1201 West Peachtree Street NW, #4900</div> <div>9 Atlanta, Georgia 30309</div> <div>10 (404) 881-7000</div> <div>11 joshua.weeks@alston.com</div> <div>12</div> <div>13 FOR THE RESPONDENT:</div> <div>14 STINSON, LLP</div> <div>15 MR. JOHN SCHROEDER</div> <div>16 1201 Walnut Street, Suite 2900</div> <div>17 Kansas City, MO 64106</div> <div>18 (816) 842-8600</div> <div>19 john.schroeder@stinson.com</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 5</div> <div>1 IT IS HEREBY STIPULATED AND AGREED by and</div> <div>2 between Counsel for the Plaintiff and Counsel for</div> <div>3 the Defendant, that this deposition may be taken by</div> <div>4 Suzanne Benoist, a Certified Court Reporter and</div> <div>5 Notary Public, and thereafter transcribed into</div> <div>6 typewriting, with the signature of the witness</div> <div>7 being expressly reserved.</div> <div>8 WILLIAM SINGHOSE, Ph.D.,</div> <div>9 of lawful age, being produced, sworn and examined</div> <div>10 on the part of the Respondent, testified as</div> <div>11 follows:</div> <div>12 EXAMINATION</div> <div>13 QUESTIONS BY MR. SCHROEDER:</div> <div>14 (Whereupon, the deposition began at 9:03 a.m.)</div> <div>15 Q. Would you please state your name for</div> <div>16 the record?</div> <div>17 A. William Sinkhose.</div> <div>18 Q. And where are you currently located?</div> <div>19 A. I'm located in Alston & Bird's</div> <div>20 offices in Atlanta, Georgia.</div> <div>21 Q. And where do you reside? You don't</div> <div>22 have to give me like street address but like city</div> <div>23 and state.</div> <div>24 A. Sure. I live in Atlanta, Georgia.</div> <div>25 Q. And do you also work in Atlanta,</div>

<p style="text-align: right;">Page 6</p> <p>1 Georgia?</p> <p>2 A. Yes. For the most part I do.</p> <p>3 Q. And who's your primary employer?</p> <p>4 A. Well, for nine months of the year it</p> <p>5 would be Georgia Tech.</p> <p>6 Q. And the other three months of the</p> <p>7 year who's your employer?</p> <p>8 A. I work for various companies. I also</p> <p>9 do a little bit of work for Georgia Tech in the</p> <p>10 summer. I run a lab that's year round there but</p> <p>11 it's a very small part of my job.</p> <p>12 Q. And when you say you work for other</p> <p>13 companies is that as a consultant?</p> <p>14 A. Yeah, generally. I mean I'm the CTO</p> <p>15 of a company as well so I'm not really a consultant</p> <p>16 there, but a lot of the times I am acting as a</p> <p>17 consultant evaluating products and things like</p> <p>18 that.</p> <p>19 Q. And you mentioned that you were in</p> <p>20 Alston Bird's office. Who else is in the room with</p> <p>21 you?</p> <p>22 A. Just Josh Weeks.</p> <p>23 Q. And do you have any documents with</p> <p>24 you?</p> <p>25 A. Yes, I do.</p>	<p style="text-align: right;">Page 8</p> <p>1 parties to the investigation, is that correct?</p> <p>2 A. That's correct.</p> <p>3 Q. And that party is US Conec, is that</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. How long have you been retained by US</p> <p>7 Conec?</p> <p>8 A. I'm not sure how long I've been</p> <p>9 retained for this particular matter, the ITC case.</p> <p>10 I was retained approximately one year ago to work</p> <p>11 on intellectual property matters in this space but</p> <p>12 it wasn't for this particular ITC case.</p> <p>13 Q. And you have submitted declarations</p> <p>14 in other proceedings for US Conec, is that correct?</p> <p>15 A. Yes. I think you might be referring</p> <p>16 to three IPR declarations I did last year.</p> <p>17 Q. Yes. That is what I'm definitely</p> <p>18 referring to.</p> <p>19 Have you represented, or been</p> <p>20 retained by US Conec with respect to any other</p> <p>21 proceedings?</p> <p>22 A. No. Just those previous IPRs, that</p> <p>23 case that those are associated with which I</p> <p>24 understand is another ITC case, or maybe a district</p> <p>25 court case, and then this ITC case.</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. What documents are those?</p> <p>2 A. I don't know, there's a stack here,</p> <p>3 I'll take a quick look.</p> <p>4 The first one is my declaration and</p> <p>5 then it looks like I have some of the patents, let</p> <p>6 me see. It looks like I have four of the patents,</p> <p>7 I have the '466, the '415, the '075 and the '794.</p> <p>8 Q. And just to kind of get it out there,</p> <p>9 so your declaration, if you open Exhibit 1 that you</p> <p>10 put in that ShareFile link, can you verify that's</p> <p>11 the same declaration that you have in front of</p> <p>12 yourself?</p> <p>13 A. Yeah, it looks pretty similar. It's</p> <p>14 got 100 pages or so, it looks to be correct.</p> <p>15 Q. Yeah, you don't need to verify it</p> <p>16 this second that every page is word for word the</p> <p>17 same, it should be, but I don't expect you to do</p> <p>18 that right now.</p> <p>19 And with respect to this ITC</p> <p>20 investigation you were obtained by one of the</p> <p>21 parties, is that correct?</p> <p>22 A. I'm sorry, you cut out there for a</p> <p>23 second.</p> <p>24 Q. With respect to this ITC</p> <p>25 investigation you are retained by one of the</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. And the other ITC case or district</p> <p>2 court case just to see if it rings a bell, would it</p> <p>3 be the district court case in the District of</p> <p>4 Connecticut, or not District of Connecticut,</p> <p>5 District of Delaware?</p> <p>6 A. I haven't worked on that case</p> <p>7 directly put that does sound like the proper venue.</p> <p>8 Q. Okay. Have you testified previously?</p> <p>9 A. Yes, I have.</p> <p>10 Q. And when you testified previously was</p> <p>11 it for a different party or was it for US Conec?</p> <p>12 A. Okay. I think I understand, I've</p> <p>13 been doing this for 25 years so yes, I've testified</p> <p>14 for a number of different parties over 25 years.</p> <p>15 Q. All right. How many times have you</p> <p>16 testified previously?</p> <p>17 A. Well, just to clarify, do you mean</p> <p>18 testify in a hearing or in court or in deposition?</p> <p>19 Q. Let's start with in hearing or court.</p> <p>20 A. That's probably about 15 times.</p> <p>21 Q. And how many times have you</p> <p>22 testified, approximately, in deposition?</p> <p>23 A. In a deposition as in being an expert</p> <p>24 witness you mean?</p> <p>25 Q. We'll start with as an expert</p>

<p style="text-align: right;">Page 10</p> <p>1 witness, yes.</p> <p>2 A. Okay. Again, I don't have any</p> <p>3 records in front of me but I would think I've been</p> <p>4 deposed as an expert approximately 35 times. 30 to</p> <p>5 35.</p> <p>6 Q. And in those 35 times were they</p> <p>7 primarily patent law cases?</p> <p>8 A. No. Not primarily. I think there</p> <p>9 were probably half of them had to do with</p> <p>10 intellectual property.</p> <p>11 Q. Were any of those 35 approximate</p> <p>12 times that you've testified as an expert witness,</p> <p>13 were any of those related to the field of fiber</p> <p>14 optic connectors?</p> <p>15 A. A number of the cases have involved</p> <p>16 connectors, I'm not sure I can remember one that</p> <p>17 was specifically fiber optics as I sit here. I</p> <p>18 don't think so, I think other kinds of connectors</p> <p>19 were involved.</p> <p>20 Q. And when you say other kinds of</p> <p>21 connectors are we discussing like electrical</p> <p>22 connectors?</p> <p>23 A. Well, some of the connectors</p> <p>24 connected light transmission and some connected</p> <p>25 electrical transmission, but the connectors the way</p>	<p style="text-align: right;">Page 12</p> <p>1 anything, but is there anything you've identified</p> <p>2 in your declaration that you either have changed</p> <p>3 your opinion regarding or that you realize you</p> <p>4 misstated?</p> <p>5 A. No.</p> <p>6 Q. How did you prepare for this</p> <p>7 deposition?</p> <p>8 A. Well, I guess I started preparing for</p> <p>9 this deposition since I started working on the case</p> <p>10 in the sense that I had to read these patents and</p> <p>11 understand them and then read Dr. Goossen's report</p> <p>12 so and so forth, stuff like that, so that's part of</p> <p>13 preparing for this. But you might mean more</p> <p>14 recently, in the recent history, and I would say I</p> <p>15 met with attorneys a couple of times and then I</p> <p>16 actually sat in yesterday on Dr. Goossen's</p> <p>17 deposition, I think that was preparation for my</p> <p>18 deposition as well.</p> <p>19 Q. All right. Turning to your</p> <p>20 declaration, which is Exhibit 1, you start your</p> <p>21 declaration on I guess the first page outside the</p> <p>22 table of contents discussing your education and</p> <p>23 work experience, is that correct?</p> <p>24 A. Well, I actually start with just an</p> <p>25 introduction, scope of my opinions is the first</p>
<p style="text-align: right;">Page 11</p> <p>1 that I view them is they're mechanical connectors,</p> <p>2 they're physically attaching to mechanical pieces</p> <p>3 and what they're transmitting often isn't important</p> <p>4 but I think some of them were transmitting light</p> <p>5 but for the most part they were probably</p> <p>6 transmitting electricity.</p> <p>7 Q. And we've already established that</p> <p>8 Exhibit 1 is your declaration, correct?</p> <p>9 A. Yes.</p> <p>10 Q. Who drafted your declaration?</p> <p>11 A. I mean to the extent I understand</p> <p>12 drafting that would be me. I started it, I</p> <p>13 generated most of the content, I generated the</p> <p>14 arguments in there, but certainly the lawyers</p> <p>15 contributed some portions and then as you know I</p> <p>16 turn it over to them and they finalize it and make</p> <p>17 it into a pdf and transfer it over to you. So I</p> <p>18 can't say I did everything in creation of this</p> <p>19 document.</p> <p>20 Q. Fair enough. And that declaration</p> <p>21 was I guess only submitted or served about a week</p> <p>22 ago, is that correct?</p> <p>23 A. Yeah. I think less than a week ago.</p> <p>24 Q. And I'm assuming with how short of a</p> <p>25 time period we're talking there probably isn't</p>	<p style="text-align: right;">Page 13</p> <p>1 section that's in my declaration.</p> <p>2 Q. And at the bottom of that you start</p> <p>3 discussing your education and work experience?</p> <p>4 A. Yes. That's correct.</p> <p>5 Q. And kind of going through it, you</p> <p>6 mentioned already that you are a professor at</p> <p>7 Georgia Institute of Technology, is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. And at paragraph 10 you state that</p> <p>10 connectors and adapters are one of the most core</p> <p>11 elements of mechanical engineering.</p> <p>12 Do you see that?</p> <p>13 A. Yes, I do.</p> <p>14 Q. Then you state right after that that</p> <p>15 you teach an introductory mechanical design class</p> <p>16 in which you teach students how to design and use</p> <p>17 connectors.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. What class is that that you teach?</p> <p>21 A. The name of it is ME, in terms of,</p> <p>22 standing for mechanical engineering, so it's Me</p> <p>23 2110 and then it has a textual name which is called</p> <p>24 Creative Decisions and Design.</p> <p>25 Q. And if you would open Exhibit 2.</p>

<p style="text-align: right;">Page 14</p> <p>1 A. Okay. I have that open.</p> <p>2 Q. Do you recognize Exhibit 2?</p> <p>3 A. It appears to be some sort of course</p> <p>4 catalog that lists courses in our department and</p> <p>5 gives the name and the credit hours and stuff like</p> <p>6 that.</p> <p>7 Q. And so ME 2110 is what, about the</p> <p>8 fourth course listed there?</p> <p>9 A. Yes, I think the fifth one.</p> <p>10 Q. Or fifth one. Okay. And is that an</p> <p>11 accurate description of that course?</p> <p>12 A. Yes.</p> <p>13 Q. And you state that within that course</p> <p>14 students, you teach students to design and use</p> <p>15 connectors, is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. What type of connectors are you</p> <p>18 teaching them to use?</p> <p>19 A. Well, sort of all kinds that you can</p> <p>20 see in my report there, I've put some of the</p> <p>21 pictures that are used in my slides. So the top</p> <p>22 one shows various types of connectors with shrink</p> <p>23 wrap boots on them and then the second picture</p> <p>24 shows sort of a pin connector that you would slide</p> <p>25 into a board that then would be soldered into place</p>	<p style="text-align: right;">Page 16</p> <p>1 designing connectors for an under-water ultrasonic</p> <p>2 sensor, is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. Did that connector use fiber optics</p> <p>5 at all?</p> <p>6 A. No. That, for the most part, this</p> <p>7 was a long time ago, I think the one we ended up</p> <p>8 using, we investigated a bunch of different kinds</p> <p>9 of sensors for this ride but I think ultimately we</p> <p>10 used an ultrasonic sensor.</p> <p>11 Q. And then you also discussed that you</p> <p>12 worked on I believe latches for simulator rooms, is</p> <p>13 that correct?</p> <p>14 A. Yes, that's correct.</p> <p>15 Q. Did any of those latches use fiber</p> <p>16 optic connectors?</p> <p>17 A. No. The latches don't transmit</p> <p>18 singles. I mean they go up and down to latch the</p> <p>19 doors, they hold them in place, but then there's</p> <p>20 other sensors to detect whether or not the latch</p> <p>21 fully extended, and that latch essentially sends an</p> <p>22 electrical signal down to the controller and says</p> <p>23 okay, everyone's secure within the room, you can</p> <p>24 start moving around. So the latch itself doesn't</p> <p>25 have like a wire coming out of it.</p>
<p style="text-align: right;">Page 15</p> <p>1 and the final picture I show there is a rack which</p> <p>2 has a bunch of different cables going in there and</p> <p>3 have connectors into adapters, so all those. But</p> <p>4 then we also give the students a controller box</p> <p>5 that appears later on in my declaration and they</p> <p>6 have to use that controller box to drive an</p> <p>7 automated machine, so on that controller box is</p> <p>8 also a number of adapters and so they have to</p> <p>9 create connectors that interface with those</p> <p>10 adapters and they have to actually program software</p> <p>11 that transfers data across those connector adapter</p> <p>12 interfaces, both in and out, they have to send</p> <p>13 signals out so they can control motors and so</p> <p>14 forth. So they get a lot of exposure to the use of</p> <p>15 connectors and adapters in this class.</p> <p>16 Q. Are any of the adapters that are</p> <p>17 given exposure to fiber optic connectors</p> <p>18 specifically?</p> <p>19 A. No. We don't use that in the</p> <p>20 sophomore level classes.</p> <p>21 Q. Moving on through your declaration,</p> <p>22 around paragraphs 12 and 13 you discuss your</p> <p>23 experience at Walt Disney World?</p> <p>24 A. Yes.</p> <p>25 Q. And in particular you discuss</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. All right. And none of the sensors</p> <p>2 that were used to like you said verify that the</p> <p>3 latch was closed used fiber optic communications,</p> <p>4 did they?</p> <p>5 A. That I don't know but that really</p> <p>6 wasn't part of my project, but I don't think so.</p> <p>7 Q. And then starting around paragraph 15</p> <p>8 you discuss working for Apple Computers, is that</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. And in particular it looked like you</p> <p>12 worked on an AudioVisual 14 display. Is that</p> <p>13 correct?</p> <p>14 A. That is correct.</p> <p>15 Q. Can you describe what the AudioVisual</p> <p>16 14 display was?</p> <p>17 A. Sure. It was actually the first</p> <p>18 computer display that had built in speakers and</p> <p>19 microphones. That may sound simple now but back</p> <p>20 then it was quite an advancement because the way</p> <p>21 monitors worked back then was they had a CRT tube</p> <p>22 in it that if you applied sound to it it would</p> <p>23 jiggle the screen, and it would go crazy, so people</p> <p>24 tried for many years to put speakers near these</p> <p>25 things and they just went nuts and they went</p>

<p style="text-align: right;">Page 18</p> <p>1 blurry, so part of our project was to get that to 2 work and we did get it to work and we sold billions 3 of them, but you can imagine that was challenging 4 to isolate the vibration in the CRT tube and also I 5 had to do things like attach light sensors to the 6 front of the monitor to see if we were affecting 7 the picture quality by injecting sound into it. So 8 it was quite an extensive project but turned out to 9 be quite successful actually. Well, and part of 10 that was to interface this new monitor which had a 11 bunch more cables coming out of it to the computer 12 and that's why we had to develop a new set of 13 connectors and adapters to get that to work. 14 Q. And, again, those connectors and 15 adapters, were those electrical connectors and 16 adapters? 17 A. I think for the most part they were. 18 At that time we had some access to sort of light 19 interfaces. Like I said, the sensors that we had 20 testing it used light, but. This was quite a while 21 ago, so I don't think they're always ready for that 22 so I think all of these lines that we had in there 23 ended up being electrical lines. 24 Q. And, so in, on the next page kind of 25 still on paragraph 15 you've got kind of a diagram</p>	<p style="text-align: right;">Page 20</p> <p>1 out there. 2 Q. And in your role there did you work 3 with fiber optic connectors at all? 4 A. Yeah, we had a lot of devices there 5 that used fiber optic connectors but I didn't 6 design, I just used them in the equipment that we 7 had. We had various pieces of sort of complicated 8 equipment to measure, like laser vibrometers and, 9 to measure, again, I was doing a lot of stuff with 10 vision and so you'd need detectors to detect light 11 and so I used a lot of machines that had light 12 detectors which had fiber optics in them but I 13 didn't design the fiber optic connectors, I just 14 used what we had. 15 Q. Do you know what type of fiber optic 16 connectors they were? 17 A. No. As I sit here I can't remember 18 that. Again, basically I would plug them in, for 19 example the laser vibrometer, and just use a laser 20 vibrometer, but I wasn't really concerned with the 21 design of the connector, I was concerned with the 22 use of the light device that it was connecting to. 23 Q. And then you returned back to Georgia 24 Tech in 2020, is that correct? 25 A. Yes.</p>
<p style="text-align: right;">Page 19</p> <p>1 of the connector plug I'm assuming and so all those 2 slots, would those be electrical slots? 3 A. I think so, I think that's what they 4 ended up all being. There were like 45 pins as I 5 recall and essentially they are sort of for example 6 voltage going in and they're to drive different 7 aspects of camera you could attach, to drive the 8 speakers, and then there's stuff coming out, and I 9 think all of those ultimately ended up being some 10 form of electrical signals, either analog or we 11 have some Iceberg [sic] C serial protocols in there 12 and things like that, so it's a variety of 13 different signals but ultimately I think all of 14 these would, you could characterize them as an 15 electrical signal. 16 Q. And then later on it sounds like you 17 worked for Google, is that correct? 18 A. Yeah, I worked for Google for quite a 19 while starting in about 2015, but I started working 20 with them while I was still basically, largely a 21 full-time professor at Georgia Tech and then after 22 a few years they asked me to come out there and be 23 on site so I went out and worked on site for, I'm 24 sorry, the Mountain View campus in Silicon Valley 25 for more than two and a half, almost three years</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And paragraph 18 you discuss that you 2 worked on LRA dynamics and control. Can you 3 explain what LRA is? 4 A. Yes. LRA stands for linear resonant 5 actuator and if you have an iPhone and it buzzes 6 that vibration or those forces are being generated 7 by an LRA inside there, it's a motor that basically 8 gets pushed back and forth and causes forces and 9 you feel them, and in addition to it being in 10 iPhones they're in iWatches, they're in smart 11 watches, and so basically I was working for Google 12 to develop new kind of, those are called haptic 13 signals, haptics are when something's applying 14 force. I was developing new kinds of haptics and 15 dynamics and controllers for Google in largely the 16 smart watch products that they were developing. 17 Q. And then starting around paragraph 19 18 you have images of the electron controller box that 19 you use for your mechanical design course, is that 20 correct? 21 A. Yes. This is the box that we 22 developed about 20, more than 20 years ago and we 23 developed these in the sense that we designed them 24 at Georgia Tech, we constructed them at Georgia 25 Tech and then we issued them to our class which has</p>

<p style="text-align: right;">Page 22</p> <p>1 hundreds and hundreds of students each year and 2 these are the brains if you will of the machines 3 that the students design and build. Now this is 4 not the one we currently use, we've developed about 5 three or four, we've developed about three in-house 6 versions like this and now we switched over and we 7 use a commercial version of this kind of box. 8 Q. And for this box that you developed 9 in 2003, did it have any fiber optic connectors or 10 adapters? 11 A. No. It interfaced with infrared 12 sensors but it doesn't, that gets converted to 13 electrical so all of these connectors are 14 electrical connectors. 15 Q. If you could can you open Exhibit 3? 16 A. Okay. I have that open. 17 Q. And Exhibit 3 is a collection of some 18 fiber optic connectors that I took images of and I 19 want to just kind of walk through these and kind of 20 understand what these are and, you know, have you 21 explain for me, you know, what your knowledge of 22 them are. On this first page do you recognize what 23 type of connector that is? 24 A. Well, yeah, I mean there's different 25 names for this kind of stuff but again, if there's</p>	<p style="text-align: right;">Page 24</p> <p>1 ferrules usually have just a few different sizes, 2 like 1.25 millimeters, or 2.5 millimeters, stuff 3 like that. There's a few standard sizes of them. 4 Q. Do you see how that connector is 5 blue? 6 A. Yes. 7 Q. Do you know what that blue signifies? 8 A. Not off the top of my head. 9 Q. Would you know what it would signify 10 if that connector was green? 11 A. Not off the top of my head. Again, 12 this is something I'd probably look up if there was 13 a need to know that. 14 Q. Are you familiar with the difference 15 in an APC and a UPC ferrule? 16 A. As I sit here you couldn't tell you 17 what the distinction was. Again, I would look that 18 up in some sort of standard. 19 Q. Do you recognize this type of 20 connector -- I'm sorry, you don't see my screen. 21 Moving to the second page, do you 22 recognize the type of connector on the second page 23 of Exhibit 3? 24 A. On the second page that looks like a 25 simplex, looks like it has one, I mean there's a</p>
<p style="text-align: right;">Page 23</p> <p>1 two I think a person of ordinary skill in the art 2 might call that a duplex connector, but it also 3 could be two simplex connectors attached together. 4 Q. Is that specifically though a certain 5 type of connector that's got a common name? 6 A. Oh, I see what you're saying. It 7 probably does. I mean a lot of these connectors 8 have common names, so if you brought up a 9 specification or description I'm sure we could 10 match it pretty quickly to a name. 11 Q. Would you recognize that connector as 12 being an LC connector? 13 A. It very well could be. Again, I 14 don't have the names of all these connectors stuck 15 in my mind in relation to how they look, but yeah, 16 LC is a pretty common name associated with duplex 17 connectors, so it looks something like that. 18 Q. Do you know what the size of the 19 ferrule is on an LC connector? 20 A. Not off the top of my head, pretty 21 small, parts of millimeters, millimeter level, but 22 again, all this stuff is written down in 23 specifications and stuff so that different 24 companies could make different ferrules that all 25 operate in the say way at that level. Those small</p>	<p style="text-align: right;">Page 25</p> <p>1 cover on it but it looks like there's one fiber 2 coming out of a ferrule there. 3 Q. Do you know if this has a common name 4 in the industry as far as that second style of 5 connector? 6 A. It probably does, but I don't know it 7 off the top of my head. 8 Q. Do you know if that connector is a 9 push pull style connector? 10 A. Not for certain but it does look 11 like, it looks like where the ridges are the user 12 would grab there and probably push in from there 13 and when they went to pull it out they would 14 probably pull back on that and it would slide back 15 and depress the latch and then it could be 16 disconnected. But I'm only seeing sort of one 17 view of this but that's certainly possible, it's 18 push pull. 19 Q. And as you're sitting here right now 20 you would not necessarily be able to tell me that 21 that is an SC connector? 22 A. That sounds about right but again, I 23 would want to look up the description of SC or look 24 at the standard for SC and compare it to that, but 25 that sounds about right.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. Do you know what the size of the</p> <p>2 ferrule is on an SC connector?</p> <p>3 A. Not off the top of my head.</p> <p>4 Q. Do you know if SC connectors are</p> <p>5 typically push pull connectors?</p> <p>6 A. I don't know if they're typically. I</p> <p>7 mean they certainly could be and this one looks</p> <p>8 like it and there's not a, it doesn't look like</p> <p>9 there's a latch the person's finger or thumb would</p> <p>10 push down and then pull out. It looks like you</p> <p>11 pull back on that outer housing and so that would</p> <p>12 generally be called a push pull connector because</p> <p>13 you would just pull backwards and it would</p> <p>14 automatically disconnect.</p> <p>15 Q. But you don't know if the standard</p> <p>16 for SC connector is to use a push pull?</p> <p>17 A. I do not know that sitting here.</p> <p>18 Q. If you keep scrolling to the third</p> <p>19 page, do you recognize that type of connector?</p> <p>20 A. Yeah, I recognize seeing this type of</p> <p>21 stuff before. If you want me to characterize it,</p> <p>22 again it looks like, well it's a duplex in the</p> <p>23 sense it has two cables but it looks like it's two</p> <p>24 simplex housed together and it's got the A and B on</p> <p>25 it, which is helping the user identify the</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Do you recognize that type of</p> <p>2 connector?</p> <p>3 A. Yes, I do.</p> <p>4 Q. What type of connector is that?</p> <p>5 A. Well, again, I don't know the name</p> <p>6 but it also looks a lot like an audio connector</p> <p>7 where you push it in and you twist it to lock it,</p> <p>8 and to take it out you would twist the other</p> <p>9 direction and pull out.</p> <p>10 Q. Do you know what the size of ferrule</p> <p>11 is on this type of connector?</p> <p>12 A. No. I don't know if there's a</p> <p>13 standard size. Again, it has a cover on it there</p> <p>14 but it probably has a standard size.</p> <p>15 Q. Moving to the fourth page.</p> <p>16 A. I'm sorry, that was my fourth page.</p> <p>17 Q. I'm sorry, moving to the fifth page.</p> <p>18 A. Okay.</p> <p>19 Q. Do you recognize this type of</p> <p>20 connector?</p> <p>21 A. Yes. I have seen this kind of</p> <p>22 connector before.</p> <p>23 Q. Do you know what this type of</p> <p>24 connector is called?</p> <p>25 A. Not off the top of my head.</p>
<p style="text-align: right;">Page 27</p> <p>1 polarity, so one of those would be an input and one</p> <p>2 would be an output and that's how you would know</p> <p>3 how to insert it, either upside down or the way it</p> <p>4 is right now or flip it around. If you wanted to</p> <p>5 change the polarity.</p> <p>6 Q. Do you know if these are SC</p> <p>7 connectors?</p> <p>8 A. I don't know exactly what those are</p> <p>9 called in terms of SC or LC or whatever in terms of</p> <p>10 the acronym.</p> <p>11 Q. And notice that the color of that</p> <p>12 connector is a beige, correct?</p> <p>13 A. Yeah. For the most part, the boots</p> <p>14 are different colors but the main portion of it is</p> <p>15 certainly beige looking.</p> <p>16 Q. Do you know if the beige color has</p> <p>17 any signification?</p> <p>18 A. I would guess that it does but I</p> <p>19 don't know what that is without looking at the</p> <p>20 standards for the colors associated with</p> <p>21 connectors.</p> <p>22 Q. Going to the fourth slide, or fourth</p> <p>23 page of this exhibit, do you see that connector</p> <p>24 there?</p> <p>25 A. Yes, I do.</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Do you know what the ferrule type is</p> <p>2 for this connector?</p> <p>3 A. I can't see that.</p> <p>4 Q. Are you able to blow up your screen</p> <p>5 at all?</p> <p>6 A. Yeah. It looks pretty blurry.</p> <p>7 There's two dark holes there on that screen,</p> <p>8 everything else is kind of blurry, so. That could</p> <p>9 be two ferrules but I've also seen connectors like</p> <p>10 this where those are two alignment pins and in</p> <p>11 between those two dark holes would be a bunch of</p> <p>12 small ferrules, like there could be 12 or 16 in</p> <p>13 there, but this is just too blurry for me to know.</p> <p>14 Q. So -- okay.</p> <p>15 So you say it could be two ferrules,</p> <p>16 do you mean fibers or ferrules that there could be</p> <p>17 multiples of?</p> <p>18 A. I really can't tell here but those</p> <p>19 two dark circles if they were will ferrules they'd</p> <p>20 probably be sticking out a little bit and I can't</p> <p>21 see that or else I can't tell if they're sticking</p> <p>22 out, but certainly I have seen connectors that look</p> <p>23 like this that are two ferrules, but I've seen them</p> <p>24 where those dark circles like I said are alignment</p> <p>25 pins or pinholes and then between that is a bunch</p>

<p style="text-align: right;">Page 30</p> <p>1 of smaller ferrules.</p> <p>2 Q. All right. And is it smaller</p> <p>3 ferrules or just smaller fibers?</p> <p>4 A. Oh, I see what you're saying. I mean</p> <p>5 it could be smaller fibers. You could call that</p> <p>6 one thing a ferrule in the sense that it's one</p> <p>7 ferrule holding let's say 16 fibers in there. So</p> <p>8 it could certainly be that.</p> <p>9 Q. All right and then there's one last</p> <p>10 page of this exhibit, page 6.</p> <p>11 A. I see that.</p> <p>12 Q. Do you know what type of connector</p> <p>13 this is?</p> <p>14 A. Again, I don't know the name of it if</p> <p>15 that's what you're asking for.</p> <p>16 Q. That is what I was asking for. All</p> <p>17 right, you can go ahead and close that exhibit.</p> <p>18 Do you understand that there are</p> <p>19 specific standards for the various types of</p> <p>20 connectors?</p> <p>21 A. Yes, I do.</p> <p>22 Q. And who sets those standards?</p> <p>23 A. Well, the way that standards work, I</p> <p>24 mean I've been on standard committees before, so</p> <p>25 the way standards work is that usually people from</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Well, I think that's evolved over</p> <p>2 time, I mean I think in the early days individual</p> <p>3 companies who would set a standard like Lucent, but</p> <p>4 currently I'm not sure that even one organization</p> <p>5 controls all aspects of these connectors, but if</p> <p>6 you put it in front of me and said this</p> <p>7 organization has developed a standard for like</p> <p>8 these LC connectors I could verify if that was the</p> <p>9 case.</p> <p>10 Q. Off the top of your head do you know</p> <p>11 who sets the standards for let's say LC connectors?</p> <p>12 A. Again, it's not, your question is who</p> <p>13 does it, I told you it's a long process so a lot of</p> <p>14 people are involved in that. If your question is</p> <p>15 what organization is putting their symbol on it,</p> <p>16 their acronym on it, I don't know as I sit here</p> <p>17 right now.</p> <p>18 Q. All right. And if I were to want to</p> <p>19 find out what the standard for LC connectors is you</p> <p>20 wouldn't know necessarily which organization to</p> <p>21 guide me to, would you?</p> <p>22 A. I would probably know that in just a</p> <p>23 few minutes because for example I would, there's</p> <p>24 basically a site that you go to and you type in LC</p> <p>25 connector standards and it returns the names and</p>
<p style="text-align: right;">Page 31</p> <p>1 a couple different companies at least get together</p> <p>2 and they have meetings and they decide that's the</p> <p>3 best for themselves and maybe the world if they</p> <p>4 start making products that have certain uniform</p> <p>5 characteristics so customers don't get confused or</p> <p>6 they're not aggravated when they try to switch them</p> <p>7 out. So that's how the standards start is</p> <p>8 basically some company recognizing the need to get</p> <p>9 some uniformity within their products. Then as you</p> <p>10 go past that point often a standard organization,</p> <p>11 such as ANSI or ASME or I triple E, they will</p> <p>12 essentially house that group of people and</p> <p>13 encourage them to meet and they'll go through a</p> <p>14 process where they come up with a document that</p> <p>15 describes the uniform features that they want and</p> <p>16 then it gets voted on and it gets published and it</p> <p>17 goes to libraries and then people who want to use</p> <p>18 these products or maybe develop these products they</p> <p>19 have a guideline, a recipe if you will that we can</p> <p>20 follow and they create part of a baseline product</p> <p>21 that should be compatible with the rest of the</p> <p>22 industry.</p> <p>23 Q. What organizations specifically in</p> <p>24 the fiber optic connector field sets these</p> <p>25 standards?</p>	<p style="text-align: right;">Page 33</p> <p>1 the organizations to you and when you do that for</p> <p>2 connectors you often get multiple organizations,</p> <p>3 but multiple organizations are controlling</p> <p>4 different parts of the connector. So it's</p> <p>5 something that, actually it's something that I</p> <p>6 teach my under graduates how to do is go and find</p> <p>7 standards for some element of a product they're</p> <p>8 developing. It's a pretty start forward thing to</p> <p>9 do.</p> <p>10 Q. All right. And I believe we've been</p> <p>11 going about, probably 45 minutes or so. Please do</p> <p>12 let me know if and when you need a break. I'll</p> <p>13 probably take a break about every hour, we did get</p> <p>14 a little bit of a late start, so I'm probably going</p> <p>15 to ask one more round of questions and then</p> <p>16 probably take a break at that point. But as I</p> <p>17 said, you know, do ask me for a break whenever you</p> <p>18 need one. I do ask that if you're in the middle of</p> <p>19 a question let's go ahead and finish that question</p> <p>20 and if I'm close to wrapping up a topic I might ask</p> <p>21 if we can just continue to finish that topic. But</p> <p>22 I didn't state that earlier but I should state it</p> <p>23 now.</p> <p>24 A. That sounds perfectly fine to me.</p> <p>25 Q. Starting around page 13 of your</p>

<p style="text-align: right;">Page 34</p> <p>1 declaration, which would be Exhibit 1 again, you</p> <p>2 discuss the level of ordinary skill in the art, is</p> <p>3 that correct?</p> <p>4 A. Yes.</p> <p>5 Q. And in particular in paragraph 35 you</p> <p>6 -- let me really quickly review that again.</p> <p>7 In, actually it's not specifically in</p> <p>8 paragraph 35. Just asking, for someone that has a</p> <p>9 year of experience designing and working with</p> <p>10 adapters and connectors -- strike that.</p> <p>11 Do you believe that one of ordinary</p> <p>12 skill in the art would need to have experience</p> <p>13 specifically with fiber optic connectors and</p> <p>14 adapters?</p> <p>15 A. No.</p> <p>16 Q. And why do you believe that it would</p> <p>17 not, that with respect to the technology at issue</p> <p>18 that the person of ordinary skill in the art would</p> <p>19 not necessarily need to have experience with fiber</p> <p>20 optic adapters or connectors?</p> <p>21 A. Well, fiber optics has to do with the</p> <p>22 idea of transmitting a light through tubes if you</p> <p>23 will, could be glass tubes or plastic tubes, and</p> <p>24 the technology relevant to that in my opinion would</p> <p>25 be for example how to manufacture those small</p>	<p style="text-align: right;">Page 36</p> <p>1 there currently?</p> <p>2 A. I think that would be useful but I</p> <p>3 don't think they need it to understand and practice</p> <p>4 these patents. I mean the patents are sort of</p> <p>5 stand alone formulas or recipes if you will and I</p> <p>6 think I could give this to say an undergraduate,</p> <p>7 one of my undergraduates who have graduated and</p> <p>8 working for a year and they've been using</p> <p>9 connectors and adapters and I were to give them one</p> <p>10 of these patents I think they could understand it</p> <p>11 and practice it.</p> <p>12 Q. Earlier we discussed simplex and</p> <p>13 duplex connectors, correct?</p> <p>14 A. Yes.</p> <p>15 Q. And the difference between a simplex</p> <p>16 and duplex connector is one would have two ferrules</p> <p>17 whereas the other would have only a single ferrule.</p> <p>18 Is that correct?</p> <p>19 A. I would say it's generally correct</p> <p>20 although you kind of brought up the issue of maybe</p> <p>21 you could put two fibers in one ferrule, you could</p> <p>22 call that structure that holds both of them and I</p> <p>23 think there would be an interpretation that it's</p> <p>24 one ferrule that holds two fibers and one of the</p> <p>25 fibers is an input fiber and one is an output</p>
<p style="text-align: right;">Page 35</p> <p>1 little teeny wires and so you have to go through a</p> <p>2 heating process and a drawing process where you're</p> <p>3 pulling those fibers through ties and you're</p> <p>4 gradually getting them smaller and smaller and</p> <p>5 pointing them around, so there's all aspect that's</p> <p>6 important in terms of if you're going to make the</p> <p>7 fiber and then you're going to coat it and install</p> <p>8 it, and I think if the patents were on that kind of</p> <p>9 stuff you would want to have some experience in</p> <p>10 that area. But the patents that we're talking</p> <p>11 about are essentially connectors and adapters and</p> <p>12 for the most part it doesn't really matter what</p> <p>13 wire's coming through there, I mean it does mention</p> <p>14 that it's fiber coming through that and that would</p> <p>15 just tell a person of ordinary skill in the art</p> <p>16 that these are pretty small and I have to have</p> <p>17 pretty tight tolerances when I make these</p> <p>18 connections, but beyond that a person of the</p> <p>19 ordinary skill in the art doesn't really need to</p> <p>20 know about that fiber technology that I mentioned</p> <p>21 earlier. So these are patents about connectors and</p> <p>22 adapters.</p> <p>23 Q. So in that case would a person of</p> <p>24 skill in the art need to have a understanding of</p> <p>25 the type of fiber optic connectors that are out</p>	<p style="text-align: right;">Page 37</p> <p>1 fiber.</p> <p>2 Q. Well, going more to like the SC</p> <p>3 connectors and the LC connectors, you would</p> <p>4 understand that there were simplexes versus a</p> <p>5 duplex, correct?</p> <p>6 A. Yes. I think the ones that you</p> <p>7 showed me earlier on I think a person of ordinary</p> <p>8 skill in the art would look at that and say there</p> <p>9 was two ferrules because there was two different</p> <p>10 structures that were holding the two fibers and</p> <p>11 they were kind of separated, right? And they were</p> <p>12 mounted in a plastic housing. I think that would</p> <p>13 be two different ferrules.</p> <p>14 Q. Between a simplex and a -- let me</p> <p>15 back up a little.</p> <p>16 Would you understand what a multi</p> <p>17 mode versus a single mode fiber would be?</p> <p>18 A. Generally, yes.</p> <p>19 Q. What is a multi mode?</p> <p>20 A. Well, a multi mode would be a single</p> <p>21 fiber the way that I understand your description, a</p> <p>22 single fiber that would be used in different modes.</p> <p>23 It could be used for example as an input signal,</p> <p>24 sending signals down in one direction, but it could</p> <p>25 also be used to receive signals, essentially going</p>

<p style="text-align: right;">Page 38</p> <p>1 up the fiber in the other direction.</p> <p>2 Q. Well, actually let's back up. Is</p> <p>3 multi node discussing the fiber or the ferrule?</p> <p>4 A. I would think the multi mode would be</p> <p>5 how you're using the fiber.</p> <p>6 Q. Okay. Do you know between multi mode</p> <p>7 or single mode which type would have more precise</p> <p>8 alignment?</p> <p>9 A. Not without looking at the standards</p> <p>10 and not without understanding what you mean by</p> <p>11 precise, but as an engineer I would think if you</p> <p>12 were using the fiber in two different ways, sending</p> <p>13 and receiving, that you might need to align that a</p> <p>14 little bit more precisely with the object that</p> <p>15 you're interfacing with.</p> <p>16 Q. How about in practice which one tends</p> <p>17 to have more precise alignment tolerances?</p> <p>18 A. That's what I'm saying, I don't know</p> <p>19 the required tolerances for that but I would think</p> <p>20 that if you're going to use something in different</p> <p>21 ways that is sending and receiving that you would</p> <p>22 need to align it a little more precisely with the</p> <p>23 one that you're interfacing with.</p> <p>24 Q. Going back to your report discussing</p> <p>25 the level of skill, or level of ordinary skill in</p>	<p style="text-align: right;">Page 40</p> <p>1 connectors. To me that as I understand a bit</p> <p>2 contradictory because the first one requires a</p> <p>3 degree and three years of experience and the last</p> <p>4 one just requires three years of design experience.</p> <p>5 Q. Would you agree that there might be a</p> <p>6 little different experience that you would get just</p> <p>7 working with fiber optics or fiber topic connectors</p> <p>8 and, versus actually designing fiber optic</p> <p>9 connectors?</p> <p>10 A. Yes, I would agree with that although</p> <p>11 that was part of my criticism is that wasn't</p> <p>12 discussed or explained in his analysis.</p> <p>13 Q. Would you agree that would take more</p> <p>14 skill to actually design a connector than to just</p> <p>15 work with a connector?</p> <p>16 A. I'm not sure I'd characterize that as</p> <p>17 more skill, but I think a person whose job was to</p> <p>18 design connectors would probably know more about</p> <p>19 certain aspects of connectors, especially in terms</p> <p>20 of how they would be manufactured, I think that</p> <p>21 would be a big difference, they would know more</p> <p>22 about the manufacturing process than someone who</p> <p>23 would just use them.</p> <p>24 Q. I think I am ready to take a break.</p> <p>25 Do you want to take about 10, 15 minute break?</p>
<p style="text-align: right;">Page 39</p> <p>1 the art, at paragraph 39 you critique Dr. Goossen's</p> <p>2 identification of level of skill in the art. Is</p> <p>3 that correct?</p> <p>4 A. Yes, I do.</p> <p>5 Q. And in particular you critique him</p> <p>6 for basically saying that there's the same amount</p> <p>7 of experience required for someone with a degree</p> <p>8 and someone who does not have a degree. Is that</p> <p>9 correct? Or a formal degree?</p> <p>10 A. Yes. Essentially what I did is I</p> <p>11 looked at his deposition and the first definition</p> <p>12 says you have to have an undergraduate degree in</p> <p>13 some fields and I agree, I think he said mechanical</p> <p>14 and electrical engineer, that seems about right.</p> <p>15 I'm not sure why he put physics in there. And he</p> <p>16 said in addition to that undergraduate degree you,</p> <p>17 the person, or the standard, would be in addition</p> <p>18 to that set of knowledge we would also need three</p> <p>19 years of experience in fiber optics and fiber optic</p> <p>20 connectors, and then he has that second one which</p> <p>21 he says a Master's degree could displace two years</p> <p>22 of experience in fiber optics, and then he got to</p> <p>23 the third one and he basically said you don't need</p> <p>24 a degree but you just need three years I think of</p> <p>25 this designing fiber optics and fiber optic</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Sure.</p> <p>2 (A RECESS WAS TAKEN BY THE PARTIES)</p> <p>3 Q. (BY MR. SCHROEDER) Before the break</p> <p>4 I spent the time discussing your qualifications,</p> <p>5 kind of the fiber optic field generally and the</p> <p>6 level of skill in the art. I'd like to move on and</p> <p>7 actually talk about the actual claim construction</p> <p>8 some. First thing though I would like to ask is</p> <p>9 would you agree that there are terms within the</p> <p>10 field of fiber optic connectors that have specific</p> <p>11 meanings within the art?</p> <p>12 MR. WEEKS: Objection to form.</p> <p>13 A. I think in the general field,</p> <p>14 certainly I think actually every field probably has</p> <p>15 that aspect where people working in the field know</p> <p>16 what certain terms mean in a certain way.</p> <p>17 Q. (BY MR. SCHROEDER) And so the world</p> <p>18 ferrule for instance would have a meaning that's</p> <p>19 specific to the fiber optic field connector, or</p> <p>20 fiber optic -- let me rephrase that because I</p> <p>21 butchered it.</p> <p>22 The term ferrule would have a meaning</p> <p>23 that is specific to the fiber optic connector</p> <p>24 field. Correct?</p> <p>25 A. I'm not sure what you mean by</p>

<p style="text-align: right;">Page 42</p> <p>1 specific to the field because I think again, people 2 who weren't working in the field if they were 3 reading about a ferrule they could easily look it 4 up and understand it, so I'm not sure the word is 5 specific to the people in the field, it does have a 6 specific meaning, I'll grant you that. 7 Q. And for instance ferrule has a 8 different meaning or might signify a different item 9 if you're talking about for example pipefitting 10 connectings or if you were to talk about pencil 11 erasers. 12 A. I'd have to consider that question 13 but sitting here answering on the fly sort of, 14 yeah, I think if you were going to talk about a 15 ferrule in those other fields I think there would 16 be some similarities in terms of it's a structure 17 that secures something else inside of it and 18 positions it, but certainly a ferrule if you want 19 to call it for pipefitting would have some 20 substantial differences to a ferrule in fiber 21 optics even though some of the features, some of 22 the characteristics would be similar. 23 Q. Right. Or how about the term boot, 24 would the term boot have a specific meaning in the 25 fiber optic connector field?</p>	<p style="text-align: right;">Page 44</p> <p>1 talking about fiber optics then you need to have a 2 fiber that can transmit light through it. 3 Q. Does the term project extension have 4 a specific meaning in the art of fiber optic 5 connectors? 6 A. I think on its own it probably 7 doesn't have a specific meaning. It could be, you 8 could have a front extension of various things, you 9 could have a current extension of the connector, of 10 the boot, I think it's probably a couple of words 11 that help you locate a portion of some other 12 component. 13 Q. And would you agree that the term 14 front extension portion would be very similar and 15 that wouldn't have a specific meaning? 16 A. Again, I think front extension 17 portion could be used to describe a lot of things, 18 you have to understand what front extension portion 19 of what object and I think at that point it would 20 have very clear meaning but it does have to be 21 linked to some sort of object. 22 Q. Within the claims of the '794 patent 23 is the word front extension portion used 24 specifically to describe a part, the boot? 25 A. That I'm not sure. You want to pull</p>
<p style="text-align: right;">Page 43</p> <p>1 A. Again, I know it has a specific 2 meaning in the sense that it's something that holds 3 the cable and helps it transition into the 4 connector but I don't think it's specific to fiber 5 optics in the sense of when I worked at Apple we 6 also called the same kind of structure a boot that 7 went from our electric cables into our physical 8 connector. And then of course boot could be on a 9 car if you were in England or a boot could be on 10 your foot. So I understand it could have a whole 11 bunch of meanings that would not occur to somebody 12 working in this field, and so it does have some 13 meaning but I really don't think boot is that 14 specific to fiber optics. 15 Q. I was more asking though like if 16 someone working in fiber optics were to hear the 17 term boot they're not thinking about the boot you 18 put on your foot. Correct? 19 A. That's certainly correct. 20 Q. And same thing with like the word 21 fiber for instance, they're not going to think of a 22 cotton fiber when someone were to use the word 23 fiber. 24 A. No. I think you're right, they would 25 not. I think if you're in the space and you're</p>	<p style="text-align: right;">Page 45</p> <p>1 that up and show me what you're referring to? 2 Q. If you would open Exhibit 5. 3 A. Okay. 4 Q. And before we get into it, the front 5 extension is one of the claim terms that you 6 provide a opinion regarding. Correct? 7 A. Yes. 8 Q. And your opinion starts on page 25 of 9 your declaration which is Exhibit 1, correct? 10 A. Let me jump back real quick. 11 Yes, my opinion is on page 25 that it 12 should be afforded a plain and ordinary meaning and 13 starting on 25 and going forward is the, I would 14 say my analysis or the justification for my 15 opinion. 16 Q. When you state that the limitation 17 should be afforded its plain and ordinary meaning, 18 what is the plain and ordinary meaning of the term 19 front extension? 20 A. Well, I think it's the, well, again 21 this is the front extension of the boot, again, we 22 probably have to, if we want to get a discussion 23 going about what we're talking about it's part of 24 the boot, and the front extension would just be the 25 front portion of it that's extending out towards</p>

<p style="text-align: right;">Page 46</p> <p>1 the front of the connector.</p> <p>2 Q. Do you know when conventional boots</p> <p>3 within the prior art were considered to have a</p> <p>4 front extension or front extension portion?</p> <p>5 A. When you say prior art do you mean</p> <p>6 the prior art that we are examining in this case or</p> <p>7 all prior art? Because I didn't search all prior</p> <p>8 art for that issue.</p> <p>9 Q. Well, how about the prior art that</p> <p>10 was in record during the prosecution?</p> <p>11 A. Yeah, I'm not sure I can testify to</p> <p>12 that sitting here. I mean you have to bring it up</p> <p>13 and see what you're talking about because I don't,</p> <p>14 I didn't examine all of those. There's a lot of</p> <p>15 patents in this case and a lot of references to</p> <p>16 different patents. There's no way I could recall</p> <p>17 that right now but if you have something specific</p> <p>18 that you want to talk about we could certainly</p> <p>19 bring it up and look at it.</p> <p>20 Q. All right. Yeah, I will in a second.</p> <p>21 I did have you open Exhibit 5 a minute ago and you</p> <p>22 kind of actually already addressed what I was</p> <p>23 asking at the time, but just can you verify that</p> <p>24 Exhibit 5 was the '794 patent?</p> <p>25 A. Yes, it is the '794 patent.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. And a minute ago you were asking, you</p> <p>2 were saying that you couldn't recall off the top of</p> <p>3 your head, you know, the specific prior art that</p> <p>4 you've seen before necessarily but that maybe if I</p> <p>5 had some examples you could look at that.</p> <p>6 A. Yes.</p> <p>7 Q. If you could turn to page 33 and 34,</p> <p>8 and actually really it kind of starts at 32.</p> <p>9 A. Of which document now?</p> <p>10 Q. Of Exhibit 4, Dr. Goossen's report.</p> <p>11 A. Did you say page 34, or paragraph?</p> <p>12 Q. I'm going to have you get to page 34</p> <p>13 but that paragraph actually starts on page 32, it's</p> <p>14 paragraph 80.</p> <p>15 A. Okay. I see paragraph 80.</p> <p>16 Q. And within paragraph 80 he's</p> <p>17 discussing U.S. patent application or the '588</p> <p>18 publication.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And then as you scroll down and you</p> <p>22 get to page 33 at the bottom you have one figure,</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. And then you have a few more figures</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. And within the '794 point there are</p> <p>2 claims at the end, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And within claims it uses the term</p> <p>5 front extension, is that correct?</p> <p>6 A. Yes, it does.</p> <p>7 Q. And you kind of said a minute ago</p> <p>8 that it's using that term to describe a part of the</p> <p>9 boot, is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. All right. And that was really all I</p> <p>12 was having you open it at that time for, but then</p> <p>13 we kind of moved past it.</p> <p>14 If you would open Exhibit 4.</p> <p>15 A. Okay. I opened Exhibit 4 and it's</p> <p>16 the expert report of Dr. Keith Goossen.</p> <p>17 Q. And you've seen this report before,</p> <p>18 correct?</p> <p>19 A. Yes, I have.</p> <p>20 Q. And if you could scroll through it</p> <p>21 real quickly and verify that yes, it's the correct</p> <p>22 version that you've seen before.</p> <p>23 A. (Reviewing document).</p> <p>24 Yes, it does look like the version</p> <p>25 that I examined.</p>	<p style="text-align: right;">Page 49</p> <p>1 on page 34, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Have you reviewed these figures</p> <p>4 previously?</p> <p>5 A. I believe I have.</p> <p>6 Q. All right. It's probably easier to</p> <p>7 look, or easiest to look at figure 2 of that prior</p> <p>8 art reference which he has reproduced on page 34.</p> <p>9 A. Okay.</p> <p>10 Q. Can you identify for me which item in</p> <p>11 this figure is a boot?</p> <p>12 A. I'd probably want to see the patent</p> <p>13 and search for the numbers, but just looking at</p> <p>14 this it looks like the boot has been labeled 38.</p> <p>15 Q. Does that boot 38 have a front end,</p> <p>16 or a front end, I'm sorry, a front extension --</p> <p>17 sorry. Yeah, a front extension. Does the boot 38</p> <p>18 that you see in figure 2 have a front extension?</p> <p>19 MR. WEEKS: Objection as to scope.</p> <p>20 A. I think this is not from the patents</p> <p>21 that we're talking about, but if I gave it this to</p> <p>22 a person with ordinary skill in the art and said</p> <p>23 there's the boot, what's the front extension, they</p> <p>24 would point to the front part of it I'm sure, they</p> <p>25 would understand they need to look at the front</p>

<p style="text-align: right;">Page 50</p> <p>1 part of that. If there's some special meaning with 2 extension that I have to add on to that I think we 3 need to know more information, but there's 4 certainly a front end portion that's extending 5 towards the front so I think it would be recognized 6 as a front extension. 7 Q. Would that meet the front extension 8 limitation as it is in the '794 patent? 9 MR. WEEKS: Objection. Scope. 10 A. Well, the front extension, I don't 11 think front extension portion is in Claim I, I 12 think it's just front extension. So there is a 13 front extension in Claim I and that part could be 14 interpreted as a front extension, but Claim I 15 requires a lot more things or has more requirements 16 on the front extension so I would have to say no, 17 that would not satisfy that limitation of Claim I 18 that discusses or requires features of the front 19 extension. 20 Q. Do boots automatically have front 21 extensions? 22 MR. WEEKS: Objection to form. 23 Q. (BY MR. SCHROEDER) Let me rephrase 24 it. Do boots necessarily have front extensions? 25 MR. WEEKS: Objection to form.</p>	<p style="text-align: right;">Page 52</p> <p>1 evidence? 2 Q. (BY MR. SCHROEDER) I'm sorry, full 3 intrinsic evidence. Let me rephrase it because I 4 obviously butchered it. 5 Would a person of skill in the art 6 recognize what the front extension or front 7 extension portion is without resorting to the full 8 intrinsic record for the '794 patent? 9 A. Certainly you don't need to refer to 10 the full record, it's described very well just in 11 the specification and the figures. I don't think 12 you need to go into the file history and all that 13 stuff. The patent itself that is just a 14 specification figures describe it very well. 15 Q. Would a person of skill in the art 16 recognize that the claimed front extension or front 17 extension portion was without resorting to the 18 specification and figures? 19 A. Well, you're asking the question 20 would they recognize what it is, you're almost 21 implying that they're looking at a connector. I 22 think if they had a connector in their hand and 23 they just read Claim I, I think they could and 24 would identify front extension, but that, again, I 25 think they have to be looking at something because</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I haven't considered that question 2 before, I'm sorry. I mean sitting here you could 3 think of boots that are really small that don't 4 have much length to them and a person of ordinary 5 skill never would have to really think about that, 6 is that a front extension or not, is it just a 7 boot. But that's not a question that I thought 8 thoroughly about in terms of preparing for this 9 deposition. 10 Q. Is a -- strike that. 11 Find paragraph 58 of your 12 declaration, which was Exhibit 1. You discuss how 13 one skilled in the art could refer to the 14 specification to understand what the front 15 extension is. Is that correct? 16 A. Yes. 17 Q. Would a person of skill in the art 18 recognize what the front extension or front 19 extension portion depending on which claim 20 limitation you're looking at is without resorting 21 to reviewing the full extrinsic evidence of the 22 '794 patent? 23 MR. WEEKS: Objection to form. 24 A. I don't know what the full extrinsic 25 evidence of a patent is. You mean intrinsic</p>	<p style="text-align: right;">Page 53</p> <p>1 if they're not looking at something I think you're 2 asking them to sort of create from scratch 3 something that meets all this, I'm not sure they 4 could do that. I think in that case they'd 5 probably want to read the specification. 6 Q. Okay. So if they were to be looking 7 at a connector and boot for a connector they would 8 just naturally be able to identify what that front 9 extension or front extension portion is in the 10 context of the claims without reviewing the actual 11 specification of the patent. 12 A. Again, this is an exercise I didn't 13 do but I'm looking at the claims right now and I'm 14 going through there and I'm imagining a person of 15 ordinary skill in the art holding the connector in 16 one hand and having this claim in the other hand 17 and reading through there, I think they could just 18 go through the claim, when they got to the front 19 extension they would look over at the connector and 20 they would be able to identify a front extension if 21 it had one, I think they would be able to do that. 22 Q. Can you read paragraph 59? You can 23 read it to yourself, of your declaration. 24 A. Okay. (Reviewing document). 25 Okay. I finished reading it.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q. I'm going to kind of parse a few 2 things in paragraph 59. 3 Do you see about the fifth line down 4 that you have something stating first, the '794 5 patent's claims and specification never used the 6 term front portion? 7 A. Yeah. I do see that. 8 Q. If you could return to Exhibit 5, 9 which is the '794 patent. 10 A. Okay. 11 Q. Can you read paragraph, or not 12 paragraph, column 6, line 61 through line 67 out 13 loud? 14 MR. WEEKS: Can you repeat that, the 15 line numbers one more time for me? 16 MR. SCHROEDER: Column 6, line 61 17 through 67. 18 A. The front extension 110 is a main 19 body 250 and a latch body 118 that attaches to the 20 main body 250. See figures 6, 7 and 14. The main 21 body 250 has a front portion 254, a middle portion 22 256, and a rear portion 258. Generally the front 23 portion 254 is with a latch body 252 attaches to 24 the main body 250 and provides for the latching of 25 the fiber optic connector 100 to a first receptacle</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. And the front extension 110 is the 2 front extension of the boot, correct? 3 A. Yes. That's correct. 4 Q. And then you also later in it you 5 make a statement that the 706 application describes 6 the front portion as having the same elements as 7 the front extension of the '794 patent. Do you see 8 that? It's about three lines later in paragraph 9 59? 10 A. Yes. Nominally the same basic 11 elements describing a boot and a rigged back 12 portion and a front portion, the things I put in 13 parenthesis, I think that's a fair assessment. 14 Q. So if you would, and just for 15 background, what is a 706 application? 16 A. It's US Provisional Application 17 number 62 slash 653706. 18 Q. And is that the provisional 19 application from which the '794 patent claims 20 priority? 21 A. Yes. I believe it is. 22 Q. And so in that case the 706 23 application would be kind of the original pad 24 application packet, correct? 25 A. Yeah. I mean you're saying if it's</p>
<p style="text-align: right;">Page 55</p> <p>1 such as an adapter. 2 Q. Would you agree that in just those 3 seven lines that you read that it referred to the 4 front portion 254 twice? 5 A. I'm sorry, I accidentally jumped to a 6 different page, let me go back there. I think 7 you're probably right. 8 Yes. It refers to front portion 254 9 twice. 10 Q. Specifically it's referring to the 11 front extension, right? 12 A. Yes, specifically it's the front 13 extension, main body. 14 Q. Right. And it's actually the front 15 portions identified as 254, correct? 16 A. Yes. The front portion of the main 17 body. 18 Q. Right. So in that case your 19 statement that the '794 plant's claims and 20 specification never used the term front portion is 21 not correct, is that true? 22 A. I think the context I was using it is 23 the front portion of the boot but it's certainly 24 saying front portion of the main body of the front 25 extension, that's correct.</p>	<p style="text-align: right;">Page 57</p> <p>1 the original one, I don't know if it's the first 2 one or not. There can be long sequences of these, 3 but I'll trust you if you say it is. 4 Q. And if you could, open Exhibit 10. 5 Do you recognize this as being 6 Exhibit M to Goossen's report? 7 A. I definitely recognize some document 8 like this, I mean I can't testify here that this 9 was M, but it does look like M and it does look 10 like a document I reviewed before. 11 Q. All right. And if you scroll past 12 the title, the cover page, do you recognize what 13 this is or what this exhibit was? 14 A. Yeah. I mean this was a, what I 15 would characterize as a filing with the US Patent 16 and Trademark Office. 17 Q. And on that first page after that 18 cover page, the exhibit on the cover page, towards 19 the top left-hand side it gives the application 20 number, is that correct? 21 A. Yes. 22 Q. And what is that application number? 23 A. 62 slash 653.706. 24 Q. Is this the application that you are 25 discussing in paragraph 59?</p>

<p style="text-align: right;">Page 58</p> <p>1 A. Yes, it is.</p> <p>2 Q. And so this is that, the '706</p> <p>3 application which we established was a provisional</p> <p>4 application?</p> <p>5 A. Yes.</p> <p>6 Q. And if you scroll through it towards</p> <p>7 the, I think it's probably around page, I think</p> <p>8 it's numbered page 10 but it would be page 11 of</p> <p>9 the pdf. Do you see a Figure 1?</p> <p>10 A. Yes. I do.</p> <p>11 Q. And within it if you rotate it you</p> <p>12 can see what their identifying as the front</p> <p>13 portion, correct?</p> <p>14 A. Yes.</p> <p>15 Q. And is this the front portion that</p> <p>16 you are discussing in paragraph 59?</p> <p>17 A. Yes, it is.</p> <p>18 Q. And where it's discussing this front</p> <p>19 portion is it giving some arrows to show which part</p> <p>20 of it is calling the front portion?</p> <p>21 A. Yeah. I mean in Figure 1 it has</p> <p>22 front portion on the bottom and then it's got some</p> <p>23 arrows associated with it, sort of the arrow is</p> <p>24 kind of covering the front portion and one pointed</p> <p>25 backwards and one pointed forward, but it's unclear</p>	<p style="text-align: right;">Page 60</p> <p>1 A. I believe the number is 110.</p> <p>2 Q. And if we look at that Figure 6 110</p> <p>3 is up on top, correct, and it's pointing at that</p> <p>4 arm that's coming off of it, is that correct?</p> <p>5 A. Yeah. It's sort of coming off the</p> <p>6 middle of that, I'm not sure I would characterize</p> <p>7 it as an arm coming off but it's definitely that</p> <p>8 top portion of it that's extending off the front.</p> <p>9 Q. Would you consider the portion of the</p> <p>10 connector that's got number 200 kind of pointing at</p> <p>11 it with being part of the front extension?</p> <p>12 A. No. I believe that's called the</p> <p>13 center portion.</p> <p>14 Q. Whereas if you look on the left for</p> <p>15 the 706 would you consider, what's currently</p> <p>16 labeled front portion, is that right underneath</p> <p>17 what you just said was called the center portion?</p> <p>18 MR. WEEKS: Objection to form.</p> <p>19 A. I wouldn't think so. I mean one of</p> <p>20 the problems that we have with Figure 1 and Figure</p> <p>21 2 is that it has these arrows with the labels we've</p> <p>22 been talking about but the arrows don't really</p> <p>23 match up well with the components. I mean if you</p> <p>24 look at push pull polarity boot for example it</p> <p>25 doesn't really seem to match up with the front and</p>
<p style="text-align: right;">Page 59</p> <p>1 what the extent of that, those arrows mean in my</p> <p>2 opinion. There's no end bars exactly where those</p> <p>3 arrows are going to.</p> <p>4 Q. Okay. Would you characterize</p> <p>5 everything that is being identified as a front</p> <p>6 portion here as meeting the front extension portion</p> <p>7 as was later claimed in the '794 patent?</p> <p>8 MR. WEEKS: Objection, form.</p> <p>9 A. Can you repeat the question?</p> <p>10 Q. (BY MR. SCHROEDER) Would you</p> <p>11 identify -- actually I'm going to give you another</p> <p>12 exhibit, it's a demonstrative exhibit, Exhibit 11.</p> <p>13 A. Uh-huh.</p> <p>14 Okay. I have 11.</p> <p>15 Q. All right. And Exhibit 11 like I</p> <p>16 said is a demonstrative exhibit where I have on the</p> <p>17 left side the figures that we were just looking at</p> <p>18 in the 706 patent, is that correct, or 706</p> <p>19 application, is that correct?</p> <p>20 A. They look pretty similar.</p> <p>21 Q. And on the right side I have Figure 6</p> <p>22 from the '794 patent?</p> <p>23 A. That looks correct.</p> <p>24 Q. What item does the '794 patent</p> <p>25 identify as being the front extension?</p>	<p style="text-align: right;">Page 61</p> <p>1 the back of the boot, it really doesn't match up.</p> <p>2 And so when I go up to front portion I also believe</p> <p>3 that those arrows don't really match up in terms of</p> <p>4 defining exactly the front and back of the front</p> <p>5 portion. I think the front portion extends further</p> <p>6 out and so I think that front portion is pointing</p> <p>7 probably to a combination of sort of that 200 and</p> <p>8 110 because it's starting kind of back near the end</p> <p>9 of 200 but extending forward we don't really know,</p> <p>10 but clearly that's the front portion in terms of it</p> <p>11 being the front compared to the back portion. I</p> <p>12 just don't think that those labels basically are</p> <p>13 giving us very definitive limits to what it's</p> <p>14 identifying.</p> <p>15 Q. All right.</p> <p>16 Moving back to your declaration,</p> <p>17 paragraphs 59, 64 and 67 you discuss multiple</p> <p>18 different places that the extension portion acts as</p> <p>19 a polarity key, is that correct?</p> <p>20 A. Can you give me those paragraph</p> <p>21 numbers again?</p> <p>22 Q. I believe it's 59, 64 and 67.</p> <p>23 A. Okay. I'm still looking at 59 and</p> <p>24 you want me to look for terms of polarity?</p> <p>25 Q. Yeah. I want you to verify that you</p>

<p style="text-align: right;">Page 62</p> <p>1 identify that that front extension portion acts as 2 a polarity key. 3 A. Yes, I think it can act as a polarity 4 key. I just looked at the three paragraphs 64, 59 5 and 67 and I've definitely written in there it can 6 act as a polarity key. 7 Q. Is that one of the primary purposes 8 of that front extension portion, is to act as a 9 polarity key? 10 MR. WEEKS: Objection to form. 11 A. I'm not sure I can characterize it as 12 a primary, it does a lot of stuff so I don't feel 13 comfortable saying it's the primary, but it can do 14 that. 15 Q. (BY MR. SCHROEDER) What other -- 16 sorry. 17 What other stuff does the front 18 extension portion do? 19 A. Well, extend forward obviously, it 20 can have latches on it, it could provide a sort of 21 a larger area for the user to hold on to. It can 22 do a lot of things, I mean we'd have to go to the 23 claims, but certainly just looking at the pictures 24 we've been talking about it has for example a latch 25 on it.</p>	<p style="text-align: right;">Page 64</p> <p>1 each other and the adapter and connector could go 2 together. 3 Q. So in that instance is the let's say 4 projection on the adapter, how would that actually 5 go internal to the connector? 6 A. Oh, I think I know what you're 7 saying. Yeah, the adapter has to be shaped 8 differently than the ones with external, so it has 9 to have an internal feature if the adapter's going 10 into, within the adapter. You can also have a 11 adapters where the connectors go over the top of 12 it, so the ones we're looking at here the adapter 13 essentially inside of a housing, you can also have 14 an adapter where the connector was over the top and 15 in that case the adapter housing would have an 16 external projection that's blocking this internal 17 projection of the connector. 18 Q. And are you aware of specific 19 adapters in the fiber connector field that goes 20 over the connector? 21 A. As I sit here right now I can't pull 22 one from memory, I can't pull a patent number or a 23 model number for you. 24 Q. Are you aware of any fiber optic 25 connectors within, or that specifically fiber optic</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. In paragraph 64 you identify that it 2 was known in the prior art that polarity keys could 3 be internal features. 4 Do you see that? 5 A. Yes. 6 Q. Can you give any examples of prior 7 art that had internal polarity keys? 8 A. Sure. I mean I can't pull up a 9 patent number for you or specific connector name, 10 but when you, you could certainly have features 11 internal that as you slid these in it would block 12 the connector from going into the adapter because 13 there's a rib sticking down, not outwardly but 14 inwardly, so those are another way of keying these 15 so they can't go in because their being blocked by 16 an internal protrusion rather than one protruding 17 outward. 18 Q. So how would that work in terms of 19 adapter? Does the adapter have to then have a 20 projection, is that what you're saying? 21 A. Yes. So the adapter has a 22 corresponding feature that they basically run into 23 each other, you can not put them together and you 24 have to say flip at 180 degrees, and then when slid 25 it in those projections would not interfere with</p>	<p style="text-align: right;">Page 65</p> <p>1 connectors that have internal features? 2 A. I looked at a lot of prior art in 3 this area over the last year and I am recalling in 4 my mind some connectors had internal features that 5 acted as keys or blockers, but I couldn't tell you 6 right now off the top of my head what those are. 7 Q. Is it your position that the front 8 extension would be entirely interior of the fiber 9 optic connector? 10 MR. WEEKS: Object to the form. 11 A. I have not considered that question 12 and I probably have to think about that quite a bit 13 to come up with a configuration where that would 14 work. 15 Q. (BY MR. SCHROEDER) If you could go 16 to paragraph 61 of your declaration. 17 A. Okay. 18 Q. You make the argument that the front 19 extension 110 is received interior to the connector 20 housing, is that correct? 21 A. I think that would be a fair summary. 22 My analysis here is showing that a portion of the 23 front extension is received interior, not the whole 24 thing. 25 Q. All right. So a portion is interior</p>

<p style="text-align: right;">Page 66</p> <p>1 is what you're saying. 2 A. Yes. 3 Q. If you could, I know that there's a 4 few places where we've looked at it, but Exhibit 5, 5 I'd like you to look at figure 6. 6 A. And Exhibit 5 you mean the '794 7 patent. 8 Q. Correct. 9 A. Just a second please. And you want 10 me to go to figure 6 you said? 11 Q. Yes. 12 A. Okay. I'm looking at that now. 13 Q. All the way on the right do you see, 14 I mean all the way to the left, I'm sorry, all the 15 way on the left do you see number 126? 16 A. Yes, I do. 17 Q. And you can look through the 18 specification to identify what that is labeled as, 19 but can you tell me what that's labeled as? As I 20 said take your time to look through it. 21 A. 126 is an opening. 22 Q. And that's an opening extending 23 through the main body of the housing, correct? 24 MR. WEEKS: Objection, form. 25 A. I think column 4 of the patent</p>	<p style="text-align: right;">Page 68</p> <p>1 Does that opening 126 connect with 2 that rail 134? 3 A. Well, it might but I don't think this 4 figure shows that. It would basically be, you 5 know, some sort of hole in part of that clear 6 structure on the top if you are using connecting in 7 the sense I could go in 126 in the front and I 8 could pop my head out in 124, I don't think this 9 figure shows that but there certainly could be such 10 an opening up there. 11 Q. And 134 you have 34 both on top and 12 bottom of that connector, correct? 13 A. That's correct. 14 Q. And so if you were to put this 15 connector together and if there were an opening 16 between that rail 134 and 126 that opening would be 17 exposed even once the boot was put on that 18 connector, correct? 19 A. I'm not sure what you mean by 20 exposed. It seems like it would kind of be covered 21 by 110. I'm trying to understand what you're 22 suggesting here, but when you slide 110 on here it 23 goes in, inside of that rail structure and it seems 24 like if there was a hole there it would be covered 25 by 110.</p>
<p style="text-align: right;">Page 67</p> <p>1 explained it pretty well, starting at line 21. It 2 says turning to the housing 102 the housing 102 has 3 the main body 120 extending between front end 122, 4 the rear end 124 and has an opening, 126, extending 5 there between. 6 Q. And so that opening is extending from 7 the front to the back of that main body, correct? 8 A. Yes, from the front and 122 to the 9 rear end 124. 10 Q. Would you consider that opening the 11 interior of the main body? 12 A. Well, I'm not sure the opening would 13 characterize the entire interior of the body but it 14 is described as an opening that goes from one side 15 to the other. There may be other things within the 16 interior is what I'm suggesting. 17 Q. Okay. And then going back to figure 18 6, can you identify what item is labeled as 134? 19 A. Yes. 134 is the rail receiving 20 portion that I was talking about in that paragraph. 21 Q. Is that rail receiving portion within 22 opening 126? 23 A. No, I don't think so. 24 Q. Does that opening 126 extend or look 25 -- let me rephrase that.</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. But on the bottom side it couldn't 2 be, correct? 3 A. I see what you're saying. If there 4 was a corresponding hole on the bottom there would 5 be nothing I would say covering that hole. 6 Q. And you haven't seen anything in the 7 specification or elsewhere suggesting that there's 8 actually a hole between that opening 126 and that 9 rail 134, correct? 10 A. It's a question I hadn't considered 11 before today but if you look for example at Exhibit 12 5, which would be the bottom or top view without 13 110 installed individually, you see some kind of 14 weird structure inside of 134 and I don't know what 15 that is. But it could be a hole. 16 Q. At least prior to today you have not 17 identified there being a hole between 134 and 1, 18 and that opening 126, correct? 19 A. That's correct. 20 Q. And you're not sure as you sit here 21 today what that structure is that you're looking at 22 in Figure 5. Correct? 23 A. That is correct. Without studying it 24 I'm not sure what that is. 25 Q. And that could just be a rounded</p>

<p style="text-align: right;">Page 70</p> <p>1 feature of that rail, correct?</p> <p>2 A. Well, it's not really what I was</p> <p>3 thinking the rail, the rails are on the side. It's</p> <p>4 on the interior of that 134. It shows up in some</p> <p>5 other figures so it has one purpose, I just don't</p> <p>6 know what that is without studying the whole</p> <p>7 specification again.</p> <p>8 Q. If you were to go to column 4, line</p> <p>9 29 through line 43.</p> <p>10 A. I've turned to column 4, what were</p> <p>11 the line items again?</p> <p>12 Q. 29.</p> <p>13 A. Okay.</p> <p>14 Q. I'm getting there myself. Would you</p> <p>15 agree that this paragraph starts off by talking</p> <p>16 about the outside of the housing 102?</p> <p>17 A. Yes.</p> <p>18 Q. And it's then describing many</p> <p>19 features that are on the, or of that outside of the</p> <p>20 housing, is that correct?</p> <p>21 A. It's stating there are many features</p> <p>22 that are integral to its use.</p> <p>23 Q. It says that the outside housing 102</p> <p>24 has many features, correct?</p> <p>25 A. Yes. I'm just finishing the</p>	<p style="text-align: right;">Page 72</p> <p>1 about that, and I'm kind of going in the middle of</p> <p>2 the sentence, this is line 33 on both the top</p> <p>3 surface and the bottom surface, actually I'm going</p> <p>4 to repeat that, or restate that, I missed</p> <p>5 something.</p> <p>6 So it says quote, on both the top</p> <p>7 surface 130 and the bottom surface 132 is a rail</p> <p>8 receiving portion 134.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Is this paragraph discussing that</p> <p>12 that rail is on the exterior surface of the</p> <p>13 connector?</p> <p>14 A. Yeah, it's saying, as you just read</p> <p>15 it's saying it's on the top surface and bottom</p> <p>16 surface. Basically there are these rail structures</p> <p>17 on both the top and the bottom. That's what it's</p> <p>18 teaching me.</p> <p>19 Q. And so it's saying that the rail</p> <p>20 portion one me is on the exterior of the housing,</p> <p>21 correct?</p> <p>22 A. That's what, I don't really think</p> <p>23 it's saying that, I'm not sure what it means to be</p> <p>24 on the exterior. It's actually forming part of the</p> <p>25 exterior. Like when you put 134 on there it's now</p>
<p style="text-align: right;">Page 71</p> <p>1 sentence, that are integral to its use.</p> <p>2 Q. And the next sentence discusses</p> <p>3 there's a top surface 130 and the bottom surface</p> <p>4 132. Is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. And would you agree that it's</p> <p>7 discussing the top surface of the outside of the</p> <p>8 housing there and the bottom surface of the outside</p> <p>9 of the housing?</p> <p>10 A. Yeah. I'm not sure I understand the</p> <p>11 distinction, yeah. The surfaces they're talking</p> <p>12 about are the top ones, the external surface, not</p> <p>13 the internal surfaces. Is that what you're</p> <p>14 suggesting?</p> <p>15 Q. Exactly. Yes.</p> <p>16 A. I believe that's what it's talking</p> <p>17 about is the external surfaces.</p> <p>18 Q. And then the next sentence it</p> <p>19 discusses that the top and bottom surfaces are</p> <p>20 basically the same, correct?</p> <p>21 A. Yes.</p> <p>22 Q. So that's basically saying they're</p> <p>23 kind of mirror images of each other, correct?</p> <p>24 A. Yeah. That seems right to me.</p> <p>25 Q. And then the next sentence it talks</p>	<p style="text-align: right;">Page 73</p> <p>1 becoming part of the exterior so whatever it was</p> <p>2 pasted on to that part's no longer the exterior.</p> <p>3 Q. All right. And this rail that is now</p> <p>4 part of the exterior of the connection, or the</p> <p>5 connector body is what receives the front extension</p> <p>6 110?</p> <p>7 A. Yeah. It's actually, just for</p> <p>8 clarity it's the rail receiving portion 134 and it</p> <p>9 is receiving the rails which are on 110.</p> <p>10 Q. And the rail receiving portion 134 is</p> <p>11 not on the interior of the housing, correct?</p> <p>12 A. Well, as I said I think when it's on</p> <p>13 there it's forming part of the exterior. It does</p> <p>14 have these they call them like a dog bone</p> <p>15 structure, so there is these overhanging parts of</p> <p>16 134. The underside of the 134 is probably to be</p> <p>17 considered not the exterior of that housing.</p> <p>18 Q. So if you go to someone's house and</p> <p>19 they have a front patio with an overhang and you're</p> <p>20 standing under that over hang, are you standing on</p> <p>21 the interior of the building?</p> <p>22 A. I kind of think it would depend on</p> <p>23 what that overhang was. We recently had just an</p> <p>24 overhang at our house and we put screens all around</p> <p>25 it and a door on it so bugs can't get in there, and</p>

<p style="text-align: right;">Page 74</p> <p>1 I think now we consider that part of our house. We 2 come up the stairs and go in through that door and 3 we're now inside our house, and that's kind of what 4 you're, an overhanging feature that we're now 5 under, so I think it kind of depends on just what 6 that structure is, but certainly if it was a little 7 teeny structure maybe people wouldn't think that 8 was the inside of the house but if it was a bigger 9 structure that had some protective function I then 10 I think maybe people would consider that to be 11 inside the house. 12 Q. And if it was just an awning over 13 let's say the door of a restaurant or store you 14 wouldn't consider standing under that awning to be 15 standing inside the store, would you? 16 A. I probably wouldn't consider that 17 inside the store. 18 Q. If you turn to paragraph 65 of your 19 declaration which is Exhibit 1 again. 20 A. Okay. 21 Q. Within this paragraph you discuss 22 that, in particular that very last sentence, that 23 thus, under Dr. Goossen's proposed construction 24 front end 204 would improperly qualify as the front 25 extension.</p>	<p style="text-align: right;">Page 76</p> <p>1 that disqualifies it from being the front 2 extension? 3 A. Yeah. I think the patent says it's 4 not the front extension, it says it's the center 5 portion. So I think the description in the patent 6 disqualifies it. 7 Q. If we're saying this wasn't a figure 8 from the patent but was actually an accused product 9 how would one of skill in the art distinguish 10 whether or not that, those portions are identified 11 as 204 would qualify in the claim limitations as 12 front extensions? 13 MR. WEEKS: Objection, scope. 14 A. Well, you know, I haven't done an 15 infringement analysis using this patent, so I think 16 I would have to think that through a little more 17 clearly. That's not what I've done to this point, 18 but I think you could go through a process, as you 19 know limitation by limitation, and look at an 20 accused product and map it and I just haven't done 21 that and feel uncomfortable doing it on the fly 22 here. 23 Q. (BY MR. SCHROEDER) You understand 24 though that the claim constructions that you, that 25 get adopted, are going to be used in the</p>
<p style="text-align: right;">Page 75</p> <p>1 Do you see that? 2 A. Yes. 3 Q. And then within that figure 6 right 4 below it you have I believe that part that you are 5 talking about, it's not really labeled 204 in the 6 figure but you have the two parts that are 7 highlighted, is that correct? 8 A. Yes. So to clarify that if you go to 9 the next page I've provided an underside view, well 10 I looked at figure 11 which is the underside view, 11 that's where it's actually labeled 204. 12 Q. Okay. 13 A. That's where I get the number. Even 14 though it's not shown in figure 6, it was shown in 15 11. 16 Q. Okay. So my question is why do you 17 identify that that is not, or does not qualify as 18 the front extension? 19 A. Well, in this particular embodiment 20 110 is identified as the front extension and that's 21 not that part and the 204 part is described as 22 being part of 200 which we talked about before is 23 the center portion. So it's part of the center 24 portion, not part of the front extension. 25 Q. Is there any specific feature of 204</p>	<p style="text-align: right;">Page 77</p> <p>1 infringement analysis and the invalidity analysis, 2 correct? 3 A. Yes. I understand the first step is 4 claim construction which is what we're involved in 5 right now, and then after this step we would then 6 consider questions of infringement and validity. 7 Q. So beyond though that the front 8 extension, beyond just the -- let me rephrase that. 9 As we're sitting here right now 10 though you're not prepared to tell me why what's 11 labeled 204 would not qualify as a front extension 12 if it were in the prior art or if it was in an 13 accused product? 14 MR. WEEKS: Object to form, misstates 15 the testimony. Incomplete hypothetical. 16 A. Yeah. I'm not saying here that it 17 wouldn't qualify as a front extension, I'm saying 18 that I haven't done an analysis. My opinion is the 19 construction put forth by Dr. Goossen is incorrect 20 because it would identify the center portion as the 21 front extension so my opinion here is just directed 22 at the claim construction issue. 23 Q. (BY MR. SCHROEDER) And what I'm 24 trying to get to is is there a construction of the 25 front extension that would sufficiently distinguish</p>

<p style="text-align: right;">Page 78</p> <p>1 that central portion that you say doesn't qualify, 2 with what should qualify as a front extension? 3 MR. WEEKS: Object to the form. 4 A. I haven't done that exercise. 5 Q. (BY MR. SCHROEDER) In paragraph 68 6 you argue that there's nothing within the 7 specification that requires that the front 8 extension be an external component. Correct? And 9 there's nothing in the prosecution history either. 10 Correct? 11 A. Well, this paragraph is just directed 12 to the prosecution history part of your question 13 but let me review it real quickly. 14 So I think the answer to your 15 question is correct, this is where I'm introducing 16 my analysis of the prosecution history and I'm 17 saying I don't think that parts of the prosecuting 18 history that Dr. Goossen put forward justifies, you 19 know, or constitutes an unmistakable disclaimer 20 that the front extension must be an external 21 component that interfaces with a mating receptacle. 22 Q. Are you aware of any written 23 description support for front extension that 24 interfaces with a mating receptacle -- strike that. 25 Are you aware of any written</p>	<p style="text-align: right;">Page 80</p> <p>1 understanding is that it is the combination of 74 2 and 72 is being referred to as 70 and 70 is the 3 boot. 4 Q. If you would open Exhibit 12. 5 A. Okay. I have it open. 6 Q. And for Exhibit 12 is Exhibit 12 the 7 '602 patent publication that we were just looking 8 at figure 6 of? 9 A. Yes, I believe it is. 10 Q. And if you would go ahead and confirm 11 that the boot is all of 70. 12 A. This patent uses the term boot just 13 for 74 and they say 72, well basically it says boot 14 74 is received over to support 72 and to support 72 15 and boot 74 are formed from respective first and 16 second materials. So the terminology in this 17 patent is that one is just 74. I think you put the 18 other parts together to create what's called a 19 strain relief assembly or something like that. 20 Q. Does the boot in figure 6 have a 21 front extension as claimed in the '794 patent? 22 A. I don't think so. 23 Q. And why do you not think so? 24 A. Well, again, I'm going to go with the 25 definition that we just sort of established that 74</p>
<p style="text-align: right;">Page 79</p> <p>1 description support that the front extension could 2 be an internal component that interfaces with a 3 mating receptacle? 4 A. Well, my written description report 5 I'm interpreting that as being the specification in 6 the figures, is that correct? 7 Q. Yeah. 8 A. I did not do that exercise, I did not 9 review that patent to address that question. 10 Q. I have a few more questions and then 11 we'll take a break, so it should be just a few more 12 minutes if you don't mind. 13 At paragraph 71 on page 36 you have a 14 figure 6. Correct? 15 A. Yes. 16 Q. And that figure 6 is from U.S. patent 17 publication number 2016, 0209602. Is that correct? 18 A. Yes. 19 Q. Can you identify for me which portion 20 of this connector, or that I'm looking at here is 21 the boot? 22 A. Well, I'd probably want to have the 23 patent in front of me but I believe it's 70. 24 Q. So it's all of it? 25 A. Sitting here without the patent my</p>	<p style="text-align: right;">Page 81</p> <p>1 is the boot and so I'm not looking at 72 anymore, 2 and 74 is clearly boot as the features that we 3 would expect at sort of a rear end and a middle and 4 the front, the front portion, but that front 5 portion or front extension would not meet the 6 additional limitations required by the '794 patent. 7 Q. And what are you labeling as the 8 front portion? 9 A. Well, I'm not labeling it but I would 10 say the front portion, what I'll say is I'm 11 referring to the front portion here would probably 12 be the front sort of quarter part. There's a 13 cylindrical part that comes in from the back that's 14 around the fiber and it kind of gets larger and 15 larger like a cone and then it flares out and sort 16 of goes into a square region, maybe about where 124 17 is on the bottom, I would say from that part 18 forward a person of ordinary skill in the art would 19 look at this and naturally associate that with the 20 portion. 21 Q. Is it a project extension portion? 22 A. Well, it could be a front extension 23 portion, sure, just not the front extension portion 24 that's claimed in the '794 patent. 25 Q. And how do you distinguish a front</p>

<p style="text-align: right;">Page 82</p> <p>1 extension portion from the front extension portion 2 that's claimed in the '794 patent? 3 A. Well, by going to the '794 patent and 4 looking at the limitations that are placed on the 5 front extension. 6 Q. So what you're saying is it doesn't 7 meet the other limitations, for instance I'm trying 8 to find where that is. It doesn't, so let's go 9 through these limitations. 10 Does it extend toward the front end 11 of the housing? 12 A. You know, I'm not seeing the housing 13 here put I would think it does. I would think the 14 housing would be somewhere off to the right if 15 we're still looking at figure 6. 16 Q. Does it attach to, does it attach to 17 the housing toward the center portion of the boot? 18 A. That I'm not sure of. 19 Q. I'm sorry, does it attach to the 20 housing forward in this portion of the boot? I 21 think I misstated that. 22 A. Yeah. So I don't know without doing 23 a computer analysis of this, we're just looking at 24 one part of it, I'm not sure how this interacts 25 with the housing and I didn't do that analysis here</p>	<p style="text-align: right;">Page 84</p> <p>1 ago identifying as the front extension of the, of 2 the '602 patent application? 3 MR. WEEKS: Objection to form. 4 A. I'm not sure I understand that 5 question. They're two very different structures, 6 so you said how do I distinction them. I guess I 7 distinction them by looking at them and saying 8 these are really very different. 9 Q. I mean you were saying though that 10 basically at least from where that U cutout was 11 forward was a front extension and I'm seeing a U 12 cut out in figure 6 as well. 13 A. Sure. I understand that. And so I'm 14 saying this particular connector if I look at it, 15 the one, just to be clear, the one in the patent 16 publication number '602, the figure 6 there, you're 17 asking me to identify a front portion. I would 18 think that a front portion would be about where 19 that u-shaped cutout is going forward but then 20 you've asked me to jump back to the '794 patent and 21 look at figure 6 of that one, and I will admit 22 there's a similar structure there but the '794 23 tells me that's not the front extension. It might 24 be part of the front portion although it's labeled 25 as center portion. So it's really the description</p>
<p style="text-align: right;">Page 83</p> <p>1 I don't think, I don't recall. 2 Q. What would the center portion of the 3 boot be? 4 A. Well, the center portion would be 5 somewhere in the center, the extent of it I think 6 might be a little variable depending on what you 7 were investigating it for, but it certainly 8 wouldn't be all the way at the rear which is the 9 smallest portion. It's probably somewhere in the 10 center of it obviously where it starts to get much 11 larger then it goes into that sort of square part. 12 The center portion might also be considered going 13 all the way up to those U-shaped cutouts. The 14 U-shaped cutouts are definitely a part of this boot 15 that it's changing and so I think a person of 16 ordinary skill in the art would see it as a natural 17 division between center and front extension 18 portion, or front portion. 19 Q. And if we were to go back to, you 20 know, paragraph 65 of your report where it's got 21 that figure 60, the figure 6 of the '794 patent. 22 A. Okay. 23 Q. How do I distinguish the highlighted 24 part that we saw in the other figure was component, 25 the front end 204, from what you were just a second</p>	<p style="text-align: right;">Page 85</p> <p>1 provided, the detailed description provided in the 2 '794 that identifies that as the central portion, 3 110 as the front extension to it and since I 4 haven't done a similar analysis for this patent 5 publication '602 I can't answer these questions 6 with that level of specificity. 7 Q. So would, so wouldn't that figure 6 8 of the '602 application, would that part, you know, 9 let's say where it's got 108 pointed to it, would 10 that part be a front extension under the plain and 11 ordinary meaning? 12 A. Yeah. I think it could be a front 13 extension, it's just not the claimed front 14 extension because the claims require more out of it 15 than just what's there in figure 6. 16 Q. And just looking at the claims going 17 back to that figure 6 in the '794 patent, would the 18 plain and ordinary meaning of front extension cover 19 what you identified as being the front ends 204? 20 A. I don't think so. 21 Q. And what limitation are they missing? 22 A. Well, I guess we're talking about the 23 plain and ordinary meaning so it just doesn't look 24 like the part that's extending out to start with so 25 I'd have to have some specific teaching about why I</p>

<p style="text-align: right;">Page 86</p> <p>1 would go so far back to gather in that portion. I 2 don't think a person of ordinary skill in the art 3 would do that, they wouldn't go back and try to 4 figure out why part of the central portion is part 5 of the front extension, I think they would look at 6 that figure and they would see 110 is the front 7 extension, it's the part extending out the front, 8 towards the front of the connector. You're going 9 to ask me to do an analysis about going back and 10 why would a person of ordinary skill in the art 11 grab some additional material, and add it to the 12 front extension, I don't think that they would, I 13 think that they would identify the front extension 14 as 110 and move forward. 15 Q. What we're trying to do though is 16 construe the claim so that one of skill, so that we 17 understand that one of skill in the art would 18 identify as a front extension and what they 19 couldn't identify as a front extension and I'm 20 struggling to see how the plain and ordinary 21 meaning get us there without something more. 22 MR. WEEKS: To the extent that was a 23 question objection to the form. 24 A. Yeah. I can understand that you 25 might be struggling over it but I don't think a</p>	<p style="text-align: right;">Page 88</p> <p>1 MR. WEEKS: Can we go off the record? 2 (A RECESS WAS TAKEN BY THE PARTIES) 3 Q. (BY MR. SCHROEDER) Welcome back. 4 A. Thank you. 5 Q. Before we get back started I just 6 want to check. Did you discuss any of your 7 testimony over lunch? 8 A. No. 9 Q. Okay. And as you sit here right now 10 is there anything that you recall misstating that 11 you want to correct before we get going? 12 A. No. 13 Q. All right. I would like to move 14 ahead in your declaration to where you discuss the 15 ferrule holder. Earlier we talked about certain 16 terms do kind of have the specific meaning or at 17 least a specialized meaning to those of skill in 18 the art, you know, words like ferrule and boot that 19 someone in the art might use differently than 20 someone outside the art. Do you know if ferrule 21 holder has a specific or understood meaning within 22 the art? 23 A. Not that I'm aware of. 24 Q. Do you know if the words ferrule 25 holder were used in any other patents that are part</p>
<p style="text-align: right;">Page 87</p> <p>1 person of ordinary skill in the art would struggle 2 over it, I think they would look at this picture 3 and they would know it was 110. 4 Q. And if 110 wasn't there would they 5 identify 204 as being a front extension portion 6 meeting the claim limitations? 7 A. I don't think so because they would 8 go to 411 and they would see 204 labeled there and 9 it wouldn't be extending out the front. They would 10 see this is very far back and that part is a part 11 of the center, central organization. 12 Q. Looking at figure 11 would the parts 13 labeled 220 qualify as a front extension portion? 14 A. No. Basically 220 is just very much 15 like 204, just the bottom, the bottom little 16 protrusions there out of 200, the central portion. 17 Q. And the only reason 220 doesn't 18 qualify as a front extension portion is because 19 there's a portion that extends further forward. 20 A. It's one of the reasons but it's 21 called the center portion in this patent so we know 22 it's the center portion. But yeah, it's nowhere 23 near the front and it's nowhere near the back so 24 it's pretty clearly the center portion. 25 Q. I think we're ready for a break.</p>	<p style="text-align: right;">Page 89</p> <p>1 of this investigation? 2 MR. WEEKS: Object to the form. 3 A. Actually as I sit here I don't know 4 which all patents ferrule holder appears in. I 5 mean I know it appears in one but I don't know how 6 many others it appears in. Sorry. 7 Q. (BY MR. SCHROEDER) That's all right. 8 If you would can you open Exhibit 8? 9 Let me know when you have it open. 10 A. Okay. I've opened Exhibit 8, it is 11 the '466 patent. 12 Q. That's what it should be. And you 13 recognize the '466 patent as being one of the 14 patents that is subject to this investigation? 15 A. Yes, I do. 16 Q. If you could go to paragraph 5, line 17 2. 18 A. Paragraph 5, you mean column 5? 19 Q. Yes, column 5, line 2. Sorry about 20 that. 21 A. Okay. I'm there. 22 Q. Do you see the term ferrule holder in 23 that line? 24 A. Yes, I do. 25 Q. And in particular it's given an item</p>

<p style="text-align: right;">Page 90</p> <p>1 number, correct?</p> <p>2 A. Yes. The item number's 132.</p> <p>3 Q. And if you scroll up to the images</p> <p>4 132 does appear in the images, is that correct?</p> <p>5 A. Of which image would you be referring</p> <p>6 to?</p> <p>7 Q. Give me a second.</p> <p>8 A. There are a lot of images, sorry.</p> <p>9 Q. Yeah, there are. That was a good</p> <p>10 point on your part.</p> <p>11 So in particular how about image 3A?</p> <p>12 A. Yes, I see in figure 3A, 134.</p> <p>13 Q. Is it 132 that we were discussing?</p> <p>14 A. 132, yes, I'm sorry. That's the</p> <p>15 number.</p> <p>16 Q. And so in the context of the '466</p> <p>17 patent the term ferrule holder is being used to</p> <p>18 specifically identify the component 132 as seen in</p> <p>19 figure 3A, correct?</p> <p>20 A. Well, yeah, I think that's one of the</p> <p>21 embodiments. There's probably other ones with</p> <p>22 other numbers. I can't say that's the only labeled</p> <p>23 embodiment in here.</p> <p>24 Q. And in figure 132 is that the</p> <p>25 component that directly holds the ferrule?</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Yes.</p> <p>2 Q. And respondents on the other hand are</p> <p>3 proposing that ferrule holder should be construed</p> <p>4 as a component that holds the ferrule directly and</p> <p>5 not another object that also contains the ferrule?</p> <p>6 A. Yeah. I'm not looking at it but that</p> <p>7 sounds about right. I don't know if -- let me,</p> <p>8 it's in my report on page 39 so I've turned there</p> <p>9 and I think what you've said is correct.</p> <p>10 Q. And so in the context of patent '146</p> <p>11 the ferrule holder in '146 is being used to</p> <p>12 describe the item that is holding the ferrule which</p> <p>13 is 132 but it's not being used to describe for</p> <p>14 instance the body of the connector the main body of</p> <p>15 the connector, whatever is identified as 144, that</p> <p>16 would in turn hold the ferrule and ferrule holder,</p> <p>17 correct?</p> <p>18 A. I'm going to be honest with you, I</p> <p>19 didn't follow that question. I think you meant for</p> <p>20 '644, that threw me off so I was looking for a</p> <p>21 different patent, so sorry about that.</p> <p>22 Q. Let me rephrase it.</p> <p>23 A. Okay.</p> <p>24 Q. In the context of how ferrule holder</p> <p>25 is being used in the '466 patent that we are</p>
<p style="text-align: right;">Page 91</p> <p>1 A. I'm not sure what you mean by</p> <p>2 directly holds the ferrule. It does at least</p> <p>3 partially hold the ferrule.</p> <p>4 Q. Well, what I mean by that is that the</p> <p>5 ferrule gets inserted into 132, correct?</p> <p>6 A. That is correct.</p> <p>7 Q. And then 132 is assembled with like</p> <p>8 components 134 and 122 and then inserted into, if</p> <p>9 you see in figure 3A connector housing, correct?</p> <p>10 A. Yes, that's all correct.</p> <p>11 Q. And so the term ferrule holder is not</p> <p>12 being used to identify the connector housing, it's</p> <p>13 specifically being used to identify the component</p> <p>14 that directly holds the ferrule. Correct?</p> <p>15 A. Well, again, with the caveat that I'm</p> <p>16 not sure what is entailed in directly holding it</p> <p>17 but I think you've summarized it correctly, 130,</p> <p>18 the ferrule goes into 132, that's the symbol of</p> <p>19 some other things and eventually finds its way into</p> <p>20 the housing of the connector.</p> <p>21 Q. If you could, and just let's back up</p> <p>22 a little bit also.</p> <p>23 So you're proposing that ferrule</p> <p>24 holder should be given its plain and ordinary</p> <p>25 meaning, correct?</p>	<p style="text-align: right;">Page 93</p> <p>1 looking at that's Exhibit 8, ferrule holder is</p> <p>2 being used specifically to identify the item that</p> <p>3 is holding, the item 132 that is holding the full</p> <p>4 130 as seen in figure 3A, correct?</p> <p>5 A. Okay. I think I followed that one</p> <p>6 and I would agree for the most part, this</p> <p>7 particular embodiment in figure 3A and the text</p> <p>8 that got us here, that is indicating that 132 is</p> <p>9 the ferrule holder and that is at least to some</p> <p>10 extent holding the ferrule 130.</p> <p>11 Q. And then that component 132 that's</p> <p>12 being identified as a ferrule holder is in turn</p> <p>13 held in what looks like 144 which would be a body</p> <p>14 of the connector, correct?</p> <p>15 A. Yes. I mean it's held by some other</p> <p>16 stuff as well but eventually when it's all</p> <p>17 assembled that is inside 144.</p> <p>18 Q. And so 144, it holds the ferrule but</p> <p>19 it holds more than just the ferrule, it holds the</p> <p>20 ferrule, the ferrule holder, the springs,</p> <p>21 everything else, correct?</p> <p>22 A. Not everything else but certainly a</p> <p>23 lot of other components all get attached and</p> <p>24 secured together within or at least attached to</p> <p>25 that 144 housing.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. And if we were to think almost along 2 the lines of nesting dolls, 132 which is the item 3 being identified as the ferrule holder is the thing 4 that houses the ferrule and then 144 which isn't 5 being identified as the ferrule holder would be a 6 further housing that is outside of that 132, 7 correct?</p> <p>8 A. Sure. I think it's roughly correct.</p> <p>9 Q. Under the plain and ordinary meaning 10 that you are proposing would 144 qualify as a 11 ferrule holder?</p> <p>12 MR. WEEKS: Objection to scope.</p> <p>13 Q. (BY MR. SCHROEDER) Let me rephrase 14 that.</p> <p>15 Under your understanding of what the 16 plain and ordinary meaning of ferrule holder is 17 would 144 also be a ferrule holder?</p> <p>18 MR. WEEKS: Same objection.</p> <p>19 A. You know, I didn't do that 20 investigation. Let me see. I'm not sure I can do 21 that on the fly here either because I think I need 22 to go into the specification and read about how 23 this staff is assembled and what's touching what 24 and what's providing support. Like I said, there's 25 a number of things that generally hold these</p>	<p style="text-align: right;">Page 96</p> <p>1 you could certainly have designs where a large 2 portion of the connector would be the ferrule 3 holder because if you took some portion away it 4 wouldn't be held. So I think it would be fair to 5 interpret a large portion of a connector to be a 6 ferrule holder.</p> <p>7 Q. And when you say that something holds 8 the ferrule does it mean that it holds the ferrule 9 in place or does that mean that directly supports 10 and graphs the ferrule?</p> <p>11 A. I think it holds the ferrule in a 12 certain place that it needs to be to perform as a 13 ferrule. It has to be positioned in a certain 14 place and there has to be certain forces applied to 15 it to hold it in that place while it's being used. 16 I think the structures that hold the ferrule in 17 that sense would be the ferrule holder.</p> <p>18 Q. So in that sense would like a spring 19 that is biasing the ferrule forward be part of the 20 ferrule holder?</p> <p>21 MR. WEEKS: Object to the form.</p> <p>22 A. I'm not sure I did that kind of 23 analysis for my report. I think the spring is 24 definitely going to be holding it in some sense, 25 when a person of ordinary skill in the art would</p>
<p style="text-align: right;">Page 95</p> <p>1 ferrules in place and just looking at figure 3 and 2 3M I'm not sure how that all works here. I'm 3 certain on 132, it's called the ferrule holder, but 4 when other things could properly be included in 5 that I didn't do that investigation.</p> <p>6 Q. So I guess part of what I'm trying to 7 understand is, you know, you're proposing a plain 8 and ordinary meaning for the term ferrule holder, 9 I'm trying to understand what you understand the 10 plain and ordinary meaning to be, and so in 11 particular I'm trying to understand does the plain 12 and ordinary meaning of ferrule holder require that 13 the ferrule directly touch the ferrule holder?</p> <p>14 A. No. I don't think that's a 15 requirement.</p> <p>16 Q. All right. Does the ferrule holder 17 have to -- so the next question then is the ferrule 18 holder the entire assembly that would be the 19 connector or is the ferrule holder a subportion of 20 the assembly?</p> <p>21 MR. WEEKS: Objection to form.</p> <p>22 A. Again, I didn't do that analysis and 23 I think it depends on the particular connector that 24 you're examining. In general I don't think the 25 entire connector would be the ferrule holder but</p>	<p style="text-align: right;">Page 97</p> <p>1 call that a ferrule holder or part of a ferrule 2 holder I'd have to look at a specific design and do 3 that analysis, and I just can't do that kind of 4 generic analysis in preparation for today.</p> <p>5 Q. All right. In the context of this 6 Exhibit 8 that we have in front of you, the '466 7 patent, and figure 3 that you see that has the 8 components of the connector is the spring acting as 9 a ferrule holder there?</p> <p>10 MR. WEEKS: Objection to scope.</p> <p>11 A. I didn't do that analysis and I'd 12 probably need to read through this to see just how 13 that spring is positioned and what forces it's 14 applying and what happens if the spring isn't 15 there. There is basically an analysis I would need 16 to do. I could probably do it at some point 17 reading through the specifics, but I just didn't do 18 that analysis coming into this deposition.</p> <p>19 Q. (BY MR. SCHROEDER) But it's not your 20 opinion that the ferrule holder is the outer most 21 portion of the connector which can be said to 22 somehow have the ferrule retained within it.</p> <p>23 MR. WEEKS: Objection to form.</p> <p>24 A. Yeah, I just didn't do that analysis, 25 I'm sorry. I don't think I can answer that</p>

<p style="text-align: right;">Page 98</p> <p>1 question at this point.</p> <p>2 Q. (BY MR. SCHROEDER) If you could open</p> <p>3 Exhibit 6.</p> <p>4 A. Okay.</p> <p>5 Q. And can you identify what Exhibit 6</p> <p>6 is?</p> <p>7 A. This is the '075 patent.</p> <p>8 Q. And is the '075 patent the patent</p> <p>9 which the term ferrule holder appears in the</p> <p>10 claims?</p> <p>11 A. Yes, I believe so.</p> <p>12 Q. And figure 2 of the '075 patent shows</p> <p>13 the entire assembly in an expanded view or broken</p> <p>14 view, is that correct? I probably mis-said that,</p> <p>15 in the blow apart view, is that correct?</p> <p>16 A. You can just call it the exploded</p> <p>17 view.</p> <p>18 Q. Okay. Yeah. Sorry.</p> <p>19 A. It's not been up or anything but it's</p> <p>20 taken apart and there's usually some lines that</p> <p>21 indicate how you put it back together. We usually</p> <p>22 call that exploded.</p> <p>23 Q. Right. Okay. Which portions of the,</p> <p>24 that we're seeing here are considered the ferrule</p> <p>25 holder?</p>	<p style="text-align: right;">Page 100</p> <p>1 A. Yeah. If you're going to go ahead</p> <p>2 and use this whole thing.</p> <p>3 Q. If that plug 200 weren't there would</p> <p>4 the ferrules remain where they're supposed to be</p> <p>5 within that adapter?</p> <p>6 A. I don't think so. You essentially</p> <p>7 busted the system here. I think the ferrules would</p> <p>8 be held within the ferrule holder and they wouldn't</p> <p>9 go anywhere, so they're being held but they're not</p> <p>10 going to be held within the adapter because to hold</p> <p>11 within the adapter you do need that plug 200.</p> <p>12 Q. And without that plug 200 the</p> <p>13 ferrules would not be held in mating position,</p> <p>14 correct?</p> <p>15 A. What do you mean by mating position?</p> <p>16 Q. Well, you use the connector to make</p> <p>17 two ferrule connectors, correct?</p> <p>18 A. I'm sorry.</p> <p>19 Q. Let me rephrase it.</p> <p>20 The purpose of an adapter in fiber</p> <p>21 optics is to mate connectors, correct?</p> <p>22 A. That is one of the uses of them. You</p> <p>23 can also just mate them to the device that's trying</p> <p>24 to read the light.</p> <p>25 Q. And in particular in the context of</p>
<p style="text-align: right;">Page 99</p> <p>1 A. Well, this version is not searchable</p> <p>2 but I can go to 300 if I recall the number.</p> <p>3 Q. And 300 then fits in to 200, correct?</p> <p>4 A. Yes, it does.</p> <p>5 Q. And in particular 4, in the image we</p> <p>6 see here there's actually four ferrule holder 300s</p> <p>7 that fit into the club 200, correct?</p> <p>8 A. That is correct.</p> <p>9 Q. Does that plug 200 hold the ferrules</p> <p>10 in place?</p> <p>11 A. Well, I'm pretty familiar with this</p> <p>12 so I don't think I have to go read the</p> <p>13 specification to answer it pretty appropriately.</p> <p>14 The plug is really holding the four ferrule holders</p> <p>15 together, the ferrule holder 300 holds the ferrule</p> <p>16 12 with a spring and a spring push, and then to</p> <p>17 keep those together or maybe we might call those</p> <p>18 ganging those together in groups of four they take</p> <p>19 four of those ferrule holders and insert them into</p> <p>20 this, I think you're right, I think it's called</p> <p>21 plug 200. So the plug 200 really here ganging</p> <p>22 together or holding together the four ferrule</p> <p>23 holders.</p> <p>24 Q. And the plug then gets inserted into</p> <p>25 the adapter 100, correct?</p>	<p style="text-align: right;">Page 101</p> <p>1 the '075 patent that this term comes from, the</p> <p>2 adapter though is being used to mate connectors,</p> <p>3 correct?</p> <p>4 A. Yes. That's certainly what that 100</p> <p>5 is going to do. Once you've assembled a connector</p> <p>6 on the right, one on the left, you would be able to</p> <p>7 put them into that connector and mate the fiber</p> <p>8 optics.</p> <p>9 Q. Right. And in particular you'd be</p> <p>10 mating basically, you know, in this figure you</p> <p>11 don't see it from the other side but you would be</p> <p>12 mating four ferrules from one side with four</p> <p>13 ferrules from the other side, correct?</p> <p>14 A. That's certainly one thing you could</p> <p>15 do.</p> <p>16 Q. And without the ferrule holder, or</p> <p>17 without the plug 200 those ferrules would not be</p> <p>18 held in place for mating, correct?</p> <p>19 A. That's right. I don't think they'd</p> <p>20 be held in place for mating, they would be held in</p> <p>21 place within 300 but this full structure here</p> <p>22 requires the 200 to position it relative to the</p> <p>23 ferrules on the other side to make essentially the</p> <p>24 optical connection.</p> <p>25 Q. Moving on in your declaration. In</p>

<p style="text-align: right;">Page 102</p> <p>1 paragraphs 80 through I believe 84 you critique Dr. 2 Goossen's analysis of a, of the prosecution history 3 with respect to a Chen reference, is that correct? 4 A. Yeah. I can't remember the paragraph 5 numbers that you said but I think my analysis of 6 Dr. Goossen's use of the file history is paragraph 7 79 to 85 it looks like. Is that what you said? 8 Q. I focused on 80 because 80 I believe 9 is where Dr. Goossen, where you were critiquing his 10 specific application of the Chen reference. 11 A. Okay. I will go along with that. 79 12 was kind of introducing the topic and getting us on 13 this page. 14 Q. Right. Yeah. 15 And in particular you critique that 16 in Chen it was the adapter 36 that was being 17 discussed, correct? 18 A. Yeah. For the most part I think the 19 discussion was based on this adapter. 20 Q. Do you know if Chen used the external 21 adapter in the same context of what we see in for 22 instance figure 2 of the '075 patent? 23 A. Okay. Just to understand your 24 question, I believe that Chen calls 36 an adapter, 25 doesn't he?</p>	<p style="text-align: right;">Page 104</p> <p>1 criticism. I think it's taking this out of 2 context. 3 Q. Haven't you gone to Chen to look at 4 how the context of that Chen used the word adapter? 5 A. That's what I'm telling you, I didn't 6 do that investigation of a contextual analysis of 7 36 and Chen. 8 Q. And so if Chen used the term adapter 9 in a context fairly similar to how the plug is used 10 in the '075 patent you wouldn't necessarily have 11 identified that, correct? 12 MR. WEEKS: Object to form. 13 A. I'm going to be honest, I don't 14 really understand that question. 15 Q. (BY MR. SCHROEDER) I'll strike that 16 question then. 17 So you did not look into what the 18 adapter 36 of Chen was or how it operated. Is that 19 correct? 20 MR. WEEKS: Objection, misstates 21 testimony. 22 A. Well, it's not correct. I was able 23 to see this figure and I see what it is and then I 24 also read the statements in the file history that 25 Dr. Goossen put forward so I do have an</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. He does. 2 A. Okay. 3 Q. He uses the word adapter but I was 4 kind of asking a slightly different question of 5 does Chen use the adapter in the same context as 6 how it's used in the '075 patent? 7 MR. WEEKS: Object to the form. 8 A. That I'm not sure of. I didn't 9 analyze -- first of all, I didn't analyze all of 10 Chen, I just looked at the parts that Dr. Goossen 11 cited and the prosecution has cited. So I don't 12 think I can fairly characterize sort of that 13 general usage by Chen. 14 Q. (BY MR. SCHROEDER) But you do 15 criticize him for jumping between the adapter and 16 the housing, correct? 17 A. Who am I criticizing? 18 Q. Dr. Goossen. 19 A. I don't think I'm criticizing him for 20 jumping around, I'm criticizing him for pulling out 21 of this discussion of this other prosecution 22 history. Pulling out statements that were being 23 made about an adapter and somehow saying those 24 apply to the different structure, the different 25 system that's in the '075 patent. That's my</p>	<p style="text-align: right;">Page 105</p> <p>1 understanding of 36 but I didn't do this further 2 contextual analysis that you were asking me about. 3 Q. If you could open Exhibit 15. 4 A. Okay. I opened 15. It is the Chen 5 '192 patent. 6 Q. And so this is the reference that's 7 being discussed by Dr. Goossen, correct? 8 A. Yes. 9 Q. Do you know if the adapter 36 is 10 being described as being part of a backplane 11 connector assembly 26? 12 A. That I do not know. If you want to 13 refer me to some part of this patent I'll read up 14 on that. 15 Q. Give me a second. 16 In particular column 3, line 19. 17 A. So I'm to that point and I think what 18 you're directing me to is a sentence that says 19 quote, backplane connector assembly 26 includes an 20 adapter, generally, designated 36, which is mounted 21 to aperture 30 in motherboard 32. 22 Q. And so the adapter 36 is describing a 23 component that basically is being used in the 24 connector assembly 26 to attach that connector 25 assembly 26 to the aperture 30 in the motherboard,</p>

<p style="text-align: right;">Page 106</p> <p>1 correct?</p> <p>2 A. I don't think it's being used to</p> <p>3 attach it to the aperture, I think it's being used</p> <p>4 to attach the ferrule holders and then it could be</p> <p>5 attached to aperture 30 in some kind of backplane.</p> <p>6 Q. Is the aperture or is the adapter and</p> <p>7 connector that's being discussed there, or I'm</p> <p>8 sorry, the assembly 26 ganging the connectors</p> <p>9 together?</p> <p>10 A. I did not do that analysis but</p> <p>11 they're certainly playing a role in that. I'm not</p> <p>12 sure I would say they're the ones doing it but it</p> <p>13 could be part of the process you described where</p> <p>14 you're ganging together four of those, but without</p> <p>15 reading this I'm not sure of what's all involved in</p> <p>16 that process.</p> <p>17 Q. Do you know, can you tell whether or</p> <p>18 not connector assembly 26 is then made with a</p> <p>19 daughter board connector assembly 28?</p> <p>20 A. No, not from what we just looked at.</p> <p>21 Q. Is there some other part of the</p> <p>22 specification you want me to look at?</p> <p>23 A. I believe it was the next paragraph.</p> <p>24 Q. Okay. Let me read the next paragraph</p> <p>25 and then maybe ask the question again. Just a</p>	<p style="text-align: right;">Page 108</p> <p>1 A. I mean probably to the extent I</p> <p>2 understand your question 28 is shown as what we</p> <p>3 might call male and 26 you can't really see from</p> <p>4 figure 2, but it would have to be a female for</p> <p>5 those to be joined together, and I understand you</p> <p>6 in figure 2 that they are joined together so yeah,</p> <p>7 I think one is a male and one is a female and they</p> <p>8 do get connected together.</p> <p>9 Q. Right. Okay. And so in the context</p> <p>10 of the patent at issue, or the plain language</p> <p>11 ferrule holder at issue was, do either of the</p> <p>12 backplane connector assemblies or the daughter</p> <p>13 board connector assembly act as ferrule holder?</p> <p>14 A. I didn't do that analysis and there's</p> <p>15 a lot of parts and actions going on that I don't</p> <p>16 fully understand because I didn't study it for that</p> <p>17 issue but I think that inside 26 and some portion</p> <p>18 of 26 are ferrule holders because we really saw</p> <p>19 that in figure 4 in my report. I don't know so</p> <p>20 much about 28, I haven't looked at the internal</p> <p>21 structure there, and I'm not even sure that there</p> <p>22 are ferrules inside there, although I suspect there</p> <p>23 are because there's cable 44 coming out the other</p> <p>24 side of it, so I can only kind of speak somewhat</p> <p>25 intelligent about 26 and I think part of 26 is a</p>
<p style="text-align: right;">Page 107</p> <p>1 second please.</p> <p>2 Let me verify it was the next</p> <p>3 paragraph, I actually scrolled up.</p> <p>4 A. Okay. I've reviewed that paragraph</p> <p>5 and it refers to figures 1 and 2 and I went back up</p> <p>6 and looked at figures 1 and 2, so I would say I</p> <p>7 have a rudimentary understanding of what it's</p> <p>8 discussing in this paragraph at this point.</p> <p>9 Q. Well, really what I'm going to ask is</p> <p>10 do the, do the backplane connector assembly 26 and</p> <p>11 the daughter connector assembly 28 act as mating</p> <p>12 female and male plugs?</p> <p>13 MR. WEEKS: John, I missed that last</p> <p>14 word, acting female and male what? I just didn't</p> <p>15 hear your question.</p> <p>16 MR. SCHROEDER: Plugs.</p> <p>17 MR. WEEKS: Thank you.</p> <p>18 A. I think to answer your question I</p> <p>19 need to go back to figure 2 so I'm looking at</p> <p>20 figure 2 now. Can you ask the question again while</p> <p>21 this is in front of me?</p> <p>22 Q. (BY MR. SCHROEDER) Do the backplane</p> <p>23 connector assembly number 26 and the daughter board</p> <p>24 assembly connector assembly 28 act as female and</p> <p>25 male plugs?</p>	<p style="text-align: right;">Page 109</p> <p>1 ferrule holder but I don't think it's the whole</p> <p>2 thing, and really we probably want to jump back to</p> <p>3 figure 4 and that clearly shows us the ferrule</p> <p>4 holders that are holding the ferrules. I think</p> <p>5 that's a better view to identify what the ferrule</p> <p>6 holder is in this case.</p> <p>7 Q. And in particular the adapter 36</p> <p>8 which is part of the connector assembly 26 over the</p> <p>9 backplane connector assembly 26, is not acting as a</p> <p>10 ferrule holder, correct?</p> <p>11 A. Again, I didn't do that analysis for</p> <p>12 this but I don't think so. I think that the</p> <p>13 ferrule holders are the portions that get inserted</p> <p>14 into that adapter. That's essentially an adapter.</p> <p>15 It's called an adapter.</p> <p>16 Q. Right.</p> <p>17 A. Ferrule holders are being attached in</p> <p>18 there and so what's going into this adapter would</p> <p>19 be the ferrule holders.</p> <p>20 Q. Going back though comparing, you</p> <p>21 know, this, during the prosecution history it's,</p> <p>22 during the prosecution history of the '075 patent,</p> <p>23 or at least within the family of the '075 patent</p> <p>24 there was a prosecution history that distinguished</p> <p>25 that adapter from ferrule holders, correct?</p>

<p style="text-align: right;">Page 110</p> <p>1 A. That is my understanding. Yes.</p> <p>2 Q. And that adapter is really acting</p> <p>3 more like what the plug is acting like in the</p> <p>4 context of the '075 patent, correct?</p> <p>5 A. I really can't agree with that, I</p> <p>6 think if you pulled up the '075 patent and looked</p> <p>7 at figure 2 you would see where the nearest, if you</p> <p>8 were trying to compare apples to oranges and kind</p> <p>9 of like two apples, that the 36 adapter and the</p> <p>10 '192 patent looks actually like a combination of</p> <p>11 plug 200 adapter 100. If I have to say it. I</p> <p>12 don't see that the combination of those two is the</p> <p>13 nearest similarity as I can detect.</p> <p>14 Q. I don't think I'm getting where I</p> <p>15 want to here.</p> <p>16 So I guess my question is though, is</p> <p>17 the -- strike that.</p> <p>18 Do you know if the '075 patent</p> <p>19 specification identifies that the ferrule holder</p> <p>20 retains the fiber optic ferrule therein?</p> <p>21 A. I don't know that but that sounds</p> <p>22 about right. Do you have a part I can look at?</p> <p>23 Q. I believe it would be column 2, 33</p> <p>24 through 35.</p> <p>25 A. Will you remind me again which</p>	<p style="text-align: right;">Page 112</p> <p>1 really know what it's directing me to.</p> <p>2 Q. Would the ferrule have to at least be</p> <p>3 partially retained within the ferrule holder?</p> <p>4 A. Again, I'm not quite understanding</p> <p>5 the retained within part. If that's the equivalent</p> <p>6 of holding then I agree with that. The ferrule</p> <p>7 holder has to hold the ferrule.</p> <p>8 Q. Well I guess, I'm trying to ask if</p> <p>9 holding means it has to actually grasp it in some</p> <p>10 way or if it just has to support it in some way?</p> <p>11 A. I'm not sure I understand there the</p> <p>12 difference between grasping and supporting, but to</p> <p>13 hold something the way I would think about it. I</p> <p>14 think a person of ordinary skill in the art would</p> <p>15 think about it is that you have to apply some</p> <p>16 forces for it to hold it.</p> <p>17 Q. Moving on to paragraph 39 of your</p> <p>18 declaration.</p> <p>19 A. 39?</p> <p>20 Q. I'm sorry, 93. Dyslexic moment.</p> <p>21 A. No worries. I'm there at paragraph</p> <p>22 93.</p> <p>23 Q. You have a figure that you've</p> <p>24 embedded in to paragraph 39, is that correct?</p> <p>25 A. No. I put it at the end of 93.</p>
<p style="text-align: right;">Page 111</p> <p>1 exhibit is '075. I think I got too many exhibits</p> <p>2 open here.</p> <p>3 Q. It is, I probably have the same</p> <p>4 issue. It should be the Exhibit 6.</p> <p>5 A. Okay. I've reopened Exhibit 6, so if</p> <p>6 you can direct me to some part of that I'll take a</p> <p>7 look at it.</p> <p>8 Q. Column 2, lines 33 through 35.</p> <p>9 A. I think those sentences say about</p> <p>10 what you said. They say that ferrule holders</p> <p>11 having a central opening extending from a first end</p> <p>12 to a second end to resiliently retain a fiberoptic</p> <p>13 ferrule therein. That's roughly what you said I</p> <p>14 think.</p> <p>15 Q. Would you agree that the ferrule</p> <p>16 holder would have to retain a ferrule therein?</p> <p>17 A. Yeah, I mean as far as practicing the</p> <p>18 claims, is that what you mean?</p> <p>19 Q. Yes.</p> <p>20 A. Okay. I don't understand the therein</p> <p>21 part but I think ferrule holders have to retain or</p> <p>22 hold, they have to hold the ferrule, that's their</p> <p>23 name. They have to hold it. I don't know what the</p> <p>24 therein is referring to. Do you know what I'm</p> <p>25 saying? It's directing me to something I don't</p>	<p style="text-align: right;">Page 113</p> <p>1 Q. I'm sorry, at the end of 93, you have</p> <p>2 a figure that you've embedded there, correct?</p> <p>3 A. Yes. I put a figure there.</p> <p>4 Q. And within that figure you</p> <p>5 highlighted the, what is identified as the ferrule</p> <p>6 holder yellow, correct?</p> <p>7 A. Yeah. This is a cross sectional view</p> <p>8 so you don't see the whole ferrule holder but to</p> <p>9 the extent that you can see the ferrule holder</p> <p>10 parts I called those in yellow.</p> <p>11 Q. All right. And I know it looks like</p> <p>12 it's kind of one part's in the front and then</p> <p>13 there's a separate part in the back that's</p> <p>14 separated, but all the yellow's actually one</p> <p>15 unitary body, correct?</p> <p>16 A. Yeah. That's my understanding. What</p> <p>17 we're seeing is a slice through the 300 at a point</p> <p>18 where it has like a hole, but if you went away from</p> <p>19 the page or into the page you would run back in to</p> <p>20 material, we just happen to be slicing through a</p> <p>21 hole that's in 300 at that point.</p> <p>22 Q. And the last sentence of paragraph 93</p> <p>23 you're identifying that using Dr. Goossen's</p> <p>24 proposed construction that the yellow would hold</p> <p>25 not just the ferrule but some other components.</p>

<p style="text-align: right;">Page 114</p> <p>1 Correct?</p> <p>2 A. That is correct.</p> <p>3 Q. And you're saying those other</p> <p>4 components contain the ferrule, is that correct?</p> <p>5 A. You know, I don't think I used the</p> <p>6 contain word. I mean that's probably close to</p> <p>7 right. I think I said it's holding. But I think</p> <p>8 maintains and holding is pretty close.</p> <p>9 Q. I believe the exact quote is the</p> <p>10 ferrule holder is holding other components that</p> <p>11 contain the ferrule.</p> <p>12 A. Okay. I agree with that.</p> <p>13 Q. And in particular are you saying that</p> <p>14 the spring contains the ferrule?</p> <p>15 A. Yes, I am. Without that spring the</p> <p>16 ferrule would slide back out backward which is to</p> <p>17 the right in figure 9.</p> <p>18 Q. Now, are you using the word contain</p> <p>19 more along the lines of that it retains it or are</p> <p>20 you using that it actually contains it within?</p> <p>21 A. Yeah, I'm not really using that</p> <p>22 within part, that contains within. I'm using it in</p> <p>23 a sense it contains the ferrule, it holds it, it</p> <p>24 keeps it in position. It's contained in the back</p> <p>25 side at the very least just to make that clear.</p>	<p style="text-align: right;">Page 116</p> <p>1 this slice view in figure 9 is the spring just</p> <p>2 pushing up against one side. But I'm not sure</p> <p>3 there's not some portion that we're missing that</p> <p>4 kind of goes inside the spring, sometimes that's</p> <p>5 how they seat springs to make sure they don't move</p> <p>6 around, there's a portion on the outside and a</p> <p>7 portion on the inside of the spring and that helps</p> <p>8 keep the spring in the position it's supposed to be</p> <p>9 in. Springs are kind of hard to keep in one spot,</p> <p>10 so sometimes they support the inside and the</p> <p>11 outside of the spring in that way.</p> <p>12 Q. If you want we can take a short break</p> <p>13 before I move on to the last couple of things. I</p> <p>14 probably have about another half hour.</p> <p>15 A. Sounds good to me.</p> <p>16 (A RECESS WAS TAKEN BY THE PARTIES)</p> <p>17 Q. (BY MR. SCHROEDER) I want to move on</p> <p>18 to the claim construction for groove. First off, I</p> <p>19 want to ask, do you disagree that a groove is a</p> <p>20 elongated recess or depression in a surface?</p> <p>21 A. I think a groove could be that, but I</p> <p>22 think that unnecessarily limits it, I'm not sure</p> <p>23 about the elongated portion. I think maybe you</p> <p>24 could have a groove that's not elongated, I'm not</p> <p>25 sure where that came from. And then there's the</p>
<p style="text-align: right;">Page 115</p> <p>1 I'm not saying it's containing all of it, it's</p> <p>2 containing the backside, being the right side of</p> <p>3 figure 9. The annotated version of figure 9 that I</p> <p>4 have.</p> <p>5 Q. And then you've got the spring push</p> <p>6 behind the spring, correct?</p> <p>7 A. Yes. the spring push is pushing on</p> <p>8 the spring, without the spring push the spring</p> <p>9 would just fall out, so it's really the combination</p> <p>10 of those two things are containing the backside of</p> <p>11 the ferrule.</p> <p>12 Q. Does the spring push even touch the</p> <p>13 ferrule?</p> <p>14 A. The spring push doesn't touch it, it</p> <p>15 applies forces to the spring which are transmitted</p> <p>16 through the spring to the other side and are</p> <p>17 applied to the ferrule.</p> <p>18 Q. And the ferrule does not fit inside</p> <p>19 that spring pushing it, does it?</p> <p>20 A. No. It's not inside of it. No.</p> <p>21 Q. And once again the ferrule isn't</p> <p>22 inside the spring either. Correct?</p> <p>23 A. That I'm not sure. I've only seen a</p> <p>24 slice through here, I'd probably want to look at</p> <p>25 the other figures but certainly what's shown in</p>	<p style="text-align: right;">Page 117</p> <p>1 recess or depression, I'd probably want that</p> <p>2 clarified by what that means or is there a</p> <p>3 difference there, but it's obviously sort of a</p> <p>4 space in a surface, right? There's no doubt about</p> <p>5 that, but the elongated part and also I'm not sure</p> <p>6 what recess and board depression means so if we get</p> <p>7 that straight I'll probably go along with a lot of</p> <p>8 it except for the elongated part.</p> <p>9 Q. If you could go to page 10 of your</p> <p>10 declaration which was Exhibit 1.</p> <p>11 A. Page 10?</p> <p>12 Q. Correct.</p> <p>13 A. Okay.</p> <p>14 Q. You have an image at the top of that</p> <p>15 page where you, and that image is of basically a</p> <p>16 bank, or a, I don't know, you call it an adapter.</p> <p>17 A. Yeah.</p> <p>18 Q. Correct?</p> <p>19 A. Yes.</p> <p>20 Q. All right. And within that adapter</p> <p>21 you've got identified longitudinal ribs along the</p> <p>22 top and along the bottom, is that correct?</p> <p>23 A. That's correct.</p> <p>24 Q. Would you consider the spaces in</p> <p>25 between those ribs to be grooves?</p>

<p style="text-align: right;">Page 118</p> <p>1 A. Yeah, I think those could be 2 interpreted as grooves. 3 Q. And would you say the same thing for 4 both the top and the bottom? 5 MR. WEEKS: Objection to scope. 6 A. Yeah, I think so. I mean again, I 7 didn't think of them in terms of grooves, I was 8 looking, I was presenting this in terms of the ribs 9 part. I probably want to take a closer look at it, 10 but both on the top and the bottom there are these 11 sort of spaces into the internal surfaces, so in 12 that respect from this point of view they look like 13 grooves. 14 Q. Going back to the portion of your 15 declaration that's specific to grooves. In 16 paragraphs 101 and 102 you're addressing in figure 17 5 that you have embedded kind of between paragraphs 18 101 and 102. Correct? 19 A. Yes. 20 Q. And that figure 5 is from the patent 21 to Xue, X-U-E, correct? 22 A. Yes. 23 Q. And in particular in these 24 paragraphs, I believe probably more in paragraph 25 102 you are discussing a through hole 15, correct?</p>	<p style="text-align: right;">Page 120</p> <p>1 agree that a groove generally has to have a base to 2 it? 3 A. What does a base mean to you? 4 Q. So like, you know, if you've got, you 5 know, let's say for instance we're looking at this 6 figure 5 and we're looking at the bottom part of 7 figure 5 just because you kind of see it a little 8 better, and at 141 you have what looks like it 9 could be a groove, is that correct? 10 A. Yeah, that could be a groove. 11 Q. And in particular that groove would 12 have basically three sides, it would have two side 13 walls and then a base. 14 A. I see what you're saying, yeah. It 15 has at least those three side walls. There's a 16 wall at the back that's probably kind of ending the 17 groove I would guess. 18 Q. Right. But, you know, like it would 19 have a base to it, correct? 20 A. You're saying base in that it has to 21 have that bottom surface. 22 Q. If the groove is in a bottom surface, 23 yes. If the groove's on top that surface might 24 actually be above the groove, but yes, it has to 25 have as you said the bottom surface if you're</p>
<p style="text-align: right;">Page 119</p> <p>1 A. Yes. 2 Q. Is that through hole 15 in and of 3 itself a groove? 4 A. No. I think it's the part of the 5 groove on 31. 6 Q. Would a surface that has a through 7 hole in and of itself be, would that through hole 8 by itself be a groove? 9 A. I'd have to see the through hole but 10 I don't think so. You could just drill a hole 11 through it, it's certainly, a drill hole through is 12 not a groove, it's just a hole. 13 Q. And even if the hole was square would 14 that be a groove? 15 A. Well, I think in that case you get a 16 little closer, it might be a groove in an 17 orthogonal direction, if we're talking about 18 something not specific as the claims here, but 19 there could be a situation where you make a square 20 hole up through a surface and you turn to look at 21 it and say oh, that's a groove in that direction 22 but it wouldn't be a groove in a way that we're 23 using it here. 24 Q. And without getting into whether or 25 not there might be holes in that base, would you</p>	<p style="text-align: right;">Page 121</p> <p>1 looking down into it. 2 A. I don't think we have to have the 3 bottom surface. Imagine there was no bottom 4 surface and this was sitting on a motherboard or 5 whatever and you brought a connector in here and 6 you just slid it in. I mean the point of these 7 grooves is to allow you to slide one component into 8 the other. So I think you could slide a component, 9 a connector into this adapter having a bottom 10 surface, 141 there, the important part would be the 11 side walls guiding the connector into the proper 12 position. 13 Q. If there were an open notch would 14 that be a groove? 15 A. Not really sure what you mean by open 16 notch. What we were just talking about may be 17 something close to an open notch but I think we'd 18 have to get into a discussion about what are 19 notches, so I don't feel so comfortable about that, 20 but I think you could have essentially open grooves 21 maybe is what I would say yes to. And open and 22 being not having to have so many surfaces, not 23 having to have that bottom surface. 24 Q. So to you is a groove something that 25 is more of a functional limitation as compared to a</p>

<p style="text-align: right;">Page 122</p> <p>1 structural limitation?</p> <p>2 A. No. I think it's a structural</p> <p>3 limitation, it's structured, but that structure</p> <p>4 generally would, in the context of these patents,</p> <p>5 in a context of this patent it generally does have</p> <p>6 a function that it can perform but it doesn't have</p> <p>7 to. It has the possibility of performing this</p> <p>8 guide function but it's definitely just a</p> <p>9 structure.</p> <p>10 Q. So I guess where I'm kind of getting</p> <p>11 tripped up then is in order for it to be a groove</p> <p>12 does it have to perform the function of guiding</p> <p>13 another component?</p> <p>14 A. I don't think it has to. You could</p> <p>15 have a decorative groove certainly but I think that</p> <p>16 if we went through these claims and we marched</p> <p>17 through the limitations we'd probably run into a</p> <p>18 limitation that required the grooves that we're</p> <p>19 talking about to perform some kind of mating</p> <p>20 function. But as a starting point I don't think it</p> <p>21 has to have a function.</p> <p>22 Q. If you look at for instance on page</p> <p>23 51 of your declaration you have figure 6 right</p> <p>24 above paragraph 110?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 124</p> <p>1 A. Let me take a quick look at that.</p> <p>2 MR. WEEKS: Objection, scope.</p> <p>3 Q. (BY MR. SCHROEDER) The '415 patent</p> <p>4 by the way is Exhibit 7.</p> <p>5 A. In Claim I certainly it doesn't</p> <p>6 require any kind of function, it just describes</p> <p>7 where it's located and it also describes that it's</p> <p>8 extending towards the center. So that one doesn't,</p> <p>9 if you want me to go through all the ones I can but</p> <p>10 that one does not require a function.</p> <p>11 Q. All right. So let's just stay on</p> <p>12 Claim I here. So Claim I does north recite the</p> <p>13 function of the grooves, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. And Claim I certainly does not</p> <p>16 require, or recite any projection being accepted in</p> <p>17 a groove, correct?</p> <p>18 A. No. Claim I doesn't have that</p> <p>19 requirement.</p> <p>20 Q. Is there anything in Claim I that</p> <p>21 would require the groove to meet any type of</p> <p>22 dimensional limitation in terms of accepting</p> <p>23 projections?</p> <p>24 A. I'm not sure what you mean by</p> <p>25 dimension.</p>
<p style="text-align: right;">Page 123</p> <p>1 Q. And do you see how there are slots or</p> <p>2 there's like a slot 11E, do you see that?</p> <p>3 A. Yes, I do.</p> <p>4 Q. So is that slot 11E a groove?</p> <p>5 A. I think it could be. I think this is</p> <p>6 one of those situations where I'd have to</p> <p>7 understand its usage a bit more but there's all</p> <p>8 kind of cutouts from this thing and some are kind</p> <p>9 of small and maybe that would be sort of like the</p> <p>10 knots you were talking about before, but at first</p> <p>11 appearances 11E could be a groove, I'd probably</p> <p>12 want to read more about it and understand its</p> <p>13 structure a little bit more and then I wouldn't</p> <p>14 mind understanding how it functions too.</p> <p>15 Q. Well, I mean again though we're</p> <p>16 saying that a groove is a structure, not</p> <p>17 necessarily a functional limitation, correct?</p> <p>18 A. That's right. I mean I think it is a</p> <p>19 structural feature but as I explained before some</p> <p>20 of the limitations would effectively require it to</p> <p>21 have a function later on down the line of inquiry</p> <p>22 if you will.</p> <p>23 Q. Do you know if the '415 patent claim,</p> <p>24 if the '415 patent specifically identifies a</p> <p>25 function within any of the claims?</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. Let me strike that.</p> <p>2 If you could go to paragraph 104 of</p> <p>3 your declaration.</p> <p>4 A. Okay. I'm there.</p> <p>5 Q. And if you can read it, the second</p> <p>6 sentence of this paragraph states, in a context of</p> <p>7 the '415 patent the POSITA would have understood a</p> <p>8 groove to refer to a space that is formed into the</p> <p>9 internal surfaces of the adapter that is</p> <p>10 dimensioned to accept projections from the ferrule</p> <p>11 holders.</p> <p>12 Do you see that?</p> <p>13 A. Yes, I do.</p> <p>14 Q. Going back to Claim I, is there any</p> <p>15 limitation in there that requires the groove to</p> <p>16 accept the projection?</p> <p>17 A. Well, no, I don't think it's a</p> <p>18 limitation in there. No. I think there's an</p> <p>19 understanding that that's what a groove would be</p> <p>20 used for in the context of this patent. That's</p> <p>21 what I'm writing there.</p> <p>22 Q. But the projection is not possible to</p> <p>23 be recited in the limitation, for this claim,</p> <p>24 correct?</p> <p>25 A. That is correct.</p>

<p style="text-align: right;">Page 126</p> <p>1 Q. And an adapter would be infringing 2 regardless of whether or not it was sized to accept 3 a projection, is that right? 4 MR. WEEKS: Scope. Vague. 5 A. Well, I haven't done any kind of 6 infringement analysis yet, we're still getting 7 claim construction so I don't think I can answer 8 that question. 9 Q. (BY MR. SCHROEDER) Also I kind of 10 misstated, under your plain and ordinary meaning 11 and what you're stating in 104 is it has to be 12 sized to receive a projection to meet that claim 13 limitation? 14 A. You said sized, I didn't really say 15 that but what I'm saying here, and maybe I'll just 16 say it a little bit different. If these grooves 17 are going to be the grooves that we're talking 18 about then they should have the capability of 19 accepting projections, you know, basically things 20 have to slide into them and they have to guide them 21 in to place. So that's what I meant by 22 dimensioned. So it's sort of the shape and the 23 placement of them. They have to ultimately be 24 capable of doing that, I don't think they would be 25 grooves, the kind of grooves we're talking about</p>	<p style="text-align: right;">Page 128</p> <p>1 grooves that are shown here in 6A. 2 Q. And the reason you believe it reads 3 out the preferred embodiment is because there's 4 latch receptacles 232 that are through holes. 5 Correct? 6 A. That is correct. 7 Q. Does the '415 patent at any place 8 identify those latch receptacles as grooves? 9 A. I don't think that the patent says 10 the latch receptacles are grooves. It's showing me 11 in this figure for example that they're part of the 12 groove. The ferrule holder 300 slides in, if we're 13 looking at figure 6A, the ferrule holder 300, 14 there's four of them but let's think of one of 15 them, they slide in from the left side and they go 16 into the groove at that point and they're colliding 17 under that whole 232 and they're into the groove 18 and then when they get far enough in their latch 19 pops up into that hole. So the hole, the last 20 receptacle is part of the groove but I don't think 21 the '415 says it is the groove. 22 Q. Does the '415 patent ever say that 23 the receptacles 232 are part of the groove 208? 24 MR. WEEKS: Objection, asked and 25 answered.</p>
<p style="text-align: right;">Page 127</p> <p>1 here. 2 Q. And the type of grooves you're 3 talking about is the type of grooves that are being 4 described in a claim, is that correct? 5 A. That's correct. 6 Q. And we'll move on to the, actually 7 before I move on can you turn to paragraph 113? 8 A. Okay. 9 Q. In paragraph 113 is it correct to 10 summarize it that you disagree with Dr. Goossen's 11 construction in part because the plug 200 includes 12 grooves in 208 and 212 and according to your 13 interpretation of this construction that the plugs 14 lack receptacles 232 would render one of those 15 grooves to not be a groove under Dr. Goossen's 16 construction? 17 Let me rephrase that. 18 A. Okay. Thank you. 19 Q. Paragraph 113 you're criticizing Dr. 20 Goossen's construction, correct? 21 A. That's correct. 22 Q. And in particular you're criticizing 23 his construction because you believe that it reads 24 out a preferred embodiment, correct? 25 A. Yes. I think it reads out the</p>	<p style="text-align: right;">Page 129</p> <p>1 A. I didn't search for that term but I 2 don't think so. As I sit here I don't think it has 3 that specific terminology. 4 Q. So you're interpreting the receptacle 5 232 as being part of the groove 208, but it doesn't 6 necessarily call it as such in the patent itself. 7 A. I don't think it calls it as such in 8 the text, it shows it as such in figure 6A for 9 example. 10 Q. Well, figure 6A we don't see what 11 exactly is going on inside of that adapter, 12 correct? 13 MR. WEEKS: Object to the form. 14 A. I do see some of what's going on and 15 also I read the description of this and I so I know 16 how it works and I just explained that to you, that 17 it's, that 300 slides in from the left into the 18 groove and goes all the way across and sticks out 19 the other side and when that latch gets far enough 20 into the groove it pops up into that through hole 21 portion of the groove which is called the latch 22 receptacle 232. 23 Q. But even if the latch receptacle 232 24 was considered something else other than the groove 25 there still would be a groove between let's say 232</p>

<p style="text-align: right;">Page 130</p> <p>1 and the end of that plug, correct?</p> <p>2 A. I think I understand your question</p> <p>3 and if we look at the upper portion of figure 6 I</p> <p>4 think what you're saying is where the 232 comes</p> <p>5 down and labels the latch receptacle, from that</p> <p>6 point over to the right until 208 you're saying</p> <p>7 that there could still be a groove there, and I</p> <p>8 will admit part of the groove is there. Yes.</p> <p>9 There's also another part of the groove which is on</p> <p>10 the other side of 232 that helps guide 300 into</p> <p>11 this thing. So the groove extends all the way from</p> <p>12 one side of this, backside all the way up into that</p> <p>13 208 label.</p> <p>14 Q. And could that by itself be a</p> <p>15 separate groove from 208?</p> <p>16 A. Well, I don't think -- I see what</p> <p>17 you're saying. So you'd have one groove and then</p> <p>18 not a groove and then another groove?</p> <p>19 Q. Yeah.</p> <p>20 A. I don't see a basis for that. I</p> <p>21 guess if the patent told me that I would go along</p> <p>22 with it but I'm only seeing in the pictures and the</p> <p>23 description one groove there.</p> <p>24 Q. Wouldn't that surface right there</p> <p>25 basically on the left side of the adapter have to</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. And in order to receive that latch in</p> <p>2 that short section in between the left most side of</p> <p>3 the adapter and then that latch receptacle, the</p> <p>4 opening there is going to have to be wider or</p> <p>5 higher at that point as compared to on the other</p> <p>6 side of the latch receptacle, correct?</p> <p>7 A. I didn't follow that but I'm going to</p> <p>8 try to piece that together for you right now.</p> <p>9 I don't think it has to be, if we</p> <p>10 look at figure 5A we can get sort of an isometric</p> <p>11 view of this.</p> <p>12 Tell me when you're at 5A. Sorry.</p> <p>13 Q. I'm at 5A now.</p> <p>14 A. Okay. A shows a lot of what we were</p> <p>15 talking about and the front part of this, this</p> <p>16 ferrule holder 300 is the 320, that projection up,</p> <p>17 and it sticks up a ways. That part does have to</p> <p>18 create this opening you're talking about, so the</p> <p>19 opening has to be a little bit bigger than that</p> <p>20 part, but if we go back further to the 316, if 316</p> <p>21 is a pretty low profile latch then it really</p> <p>22 wouldn't stick up much higher than that 320 and in</p> <p>23 that particular, with that particular geometry the</p> <p>24 back opening that you just referred to doesn't have</p> <p>25 to be any bigger, it could be just the same.</p>
<p style="text-align: right;">Page 131</p> <p>1 be a different level than the surface of 208</p> <p>2 because, you know, in front of 232 it's receiving</p> <p>3 the latch but then that latch is basically</p> <p>4 stopping, you know, within that receptacle.</p> <p>5 MR. WEEKS: Objection to the form.</p> <p>6 A. I did not follow the question. You</p> <p>7 started off referring to something and I was trying</p> <p>8 to locate what you were referring to and I just</p> <p>9 couldn't, I can't find it. I'm not sure what you</p> <p>10 were referring to.</p> <p>11 Q. (BY MR. SCHROEDER) So each, there's</p> <p>12 four connectors that are going into this plug,</p> <p>13 correct?</p> <p>14 A. There's four of what I think are</p> <p>15 labeled 300. Those are being slid into this.</p> <p>16 Q. Right. And each of those 300,</p> <p>17 they're not being labeled but you see them sticking</p> <p>18 out the back is a latch, correct?</p> <p>19 A. Yeah. I'm pretty sure the number is</p> <p>20 actually 316 on other figures. That figure 5A</p> <p>21 shows I think what you're talking about is 316.</p> <p>22 Q. And those latches do not run the</p> <p>23 entire length of the body of the conductor,</p> <p>24 correct?</p> <p>25 A. That's correct.</p>	<p style="text-align: right;">Page 133</p> <p>1 Q. But that opening has to allow that</p> <p>2 part, the shoulder right there behind 316 in figure</p> <p>3 5A to pass through it to get into the latch</p> <p>4 receptacle, correct?</p> <p>5 A. That is correct. But as you're</p> <p>6 putting this in 316 is pushed all the way down,</p> <p>7 okay, it's compressed and you slide it forward and</p> <p>8 when it gets to that hole it's able to pop up and</p> <p>9 into that latch receptacle, so 316 while it's being</p> <p>10 inserted doesn't stick up like that, it's pressed</p> <p>11 down flat. So it would be the pressed down flat</p> <p>12 height that we'd have to compare to the height of</p> <p>13 320 and they look about the same and that's,</p> <p>14 certainly the patent doesn't teach that it has to</p> <p>15 be any bigger than 320.</p> <p>16 Q. But it definitely doesn't teach that</p> <p>17 opening is the same height is the grooves two away</p> <p>18 going the rest of the way through.</p> <p>19 A. I don't know that it doesn't teach</p> <p>20 that. I think that if you were to investigate that</p> <p>21 issue we would look at some sort of cross sectional</p> <p>22 view to make it to one figure 4, and if we could do</p> <p>23 that investigation, I didn't do that investigation,</p> <p>24 but the patent may do what you're saying or maybe</p> <p>25 6C. With all these cross sectional views that</p>

<p style="text-align: right;">Page 134</p> <p>1 might be able to be investigated to answer your 2 question, I just didn't do that. 3 Q. Moving on to the next claim 4 limitation. You provide, or next limitation that's 5 at issue is the second top surface and second 6 bottom surface being different from the top surface 7 and the bottom surface in the main body. Do you 8 see that limitation? 9 A. Yes, I do. 10 Q. And that starts at page 53, correct? 11 A. Yes, it does. 12 Q. And respondents proposed construction 13 is that the second top surface is at a different 14 level than the first top, or than the first top 15 surface that's recited in the claim or which it's 16 not actually -- let's refer to that. So there's 17 two top surfaces, the top surface and the second 18 top surface, correct? 19 A. Yes. 20 Q. And respondent's construction is that 21 those two surfaces, those two top surfaces, are at 22 a different level, correct? 23 A. Yes. 24 Q. And same thing with the bottom 25 surface, that there's the claim recites a bottom</p>	<p style="text-align: right;">Page 136</p> <p>1 A. Yes. I mean there are at least those 2 two bottom surfaces. I mean there's, those two 3 surfaces which then have grooves in them and we 4 could, I mean maybe the bottom of those grooves are 5 also other surfaces, but certainly there are at 6 least those two surfaces that you just talked 7 about. 8 Q. And in this figure they are at 9 different levels, correct? The one surface is 10 stepped up from the other surface, is that correct? 11 A. Yes. If we assume levels means like 12 the vertical height and we're drawing, you know, 13 assuming these are flat on the table they're 14 stepped up to a different height. 15 Q. Is there any disclosure within the 16 '415 patent where those surfaces would be at the 17 same height? 18 A. I didn't do that investigation and 19 the embodiment shown in a figure, I don't see a 20 figure that shows something that you just asked me 21 about. 22 Q. Is it your position though that the 23 claims would cover some type of situation where 24 both the first surface or both the, you know, first 25 surface and the second surface could be at the same</p>
<p style="text-align: right;">Page 135</p> <p>1 surface and a second bottom surface, correct? 2 A. Yes. 3 Q. And respondent's proposed 4 construction for that is that the bottom, that 5 those two bottom surfaces are at different levels, 6 correct? 7 A. I think I followed all that. Yes. 8 Essentially my view of this is that the claim is 9 being construed and the word different, which is 10 the actual limitation, is being construed as 11 essentially as different level. 12 Q. Right. 13 A. The way I'm viewing this. 14 Q. And when you go to let's say the '415 15 patent, which I believe this is actually, is this 16 south of '415? I believe it is. Yes. If you go 17 to the '415 patent and you look at figure 3. 18 A. Okay. 19 Q. And if you're looking at the bottom 20 part of figure 3 you're looking at a first bottom 21 surface which kind of starts right where 14, yeah, 22 probably starts right where 114 is kind of pointing 23 to the edge and goes backwards, and then there's a 24 second bottom surface which would be the surface of 25 the center portion, correct?</p>	<p style="text-align: right;">Page 137</p> <p>1 height? 2 MR. WEEKS: Objection to form. 3 Scope. 4 Q. (BY MR. SCHROEDER) Let me rephrase 5 it. 6 When the claim states that there's a 7 top surface and a second top surface, would those 8 claims cover a surface that, or two surfaces that 9 are at the same level? 10 A. Yes, I think they could. 11 Q. And, but as far as you're aware 12 there's no disclosure within the patent of two top 13 surfaces that are at the same level, is that 14 correct? 15 A. Again, I didn't do an investigation, 16 but like I said I looked at the figures and I don't 17 see that shown in a figure embodiment, you know, an 18 embodiment that's shown in a figure, but one could 19 certainly have two top surfaces being different 20 that are at the same level, for example surfaces 21 with different friction properties or different 22 surface finishes or something like that. They 23 could certainly be two different top surfaces and 24 be at the same level. 25 Q. And so you're saying that like if it</p>

<p style="text-align: right;">Page 138</p> <p>1 was a different material it might be two different 2 surfaces at the same level. 3 A. Again, sort of doing this on the fly 4 I think yeah, you might want to have a device like 5 this where you start to slide it in and generally 6 you would be pressing up against that top surface 7 and it might be slippery, so you allow your 8 connector to go in and when you get further in you 9 switch over to a high friction surface so it starts 10 to slow down and you click it into place and then 11 you've got a good connection there because you've 12 got like high friction surfaces. That seems like 13 that would be two different surfaces and it would 14 be at the same height. 15 Q. All right. During the prosecution of 16 the '415 patent was there any distinction made with 17 respect to a patent that, by Pronovost? 18 A. That sounds familiar, can you refer 19 me to some portion of my report where I discuss 20 that? 21 Q. Try starting around paragraph 118. 22 A. Okay. 23 Q. Let me know when you review that. 24 A. Okay. 25 Okay. I think I've reviewed enough</p>	<p style="text-align: right;">Page 140</p> <p>1 the adapter with connectors from both sides and 2 it's a cut away view, correct? 3 A. That's correct. 4 Q. If you would on exhibit I believe 5 it's 17. 6 A. Okay. 7 Q. Can you verify that the, I've got two 8 figures in 17 from Pronovost that I then have 9 annotated. Can you verify that the first figure, 10 figure 3, is the figure 3 from Pronovost that you 11 have just been looking at? 12 A. Yes, that looks correct. 13 Q. With the one difference between the 14 two being I've highlighted two surfaces blue of the 15 adapter, correct? 16 A. Yes. It looks like that's what you 17 did. 18 Q. I highlighted the top surface and the 19 bottom surface, correct? 20 A. Yeah. Top internal and the bottom 21 internal surfaces. 22 Q. Would you agree that it's showing 23 that there is right there that there's basically, 24 you know, it's the same level across? 25 MR. WEEKS: Objection to form.</p>
<p style="text-align: right;">Page 139</p> <p>1 of it probably to answer a question. 2 Q. And in particular within paragraph 18 3 you have a quotation from the prosecution history, 4 correct? 5 A. Yes. 6 Q. And one of the statements that was 7 made to distinguish Pronovost is that Pronovost, et 8 al. has only one level of surface. 9 Is that correct? 10 A. That is correct. 11 Q. Have you looked at Pronovost? 12 A. I looked at just small portions of it 13 so I could understand this, but I haven't studied 14 the entire thing. 15 Q. If you would I believe Pronovost is 16 Exhibit 16. 17 A. Yes. I opened it and I definitely 18 remember reviewing this. 19 Q. Right. And so in particular I'm 20 going to draw your attention to figures 1 and 3. 21 A. Okay. I'm looking at those right 22 now. 23 Q. And for figures 1 and 3 we have the 24 adapter shown in Figure 1 without the actual 25 connector in it, and then for figure 3 you've got</p>	<p style="text-align: right;">Page 141</p> <p>1 A. Yeah. I mean I think this one 2 particular slice through is just showing that 3 there's one level there and that's I think what the 4 discussion was, I'll go along with it. But I think 5 if we looked at other figures in there we might 6 have a more interesting discussion of whether or 7 not there's just one level, you know, we might see 8 different views of it that shows left and right 9 portions of this adapter and maybe we'll see 10 different levels there. What I'm thinking about 11 is, you know, figure 1 where you kind of see inside 12 there and it looks like maybe there's different 13 levels there but I'd have to read the patents that 14 were at issue, but I kind of go along with the 15 discussion in a file history that there's just one 16 level certainly from that point of view, I would 17 agree with that. 18 Q. And there's definitely only one level 19 from the left side opening to the center portion, 20 correct? 21 A. Agree. From what we see in figure 3. 22 Q. All right. And then if you go to the 23 second page I have those same, or I have part of 24 figure 1, is that correct? 25 A. Agree. The lower left side.</p>

<p style="text-align: right;">Page 142</p> <p>1 Q. Right. And this is just showing the 2 adapter, correct? 3 A. Agree. That's showing sort of an 4 isometric view of the adapter where we can see 5 inside of it a little bit. 6 Q. Right. And in particular I've 7 highlighted in blue the, what I would call the base 8 of that adapter, and then there's a groove that I 9 highlighted red. Correct? 10 A. That looks like what you've done. 11 Yes. 12 Q. And would you agree that as far as 13 you're aware that both on the left and right-hand 14 side of that groove it's the same surface? 15 A. Agree. I don't have anything to 16 dispute that at this point, again without reading 17 the patent for that issue I would believe you that 18 that would be considered one surface with a groove 19 cut into it. That does seem like an appropriate 20 interpretation from what I'm seeing right now. 21 Q. If you could on Exhibit 18. 22 A. Okay. 23 Q. The only difference between what you 24 were just looking at and Exhibit 17 and what you're 25 looking at now is I added a dotted line right there</p>	<p style="text-align: right;">Page 144</p> <p>1 second surface, would it? 2 MR. WEEKS: Object to form. Scope. 3 A. I don't think it would necessarily 4 change it. In fact we need to look into claims 5 where the surface may have a notch in it but again 6 I'm not sure I investigated that issue totally, but 7 I think you said not necessarily I would probably 8 go along with that. It could but not necessarily 9 have to. 10 Q. And that could be if for some reason 11 it was rough in front of the dotted line and smooth 12 behind it or vice-versa. 13 A. Agree. I think you would have to 14 have some indication that it's a different surface. 15 Q. And it's not just the presence of 16 that notch that turns it into a different surface, 17 correct? 18 A. I don't think so. Not just the 19 presence of a notch. It would have to be some 20 other indication of why you were changing to a 21 different surface. 22 MR. SCHROEDER: That is all I have on 23 direct. 24 MR. WEEKS: I think we lost Pete but 25 he sent an e-mail about this yesterday, about he</p>
<p style="text-align: right;">Page 143</p> <p>1 at the start of the groove and behind the notch. 2 Do you see that dotted line? 3 A. I do see the dotted line, I'm not 4 sure I agree with your characterization but I do 5 see the dotted line. 6 Q. All right. That's what I tried to do 7 is draw the dotted line right at the spot where the 8 notch ends and the groove begins. 9 A. I understand where you've placed it. 10 Q. Do you believe that one skilled in 11 the art would consider a different surface in front 12 of that dotted line and behind that dotted line? 13 A. Without reading the patent and all 14 I'm being presented with is this, is I don't see 15 why it would be a different surface but if I went 16 to the patent and it had a description and it said 17 up into that end of what you're calling the notch I 18 have a low friction surface and then I switch over 19 to a high friction surface then I would have some 20 evidence that they're two different surfaces, but 21 what you're saying to me right now looks like one 22 surface. 23 Q. And just the presence of different 24 notches or different grooves wouldn't necessarily 25 change a surface from being a first surface to a</p>	<p style="text-align: right;">Page 145</p> <p>1 was going to have to drop, so let me check that 2 e-mail and see if we eclipsed the time, or maybe it 3 was earlier this morning. If he's not here I will 4 go ahead, I have a couple questions. But if he 5 wants to ask questions I want to make sure he gets 6 the chance. 7 MR. SCHROEDER: I believe he said he 8 had to drop at 3, which I believe it's probably 3 9 your time. 10 MR. WEEKS: All right. In that case 11 I am not sure how to do this so you can hear me but 12 I'm just going to scoot a little closer to Dr. 13 Singhose. 14 I have just a few questions. 15 EXAMINATION 16 QUESTIONS BY MR. WEEKS. 17 Q. Dr. Singhose, earlier today you were 18 asked a number of questions about the color of the 19 connectors. Do you recall that? 20 A. Yes, I do. 21 Q. Are there any claims of the five 22 patents that you reviewed that required the 23 connector be any particular color? 24 A. No. 25 Q. Do you recall earlier you were asked</p>

<p style="text-align: right;">Page 146</p> <p>1 some questions about whether a certain connector 2 was UPC or APC. Do you recall that? 3 A. Yes. 4 Q. Do any of the claims of the patents 5 that you have opined on required the connectors or 6 the ferrules to be UPC or APC? 7 A. I don't think so. 8 Q. And you were also asked some 9 questions about single mode fiber and multi mode 10 fiber. Do you recall that? 11 A. Yes. 12 Q. Do any of the patents or claims that 13 you have opined on require the use of single mode 14 fiber or multi mode fiber? 15 A. I don't think so. 16 Q. Okay. 17 MR. WEEKS: That was all I had. I'll 18 pass him back. 19 MR. SCHROEDER: In that case I have 20 no further questions. 21 MR. WEEKS: Thanks. 22 23 (The deposition concluded at 2:05) 24 25</p>	
<p style="text-align: right;">Page 147</p> <p>1 REPORTER CERTIFICATE 2 I, SUZANNE BENOIST, Certified 3 Shorthand Reporter, do hereby certify that there 4 came before me via Zoom, the above-referenced 5 parties, that the proceeding was translated and 6 proofread using computer-aided transcription, and 7 the above transcript of proceedings is a true and 8 accurate transcript of my notes as taken at the 9 time of said event. 10 I further certify that I am neither attorney 11 nor counsel for nor related nor employed by any of 12 the parties to the action in which this examination 13 is taken; further, that I am not a relative or 14 employee of any attorney or counsel employed by the 15 parties hereto or financially interested in this 16 action. 17 Dated this 9th day of September, 2024. 18 19  20 Ms. Suzanne Benoist, 21 RPR, CCR-MO-KS-NM, CSR-IL-IA 22 23 Notary Public No. 07541281 24 State of Missouri - Jefferson County 25 My commission expires: 5/10/2028</p>	

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

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