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

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

Petitioners,

v.

MAXELL, LTD.,

Patent Owner

Case: IPR2024-00906

U.S. Patent No. 11,445,241

and

Case: IPR2024-00907

U.S. Patent No. 10,129,590

DEPOSITION OF CHARLES D. CREUSERE

MARCH 7, 2025
9:00 a.m.
456 East University Avenue
Las Cruces, New Mexico 88005

PURSUANT TO THE NEW MEXICO RULES OF CIVIL PROCEDURE, this deposition was:

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I N D E X

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EXHIBITS:

Exhibit 1002- Declaration (00906)	Attached
Exhibit 1002 - Declaration (00907)	Attached
Exhibit 1010 - Nokia N93 User Guide	Attached
Exhibit 1008 - U.S. Patent Dua	Attached
Exhibit 1022 - Video Distribution	Attached
Exhibit 1009 - U.S. Patent Herle	Attached

MS. KO: Hi, my name is So Ra Ko. I need to get a copy of the rough and the electronic transcript.

MR. BHATTARAI: My name is Roshan Bhattarai from DAPiper. I'm good with what she ordered.

CHARLES D. CREUSERE,

sworn by the Certified Court Reporter, testified as follows:

EXAMINATION

BY MS.KO:

Q. Good morning, Mr. Creusere. My name is So Ra Ko. I represent Maxell in this case.

Can you please state your name.

A. Yes. My name is Charles Creusere.

Q. And do you understand that this deposition is being taken in relation to IPR2024-00906 and in relation to IPR2020-00907?

A. Yes, I do.

Q. So I know you're fairly familiar with the deposition process.

Is there any reason you would not be able to testify truthfully today?

A. No, there is not.

Q. So how many times have you been deposed

before?

A. I've lost count, but it's -- it has to be around 20.

Q. How many times have you been deposed in the past year?

A. Twice.

Q. And specific to an IPR deposition, do you understand that you are not permitted to discuss the substance of your testimony with Counsel during the breaks for cross-examination?

A. Yes, I understand that.

Q. And do you agree not to discuss the substance of your testimony with Counsel during the breaks?

A. Yes, I do.

Q. So these two IPRs relate to U.S. Patent Numbers 10,129,598 and 11,445,241. Correct?

A. That's correct.

Q. And if I refer to Patent 10,129,590 as the '590 patent, will you understand that I am referring to U.S. Patent Number 10,29,590?

A. Yes, I understand that.

Q. And if I refer to the '241 patent, will you understand that I'm referring to U.S. Patent Number 11,445,241?

A. Yes, I do understand that.

Q. I will also understand if you do the same.

I understand that you have testified or otherwise provided opinions regarding the '590 patent in other cases. Is that correct?

A. Yes, I was involved in what became an ex parte review in 2021.

Q. And today if I ask you about your opinions or your report, slash, declaration or this case or this matter, can we agree that we are both talking these two IPRs specifically?

A. Yes. All of my testimony today is with respect to these two IPRs.

Q. And if otherwise, I will specify. Please do the same.

A. Yes.

Q. I see -- have you brought your own copies of your declarations for the two IPRs?

A. Yes. This binder has unmarked copies of my declarations, the patents in suit and the exhibits that I cite in my declarations.

Q. I also have brought copies. You're free to use your own if you would like.

MS. KO: I will be now passing around Exhibit 1002 from the '590 IPR and Exhibit 1002 from the '241 IPR. And the difference will be on the first

page.

This should be the '241.

MR. BHATTARAI: Thank you.

Q. (BY MS. KO) The '241 IPR and '590 IPR petition shares many of the same exhibits.

Is that correct?

A. Yes, that is correct.

Q. The exceptions to this include the declarations marked as Exhibit 1002 in each respective IPR and Exhibit 1001 in the '241 IPR and Exhibit 1024 in the '590 patent IPR.

Is that correct?

A. I believe that is correct.

Q. And please feel free to compare the exhibit tables in your declaration.

A. Yes, that's correct.

Q. For the remaining exhibits, the same copy of each document is duplicated in each proceeding.

Is that correct?

A. That certainly should be correct. I believe it's correct.

Q. So, for example for Exhibit 1008, which is the reference Dua, that is for the '590 IPR position. The same copy of that is Exhibit 1008 for the '590 IPR as it is Exhibit 1008 for the '24 IPR positions.

Is that correct?

A. To my knowledge that is correct. I obviously did not submit the documents with the final positions. So those were the same documents that I evaluated in my analysis, but I can't speak to exactly what was submitted for each of these two petitions.

Q. Okay. And that should be your understanding for the remaining exhibits that were not the exceptions that are not different across the exhibit tables. Is that correct?

A. That is certainly my understanding.

Q. I'm going to start with Exhibit 1002 from the '590 IPR, IPR2024-00907.

Do you recognize this as your declaration in the matter?

A. Yeah. I'm looking at my copy. I mean I can take a look at your copy and if you want me to thumb through it and -- just to make sure it looks like about the same as mine. I'm sure it is.

MS. KO: And this is the '241, just so you have it.

A. It certainly seems to be exactly the same.

Q. (BY MS. KO) For paragraph 2, you state: I currently hold [sic] opinions.

Is that still the case?

That is on page 14.

A. Yes, that is certainly the case.

Q. And across your career, have you specifically dealt with designing mobile devices?

A. No, but I have dealt with communication systems and I've dealt with transmission of video through communication systems throughout my career.

Q. Have you dealt with designing media devices like MP3 players?

A. No, I've not dealt with designing MP3 players or other media devices.

Q. So flipping to page 21 -- excuse me -- page 20.

Here you discuss -- this is your legal standard section of your declaration. Is that correct?

A. Well, page 20 is part of section X, and I discuss first off in part A, the various grounds that I will be analyzing. And then in part B, which is on page 20, I specifically discuss some -- some, I guess you could say, housekeeping with respect to mappings that we are making between different Bluetooth -- sorry -- different radios relative to claims language.

Q. On page 24 in paragraph 22, you state that: I also understand that when considering the obviousness of a patent claim, one should consider whether a

teaching, suggestion, or motivation to combine the references exists so as to avoid impermissibly applying hindsight when combining or modifying prior art. I understand this test should not be applied rigidly, but that the test can be important to avoid such hindsight.

Do you see that?

A. I'm sorry. Could you give me which paragraph we're talking about.

Q. Oh, excuse me.

Paragraph 22 on page 24. And when I refer to the pages, I'm referring to the exhibit pages, if that helps. I realize there's two page numbers on each declaration.

A. Yes. So, okay, I see.

Q. Oh, I realize -- sorry -- you're looking at your own copy.

A. Right.

Q. So that would be on page 11 in paragraph 22.

A. Okay. So what was your question regarding paragraph 22?

Q. Yes.

Do you want to take a moment to read paragraph 22.

A. I have read paragraph 22.

What was your question?

Q. I guess my question there was essentially do you see the paragraph?

A. Yeah. Yes, I see this paragraph.

Q. Okay. So where you say "impermissibly applying hindsight," is there a circumstance where it would be permissible to apply hindsight?

A. No, it's not permissible to imply -- imply [sic] hindsight. It's not -- no.

Q. And what is your understanding of what hindsight bias is?

MR. BHATTARAI: Objection, form.

A. Well, I'm not a lawyer, but from what I understand about the process, if you take the limitations of a -- of a patent claim and you basically go and shop around, if you will, if you treat it like a -- like a buffet list and you shop around from different prior art references and pull one thing from one prior art reference for one claim with limitation, pull something else from some other possibly unrelated prior art reference to satisfy another claim limitation, et cetera, put those together, that would be an example of impermissible hindsight.

Q. And do your opinions apply to the corresponding sections in the '241 patent declaration as well?

A. My opinions regarding impermissible hindsight?

Q. Yes.

A. Yes, I mean you asked about that in general. We're not really -- I mean you're talking about my understanding of the concept of impermissible hindsight. That would apply to any patent I was involved with analyzing.

Q. On page 26 of your declaration, in paragraph 76, you reference the reexamination of the '590 patent.

Did you review the reexamination file history?

A. Yes, I did.

Q. And did you review it in its entirety?

A. I believe so.

Q. Now flipping to page 17.

MR. BHATTARAI: So are you referring to the exhibit page or the pdf page?

MS. KO: Oh, sorry. I am referring to the pdf page because I believe that is what he has in front of him right now.

A. I'm on page 17.

Q. (BY MS. KO) So on this page, you have a section for Prior Art References.

Do you see it?

A. Yes, I do see it.

Q. In this section you identify Dua.

When did you first become aware of the Dua reference?

A. I'm not absolutely sure about that. I certainly became aware of it last spring when I started working on this -- this particular IPR set.

Q. Is it correct to say you did not conduct a prior art search?

A. I did not conduct a prior art search on this, no.

Q. So were the references provided to you by counsel for Samsung?

A. These references were provided to me by counsel from Samsung.

Q. And that is true for each of the references listed in this section, Dua, Herle, N93, Rooyen, Desai BT-Spec 3GPP-SPEC and Kao?

A. Yes, that is correct.

Q. On page 20 of your declaration, you have an overview of the mappings. Do you see it?

A. Yes. I see the overview of the mappings.

Q. And these are the mappings you rely on throughout the petition. Is that correct?

MR. BHATTARAI: Object to the form.

A. This is a table designed to concisely show the

mappings for later reference.

This is not the only information I rely on throughout the declaration. I rely on the underlying documents related to these mappings. So underlying documents with respect to Bluetooth, UMTS, GSM, NFC and WiFi.

Q. When you refer to GSM and UMTS, you're referring to 2G and 3G capabilities respectively.

Is that correct?

A. That is approximately correct. There were many variations as the standard progressed from, say, GSM, which is often thought of as 2G to UMTS, which is thought of as 3G. There were -- there was EDGE, for example, which was an enhancement of GSM partway between, but -- but essentially I think that's a reasonable characterization.

Q. And these mappings are the same in the '241 declaration. Is that correct?

A. Yes, the radio mappings, as given in this table -- the same table appears in both of these with the same radio mappings.

Q. So your opinions stated in reference to this section apply to the '241 declaration equally. Is that correct?

A. To my recollection, this section is

identical -- section encompassing paragraph 65 and 66 are identical in both of the declarations.

MS. KO: I will now be passing out Exhibit 1010, the Nokia N93 User guide.

Q. (BY MS. KO) And as stated previously, this should be the same Exhibit 1010 in the '590 declaration -- excuse me -- referenced in the '590 declaration and '241 declaration.

Is that correct?

A. It appears to be.

Q. And you cite to this document in your declaration at several points. Is that correct?

A. Yes, I do.

Q. N93 is a User guide for the Nokia N93 phone. Is that correct?

A. Yes, N93 is the users' guide for the N93 phone.

Q. And looking at page 30 of your declaration.

If you take a moment to read paragraph 84 in relation to the preamble of Claim 1, and please let me know when you're done.

A. Okay. I'm done.

Q. Is it correct to say that it is your opinion that N93 discloses a multi-radio, multimedia cellular phone?

A. Yes, that is my opinion.

Q. And in your opinion the N93 alone discloses the preamble of Claim 1. Is that correct?

MR. BHATTARAI: I'll object to the form.

A. Well, this particular case we're talking about -- so this is with respect to my ground 1, I'm talking about the combination of N93, Dua and Herle. So certainly the combination of N93, Dua and Herle most definitely describe -- disclose the preamble of Claim 1.

Q. (BY MS. KO) Do you believe that the language of multi-radio, multimedia cellular phone discloses video processing apparatus?

A. The multi-radio and multimedia cell phone in parenthetical remarks is simply referring to -- it's shorthand to refer to what this device is. But I most definitely believe that -- that the N93, in combination with Dua, discloses the video processing apparatus as required in the preamble of Claim 1.

Q. So it your opinion that the N93 alone cannot disclose the video processing apparatus of the preamble of Claim 1 alone?

MR. BHATTARAI: Objection, form.

A. Well, my opinion with respect to this portion of my declaration is that we're talking about the

combination of N93, Dua and Herle.

I have no grounds -- if we go back and look at the grounds that I've considered here -- so the grounds are given on page 7.

Ground 1 considers N93, Dua and Herle. And that's what we're talking about at this point in the declaration.

Ground 2 considers N93, Dua, Herle, Rooyen, Desai, the Bluetooth-Spec, the 3GPP-SPEC and Kao.

Ground 3 deals with Dua and Herle.

Ground 4 deals with Dua, Herle and N93.

And Ground 5 deals with Dua, Herle, N93, Rooyen, Desai, Bluetooth-Spec, 3GPP-Spec and Kao. There's no ground that I have analyzed that only considers N93.

Q. Can you point to where in your declaration in relation to the preamble, you rely on the component from Dua and a component on N93 together to disclose the preamble to Claim 1.

A. Again, my opinion is based on the combination -- combination of these -- of these references.

First and foremost, N93, as you pointed out earlier, is a Users' guide, it's not an actual

device. So I'm not relying on any components from the device. I'm relying on the description of the device operation from the Users' guide.

Dua is a patent application that describes a notional device multi- -- a small compact multimedia device, Which could be a cell phone. Again it is not a physical device. So as I state later in discussing the combination -- which I'd be happy -- be happy to go through with you -- the -- the combination is not a literal shoehorning of one device into another device. Rather, as I -- as I state in some clarity, Dua provides insight into the internal operations of the N93, how the N93 might be accomplishing operations that it states explicitly that it does, in addition to providing the possibility of an improved means for assigning radios.

So there's no -- there's no physical shoehorning of one device, say Dua into N93 or vice versa.

Q. So I wasn't describing physical shoehorning, but I was describing -- I was asking whether you could point to where in your discussion in relation to the preamble of Claim 1, you can point to a combination between N39 and Dua to disclose the video processing apparatus.

Can you point to something in paragraph 84?

A. Well, paragraph 84 literally says that the combination discloses or renders obvious a, quote, video processing apparatus, parenthesis, multi-radio, multimedia cell [sic] phone.

And it cites Exhibits 1010 -- Exhibit 1010 is the one we're talking about now, the Nokia N93 Users' guide -- and it also cites Exhibit 108 [sic]. Exhibit 108 is the Dua patent application.

So clearly I am citing both the N93 and 108. And the passages I cite -- so for example in 108, it's paragraphs 57 and 58.

And if we go look at paragraphs 57 and 58 from Exhibit 1008 -- so, for example at the start of 57, it states that: Figure 1 is a functional representation of the components of a media player [sic] with cellular phone capability, in accordance with one embodiment of the present invention. The term "media player" generally refers to an electronic device -- to electronic devices that are capable of media -- processing media such as audio, video, images, presentations, animations, and Internet content, as for example, cellular phones, personal digital assistants, music players, game players, video players, cameras,

and the like.

So the claim language specifically requires a video-processing apparatus. I think I can safely say that -- that the device described in Dua in Exhibit 1008 would describe a video-processing apparatus.

Q. So I'm asking specifically about N93.

Does a device -- does the user manual that describes a device that can record videos and take cellular calls, disclose a multi-radio, multimedia -- multimedia cellular phone?

A. Well, if we look at the citations I get from Exhibit 1010, which is the users' manual -- so it's pages 25 -- 23 to 25.

So page 23 is a section labeled Camera and it discusses the fact that -- that the -- your N93 has two cameras, a high-resolution camera on the side of the device, main camera, and a lower-resolution camera on the top of the main display.

It says the N93 supports imagine capture at a specific resolution.

It says that images and video are automatically saved in the Gallery. And that video clips are recorded using the .mp4 file format or the 3GPP file format.

And then it discusses -- it goes on to discuss the process of how you can actually use the device to record video.

So again, I would say that that device most definitely satisfies the -- the -- the video apparatus claim language of the preamble.

Q. Can you go to paragraph 86 on page 31.

It is your opinion that N93 discloses the cellular phone comprises electronic circuits and includes a Bluetooth radio communication circuit.

Is that correct?

A. I literally say that N93 discloses the cellular -- the cellular phone comprises electronic circuits and includes a Bluetooth radio circuit.

And I cite the appropriate pages from -- from the N93 users' manual.

Q. So is that correct?

A. So yes, I -- I literally state that in the first sentence in the paragraph so that is correct.

Q. In paragraph 89 of page 32, you state that N93 and Dua's disclosure of Bluetooth inherently discloses to a POSITA the modulation scheme and frequency required by the Bluetooth standard.

Is that correct?

A. I certainly state that. And I go on to state

that -- that in the alternative -- because Bluetooth and -- because Bluetooth was a well-known and published standard, in the alternative, the Bluetooth modulation schemes and frequencies would have been obvious based on the knowledge of a person of ordinary skill in the art as evidenced by those same references.

Q. So it is your belief that the -- that a cellular phone that comprises electronic circuits and includes a Bluetooth radio communication circuit satisfies the claim limitation [1a]?

A. It is my belief that the combination of N93 and Dua satisfies the claim limation of [1a].

Q. Can you point to what you require in Dua to add to the (indiscernible) features of N93 to disclose [1a]

A. Well, as I stated earlier, Dua provides additional details as to the internal operation of N93. Their base -- they're accomplishing the same purpose.

So if we look at paragraph 87 of my declaration, I state that Dua also discloses the cellular phone comprises, quote, integrated [sic] chips and circuitry, including a short-range transceiver that comprises a Bluetooth radio communication circuit and provides additional implementation details.

So this additional implementation details

is provided by Dua in terms of, for example, if we take a look at -- at Dua, we see that Figure 1 Dua shows a -- the internal -- internal graphic -- it shows a schematic diagram of the processing that would be internal to a cell phone such as the N93.

The N93 users' manual doesn't give that kind of detail. But Dua shows that, for example, our cell phone would have a CPU unit, a video Kodak camera, display, network transceiver, short- -- short-range transceiver, storage, keypad, DSPI with Kodak memory and power.

So that would be the statement at the bottom of page 30 -- bottom of page 31, paragraph 87, with -- with respect to Dua providing additional implementation details.

Q. So it is your opinion that these implementation details from Dua are required to make it obvious to a POSITA that N93 discloses or renders obvious claim limitation [1a]?

MR. BHATTARAI: Objection, form.

A. I think you misstate this. "Required" is not the right word. I am not saying that they're required. I'm saying that they're illuminating. So it is possible that -- I mean pers- -- I think persons of ordinary skill in the art, I would have naturally

assumed a -- an architecture such as the one in Figure 1 of Duas would underlie the N93 device, but it's much more convincing to be able to point to a device such as Duas, which carries out the same functionality as the N93 and contains a schematic block diagram of the internal architecture and organization of the device.

Q. (BY MS. KO) So is it your opinion that N93 alone cannot disclose limitation [1a]?

MR. BHATTARAI: Objection, form.

A. I have not -- as I mentioned earlier, I've not opined on that. My opinions are with respect to a set of specific grounds. And what we're talking about right now is Ground 1 where my opinion is based in Ground 1 on the combination of N93, Dua and Herle.

Q. (BY MS. KO) So your opinion relies on Dua in each and every limitation of Claim 1. Is that correct?

MR. BHATTARAI: Objection, form.

A. My opinion relies on the combination of N93, Dua and Herle for every claim limation of Claim 1.

Q. (BY MS. KO) Can you turn to page 33, paragraph 91.

Here you describe that N93 discloses that a cellular phone includes circuits and a UMTS radio communication circuit operating in the 2100 megahertz

band.

Is that correct?

A. That is literally the first sentence of -- of paragraph 91, yes.

Q. And has your opinion changed regarding this?

A. No, that is -- that is a clearly -- a clearly documented fact from Exhibit 1010.

Q. And then in the next paragraph, you state that Dua also discloses the cellular phone includes a UMTS transceiver by disclosing a 3G radio as fully compliant with all worldwide 3GPP standards and provides additional implementation details.

Is that correct?

A. Yes, you've literally read the first sentence of paragraph 92.

Q. And your opinion has not changed. Is that correct?

A. My opinion has not changed.

Q. Can you turn to page 35.

A. Okay.

Q. And read paragraph 95.

A. Okay.

Q. Is it your opinion that N93 discloses a cellular phone that includes a GSM radio?

Is that correct?

A. Yes. Again, the first sentence of the paragraph literally states that.

Q. And you also state that N93 discloses that the cellular phone with the GSM radio can connect to the Internet and is capable of transmitting information.

Is that correct?

A. Yes, in the paragraph I disclose that the N93 can use GSM to connect to the Internet.

Q. Can you turn to page 36.

A. Okay. I'm on page 36.

Q. And in paragraph 97 you discuss that the disclosure of GSM radios inherently discloses to a POSITA the GSM frequency bands required by the relevant standards.

Is that correct?

A. Yes, I literally state that N93s and Dua's disclosure of GSM radios inherently discloses to a POSITA the GSM frequency bands required by the relevant standard.

Q. And can you turn to page 37 in paragraph 99 --

Excuse me. Can you -- back to page 36 and paragraph 98.

Here you state that N93 and Dua each disclose a Wi-Fi radio circuit.

Is that correct?

A. Yes. Dua -- N93 and Dua each disclose an additional "third radio communication circuit," including a Wi-Fi -- including a Wi-Fi radio circuit in short range transceiver, which can transmit media and connect to the Internet on their respective third transmission frequency band.

Q. And can you turn to page 37, paragraph 99.

A. Yes.

Q. And here you make the statement that the disclosure of Wi-Fi radio communication circuits will inherently disclose to a POSITA the frequency bands and modulation schemes as defined by the relevant standard.

Is that correct?

A. I do state that.

And I further state that in the alternative, the Wi-Fi frequencies and modulation schemes would have been obvious based on the knowledge of a personal of ordinary skill in the art, as -- as evidenced by those same references.

Q. And did Counsel explain to you the legal concept of inherency?

A. Yes.

Q. What is your understanding of the legal concept of inherency?

A. That something is inherent if -- if it had to

be -- if -- if that thing had to be part of -- of the whatever for the whatever to operate.

Q. On pages 8 and 9 of your report, can you look over paragraph 19 and let me know when you have read over it.

A. Okay.

Q. Here you are describing examples of approaches and rationales to determining whether a piece of prior art could have been combined with other prior art.

Is that correct?

A. You're referring to the bulleted list?

Q. Yes.

A. Yes, the bulleted list is a list of rationales that may be considered.

Q. In your opinion would a POSITA be motivated to create an illegal device?

MR. BHATTARAI: Objection, form.

A. Possibly. People create illegal devices all the time. I don't see that that's relevant to the discussion here.

Q. (BY MS. KO) Can you turn to page with Roman numeral vi, 6, on page 7 of the labeled exhibit.

A. The first page of the Claims charts?

Q. Yes.

A. Okay. Yes.

Q. There are several claim limitations such as [1h] and [1j] that discuss controlling assignment of connection of a radio communication circuit.

Do you see that?

A. Yes. I see claims [1h] and [1j].

Q. And do you determine assignment at the moment when a device establishes a connection with a specific network?

MR. BHATTARAI: Objection, form.

A. It's possible that could be the point of assignment, but it doesn't have to be.

I think assignment could simply be the point at which the processer -- it could be a number of different points and I haven't identified the exact point of assignment, but it could be the point at which the processer determines which rate it's going to assign, but before it's actually carried that out. It could be in -- in allocating the radio and then allocating the radio frequency, there could be multiple steps involved. So it could -- it could occur -- it could be defined via -- at different -- at different points. But the bottom line is is the pro- -- the way the process will work is the controller will make a decision to assign the radio. In the case of [1j], the decision is made at the indication of a user. And once

that indication is received by the controller, the controller assigns and then internally the system will go through whatever steps it needs in order to set up that connection and ultimately allow for the transmission of video, which is a further part of the limitation [1j].

Q. (BY MS. KO) And can you turn to page 37.

A. I'm on page 37.

Q. At paragraph 101 you state that N93 discloses the phone includes cameras.

Is that correct?

A. Yes, that is correct.

Q. You state that these cameras can take still images and video based on N93 disclosure.

Is that correct?

A. Yes, based on the discloser of N93 given in the users' manual, it can take both videos and still pictures.

Q. And you state that page 125 of N93 discloses electronic circuits.

Is that correct?

A. That is what I state in paragraph 101.

Q. And do you believe a camera with imaging sensors satisfy [1d]'s imaging circuit?

MR. BHATTARAI: Objection, form.

A. Well, the d -- Claim [1d] limitation states: An imaging circuit capable of [sic] video information and still information -- still picture information via optical systems.

So N93 certainly satisfies that. But again, the -- if you go up to paragraph 100, I state: The combination discloses or renders obvious an imaging circuit, parenthesis, camera with imaging sensors, capable of receiving video information and still picture information via an optical system.

So in paragraph 101, I'm citing support from the N93 user's manual in that.

In paragraph 102 I cite support from Dua where I state at the beginning of the paragraph that Dua also discloses the cellular phone includes a camera -- which is Camera 104 and labeled Figure 1 -- to record videos and take still pictures and provides implementation details, that is to say implementation details beyond what is provided in N93, including lenses and filters and image sensors.

Q. (BY MS. KO) Can you turn to page 38 of your report -- excuse me -- declaration.

A. Yes. I'm on page 38.

Q. In paragraph 104 you discuss that N93 renders obvious that the phone compresses the still pictures

using one type, JPEG, and video using a different type of compression.

Is that correct?

A. Yes, I -- the first paragraph -- the first sentence of the paragraph literally states that. Yes.

Q. And you state that JPEG is a compression method. Is that correct?

A. Yes. On page 39, in this same paragraph near the top, I state that that -- that: It would be therefore obvious for the POSITA to implement the well-known standard compressions --

Let's see. I'm sorry.

So I say different -- different from JPEG compression.

So obviously I'm referring to JPEG as a compression methodology, though in that sense I'm actually really talking about video compression rather than -- than the -- than the image -- still image compression.

Q. So just to clarify, you state that JPEG is a first type of compression method. Is that correct?

A. I state that JPEG is one type of compression and that's in the first sentence of paragraph 104. And it is specifically a compression -- a compression method used for still image compression.

So -- so, yes, in terms of the claim limitation, that the limitation of [1e] is a compression circuit compressing the still image information using a first type of compression method and the video information using a second type of compression method.

So in -- in this context JPEG then would be a still imagine compression algorithm, which in terms of the claims language would be the first type of compression. And then MPEG would be the video compression, which would be in terms of the claims language the second type of compression.

Q. And if you flip to page 40 of your declaration.

In paragraph 107, you state that N93 discloses a phone includes a keypad to receive user key presses.

Is that correct?

A. Yes, I do state that.

Q. And you state that a keypad is a type of input device that is capable of receiving a user indication.

Is that correct?

A. Yes, I do state that.

Q. And on page 41 in paragraph 110, you state that N93 discloses the phone includes a memory card or

device memory capable of storing video captured locally or received over a radio.

Is that correct?

A. Yes, I state that N93 discloses a phone that includes accumulation circuits, which could be memory card, memory device, capable of storing video captured locally or received over a radio for later playback or transmission.

Q. And you state that a memory card or device memory is a type of accumulation circuit. Is that correct?

A. I state that -- I give as examples of accumulation circuits a memory card or a device memory.

Q. And can you turn to page 43 of your declaration.

A. I'm on page 43.

Q. You state that N93 discloses the phone is a computing device running the Symbian operating system with a user interface for presenting the user with options on the display in responding to user's input and selection of radios to transmit or receive video or connect to the Internet or home network.

Is that correct?

A. Yes, that is literally paragraph 113.

Q. Has your opinion changed regarding this

statement?

A. No, it has not.

Q. You also state that a controller running the Symbian OS controls the UI and assignment of each of the Bluetooth UMTS, GSM and Wi-Fi radios.

Is that correct?

A. Yes, I state that in paragraph 114.

Q. Can you turn to page 24 of Exhibit 1010.

A. Okay.

Q. Can you take a moment to look over this page and let me know when you are finished.

A. Okay.

Q. It is your opinion that this page discloses sending video over Bluetooth. Is that correct?

MR. BHATTARAI: Objection, form.

A. Well, if we go to the right-hand column in one of the bullet points, the third bullet point from the top, it states that to send the video using multimedia, e-mail, Bluetooth connectivity, or infrared, press that strange-looking key and -- or select Send. For more information, see Messaging and Bluetooth connectivity.

So this certainly states clearly that -- that the N93 is capable of sending the captured video via Bluetooth and it states how one does that.

Q. (BY MS. KO) Can you turn to page 83 of

your -- the Exhibit 1010.

A. Okay.

Q. In the upper left, can you take a moment to read the two bullets and the text before the two bullets.

And let me know when you finish.

A. Okay.

Q. Is it correct to say that this part of the page describes connection of the device to a compatible PC for two different functions?

MR. BHATTARAI: Objection, form.

A. This specific part you point out is talking about connecting the PC to -- to a computer for transfer of information between the Nokia PC Suite of applications and synchronizing calendars, et cetera. Though, if we look on the other side of the page under Bluetooth connectivity, the reference states that you can connect wirelessly to other compatible devices with wireless Bluetooth technology. Compatible devices may include mobile phones, computers, and enhancements such as headsets and car kits. You can use Bluetooth connectivity to send images, video clips, music and sound clips, notes. You can connect wirelessly to a compatible PC.

Q. (BY MS. KO) Would you like me to reask the

question? I was not referencing the Bluetooth connectivity page. I was referring to the PC connection part of the page. And I was asking if this part of the page described connection of the device to a compatible PC for two different functions?

A. Yes. And I answered that to begin with. It describes the connection of the device to a compatible PC for the functions specifically of transferring information between the Nokia PC Suite applications and your device and to use your device as a modem to connect to the network.

Q. Can you look at the Bluetooth connectivity part of the page now on page 83.

A. Uh-huh.

Q. Do you see any mention of specific data rates on this part of the page?

A. No specific data rates. Further, on the -- on the following page, the discussion goes on to say that you need to be within 10 meters -- the two devices need to be within 10 meters of one another, but there's no discussion of the data rates that you --

Q. So is it correct to say there is no discussions of data rate on page 83 or 84 of Exhibit 1010?

A. I do not see any discussion of data rates on

either of those two pages.

Q. And then --

MS. KO: Can we go off the record.

(Recess.)

Q. (BY MS. KO) Can you flip to page 24 of Exhibit 1010.

A. I'm on page 24.

Q. Before we reference this page, you discussed that you believe this page discloses sending video over Bluetooth. Is that correct?

A. Yes, that's correct.

Q. And do you believe that the video that is sent based on this disclosure -- excuse me -- is a video that was stored in -- in the device of the N93?

A. Yes. The top of the right column of the page 24 states that after you record a video clip, the following -- it's like the following from the tool bar.

So -- so you've recorded the video clip. For the video clip to have been recorded, it has to have been stored in device memory or on memory card. And from the column on the right side, we see that the third bullet from the bottom, this is column -- if you go back to page 23, it's talking about what the viewfind- -- the video viewfinder displays the following. And one of the things it displays, third

from the bottom, is the device memory and memory card, which shows where the videos are saved is what the -- what it says.

Q. And can you go to page 84 of Exhibit 1010.

A. Okay.

Q. In the right-hand column where it reads Settings --

A. Yes.

Q. -- I guess can you read the text in this section and let me know when you're finished.

A. Okay.

Q. When it describes selecting on or off with Bluetooth to connect wirelessly to another compatible device via Bluetooth, do you believe that this is part of a set of user indications to control assignment of the Bluetooth circuit?

MR. BHATTARAI: Objection, form.

A. Well, I think that the appropriate thing to do here is for me to go to my declaration because I spell out exactly what the user indication process is.

Q. Page 47.

A. Yes, on page 47. Thank you. Yes.

So the process of user indicating follows a number of steps. The process of user indicating and then transmitting the videos. So the first step would

be to turn -- connect Bluetooth on. That's step 1.

Second step in the process with a user indicates to the controller to make Bluetooth radio visible so visibility shown to all.

Third step is that the user indicates to the controller to assign the Bluetooth radio to detect a external -- a Bluetooth external device to send video to by and except for example, opening the Gallery application and selecting the item video clip using the Options>Send>Via>Bluetooth.

And then step 4, in response to a prompt -- to a displayed prompt showing the detected external device, the user indicates the particular device with which the user wants to establish -- wants the controller to establish a connection to transfer the video.

Then step 5 is not part of the indication process, but it's the final step, which is in response, if previously paired, the N93 establishes a connection with the indicated device and transmission of the video clip begins and "Sending data" is displayed.

Q. So you were pointing to multiple indications in N93 in relation to this limitation. Is that correct?

A. There's a process involved. So this is with

respect to the -- to the N93 users' manual and the process document by the N93 users' manual, there's a process that's evolved -- that's involved. And certainly by the end of step 4 a user indication has been provided and the Bluetooth radio has been selected based on that user indication.

Q. (BY MS. KO) Is it correct to say that there are multiple key presses throughout this set of steps that you've laid out on pages 47 and 48 in your declaration?

A. Yes, there will be multiple key presses.

Q. Can you go to Exhibit 1010, page 61.

A. Okay, I'm on page 61.

Q. In the right-hand column of page 61, does the N93 User manual describe Video sharing?

A. So the section you're referring to, the right-hand column on page 61, specifically applies to a live Video sharing. So basically a video phone type video transmission.

Q. Is it correct that it describes a series of indications to share video when a voice call is active on page 61?

A. Well, what it describes is that one party -- so when the voice call's active, one party must select Options>Share video>Live, then the system communicates.

So the -- the device sends the invitation to the SIP service. You have added to your contact list of the recipients so basically the addresses and the destination who you want to share with. If that's the case where if the recipient has several SIP addresses in the contact card, you have to select the specific SIP address that you want to use. The indication, though, from that is that if SIP -- if the person did not have several, you don't need to do that step.

If the SIP address of the person is not available, you have to enter it and hit okay.

The bottom line is based on my reading of this, if the recipient has only one SIP address and the address is already in contact from a contact card, then you go immediately to step 3. And step 3 says sharing begins automatically when the recipient accepts the invitation. So the only other -- other thing that would have to happen would be the recipient would have to -- to click a button saying, yes, I'm accepting the invitation of the (indiscernible).

Q. Do you believe that the sharing is conditional upon the recipient accepting the invitation?

A. Well, for the N93 device, it's described by the N93 users' manual, this segment -- this -- this -- the section that I've read seems to clearly indicate

that the recipient must accept the invitation before the video sharing will automatically begin.

Q. So when the recipient accepts the invitation, do you believe the controller is controlling the assignment of the UMTS radio in the N93 device?

A. The controller is most definitely controlling the assignment of the UMTC -- UMTS radio in his contacts. But I don't -- I have not specifically evaluated in this chain exactly where the controller is -- is actually making that assignment but -- but between the person who wants to share on selecting Options, Share video and Live, and the person accepting the share -- accepting the invitation to share, during that process the controller is most definitely allocating the UMTS connection, UMTS radio circuit to this live video call.

MS. KO: I will be passing out Exhibit 1008. For reference it's titled Dua.

Q. (BY MS. KO) You cite to this document Exhibit 1008 in your declaration at several points.

Is that correct?

A. Yes, that is correct.

Q. This reference entitled Wireless Media System and Player and Method of Operation.

Is that correct?

A. Yes, that is correct.

Q. Can you turn to page 2 of Dua, Exhibit 1008.

A. Yes.

Q. So does this Figure 1 of Dua show GSM and UMTS capabilities in the network transceiver?

A. This figure shows a network transceiver 105. It doesn't specifically state GSM and UTMS capabilities, but that can be determined from the text.

Q. And it is your opinion that Dua does not disclose lower-level implementation details. Is that correct?

A. What are you referring to when you say "lower-level implementation details"?

Q. So I am referring to a paragraph in your report, I believe on page 68.

So you state that neither Dua nor N93 disclose lower-level implementation details. Is that correct?

A. I state that neither reference explicitly discloses lower-level implementation details. So at the chip level.

Maybe I should say at the level describing the applicable standards.

Q. Can you turn to paragraph 69 of Dua.

A. Yes.

Q. And can you take a moment to read through paragraph 69 and let me know when you are finished.

A. I'm finished.

Q. This paragraph of Dua does not include the word "support." Is that correct?

A. Well, the paragraph specifically says: In accordance with a preferred embodiment of the invention, media player 100 is fully compliant with 3GPP and 3GPP2 standards. 3GPP and 3GPP2 are worldwide standards for the creation, delivery and playback of multimedia over 3rd generation, high-speed wireless networks. Defined by the 3rd Generation Partnership Project and the 3rd Generation Partnership Project 2 respectively, these standards seek to provide uniform delivery of rich multimedia a over newly evolved, broadband networks, parenthesis, 3rd generation networks, to the latest multimedia-enabled devices, such as media players.

Q. So the word "specifically support" is not in this paragraph. Is that correct?

A. The word compliant's in the paragraph. The word support is not.

Q. And which of 3GPP or 3GPP2 refer to UMTS?

A. 3GPP refers to the UMTS.

Q. And it is your opinion that a POSITA would

know that. Is that correct?

A. Yes, it's my opinion that a POSITA would know that the 3GPP standards were the ones that were being -- that were being developed at the time to move from what was called 2G -- well, they were actually developed to develop 2G, but they were -- at that time had moved from 2G to 3G. And UTMS is -- is one of the 3G standards that was prevalent at the time.

Q. And can you go to Figure 10, which is on page 13 of the exhibit labeled report.

A. I'm on Figure 10.

Q. Do you recall referring to Figure 10 in your declaration?

A. Yes, I do.

Q. Based on Figure 10, the video camera 712 is not receiving video data by radio technology. Is that correct?

A. Based on my understanding -- so we're looking at 710. Correct? Panel 710?

Q. Yes. And then video camera 712. Yes.

A. So video camera 12 is -- is transmitting so it is -- it is -- it is observing the video environment using its lens and sensor, it is digitizing a video and it is transmitting it to the wireless -- to the mobile device in that particular panel.

Q. So in this figure, the wireless media player 100A is receiving video data from the video camera. Is that correct?

A. Yes. In -- in, again, panel 710, the wireless media player 100A is receiving video via its short-range radio from the video camera 712.

Q. And it is not transmitting the video data to the video camera from wireless media player 100A. Is that correct?

A. That's correct. It is instead transmitting the video data through the cellular network to antenna 7.1 and ultimately to the core Internet network.

Q. And between wireless media player 100A and wireless media player 100B, you believe that these wireless media players can be communicating over 3G. Is that correct?

A. Yes, that both the text of the -- describing this figure until the figure indicates that wireless media player 100A is communicating with a cell phone tower, which is connecting to the Internet, which is then communicating with another cell phone tower that would be core network 741 and Radio Access Network 742, which is then communicating with wireless media player 100B.

Q. And wireless media player 100B is not

receiving video data from the television. Is that correct?

A. That's correct. Instead it is transmitting video data, specifically the video data it received from user A, which was captured by video camera 712. It is transmitting that data over the short-range communications link to television 751.

Q. And based on your mappings of Bluetooth UMTS as the first radio communication circuit and second radio communication circuit respectively, you believe that this connection between the wireless media player 100B and the television is to be over Bluetooth. Is that correct?

A. Dua specifically states that the connection is occurring over short- -- over the short-range radio. And Dua also states that the short-range radio contains both Bluetooth and Wi-Fi. So -- so Bluetooth is one of the -- one of the two, and only two possible connections that could be made. So it could certainly be -- a person of ordinary skill in the art would certainly understand that -- that the Bluetooth connection is a viable connection for the short-range video communications shown here.

Q. And you're not alleging that the connection between wireless and video player 100A and 100B is over

Bluetooth based on this figure. Is that correct?

A. Purely based on this figure, I am not alleging that. I'm -- I'm -- this figure shows clearly that the connection between the two wireless devices is occurring over the cellular network.

Q. And can you turn to paragraph 192. This is on page 37.

Can you please read this paragraph and let me know when you're finished.

A. Okay.

Q. This paragraph describes the communication between the video camera and wireless media player 100A. Is that correct?

A. That's -- that's the first sentence of the paragraph, but then it then goes on to describe the process of communicating that information to wireless User B's terminal device.

Q. And this paragraph does not include any explicit mention of Bluetooth. Is that correct?

A. Well, this -- this paragraph is describing the communications through the wireless network and then through the Internet. They say specifically Internet. So -- so towards the bottom, it says: Mapped to User B's name could be an E.64 [sic] number, URI, SIP address, or other Internet-routable address which

corresponds to User B's wireless media player.

So they were first specifically referring to the connection that is going up through the cellar -- cellular system through the Internet and then back through the cellular system on the other side.

Q. So does this paragraph include any explicit mention of Bluetooth?

A. No, this paragraph does not mention Bluetooth.

Q. Can you take a moment to look at paragraph 195 and please let me know when you have finished.

A. Okay.

Q. This paragraph describes the steps following a decision by User B to watch the video feed on his television. Is that correct?

A. Yes, this paragraph follows the steps where User B decides they're going to watch the video on television for an enhanced viewing experience and surround sound.

Q. And does this paragraph include any explicit mention of Bluetooth?

A. Paragraph 195 does not explicitly mention Bluetooth.

Q. Can you look at paragraph 196 and read over it and please let me know when you're finished.

A. Okay.

Q. So paragraph 96 -- excuse me -- paragraph 196 describes establishing communication between media player 100B and a television. Is that correct?

A. Yes, that's correct.

Q. And this paragraph is directed towards handling a video broadcast signal. Is that correct?

A. This paragraph is directed towards forwarding the video that User B is receiving via the cellular connection from User A, forwarding that video to the television that was -- that was -- that was mentioned in the previous paragraph 195.

Q. And this paragraph does not include any explicit mention of Bluetooth. Is that correct?

A. This paragraph states that wireless connectivity between devices using any number of supported wireless protocols is automatically established, and the media content is automatically transmitted per steps described in Figure 8A.

It does not say which wireless protocols are supported, it simply says that -- that any number of wireless protocols are automatically sent.

Let me see.

Any number of -- using any number of supported wireless protocols. And it mentions elsewhere in the patent that Bluetooth is a supported

wireless protocol.

Q. But in this paragraph itself, it does not include any explicit mention of Bluetooth itself. Is that correct?

A. Bluetooth is not explicitly mentioned in this particular paragraph.

Q. Can you turn to paragraph 197 and read this and please let me know when you finish.

A. Okay. I'm finished.

Q. This paragraph also describes the communication between media player 100B and the television. Is that correct?

A. Yes, this paragraph, paragraph 197, specifically describes an embodiment where the television is not able to process packetized streaming video content. So basically it can't project -- process the kind of content that is sent out by typical digital radios such as Bluetooth.

So it instead provides an alternative methodology where the signal is actually rebroadcast as a conventional but short-range television signal on either UHF or VHF.

Q. And can you turn to paragraph 198 and read this and please let me know when you finish.

A. So this is looking at the opposite situation

of paragraph 197 where the media player can actually take in conventional TV broadcasts on UHF, VHF and even radio broadcasts, AM and FM, and then in real time digitize those broadcasts or -- or packetize those broadcasts by using Internet protocol and then send them out to another -- another device or -- or even store them.

Q. In your opinion does paragraph 198 apply to the Bluetooth standard?

A. So paragraph 198 specifically does not look at -- so the end of paragraph 198 states that -- that the -- so in accordance with the invention, the media manager application 120 operating on the media player 100 also has the ability to receive a broadcast signal, e.g., UHF, VHF, FM, or AM, and convert the content to a digital format that can be recorded and stored in the media player's hard drive.

So this particular paragraph is talking about capturing those broadcast signals and specifically storing them.

Q. So can you capture -- would a -- strike that.

Would a POSITA understand Bluetooth to include the ability to receive broadcast signals?

A. Bluetooth was -- Bluetooth radios were designed to communicate one-to-one between -- between

one device and another specific device. By definition broadcasts are -- signals are one-to-many signals. So you have one transmitter that's picked up by thousands of devices. So a person of ordinary skill in the art would understand that Bluetooth is not a broadcast radio. It's what you might call a narrow -- a very narrow cast radio.

Q. Have you personally assisted in the creation of standards for UMTS, GSM, Bluetooth or Wi-Fi?

A. I have not.

Q. What is your understanding of the process for developing a standard?

A. My understanding is that typically a -- an organization starts the process by forming a working group of -- the working group is composed of individuals who represent companies who are interested in the standard, as well as often university researchers who are involved in research related to the standard. So they form these working groups to standardize, to come up with some standard technology for some specific -- that solves some specific problem. And these working groups then accept proposals -- from -- from within the working group and without -- without the working group, they accept proposals for technologies to be incorporated into the standards.

They coordinate the evaluation of these different technologies. They have meetings to -- to discuss their findings. They have votes and they eventually -- they eventually formulate and first draft standards. And then they finalize those standards and then they usually, even once they finalized a version of the standard, they continue their work to come out with better versions of the standard. So it tends to be an ongoing process.

Q. And the standards describe varying degrees of requirements for processes and data structures to comply with that standard. Is that correct?

A. The purpose of the standard is to create interoperable products. So -- so to the extent that it is necessary to make products -- make it -- to make it so that products made by different manufacturers -- so product by Nokia or supplied from Motorola, for example -- to the extent that that's necessary, those details are spelled out in the standard.

Q. Do standards typically include terms such as may, shall, should or can to describe varying degrees of requirements for processes in data structures to comply with the standard?

MR. BHATTARAI: Objection, form.

A. Standards tend to have multiple levels. So

there will be sort of basic requirements of the standard that every manufacturer of the technology must adhere to in order to -- for -- for interoperability to -- to occur.

There may be options -- optional capabilities that a manufacturer can -- can support. And those optional capabilities could be defined with -- some with a may, you know, that the -- the -- the standard may implement this whatever as an option.

MS. KO: I'll be passing out Exhibit 1022, which is the same exhibit in the '241 and '590 IRPs.

A. Thank you.

Q. (BY MS. KO) This is one of the exhibits you refer to in your declaration. Is that correct?

A. Yes, that is correct.

Q. And this profile defines the requirement for Bluetooth devices necessary for support of video distribution. Is that correct?

A. This document defines requirements for the video distribution profile. That is a specific profile that was created by the -- the group that developed Bluetooth for -- to facilitate video distribution.

Q. Are you aware of any products that have -- excuse me -- that have supported the video distribution

profile?

A. I'm sure there are many. I haven't done any research as to what products and especially what products in time frame -- in the 2007 time frame of the patents in suit might or might not have supported the video distribution profile.

Q. In your experience have you used a consumer device to stream video over Bluetooth?

A. Yes, I certainly have.

Q. Can you describe what that process looked like and what sort of device you used.

A. Well, I mean I've used -- if I -- if I share my screen on my Apple TV from my lap -- my -- my -- Mac -- MacBook laptop, then -- and used that to show a video from my computer, then I'm -- then I'm streaming video from one device to another one.

Q. And is that using Bluetooth?

A. Honestly, I'm not sure.

Q. Is there a process -- is there a product that you are sure of that has the capability to stream video over Bluetooth.

A. Oh, I'm -- I'm sure that I have many products. I mean there are many products with this capability and I'm sure I have used them in the past. This capability has existed for a long time, but I can't say that I can

off the top of my head I mean not evaluating this as part of my -- my analysis that went into my declaration. I can't say that I've, you know, gone through them and done testing on multiple products and examined exactly how they're connecting and whether or not they're using something like the video distribution profile to transmit that video.

Q. Is it correct to say that cellular devices do not support for the capability -- the Wi-Fi capability to connect over both 2.4 gigahertz and five gigahertz band on or about November 28, 2007?

A. So you're asking whether or not cellular devices before 2007 were capable of simultaneously connecting between Wi-Fi -- five gigahertz Wi-Fi and 2.4 gigahertz Wi-Fi? Is that what you're asking?

Q. I will rephrase.

Are you aware of any specific cell phone product on or about November 28, 2007, that supported the Wi-Fi capability to connect over both -- either 2.4 gigahertz or five gigahertz and supported both frequencies?

MR. BHATTARAI: Objection, form.

A. I have not done -- such analysis is not part of my declaration. I've not analyzed what the capabilities of -- of all of the many multimedia cell

phones that were available in 2007, what their capabilities were in terms of their connection abilities.

Q. (BY MS. KO) Isn't it correct that LTE base stations were not deployed as of November 28th, 2007?

MR. BHATTARAI: Objection, form.

A. You're asking me if it is correct that LTE stations were not deployed as of November 2007? Is that what you're asking that they had not been deployed?

Q. Yes.

A. Honestly -- two problems with that question.

One is that -- is that LTE, long-term evolution is not really one thing. It's really -- it's really a -- you know, it's sort of -- it's a progression. We went from -- from 3G to 3.5G to 3.75G with a progression of standards. I can certainly say that in 2007 the most prevalent connection available was 3G at that time.

MS. KO: Can we go off the record.

MR. BHATTARAI: Sure.

(Recess.)

Q. (BY MS. KO) Can we go to Exhibit 1002, page 46 of the '590 declaration, starting at --

Oh, sorry.

A. That's fine. I'm there. Okay.

Q. In relation to limitation [1j], you discuss user indications of what that you state are disclosed by N93. Is that correct?

A. So starting from paragraph 126 on page 47, I go through the -- the sequence as an example of how N93 users' manual discloses that video can be transmitted via Bluetooth. So that's the five-step process beginning in paragraph 127. And I have additional discussion on that with respect to the N93 going through -- specifically with respect to the N93 going through paragraph 128.

Q. So through these paragraphs, are you stating that N93 discloses limitation [1j]?

A. Well, again, this is part of the combination. So it's the combination of N93 with Dua and Herle. And this is giving support taken from the N93 users' manual on exactly how N93 supports this -- this requirement of providing an indication and selecting a channel -- selecting a radio.

Q. Is Herle mentioned in relation to this limitation at all?

A. Herle is not mentioned in relation to this limitation.

Q. When you discuss Dua in paragraph 130, you

discuss an incorporation of N93's Bluetooth implementation into Dua's.

Is that correct?

A. Actually, no, I -- I specifically state a POSITA would have recognized the N93's Bluetooth implementation as an example of the normal technique from Dua.

So Dua discloses that the sort of prior art technique of selecting the radio would be to have the user manually select it.

And so what I'm saying in paragraph 130 is that -- that the -- the explanation given, for example, in paragraph 127 for how the process is performed on N93, that that is an example of such a normal technique where the user gives a -- a direct indication as to which radio should be used to transmit the video.

Q. What is missing from N93 that you turn to Dua in relation to this limitation?

A. There's nothing missing from N93.

N93 -- the discussion N93 is -- is a specific example of how this process is applied in the -- in the N93 device. The discussion in Dua is more general.

Dua specifically discloses that -- that

this process of having a user manually indicate which radio to use is the normal process. And Dua's innovation, of course, was to propose that, yes, while you could do the normal process, there's also an improved process which you could do using the NFC radio.

Q. Did you cite any additional examples of these prior art normal techniques from Dua in relation to this limitation?

A. Well, if we take a look at Dua, in particular, we look at citations that I give in my declaration, paragraphs 9, 123 and 124. So if we first go to 123 and 124, 123 -- 123 states the following: After the media player's RFID tag-reader module 113 receives the Bluetooth serial number and other parameters, the data is transferred to CPU 109. Media player 100 instantly sends a Bluetooth paging message using the received information via its short-range transceiver 108. In response to the page, the headphone 152 performs a setup connection [sic] with media player 100 using normal Bluetooth set-up [sic] procedure. Upon completion, the media player [sic] can stream all audio output via wire signal [sic] to the headphone unit [sic].

The next paragraph states that the RFID

discovery/paging process shortens the session setup time compared to the normal Bluetooth terminal discovery process for establishing a session.

The normal process would be the process where the user has to indicate that this Bluetooth session must be established. The enhanced process or the improved process, I should say, that Dua is proposing is where the IFD collects that information by tak- -- getting it directly from the device you're trying to establish a connection to and then -- and then establishes the connection.

So that's an example in Dua. Dua doesn't discuss the normal process very much because Dua's contrasting its improved process with that normal process.

Q. And is it correct to say that you're not alleging that this improved process discussed by Dua would disclose limitation [1j]?

MR. BHATTARAI: Objection, form.

A. Well, that's not correct. Elsewhere in the document I discuss any declaration -- I discuss how the improved process would also disclose limitation [1j].

Q. (BY MS. KO) But do you discuss that in relation to Ground 1 on pages 48 to 49 of your declaration?

A. With respect to pages 48 and 49, I'm only discussing the normal indication techniques, the one that's -- that I give as an example from N93 with respect to those pages.

Q. So it's correct to say that in relation to Ground 1 you are not alleging that the improved process of Dua discloses limitation [1j]. Is that correct?

MR. BHATTARAI: Objection, form.

A. What is safe to say is that with respect to the pages 48 and 49, I do not discuss how the improved process of Dua satisfies this claim limation.

MS. KO: And I'll pass out Exhibit 1009.

Q. (BY MS. KO) This is the Herle reference that you refer to throughout both declarations. Is that correct?

A. Yes, that is correct.

Q. And Herle is entitled System and Method For Delta-Based Over-The-Air Software Upgrades For A Wireless Mobile Station. Is that correct?

A. Yes, that is correct.

Q. Are you aware of any disadvantages of delta-based update processes?

A. I haven't evaluated the relative strengths and weaknesses specifically of using a delta-based update process versus using some other non-delta-based update

process.

Q. Are you an iPhone or an Android user?

MR. BHATTARAI: Objection, form.

A. I have an iPhone currently. I have used an Android in the past, but I currently have an iPhone.

Q. (BY MS. KO) So you are familiar with both IOS and Android operating systems. Is that correct?

A. Yes, I am.

Q. Is it correct to say Apple has implemented delta-based updates for the IOS operating system?

MR. BHATTARAI: Objection, form.

A. Honestly I haven't -- I haven't studied it so I can't answer that one way or the other. All I know is my phone tells me every once in a while that I need to update my operating system and I tell it to do it.

Q. (BY MS. KO) What about Android, is it correct to say Android has used delta-based updates --

MR. BHATTARAI: Objection, form.

Q. -- for updates?

MR. BHATTARAI: Sorry.

A. Again, I can't address that. I haven't studied, you know, the Android phone operating system currently or gone back and reviewed what's done in the past.

MS. KO: I pass the witness.

MR. BHATTARAI: Can we take a 10-minute break, I need to confer with my colleague.

(Recess.)

MR. BHATTARAI: No more questions from my side and we reserve the right for our witness to review and sign the declaration -- or I mean sign the transcript.

(Deposition concluded at 11:40 a.m.)

SAMSUNG V. MAXELL; IPR2020-00906 & IPR2024-00907

WITNESS SIGNATURE/CORRECTION PAGE

If there are any typographical errors to your deposition, indicate them below:

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Any other changes to your deposition are to be listed below with a statement as to the reason for such change.

PAGE	LINE	CORRECTION	REASON FOR CHANGE

I, CHARLES D. CREUSERE, do hereby certify that I have read the foregoing pages of my testimony as transcribed and that the same is a true and correct transcript of the testimony given by me in this deposition on March 7, 2025, except for the changes made.

_____ _____

Date Signed CHARLES D. CREUSERE

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

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

Petitioners,

v.

MAXELL, LTD.,

Patent Owner

Case: IPR2024-00906

U.S. Patent No. 11,445,241

and

Case: IPR 2024-00907

U.S. Patent No. 10,129,590

CERTIFICATE OF COMPLETION OF DEPOSITION

I, TRUENEA TEASLEY, CCR #64, DO HEREBY CERTIFY that on March 7, the deposition of CHARLES D. CREUSERE was taken before me at the request of, and sealed original thereof retained by:

For the Defendant:
So Ra Ko
Mayer Brown LLP
1999 K Street, Northwest
Washington, D.C. 20006
sko@mayerbrown.com

I FURTHER CERTIFY that copies of this certificate have been mailed to or delivered to all counsel, and parties to the proceedings not represented by counsel, appearing at the taking of the deposition:

For the Plaintiff:

Roshan K. Bhattarai
DLAPiper
500 Eighth Street, Northwest
Washington, DC 20004il
roshan.bhattarai@us.dlapiper.com

I FURTHER CERTIFY that examination of this transcript and signature of the witness was reserved by the witness and all parties present. On _____March 20_, 2025, a letter was mailed or delivered to Roshan K. Bhattarai regarding obtaining signature of the witness, and corrections, if any, were appended to the original and each copy of this deposition.

I FURTHER CERTIFY that the cost of the original and one copy of the deposition, including exhibits, to Ms. So Ra Ko, is $_____.

I FURTHER CERTIFY that I did administer the oath to the witness herein prior to the taking of this deposition; that I did thereafter report in stenographic shorthand the questions and answers set forth herein, and the foregoing is a true and correct transcript of the proceeding had upon the taking of this deposition to the best of my ability.

I FURTHER CERTIFY that I am neither employed by nor related to any of the parties or attorneys in this case, and that I have no interest in the final disposition of this case in any court.

Truenea Teasley

TRUENEA TEASLEY, CSR/RPR/CCR
CCR No. 64
License Expires: 12-31-2025

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