

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:

TAKEN BY: MS. SO RA KO
ATTORNEY FOR Maxell, Ltd.

REPORTED BY: TRUENEA TEASLEY, CSR/RPR/CCR
CCR #64
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A P P E A R A N C E S

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ALSO PRESENT:

Brian Erickson (via Zoom)

I N D E X

WITNESS:	PAGE:
CHARLES D. CREUSERE	
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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

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

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

7 CHARLES D. CREUSERE,
8 sworn by the Certified Court Reporter, testified as
9 follows:

10 EXAMINATION

11 BY MS.KO:

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

14 Can you please state your name.

15 A. Yes. My name is Charles Creusere.

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

19 A. Yes, I do.

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

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

24 A. No, there is not.

25 Q. So how many times have you been deposed

1 before?

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

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

6 A. Twice.

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

11 A. Yes, I understand that.

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

14 A. Yes, I do.

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

17 A. That's correct.

18 Q. And if I refer to Patent 10,129,590 as the
19 '590 patent, will you understand that I am referring to
20 U.S. Patent Number 10,29,590?

21 A. Yes, I understand that.

22 Q. And if I refer to the '241 patent, will you
23 understand that I'm referring to U.S. Patent Number
24 11,445,241?

25 A. Yes, I do understand that.

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

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

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

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

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

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

15 A. Yes.

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

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

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

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

1 page.

2 This should be the '241.

3 MR. BHATTARAI: Thank you.

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

6 Is that correct?

7 A. Yes, that is correct.

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

12 Is that correct?

13 A. I believe that is correct.

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

16 A. Yes, that's correct.

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

19 Is that correct?

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

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

1 Is that correct?

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

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

11 A. That is certainly my understanding.

12 Q. I'm going to start with Exhibit 1002 from the
13 '590 IPR, IPR2024-00907.

14 Do you recognize this as your declaration
15 in the matter?

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

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

22 A. It certainly seems to be exactly the same.

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

25 Is that still the case?

1 That is on page 14.

2 A. Yes, that is certainly the case.

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

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

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

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

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

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

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

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

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

6 Do you see that?

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

9 Q. Oh, excuse me.

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

14 A. Yes. So, okay, I see.

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

17 A. Right.

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

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

21 Q. Yes.

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

24 A. I have read paragraph 22.

25 What was your question?

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

3 A. Yeah. Yes, I see this paragraph.

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

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

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

11 MR. BHATTARAI: Objection, form.

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

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

1 A. My opinions regarding impermissible hindsight?

2 Q. Yes.

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

8 Q. On page 26 of your declaration, in paragraph
9 76, you reference the reexamination of the '590 patent.

10 Did you review the reexamination file
11 history?

12 A. Yes, I did.

13 Q. And did you review it in its entirety?

14 A. I believe so.

15 Q. Now flipping to page 17.

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

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

21 A. I'm on page 17.

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

24 Do you see it?

25 A. Yes, I do see it.

1 Q. In this section you identify Dua.

2 When did you first become aware of the
3 Dua reference?

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

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

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

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

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

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

18 A. Yes, that is correct.

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

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

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

24 MR. BHATTARAI: Object to the form.

25 A. This is a table designed to concisely show the

1 mappings for later reference.

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

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

9 Is that correct?

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

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

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

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

25 A. To my recollection, this section is

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

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

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

9 Is that correct?

10 A. It appears to be.

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

13 A. Yes, I do.

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

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

18 Q. And looking at page 30 of your declaration.

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

22 A. Okay. I'm done.

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

1 A. Yes, that is my opinion.

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

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

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

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

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

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

23 MR. BHATTARAI: Objection, form.

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

1 combination of N93, Dua and Herle.

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

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

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

11 Ground 3 deals with Dua and Herle.

12 Ground 4 deals with Dua, Herle and N93.

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

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

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

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

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

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

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

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

1 Can you point to something in
2 paragraph 84?

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

7 And it cites Exhibits 1010 -- Exhibit
8 1010 is the one we're talking about now, the Nokia N93
9 Users' guide -- and it also cites Exhibit 108 [sic].
10 Exhibit 108 is the Dua patent application.

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

14 And if we go look at paragraphs 57 and 58
15 from Exhibit 1008 -- so, for example at the start of
16 57, it states that: Figure 1 is a functional
17 representation of the components of a media player
18 [sic] with cellular phone capability, in accordance
19 with one embodiment of the present invention. The term
20 "media player" generally refers to an electronic
21 device -- to electronic devices that are capable of
22 media -- processing media such as audio, video, images,
23 presentations, animations, and Internet content, as for
24 example, cellular phones, personal digital assistants,
25 music players, game players, video players, cameras,

1 and the like.

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

7 Q. So I'm asking specifically about N93.

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

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

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

20 It says the N93 supports image capture
21 at a specific resolution.

22 It says that images and video are
23 automatically saved in the Gallery. And that video
24 clips are recorded using the .mp4 file format or the
25 3GPP file format.

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

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

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

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

11 Is that correct?

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

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

17 Q. So is that correct?

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

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

24 Is that correct?

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

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

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

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

13 Q. Can you point to what you require in Dua to
14 add to the (indiscernible) features of N93 to disclose
15 [1a]

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

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

25 So this additional implementation details

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

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

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

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

20 MR. BHATTARAI: Objection, form.

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

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

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

10 MR. BHATTARAI: Objection, form.

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

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

18 MR. BHATTARAI: Objection, form.

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

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

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

1 band.

2 Is that correct?

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

5 Q. And has your opinion changed regarding this?

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

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

13 Is that correct?

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

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

18 A. My opinion has not changed.

19 Q. Can you turn to page 35.

20 A. Okay.

21 Q. And read paragraph 95.

22 A. Okay.

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

25 Is that correct?

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

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

6 Is that correct?

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

9 Q. Can you turn to page 36.

10 A. Okay. I'm on page 36.

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

15 Is that correct?

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

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

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

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

25 Is that correct?

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

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

8 A. Yes.

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

13 Is that correct?

14 A. I do state that.

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

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

22 A. Yes.

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

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

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

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

6 A. Okay.

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

10 Is that correct?

11 A. You're referring to the bulleted list?

12 Q. Yes.

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

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

17 MR. BHATTARAI: Objection, form.

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

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

23 A. The first page of the Claims charts?

24 Q. Yes.

25 A. Okay. Yes.

1 Q. There are several claim limitations such as
2 [1h] and [1j] that discuss controlling assignment of
3 connection of a radio communication circuit.

4 Do you see that?

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

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

9 MR. BHATTARAI: Objection, form.

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

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

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

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

8 A. I'm on page 37.

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

11 Is that correct?

12 A. Yes, that is correct.

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

15 Is that correct?

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

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

21 Is that correct?

22 A. That is what I state in paragraph 101.

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

25 MR. BHATTARAI: Objection, form.

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

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

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

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

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

23 A. Yes. I'm on page 38.

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

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

3 Is that correct?

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

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

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

12 Let's see. I'm sorry.

13 So I say different -- different from JPEG
14 compression.

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

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

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

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

7 So in -- in this context JPEG then would
8 be a still image compression algorithm, which in
9 terms of the claims language would be the first type of
10 compression. And then MPEG would be the video
11 compression, which would be in terms of the claims
12 language the second type of compression.

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

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

18 Is that correct?

19 A. Yes, I do state that.

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

22 Is that correct?

23 A. Yes, I do state that.

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

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

3 Is that correct?

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

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

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

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

16 A. I'm on page 43.

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

23 Is that correct?

24 A. Yes, that is literally paragraph 113.

25 Q. Has your opinion changed regarding this

1 statement?

2 A. No, it has not.

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

6 Is that correct?

7 A. Yes, I state that in paragraph 114.

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

9 A. Okay.

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

12 A. Okay.

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

15 MR. BHATTARAI: Objection, form.

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

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

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

1 your -- the Exhibit 1010.

2 A. Okay.

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

6 And let me know when you finish.

7 A. Okay.

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

11 MR. BHATTARAI: Objection, form.

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

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

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

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

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

14 A. Uh-huh.

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

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

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

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

1 either of those two pages.

2 Q. And then --

3 MS. KO: Can we go off the record.

4 (Recess.)

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

7 A. I'm on page 24.

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

11 A. Yes, that's correct.

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

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

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

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

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

5 A. Okay.

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

8 A. Yes.

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

11 A. Okay.

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

17 MR. BHATTARAI: Objection, form.

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

21 Q. Page 47.

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

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

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

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

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

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

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

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

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

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

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

11 A. Yes, there will be multiple key presses.

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

13 A. Okay, I'm on page 61.

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

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

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

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

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

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

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

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

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

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

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

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

17 MS. KO: I will be passing out Exhibit
18 1008. For reference it's titled Dua.

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

21 Is that correct?

22 A. Yes, that is correct.

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

25 Is that correct?

1 A. Yes, that is correct.

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

3 A. Yes.

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

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

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

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

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

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

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

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

24 Q. Can you turn to paragraph 69 of Dua.

25 A. Yes.

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

3 A. I'm finished.

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

6 A. Well, the paragraph specifically says: In
7 accordance with a preferred embodiment of the
8 invention, media player 100 is fully compliant with
9 3GPP and 3GPP2 standards. 3GPP and 3GPP2 are worldwide
10 standards for the creation, delivery and playback of
11 multimedia over 3rd generation, high-speed wireless
12 networks. Defined by the 3rd Generation Partnership
13 Project and the 3rd Generation Partnership Project 2
14 respectively, these standards seek to provide uniform
15 delivery of rich multimedia a over newly evolved,
16 broadband networks, parenthesis, 3rd generation
17 networks, to the latest multimedia-enabled devices,
18 such as media players.

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

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

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

24 A. 3GPP refers to the UMTS.

25 Q. And it is your opinion that a POSITA would

1 know that. Is that correct?

2 A. Yes, it's my opinion that a POSITA would know
3 that the 3GPP standards were the ones that were
4 being -- that were being developed at the time to move
5 from what was called 2G -- well, they were actually
6 developed to develop 2G, but they were -- at that time
7 had moved from 2G to 3G. And UTMS is -- is one of the
8 3G standards that was prevalent at the time.

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

11 A. I'm on Figure 10.

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

14 A. Yes, I do.

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

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

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

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

1 Q. So in this figure, the wireless media player
2 100A is receiving video data from the video camera. Is
3 that correct?

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

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

10 A. That's correct. It is instead transmitting
11 the video data through the cellular network to antenna
12 7.1 and ultimately to the core Internet network.

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

17 A. Yes, that both the text of the -- describing
18 this figure until the figure indicates that wireless
19 media player 100A is communicating with a cell phone
20 tower, which is connecting to the Internet, which is
21 then communicating with another cell phone tower that
22 would be core network 741 and Radio Access Network 742,
23 which is then communicating with wireless media player
24 100B.

25 Q. And wireless media player 100B is not

1 receiving video data from the television. Is that
2 correct?

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

8 Q. And based on your mappings of Bluetooth UMTS
9 as the first radio communication circuit and second
10 radio communication circuit respectively, you believe
11 that this connection between the wireless media player
12 100B and the television is to be over Bluetooth. Is
13 that correct?

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

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

1 Bluetooth based on this figure. Is that correct?

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

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

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

10 A. Okay.

11 Q. This paragraph describes the communication
12 between the video camera and wireless media player
13 100A. Is that correct?

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

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

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

1 corresponds to User B's wireless media player.

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

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

8 A. No, this paragraph does not mention Bluetooth.

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

11 A. Okay.

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

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

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

21 A. Paragraph 195 does not explicitly mention
22 Bluetooth.

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

25 A. Okay.

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

4 A. Yes, that's correct.

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

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

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

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

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

22 Let me see.

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

1 wireless protocol.

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

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

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

9 A. Okay. I'm finished.

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

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

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

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

25 A. So this is looking at the opposite situation

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

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

10 A. So paragraph 198 specifically does not look
11 at -- so the end of paragraph 198 states that -- that
12 the -- so in accordance with the invention, the media
13 manager application 120 operating on the media player
14 100 also has the ability to receive a broadcast signal,
15 e.g., UHF, VHF, FM, or AM, and convert the content to a
16 digital format that can be recorded and stored in the
17 media player's hard drive.

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

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

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

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

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

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

10 A. I have not.

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

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

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

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

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

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

24 MR. BHATTARAI: Objection, form.

25 A. Standards tend to have multiple levels. So

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

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

10 MS. KO: I'll be passing out
11 Exhibit 1022, which is the same exhibit in the '241 and
12 '590 IRPs.

13 A. Thank you.

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

16 A. Yes, that is correct.

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

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

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

1 profile?

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

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

9 A. Yes, I certainly have.

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

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

17 Q. And is that using Bluetooth?

18 A. Honestly, I'm not sure.

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

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

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

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

12 A. So you're asking whether or not cellular
13 devices before 2007 were capable of simultaneously
14 connecting between Wi-Fi -- five gigahertz Wi-Fi and
15 2.4 gigahertz Wi-Fi? Is that what you're asking?

16 Q. I will rephrase.

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

22 MR. BHATTARAI: Objection, form.

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

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

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

6 MR. BHATTARAI: Objection, form.

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

11 Q. Yes.

12 A. Honestly -- two problems with that question.

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

20 MS. KO: Can we go off the record.

21 MR. BHATTARAI: Sure.

22 (Recess.)

23 Q. (BY MS. KO) Can we go to Exhibit 1002, page
24 46 of the '590 declaration, starting at --

25 Oh, sorry.

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

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

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

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

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

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

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

25 Q. When you discuss Dua in paragraph 130, you

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

3 Is that correct?

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

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

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

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

20 A. There's nothing missing from N93.

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

25 Dua specifically discloses that -- that

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

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

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

25 The next paragraph states that the RFID

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

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

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

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

19 MR. BHATTARAI: Objection, form.

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

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

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

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

8 MR. BHATTARAI: Objection, form.

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

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

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

16 A. Yes, that is correct.

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

20 A. Yes, that is correct.

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

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

1 process.

2 Q. Are you an iPhone or an Android user?

3 MR. BHATTARAI: Objection, form.

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

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

8 A. Yes, I am.

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

11 MR. BHATTARAI: Objection, form.

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

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

18 MR. BHATTARAI: Objection, form.

19 Q. -- for updates?

20 MR. BHATTARAI: Sorry.

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

25 MS. KO: I pass the witness.

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

3 (Recess.)

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

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

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

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

5 Petitioners,

6 v.

7 MAXELL, LTD.,

8 Patent Owner

9 Case: IPR2024-00906

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

11 and

12 Case: IPR 2024-00907

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

14
15 CERTIFICATE OF COMPLETION OF DEPOSITION

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

20 For the Defendant:

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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:

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1 I FURTHER CERTIFY that examination of this
2 transcript and signature of the witness was reserved by
the witness and all parties present. On

3 March 20, 2025, a letter was mailed or
4 delivered to Roshan K. Bhattarai regarding obtaining
signature of the witness, and corrections, if any, were
5 appended to the original and each copy of this
deposition.

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

8
9 I FURTHER CERTIFY that I did administer the oath
10 to the witness herein prior to the taking of this
deposition; that I did thereafter report in
11 stenographic shorthand the questions and answers set
forth herein, and the foregoing is a true and correct
12 transcript of the proceeding had upon the taking of
this deposition to the best of my ability.

13
14 I FURTHER CERTIFY that I am neither employed by
15 nor related to any of the parties or attorneys in this
case, and that I have no interest in the final
16 disposition of this case in any court.

17
18 

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