



Transcript of Dr. Robert Stevenson

Date: April 18, 2025

Case: Google, LLC -v- 138 East LCD Advancements Limited (PTAB)

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1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4
5

6 GOOGLE LLC,
7 Petitioner,

8 v.

9 138 EAST LCD ADVANCEMENTS LIMITED,
10 Patent Owner.

11
12 Case IPR2024-00959
13 U.S. Patent No. 7,428,082 B2

14 DEPOSITION OF
15 ROBERT STEVENSON, Ph.D.
16 FRIDAY, APRIL 18, 2025

17
18 6:01 a.m. PDT

19 to

20 8:54 a.m. PDT
21
22

23 Stenographically Reported by:
24 Burgundy B. Ryan, RPR,
25 CSR No. 11373
Job No. 578950
Pages 1-99

A P P E A R A N C E S

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QUESTIONS INSTRUCTED NOT TO ANSWER:

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STIPULATIONS

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(None)

QUESTIONS MARKED

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REPORTER'S NOTE:

QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT
NECESSARILY REFLECT A DIRECT QUOTE.

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E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
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1 BE IT REMEMBERED that, pursuant to Notice
2 of Taking Deposition, and on Friday, April 18, 2025,
3 commencing at 6:01 a.m. PDT thereof, via remote
4 video teleconference, before me, Burgundy B. Ryan, a
5 Certified Shorthand Reporter in and for the State of
6 California, personally appeared

7 ROBERT STEVENSON, Ph.D.,
8 a witness called on behalf of PATENT OWNER, and who,
9 having been first duly sworn by me to testify to the
10 truth, was examined and testified as follows:

11 IT TECHNICIAN: Thank you to everyone for
12 attending this proceeding remotely, which we
13 anticipate will run smoothly.

14 Please remember to speak slowly, and do
15 your best not to talk over one another.

16 Please be aware that we are recording this
17 proceeding for backup purposes. Any off-the-record
18 discussions should be had away from the computer.
19 Please remember to mute your mic for those
20 conversations.

21 Please have your video enabled to help the
22 reporter identify who is speaking. If you are
23 unable to connect with the video and are connecting
24 via phone, please identify yourself each time before
25 speaking.

1 We will provide a complimentary, unedited
2 recording of this deposition with the purchase of a
3 transcript.

4 I apologize in advance for any
5 technical-related interruptions. Thank you.

6 COURT REPORTER: Good morning. My name is
7 Burgundy Brooke Ryan, California CSR No. 11373.

8 Counsel, please state your name and
9 appearance for the record.

10 MR. LAROQUE: This is Sam LaRoque, Robins
11 Kaplan, on behalf of the patent owner, 138 East LCD
12 Advancements Limited.

13 MR. HIGH: This is Robert High on behalf of
14 the Petitioner Google and witness.

15 (Whereupon, the witness was sworn.)

16 COURT REPORTER: Thank you very much.

17 Counsel, you may proceed.

18 MR. LAROQUE: Thank you.

19 ROBERT STEVENSON, Ph.D.,
20 having been first duly sworn to tell the whole
21 truth, testified as follows:

22 EXAMINATION

23 By MR. LAROQUE:

24 Q. Good morning, Dr. Stevenson.

25 Can you please state your full name for the

1 record?

2 A. Robert Stevenson.

3 Q. And, Dr. Stevenson, where are you this
4 morning?

5 A. In Atlanta, Georgia.

6 Q. And you have counsel in the room with
7 you, Mr. High; is that right?

8 A. Correct.

9 Q. Is there anybody else in the room with
10 you?

11 A. No.

12 Q. Are you currently employed?

13 A. Yes.

14 Q. And who is your employer?

15 A. The University of Notre Dame.

16 Q. What is your position at the University of
17 Notre Dame?

18 A. I have several. I'm a professor of
19 electrical engineering. I'm also the associate
20 chair for the department of electrical engineering.
21 And I'm the director of undergraduate studies for
22 electrical engineering.

23 Q. And how long have you been at the
24 University of Notre Dame?

25 A. It will be -- it will be 35 years in

1 August.

2 Q. And have you been deposed
3 before, Dr. Stevenson?

4 A. Yes.

5 Q. About how many times have you been
6 deposed?

7 A. I couldn't tell you an exact number. It's
8 over 50 though.

9 Q. Okay. Have you been deposed before in an
10 IPR proceeding such as the one at issue today?

11 A. Yes.

12 Q. And do you know about how many times you've
13 been deposed in IPR proceedings?

14 A. Again, it's somewhat of a guess but it
15 would be probably at least a dozen.

16 Q. Okay. So clearly you have a lot of
17 deposition experience. I won't belabor the rules
18 but I do want to touch on -- on a few key ones here.

19 So the first one is, if you don't
20 understand my question that I ask you today, any
21 question, please tell me that and then I will try to
22 rephrase it. Is that okay?

23 A. Yes.

24 Q. And unless you tell me otherwise, I will
25 assume that you understand my question. Is that

1 okay?

2 A. That's what I'll try to do.

3 Q. Do you understand, Dr. Stevenson, that
4 you're testifying under oath today under penalty of
5 perjury?

6 A. Yes.

7 Q. And, Dr. Stevenson, are you taking any
8 medications or suffering from any illness that might
9 prevent you from understanding my questions or
10 answering them fully?

11 A. No.

12 Q. We'll take a break, probably try to take a
13 break about every hour. If you need a break more
14 often, feel free to ask, but if there is a question
15 pending, I just ask that you wait and finish
16 answering the question before taking a break. Is
17 that okay?

18 A. Yes.

19 Q. What did you do to prepare for your
20 deposition today?

21 A. Are you referring just in terms of recently
22 or since I started working on this matter?

23 Q. Well let's start with since you started
24 working on this matter.

25 A. Initially I -- I reviewed the patent. I

1 understood, you know, what the limitations were and
2 the claims at issue. Then began looking at various
3 pieces of art to determine whether -- to assess the
4 validity of the patent based on those pieces of art.
5 Wrote a declaration at some point a couple of months
6 back. And then more recently I've reviewed that
7 material to prepare for today.

8 Q. Did you have any meetings with anybody to
9 prepare for your deposition today?

10 A. Are you talking about just like in the past
11 week?

12 Q. Sure. We can -- we can do the past week.

13 A. I had a -- a video meeting on Monday and
14 then I arrived in Atlanta yesterday and talked to
15 some people today -- yesterday also.

16 Q. And how long was that video meeting on
17 Monday?

18 A. I couldn't tell you an exact number, but
19 maybe -- it lasted maybe two hours, something like
20 that.

21 Q. Do you recall who was present at that
22 meeting?

23 A. Robert High.

24 Q. Anybody else?

25 A. I don't believe so, no.

1 Q. And then you said you arrived in Atlanta
2 yesterday and -- and had another meeting. How long
3 was that meeting?

4 A. I will say maybe four hours.

5 Q. And who was present at that meeting?

6 A. Robert High.

7 Q. Anybody else?

8 A. No.

9 Q. Did you review any documents as part of
10 either of those meetings?

11 A. Yes.

12 Q. Do you know about how many documents you
13 reviewed?

14 A. Didn't keep track of an exact number. It
15 would be, you know, half a dozen to a dozen
16 documents probably.

17 Q. Okay. Prior to -- to this past week, did
18 you have any meetings with anybody for the specific
19 purpose of preparing for this deposition?

20 A. Not with this -- for this deposition, no.

21 Q. Dr. Stevenson, you -- well, I'll go ahead
22 and -- and read it into the record but I have here,
23 it's labeled Google Exhibit 1003. It's a document
24 with the title Declaration of Robert Stevenson,
25 Ph.D.

1 (Whereupon, Stevenson Exhibit 1003 was marked for
2 identification.)

3 By MR. LAROQUE:

4 Q. Do you have that document with you,
5 Dr. Stevenson?

6 A. Yes, I have a clean printout.

7 Q. Okay. That's the declaration that you --
8 that you prepared for this proceeding; correct?

9 A. Yes, it appears to be an accurate copy.

10 Q. All right. Dr. Stevenson, what is your
11 billable rate for work that you performed on this
12 matter?

13 A. \$700 an hour.

14 Q. And did you draft this declaration
15 yourself?

16 A. I worked on the declaration with the
17 attorneys for Google.

18 Q. Did you draft parts of this declaration?

19 A. What do you mean by "draft," I guess?

20 Q. Well, yeah, did you -- did you actually
21 write the paragraphs that -- that are in this
22 declaration?

23 A. If you are asking if I typed them in, I
24 didn't type them in in this format because I don't
25 particularly like Word. So someone else formatted

1 it correctly and cut it together in the format that
2 you see. I certainly worked with the attorneys in
3 terms of crafting the sentences, some of which, you
4 know, I can recall typing in myself in an email
5 setting, others someone else might have typed in the
6 first part.

7 Q. And you signed this declaration at the end;
8 correct?

9 A. Yes.

10 Q. And by doing so, you -- you adopted this
11 declaration as -- as your own; right?

12 A. I'm not sure why -- what do you mean by
13 "adopted." The goal of putting this together was
14 for -- to as accurately as possible reflect my
15 opinions I formed in -- in this matter. And so I
16 signed the document because I felt it to the best of
17 my ability reflected my opinions.

18 Q. And about how many hours did you spend
19 preparing this declaration?

20 A. This was last summer so I couldn't tell
21 without referring to some records.

22 Q. Do you have any estimate?

23 A. At this point, no.

24 Q. Do you think it was less than 50, more than
25 50?

1 A. If I were to guess, probably more than 50
2 but I don't know without looking.

3 Q. Okay. If you would turn in your
4 declaration to page 15, page 15 into page 16?

5 A. Okay.

6 Q. And do you see it's actually at the top of
7 page 16 there is a table there; correct?

8 A. Yes.

9 Q. And -- and you say that you reviewed these
10 documents?

11 A. Yes.

12 Q. So you reviewed -- you did review all of
13 these materials that are -- that are cited in this
14 list; correct?

15 A. Yes.

16 Q. And before we proceed further in the
17 deposition today, are there any changes or
18 corrections to your declaration that -- that you
19 want to make?

20 A. Not that I found in reviewing the
21 document, no.

22 Q. Okay. If you would turn, Dr. Stevenson,
23 to -- and I'm mainly going to go by paragraph number
24 here but I'll -- I'll throw out pages as well.

25 So it's paragraph 15 which is -- oops, I'm

1 sorry, scratch that. Give me just a moment. It's
2 actually paragraph 46 which is at page 24.

3 A. Okay.

4 Q. And do you see you say, "I am not aware of
5 any evidence of secondary considerations, such as
6 unexpected results, industry skepticism, long-felt
7 unresolved need, commercial success, praise by
8 others, or copying that would alter my opinion set
9 forth below."

10 Did I read that correctly?

11 A. I believe you did.

12 Q. Did you actually perform any investigation
13 into secondary considerations?

14 A. I certainly thought about it, and I've been
15 working in this industry a long time, so I certainly
16 pulled on my own experience and knowledge. Because
17 this was so long ago, I don't recall if I did
18 anything specifically but it's typical for me, you
19 know, when looking at this sort of information to do
20 a little bit of searching, look at the library for
21 news articles, things like that. But I couldn't
22 tell you if I did that here.

23 Q. Okay. So -- so you just -- you just don't
24 recall?

25 A. This was last summer so I don't recall

1 what -- what I did specifically about this one. I
2 just know what I typically do.

3 Q. Just a moment. If you would turn to page
4 32 now and paragraph 60. Let me know when you're
5 there.

6 A. I am.

7 Q. And do you see you say, "In my opinion,
8 POSITA in the field of the '082 Patent would have
9 had a bachelor's degree in electrical engineering,
10 computer science, or related disciplines, and two
11 years of experience in digital image processing."

12 Do you see that?

13 A. Yes.

14 Q. And then you say, "Relevant work experience
15 can substitute for formal education and additional
16 education could substitute for work experience?"

17 A. Yes.

18 Q. And so that is the definition of a person
19 of ordinary skill in the art that you adopted in
20 performing your analysis underlining this
21 declaration; is that fair?

22 A. As it says in the paragraph, I worked to
23 form my opinion and that was the opinion I have
24 about what the person of ordinary skill in the art
25 would know. I then use that in forming my

1 opinion.

2 Q. Have -- have you -- well, let me -- let me
3 put it differently.

4 You haven't changed your adopted definition
5 of a person -- a person of ordinary skill in the art
6 since you wrote this, have you?

7 A. Maybe just to ask a question to clarify --
8 clarification. You keep on using the word "adopted"
9 and I'm not sure what you mean by that.

10 Are you asking if I changed my opinion?

11 Q. Well, as -- as part of your analysis do --
12 you understand that you are supposed to look at the
13 invention through the eyes of a person of ordinary
14 skill in the art at the time -- the priority date of
15 the patent; is that fair?

16 A. Yes, that's my understanding.

17 Q. And in order to do so, you have to have
18 some understanding of the background of that person
19 of ordinary skill in the art; right?

20 A. Correct.

21 Q. And that's what you've set forth in
22 paragraph 60, that background; is that fair?

23 A. Well I mean as it -- as it says there, and
24 it says it otherwise in the document, I have an
25 understanding of what you just characterized as

1 what -- how the patent should be viewed. I worked
2 on what that opinion was, which I expressed in
3 paragraph 60, and then I utilize that opinion
4 throughout, you know, my analysis in -- in the
5 declaration.

6 Q. So maybe I'll ask this in a simpler way.

7 Do you have any changes to paragraph 60
8 that you would want to make or are you satisfied
9 with paragraph 60?

10 A. I'm fine with paragraph 60 at this point.

11 Q. Okay. Dr. Stevenson, I would like you to
12 turn now, and I'll also introduce this to the
13 record, but it is a document that is stamped Exhibit
14 1001 -- Google Exhibit 1001, and it is US Patent No.
15 7,428,082 to Nakajima.

16 (Whereupon, Stevenson Exhibit 1001 was marked for
17 identification.)

18 By MR. LAROQUE:

19 Q. Do you have a copy of that patent with
20 you, Dr. Stevenson?

21 A. Yes, I do.

22 Q. Okay. And you've seen this patent before;
23 correct?

24 A. Yes.

25 Q. This is the patent that is at issue in --

1 in this IPR proceeding; right?

2 A. Correct.

3 Q. And if you would turn, Dr. Stevenson, to
4 column 5 of this patent and find your way to -- to
5 the paragraph that starts at line 58.

6 A. I'm there.

7 Q. And do you see it says, "The DSC 10
8 generates an image file and transmits the image file
9 to the printer 11 through the memory card MC."

10 Do you see that?

11 A. I see that first sentence.

12 Q. And then it says, "Two kinds of data are
13 related and stored in the image file; image data and
14 image processing control data (herein referred to as
15 PIM parameters or PIM)."

16 Do you see that?

17 A. Yes.

18 Q. And then it says, "This data is used to
19 control image processing of the image data that the
20 printer executes."

21 Do you see that?

22 A. Yes.

23 Q. Okay. So in this embodiment as described
24 by the patent, the image processing control data is
25 PIM parameters or PIM?

1 MR. HIGH: Objection. Form.

2 THE WITNESS: My -- the way I read that
3 paragraph and the way I see that -- those two phases
4 used throughout the patent were -- they were
5 somewhat interchangeable.

6 By MR. LAROQUE:

7 Q. By those two phrases do you mean -- I'm
8 sorry. Can you clarify what you mean by "those two
9 phrases?"

10 A. Image processing control data and PIM. I
11 don't recall the phrase PIM parameters used
12 elsewhere in the patent, but those -- I recall PIM
13 being used in image control -- image processing
14 control data being used throughout the patent.

15 Q. Okay. And so you said your understanding
16 is that those terms are -- are interchangeable as
17 used in the patent.

18 A. That's the way I think someone skilled in
19 the art or having read the patent would see those
20 two terms.

21 Q. Understood. And that data, the -- the PIM
22 or the image processing control data, controls image
23 processing of the image data?

24 A. Can you say that again? I just want to
25 make -- repeat the question just -- I want to get it

1 clear.

2 Q. Yeah. Sure. The -- the image processing
3 control data or PIM is data that controls image
4 processing of the image data?

5 A. Yes, it's data that is going to be used in
6 the processing of the image.

7 Q. And if you would look now at -- at the end
8 actually of that same paragraph starting at column
9 5, line 64, do you see it says, "The PIMs are
10 pre-stored in the DSC 10 and attached in the image
11 file according to the user's instructions?"

12 A. Yes.

13 Q. So the -- the PIMs are actually attached to
14 the image file?

15 A. You know, that's -- the word attached is a
16 little bit -- you know, can mean a couple of
17 different things. It means that somewhere there is
18 association built between the two of some sort that
19 is going to be utilized and is understood by the
20 system.

21 Q. All right. So would -- would they both be
22 part of -- of a same -- a same file, a same single
23 file?

24 MR. HIGH: Objection. Form.

25 THE WITNESS: There are a number of ways

1 you can form associations or attachments. One of
2 them would be to put them in the same file. But
3 there are other ways.

4 By MR. LAROQUE:

5 Q. What would some of those other ways be?

6 A. I mean it could be all over the place in
7 terms of the system design and what you -- how you
8 design your system. Basically anything that would
9 form a connection so that someone -- so the system
10 can look at it and understand that those two pieces
11 of information are related to each other I think
12 would -- would kind of follow that language. But it
13 could create link files, you could create, you know,
14 hair files, you can -- lots of different ways,
15 there's a lot of flexibility here.

16 Q. But there is an association in the system
17 between the PIM and the image data; is that fair?

18 A. I think someone skilled in the art reading
19 that sentence would understand that the idea of
20 attachment is -- is -- that's what it's getting
21 at.

22 Q. Okay.

23 A. It's getting at there is some data stored
24 in the system that associates those two pieces of
25 data.

1 Q. If you would go now to the next
2 column, column 6, and the last paragraph that starts
3 about line 63. Let me know when you're there.

4 A. All right. I'm there.

5 Q. And that paragraph says, "The PIM includes
6 various information such as the following; gamma
7 value of the DSC 10, setting parameters for contrast
8 and color balance, and color space parameters that
9 identifies the color space where the image data is
10 defined."

11 Do you see that?

12 A. Yes.

13 Q. And then it says, "Besides these
14 parameters, the PIM also includes various parameters
15 related to the shooting condition; exposures, white
16 balances, apertures, shutter speeds, and zoom
17 settings."

18 Do you see that?

19 A. Yes.

20 Q. So the PIM includes information relating to
21 gamma values?

22 MR. HIGH: Objection. Form.

23 THE WITNESS: A person skilled in the art
24 would understand that's one type of information that
25 may be stored in a PIM.

1 By MR. LAROQUE:

2 Q. And are you familiar with that term "gamma
3 values?"

4 A. Yes.

5 Q. What are -- what are gamma values?

6 A. There is a technique that -- for tonal
7 correction that has been used for a long time,
8 probably dating back to the '50s or '60s. It's --
9 there is a well known formula that has a value which
10 is called the gamma and it relates to a tonal
11 correction curve that is understood to influence how
12 the number should be understood.

13 Q. And the PIM also includes information
14 relating to contrast?

15 MR. HIGH: Objection. Form.

16 THE WITNESS: Is that the question?

17 MR. LAROQUE: It is.

18 THE WITNESS: Again, it's example of a type
19 of parameter you might wish to store in this piece
20 of data.

21 By MR. LAROQUE:

22 Q. And are you familiar with -- with the
23 concept of contrast as it relates to images?

24 A. Yes.

25 Q. And can you describe that briefly for me?

1 A. Very simply it's talking about the
2 relationship from the darkest to the brightest parts
3 of the -- of an image.

4 Q. The PIM also has a shooting condition
5 information, like information about exposure, white
6 balance, aperture and zoom; is that right?

7 MR. HIGH: Objection. Form.

8 THE WITNESS: It can. In some applications
9 that would make sense, other applications it may
10 not.

11 By MR. LAROQUE:

12 Q. But it -- it can, and as described in this
13 example at least, it -- it refers to exposures white
14 balances, apertures, shutter speeds, and zoom
15 settings.

16 Do you see that?

17 A. That sentence includes those ideas, yes.

18 Q. Okay. If you turn to Figure 8 of the '082
19 patent which is at page 9.

20 And do you recall seeing this figure
21 before?

22 A. Yes.

23 Q. Do you see it's a flow chart, right, with
24 various boxes and -- and vertical arrows?

25 A. I'm fine with your characterization I

1 guess.

2 Q. And do you see that some of those boxes are
3 double boxes, they -- they have actually concentric
4 rectangles instead of just one?

5 A. Yes.

6 Q. Do you recall what those double boxes
7 mean?

8 A. My recollection from the patent is a
9 description of that saying that -- that it's somehow
10 related to where you might use some of the values
11 from the PIM in the processing.

12 Q. And do you know how -- how you would use
13 those values from the PIM in the processing?

14 A. It depends on -- I certainly understand the
15 concept of what they are talking about in the certa
16 processing. The details would depend on, you know,
17 exactly what -- you know, the implication we're
18 talking about.

19 Q. And where are those processes carried out?
20 Are they carried out at the camera? Are they
21 carried out at the printer? Somewhere in between?

22 MR. HIGH: Objection. Form.

23 THE WITNESS: I think there is various
24 embodiments being discussed. Are we talking about a
25 particular embodiment? So I'm not sure which

1 embodiment you're talking about at this point I
2 guess.

3 By MR. LAROQUE:

4 Q. Well let me ask, is it possible to carry
5 out those processes at -- at the camera?

6 A. Theoretically or disclosed in the patent or
7 claimed by the patent?

8 Q. Well let's start with theoretically.

9 A. These processes are -- are common image
10 processing -- digital image processings in this case
11 processes. You can carry them out wherever you have
12 some sort of digital processing capability.

13 Q. So you could carry them out on -- on the
14 printer as well?

15 A. Are we still talking theoretical?

16 Q. Yes.

17 A. Wherever there is processing. So there's
18 processing in many printers, not all printers, but
19 if you have a printer that has processing, you could
20 choose to do process -- this sort of processing in
21 that processor.

22 Q. And do you recall whether the patent
23 discloses carrying these processes out at the
24 printer?

25 A. I believe at least in one embodiment it

1 does.

2 Q. Okay. Do you know what PIM stands for?

3 A. It's kind of an old term. It's falling out
4 of favor. I think it's something like print image
5 matching, if I remember, something along those
6 lines.

7 Q. And do you have any experience in your
8 background working with PIMs?

9 A. My recollection was only -- it was being
10 advocated for by one printer manufacturer. Never
11 really widely adopted. I'm trying to -- I think
12 maybe it was Epson. And I know I've seen the term
13 before, and I've done some work for Epson so
14 probably in that context if I put all of the pieces
15 together, but I had seen -- I had seen the term
16 before.

17 Q. And did you ever actually work directly
18 with PIMs?

19 A. What do you mean "work directly with?"

20 Q. Have you used PIMs in -- in -- in any of
21 your research, for example?

22 A. I guess I'm -- you know, given how broadly
23 you stated that question, I probably should say
24 yes.

25 Q. Do you recall in what context that was?

1 A. Well, as I just mentioned, there was a
2 printer company that was advocating for this and
3 this use of this particular data structure, and I --
4 you know, at one point I was doing a lot of printer
5 work and I had various printers from a lot of
6 manufacturers so certainly when I was using that
7 printer I was using a PIM.

8 Q. Were -- did you ever -- do you have any
9 experience say in manipulating or editing PIMs?

10 MR. HIGH: Objection. Form.

11 THE WITNESS: I mean this goes back. I was
12 doing this sort of work in the '90s, late '90s. I
13 couldn't tell you at this point.

14 By MR. LAROQUE:

15 Q. And you mentioned that there was a printer
16 company that was advocating for these PIMs. And I
17 think you said you think it was Epson; is that
18 right?

19 A. Yes.

20 Q. And do you recall why this printer company
21 was advocating for PIMs?

22 A. Well, in the -- in the '90s there was an
23 effort to address this color matching printer. The
24 fact that we had multiple devices for capturing and
25 reproducing color, you know, scanners, cameras. For

1 captioning, things like monitors, printers, printers
2 from different manufacturing for reproducing images.
3 And in the early '90s the colors were really bad,
4 everything was changing, so in the mid '90s a lot of
5 research started going in to addressing that
6 problem. I was working with Apple at the time and
7 they were in the middle of developing a technology
8 called color sync and I was working with Apple on
9 color sync.

10 So there is a lot of companies that were
11 doing that sort of thing, trying to address this
12 problem, trying to come up with a way to fix this
13 problem with the fact that the colors were not
14 matching between our input and output devices. So
15 you had various companies posing ideas, adopting
16 newer pieces of hardware. I know HP had something
17 they were doing. Apple certainly did something that
18 did develop this color sync idea. And my
19 recollection is -- is Epson -- I think it was Epson
20 put out this idea of a PIM to help with this color
21 matching issue that we were experiencing.

22 Q. Was -- was -- do you recall whether Epson
23 was concerned with solving other problems related to
24 image processing besides color, like the contrast or
25 the gamma values that you mentioned earlier?

1 A. Well, they -- they all play in that -- they
2 all play in that same problem so -- which is all
3 about color matching. You worry about things like
4 gamma, you worry about contrast and brightness. So
5 they all have an impact so you worry about them
6 collectively, I would say.

7 Q. And is color space another aspect of -- of
8 that color matching problem?

9 A. Same. We have to talk about color spaces
10 when you're talking about a miscolor matching
11 problem.

12 Q. And what's your understanding of that term
13 "color space?"

14 A. Well tell me -- you know, the world is a
15 colorful place. We capture information about
16 that -- that color. And how we represent it in a
17 system -- digital system or analog system, you know,
18 we're -- we're representing the information we
19 capture that is supposed to represent this --
20 this -- this colorful world, and how we do that
21 representation we refer to as a color space.

22 Q. Are you aware of different standard color
23 spaces?

24 A. Yes, there is many.

25 Q. Can you give me just a few examples?

1 A. RGB is kind of a basic one. XYZ. SRGB.
2 There is a various -- Adobe RGB. I don't remember
3 the names of them all but there are variations of
4 RGB with kind of extended pallets that Adobe
5 proposed and I used to use a lot. There is a --
6 things like that are more printer specific like
7 CNYK. They are all examples of color spaces.

8 Q. Going back to the '082 patent. Do you
9 recall as disclosed in -- in the patent where the
10 PIM is stored?

11 MR. HIGH: Objection. Form.

12 THE WITNESS: I would -- I would have to
13 look at the patent to see the places it talks about
14 where it might be stored.

15 By MR. LAROQUE:

16 Q. Can you actually look at Figure 3 of the
17 patent which is at page four?

18 A. Okay.

19 Q. And do you see there is a large block
20 there, it's denoted by the number 32 and it says
21 "Storage Module?"

22 A. Yes.

23 Q. And there are two sub-blocks within that
24 storage module and one of them, 33, is "Control Data
25 Storage Module."

1 Do you see that?

2 A. Yes.

3 Q. And do you see there is an arrow coming out
4 of that larger square at the bottom and it says
5 "PIM?"

6 A. Yes.

7 Q. Do you recall that PIMs can be stored in
8 that control data storage module?

9 A. That's one of the places where it can be
10 stored I recall. My answer before was about I think
11 there might be other places disclosed.

12 Q. But you don't recall specifically what --
13 what other places there are?

14 A. I didn't -- I didn't create a list in my
15 head of the places where it may be stored.

16 Q. This -- this storage module, as -- as
17 described in the patent, this is on the -- the image
18 generating device, correct, the camera for
19 example?

20 A. I believe that's what Figure 3 is directed
21 at. Let me verify that quickly.

22 Yes, in that -- this is -- this is meant to
23 illustrate kind of the functional blocks of a -- of
24 a digital still camera.

25 Q. And when you're using a PIM to -- to

1 control the -- the image output, say according to
2 the figure that we looked at earlier which was
3 Figure 8, do you have separate PIMs on the camera
4 and the printer or do you have just one PIM that --
5 that's used by both?

6 A. It depends on your implementation.

7 Q. Well, as -- as disclosed in the patent. Do
8 you recall whether there is -- there is one PIM
9 that's used for this image processing or multiple
10 PIMs?

11 A. Are we talking about disclosed explicitly
12 or, you know, kind of within the teachings of the
13 patent?

14 Q. Well let's start with disclosed explicitly.

15 A. I would have to reread the patent to answer
16 your question. I don't remember, you know, how it's
17 discussed -- how it may be used that way.

18 Q. But you -- you also asked within the
19 general -- more general teachings of -- of the
20 patent. What about that case?

21 A. Well, I mean there is a -- there is a piece
22 of information that we have for processing, you
23 know, that -- there is information we need for
24 processing, you might say. And certainly some of it
25 can come from the camera, some of it can come from a

1 printer, some of it can come from someplace else.
2 You know, the patent is talking about a specific
3 embodiment to teach this concept of the information,
4 the image processing control data, and one way of
5 they believe is, you know, interesting for providing
6 that information to the processing steps that need
7 it.

8 Q. So turning back to -- to Figure 8 and the
9 image processing flow depicted there, can that image
10 processing flow be performed using just one PIM?

11 MR. HIGH: Objection. Form.

12 THE WITNESS: Are you talking about what's
13 explicitly discussed in the patent or are you again
14 talking about kind of a broader within the scopes of
15 the teaching of the patent?

16 By MR. LAROQUE:

17 Q. Let's say what's specifically discussed in
18 the patent.

19 A. I would have to reread the patent to kind
20 of understand. I never read the patent with that
21 question in mind so I couldn't tell you exactly how
22 the patent addresses that particular issue.

23 Q. Okay. If you would turn in the patent to
24 column 9, and I'm looking at the paragraph that
25 starts at line 4.

1 Let me know when you're there.

2 A. Okay.

3 Q. And that paragraph says, "Figure 7 shows an
4 example of the parameters of the PIM. There are
5 four processing modes that are suitable for the four
6 kinds of situations that may occur. The parameters
7 of the PIM are predetermined for each of these
8 processing modes. In this embodiment, the PIM
9 includes the four kinds of parameters shown in
10 Figure 7: Gamma correction; color space; contrast;
11 and color balance."

12 Do you see that?

13 A. Yes, I see that.

14 Q. So if we turn now to -- to Figure 7 which
15 is at page 8?

16 A. Okay.

17 Q. Do you see in the right most column it's --
18 it's labeled "Suitable Situations?"

19 A. Yes.

20 Q. And the four instances here are "Standard,
21 Portrait, Landscape and Sunset?"

22 A. Yes.

23 Q. What do those situations refer to or what
24 would a person of ordinary skill in the art
25 understand those situations to refer to?

1 A. In my recollection of the way the patent
2 talks about this figure is the -- you know, this
3 embodiment of the invention is that, you know, these
4 are different sorts of situations in which you might
5 capture the image. You know, if you are taking a
6 portrait of a person, that is a -- kind of a
7 situation versus a landscape. Those are different
8 situations. You might want different camera
9 settings in those two situations.

10 Q. And if -- if you look at the parameters of
11 those -- those middle four columns, there is a
12 different set of parameters that corresponds to each
13 situation.

14 Do you see that?

15 A. Yes.

16 Q. And those parameters are "Gamma Correction,
17 Color Space, Contrast, and Color Balance?"

18 A. I see that.

19 Q. And so for each of those situations,
20 according to this figure, you have a different set
21 of those four parameters; right?

22 A. I think that's what the patent writer is
23 trying to get across at the idea that you want a
24 different set of parameters based on the
25 situation.

1 Q. And those parameters would inform the
2 printer or -- or an output device how to process
3 the -- the image data; is that right?

4 A. Well, whatever device that's doing the
5 processing of the color data to -- to understand
6 what the colors mean or what the numbers mean in
7 this -- in the particular -- in set of each data,
8 they would use this information to get that
9 understanding. They may use it for processing, they
10 may just use it for other reasons. But what the
11 patent teaches is that these are pieces of
12 information that are potentially useful.

13 Q. And they -- they are useful, for example,
14 in processing the image at -- at an output device?

15 A. That would be one of the ways they can be
16 used certainly.

17 Q. These -- these suitable situations,
18 standard, portrait, landscape, sunset, these can be
19 selected on the camera; right?

20 MR. HIGH: Objection. Form.

21 THE WITNESS: In the embodiment that is
22 disclosed, or at least I should say one of the
23 embodiments disclosed in the patent, I think that is
24 sort of the discussion of the idea that you can --
25 you can have some of these available and you can

1 enter a menu and select one of these.

2 By MR. LAROQUE:

3 Q. And these suitable situations, you know, in
4 this embodiment where they can be selected on the
5 camera, they are not depending on the printer in any
6 way, are they, or the output device?

7 MR. HIGH: Objection. Form.

8 THE WITNESS: They certainly can be. There
9 certainly can -- what you -- what you -- if you have
10 in mind what the output device is, you can do things
11 about, you know, selecting the color space
12 setting -- all these things could be influenced by
13 your choice of output devices. So they can be.
14 Some cases, you know, maybe you don't know the
15 output, maybe they wouldn't be.

16 By MR. LAROQUE:

17 Q. Okay. Let me switch gears a little bit.

18 The claims of the '082 patent, and I'm
19 talking very generally right now, but the claims
20 recite terms -- claim one, for example, cites the
21 terms image data and also image processing control
22 data; correct?

23 MR. HIGH: Objection. Form.

24 THE WITNESS: You confused me a little bit
25 with your -- with talking about claims and talking

1 about them generally but --

2 By MR. LAROQUE:

3 Q. Well, okay. Scratch that. Let me be more
4 specific.

5 Let's look at claim 1 of the '082 patent?

6 A. Okay.

7 Q. And claim 1 of the '082 patent cites the
8 term image data; right?

9 A. I see that phrase.

10 Q. And it also recites the term image
11 processing control data; right?

12 A. Yeah, I see that -- that phrase in the
13 claim also.

14 Q. And we talked a little bit earlier about
15 your understanding or the understanding of a person
16 of ordinary skill in the art of that term image
17 processing control data.

18 Do you remember that?

19 MR. HIGH: Objection. Form.

20 THE WITNESS: To a certain extent. I think
21 we just talked about whether -- how it matched up
22 with the word PIM.

23 By MR. LAROQUE:

24 Q. And I'm wondering, do you have an opinion
25 about what a person of ordinary skill in the arts

1 at -- at the priority date of this patent around
2 2002 would have understood the term image to mean?
3 So not image data, not image processing control data
4 but image?

5 A. Are you talking about someone having read
6 the patent and now looking at the claims would
7 they -- how they would understand -- I should say a
8 person of ordinary skill in the art having read the
9 patent now looking at the claims how they would
10 understand the word image? Is that what you're
11 asking?

12 Q. Well, we can -- we can start with
13 that, yes.

14 A. I didn't work through the process of trying
15 to figure out, you know, a definition for the word
16 image under that condition.

17 Q. So let's -- let's step aside from -- from
18 the patent then. Would -- do you have an opinion
19 about what a person of ordinary skill in the art, as
20 you laid out, you know, the qualifications or
21 experience of that person in paragraph 60 of your
22 declaration, would have understood an image to be?

23 A. I haven't done the work that I think would
24 be necessary in this sort of legal proceedings to
25 kind of give a definition of the word image.

1 Q. Okay. So you -- you don't have a specific
2 opinion on that.

3 A. Not -- not in the context of this -- of
4 this -- of this case, no.

5 Q. Okay.

6 A. I haven't -- yeah, I take it seriously, you
7 know, these definitions I know they are very
8 important so I would want to do some work before I
9 offered opinion like that.

10 Q. All right. You can set aside the '082
11 patent for now, although we will probably return to
12 it later.

13 And I would like to introduce a new exhibit
14 to the record. This is an exhibit labeled Google
15 Exhibit 1005.

16 (Whereupon, Stevenson Exhibit 1005 was marked for
17 identification.)

18 By MR. LAROQUE:

19 Q. It is a published US patent application
20 with the publication number US 2002/0030833 and it
21 lists Kuwata, et al., as inventors.

22 Do you have that document, Dr. Stevenson?

23 A. Yes, I do.

24 Q. And do you recognize this published patent
25 application?

1 A. Yes.

2 Q. And you've reviewed this and relied on it
3 in -- in your declaration, did you not?

4 A. Yes.

5 Q. All right. I would like you to turn in
6 your declaration, if you would, Exhibit 1003, to
7 paragraph 65. That is at -- starts at page 33.

8 A. Okay.

9 Q. And do you see here that you are describing
10 Kuwata Exhibit 1005?

11 A. Yes, in this section of the report I
12 attempted to describe it at a relatively high level
13 kind of the basic teachings of -- of that piece of
14 art.

15 Q. And do you see at paragraph 65 it starts --
16 of your declaration, Exhibit 1003, it starts,
17 "Kuwata, like the '082 patent, relates to processing
18 image data based on the control parameter values
19 obtained from the analyzed output control
20 information related to the image data."

21 Do you see that?

22 A. Yes.

23 Q. What do you mean here by "related to the
24 image data?"

25 A. Well it's the same sort of what we talked

1 about before about how, you know, in the '082 the
2 idea of attachment is building this association
3 between some control information and a particular
4 image. It's that same sort of concept that there is
5 some sort of association between these control
6 parameters and a particular set of image data
7 discussed in Kuwata.

8 Q. And if you go to the next
9 paragraph, paragraph 66, which starts at the top of
10 page 35, do you see it says, "Kuwata discloses the
11 DSC 22 is a type of image data generating apparatus
12 that generates image data GD and stores the image
13 data GD and output control information CI within one
14 image file GF."

15 That is what you said; right?

16 A. I see that sentence.

17 Q. And so image data and output control
18 information are stored in one file here in image
19 file GF?

20 A. In at least one of the embodiments
21 discussed in Kuwata.

22 Q. And that image file GF is stored on the
23 camera; correct?

24 MR. HIGH: Objection to form.

25 THE WITNESS: I think -- similar to the

1 reference I think within the, you know, the
2 teachings there's probably other places it could be
3 stored, but at least in terms of the paragraphs I
4 cite there, it's talking about the camera and so in
5 that embodiment disclosed -- or discussed in Kuwata
6 it's talking about a file stored on a camera.

7 By MR. LAROQUE:

8 Q. And that file, as also taught by Kuwata,
9 can be sent to or output to an output device like a
10 printer for printing or rendering?

11 A. It lists that sort of disclosure, yes.

12 Q. If you would look elsewhere in -- in
13 paragraph 66 you go on to describe some pre-set
14 conditions, pre-set output conditions?

15 Do you see that?

16 A. Yes.

17 Q. And then -- and then you say -- the
18 last sentence of the paragraph, "Like the '082
19 patent's imaging processing control data, Kuwata's
20 output control information CI is information for
21 controlling image processing at the output device."

22 Do you see that?

23 A. Yes.

24 Q. And so fair to say that is your
25 understanding of image processing control data in

1 the '082 patent, that it's information for
2 controlling image processing at the output device?

3 MR. HIGH: Objection. Form.

4 THE WITNESS: As I think I mentioned
5 before, I didn't try to, you know, form an opinion
6 about the entire scope of what the '082 might mean
7 by that phrase. What I'm saying here is that, you
8 know, this teaching is directly the same teaching as
9 what is referred to in the '082 and so it certainly
10 meets that limitation kind of no matter what the
11 definition is.

12 By MR. LAROQUE:

13 Q. All right. At paragraph 67, the next
14 paragraph, you describe Figure 7.

15 Do you see that?

16 A. Yes.

17 Q. And you say it shows the image processing
18 flow?

19 A. I see that phrase in the sentence.

20 Q. If you would take a look at Figure 7 in
21 Exhibit 1005. And this is an information processing
22 flow that is shown in Figure 7; right?

23 A. I don't know what you mean by information
24 processing flow.

25 Q. I'm sorry, an image processing flow is what

1 I meant to say.

2 MR. HIGH: Objection. Form.

3 THE WITNESS: Figure 7 is a flow chart that
4 shows the image processing flow at a digital still
5 camera related to a second related to the patent
6 obviously so it's one of the embodiments that is
7 discussing the embodiments of this Kuwata
8 reference.

9 By MR. LAROQUE:

10 Q. Okay. And these steps that are shown in
11 Figure 7 are performed on the camera; correct?

12 A. In this embodiment that is being discussed
13 here, yes.

14 Q. Okay. And the -- the end result coming out
15 of this information flow is this single file that
16 contains both the image data and the output control
17 information; right?

18 A. In this second embodiment of Kuwata the
19 output of the Figure 7 processing so, I mean, I
20 don't know if we want to go into all the details
21 but, you know, kind of the processing and what
22 information is put in the second embodiment is
23 discussed, you know, in column 7 starting in
24 paragraph 89 going through 92 of the Kuwata
25 reference. So it's discussing this for the second

1 embodiment, what these steps are doing and what sort
2 of information may end up in the file.

3 Q. And that information that ends up in the
4 file is this image data in this -- at this output
5 control information?

6 A. In the second embodiment I think there is
7 at least that information there.

8 Q. Okay. If you would go back to your
9 declaration at paragraph 69 which is at page 37.

10 A. Okay.

11 Q. And now you're describing Figure 10 in
12 Kuwata. And you say that Figure 10 depicts one
13 example of the flow of image processing of printer
14 24 when it receives the image file from either DSC
15 22 or the PC.

16 Do you see that?

17 A. Yes.

18 Q. All right. So -- so what Figure 10 is
19 describing is steps that are performed by the
20 printer; is that right?

21 A. In this embodiment, yes, it's talking about
22 a printer performing this particular -- these
23 particular steps shown in Figure 10.

24 Q. Okay. If you would look now in -- in
25 Kuwata at paragraph 81 and that is at page 18.

1 A. I'm at paragraph 81.

2 Q. And at the very -- in the last sentence of
3 paragraph 81 it says, "DSC 22 also includes select
4 and determine button 226 for selecting and setting
5 output control information CI."

6 Do you see that?

7 A. I see that sentence.

8 Q. So a user, according to Kuwata, can select
9 and set this output control information on the
10 camera?

11 A. It said some aspects of it I'm sure.

12 Q. And that output control information will
13 then be stored with the image data and -- and as we
14 saw described in Figure 7 of Kuwata; right?

15 A. I just want to make sure we're still
16 talking about the second embodiment since we jumped
17 to different parts of the patent here.

18 Q. Sure. Sure.

19 MR. HIGH: Counsel, while he is reviewing,
20 do you think we could take a break soon.

21 MR. LAROQUE: Yeah. We can -- we can take
22 a break in -- let me just finish up this line. It
23 will just be a couple minutes.

24 THE WITNESS: So it seems like we're
25 talking about a different embodiment here than we

1 were talking about two minutes ago. So since I
2 didn't understand that when you asked your -- asked
3 your question, maybe -- maybe you could re-ask your
4 question.

5 By MR. LAROQUE:

6 Q. Sure. So let's look again at that sentence
7 at the end of paragraph 81. It says, "DSC 22 also
8 includes select and determine button 226 for
9 selecting and setting output control information CI;
10 right?

11 A. Right. I see that sentence, yeah.

12 Q. And we just discussed that a user in this
13 embodiment can select and set this output control
14 information on the camera.

15 Do you remember that?

16 A. Yes.

17 Q. And as taught by Kuwata, that output
18 control information will then be stored with the
19 image data on the camera; right?

20 A. I think that idea is within the scope of
21 the teachings, you know, that someone of ordinary
22 skill in the art would understand having read
23 Kuwata. I'm not sure it is explicitly stated that
24 way -- as you have without rereading the patent.
25 The point is it's different embodiments and so I

1 would want to make sure, you know, that that flow
2 is, you know, explicitly, since I believe someone
3 would understand that is certainly a possibility but
4 I don't know if it explicitly states that.

5 Q. Well, let me -- let me just direct you to
6 the next paragraph of Kuwata, paragraph 82. And if
7 you see the first sentence there it says, "In
8 addition to image data GD, the DSC 22 used in this
9 image data output system 20 stores output control
10 information CI as an image file GF in storage device
11 225."

12 Do you see that?

13 A. I see that.

14 Q. And then it says, "Output control
15 information CI can be automatically stored in
16 storage device 225 as an image file GF together with
17 image data GD when obtaining image data GD by
18 setting in advance the output device planned for
19 output or by setting in advance any output
20 conditions on DSC 22 before shooting."

21 That's a long sentence, but do you see that
22 one?

23 A. Yes.

24 Q. Okay. So -- so does that -- does that help
25 you to answer my previous question which was the

1 last sentence of paragraph 81, the -- the teaching
2 there is that the output control information will be
3 stored with the image data on the camera?

4 A. That's one possibility taught by Kuwata.

5 Q. Okay. That output information that's
6 stored with the image data as taught by Kuwata and
7 understood by a person of ordinary skill in the art
8 would -- would be used by the printer or output
9 device for processing the image; is that -- that
10 fair?

11 MR. HIGH: Objection. Form.

12 THE WITNESS: It seems you are getting more
13 and more hypothetical with your questions. So, you
14 know, I'm -- I'm trying to follow along. But are
15 you asking is this -- does this disclose explicitly
16 by Kuwata or would someone skilled in the art
17 understand it could be used in that sort of
18 situation?

19 By MR. LAROQUE:

20 Q. Would some -- would a person skilled in the
21 art in view of Kuwata understand that it could be
22 used in that situation?

23 A. A person skilled in the art, you know,
24 reading Kuwata would understand that you could use
25 this selection button to select things, like we

1 talked before about processing modes, select
2 something like that. That would generate some
3 information that could be stored into a file and
4 then that could be utilized by a printer in
5 reproducing the image.

6 Q. So that output control information CI
7 that's stored with the image data GD as taught by
8 Kuwata, is that output control information specific
9 to that image data?

10 MR. HIGH: Objection. Form.

11 THE WITNESS: I'm not sure what you mean by
12 that. You know, it's the -- you know, based on the
13 settings of the camera and the options chosen by the
14 user, it is the information that the user chose to
15 associate with that image file. How unique it
16 is, it probably depends on a lot of things.

17 MR. LAROQUE: Okay. Let's take a break.
18 Can we take 10 minutes? Is that all right?

19 MR. HIGH: Sounds good.

20 MR. LAROQUE: Okay. Thank you.

21 COURT REPORTER: We're off the record.

22 (Recess.)

23 COURT REPORTER: All right. We are back on
24 the record. Proceed, Counsel.

25 By MR. LAROQUE:

1 Q. All right. Welcome back, Dr. Stevenson.
2 We were talking -- before the break we were
3 looking at your declaration and some of your
4 discussion of the Kuwata reference.

5 Do you remember that?

6 A. Yes.

7 Q. Let's continue with that.

8 And if you would look in your
9 declaration, Exhibit 1003, at -- at paragraph 66?

10 A. I'm there.

11 Q. And you say in the second sentence -- you
12 say, "This output control information CI includes
13 user-selected output conditions selected from a menu
14 of preset output conditions stored in memory within
15 control circuit 224 of DSC 22."

16 Do you see that?

17 A. Yes.

18 Q. So you are referring in this sentence to
19 both output control information and output
20 conditions; correct?

21 MR. HIGH: Objection. Form.

22 THE WITNESS: I guess I see both of those
23 phrases in the -- in that sentence.

24 By MR. LAROQUE:

25 Q. And do you have an understanding of the

1 relationship between output control information and
2 output conditions?

3 A. So I think paragraph 84 gives a fairly
4 clear understanding of what the -- Kuwata means by
5 output conditions. It reads, "Output conditions
6 means output conditions set by the user on a digital
7 still camera 22 and is information set as a user
8 chooses, such as gamma value, target color space,
9 contrast, and sharpness.

10 Q. Okay.

11 A. So those are the output conditions that a
12 user may set, you know, specific to a particular
13 situation they are in.

14 And then I don't find quite as clear as the
15 definition but I think the output control
16 information CI is what's discussed within Kuwata as
17 that information that is -- that -- that is sent
18 across to something like, for example, a printer.
19 So it may include some of these settings that are
20 output conditions.

21 Q. And so you mentioned after you read
22 paragraph 84 that the output conditions are set by
23 the user and -- and I believe you said that they
24 could be specific to a situation?

25 MR. HIGH: Objection. Form.

1 THE WITNESS: Well, that's one way to
2 look -- they don't have to necessarily be set by a
3 user but that's one thing that's being discussed
4 here in the paragraphs we are pointing to. I don't
5 think they necessarily all have to be set by a user,
6 that's not a -- what makes it an output condition.
7 It's just these sort of settings that we would have
8 that could be, you know, particular to a particular
9 situation depending on the printer, depending on the
10 capture information, depending on what sort of, you
11 know, details you want to pull out.

12 By MR. LAROQUE:

13 Q. Could those situations be something like
14 portrait mode, for example?

15 A. I mean that could be an example of a sort
16 of situation where you might want to adjust some of
17 these output conditions, yes.

18 Q. And you mentioned that the -- these output
19 conditions include gamma value, target color
20 space, contrast, and sharpness; right?

21 MR. HIGH: Objection. Form.

22 THE WITNESS: Those are the examples
23 specifically provided in paragraph 84. I don't
24 think it's limited to those things.

25 By MR. LAROQUE:

1 Q. When we were looking earlier at the '082
2 patent, we talked about gamma value.

3 Do you remember that?

4 A. Yes.

5 Q. We talked about how gamma value is a
6 property of -- of an image.

7 Do you remember that?

8 A. I don't know if I said it was a property of
9 the image.

10 Q. Do you -- is gamma value a property of --
11 of an image?

12 A. The -- the gamma value is a number that is
13 associated with a particular function which is
14 called a gamma tonal curve. You can associate that
15 such -- those -- that information with a particular
16 image.

17 Q. How about contrast, is that a property of
18 an image?

19 A. You have to be a little bit careful because
20 in different contexts the word contrast by itself
21 can be a property but it's also sometimes just
22 referred to as a control setting. So in that case a
23 control setting is not a property of the image. So
24 that word is a little bit -- used in different
25 contexts I guess.

1 Q. But -- but it can be a property of -- of an
2 image.

3 A. When we talk about particular set images,
4 the contrast is, you know, the relationship between
5 the various parts of the image and the darkest parts
6 of the image, that's what we refer to as contrast.

7 Q. What about sharpness? We didn't talk about
8 sharpness earlier. Do you know what that is?

9 A. Yes.

10 Q. And what -- what is sharpness?

11 A. It's a -- you would say it's a -- it's a --
12 it's the perceived how -- how sharp -- you know, I'm
13 trying to use the word but it's -- it's -- you know,
14 the -- it's how the image looks to a user that users
15 generally use in terms of how, you know, kind of
16 crisp the edges are, things like that. That's kind
17 of the idea. And it's a setting we can -- by some
18 processing we can make an image appear sharper than,
19 you know, more crisp than it was originally or less
20 depending on, you know, what we want.

21 Q. So like contrast, is it fair to say that
22 sharpness can be a setting and can also be a
23 property of an image?

24 A. Certainly I have seen it used a lot as a
25 setting, you know, adjustment, you can adjust the

1 sharpness up or down type of -- I have seen it used
2 many, many times that way. I imagine someone has
3 come up with some sort of a measure of sharpness
4 that they might have out there but I think that's
5 probably not as well adopted you might say as like
6 the idea of contrast.

7 Q. Understood. How about target color space?
8 Do you -- do you know what that means?

9 A. Certainly. We talked about color space
10 before and it stills means what it did last time we
11 talked about it. The idea of a target here is just
12 the idea of, you know, what -- how we want to format
13 the data, what are we heading towards? Do we want
14 it in XYZ? I think that is all that's trying to be
15 expressed there.

16 Q. So what color space do we want the data to
17 be in?

18 A. Something along those lines. I would have
19 to look exactly how they are used throughout the --
20 throughout the reference but that's the way I would
21 take that term.

22 Q. So these examples, are -- are these --
23 these are similar to the parameters that we talked
24 about in -- in the PIM of the '082; right?

25 A. I recall us talking about gamma. I don't

1 know if we talked about -- I don't recall the other
2 ones we talked about specifically. I know there was
3 a sentence there so if you could refer to me to the
4 sentence maybe I could verify.

5 Q. Well let me ask a different question.

6 Do you -- in your opinion, would a person
7 of ordinary skill in the art reading about these
8 output conditions in Kuwata in -- in 2002, would
9 they have understood Kuwata to be describing a
10 PIM?

11 MR. HIGH: Objection. Form.

12 THE WITNESS: They would understand that
13 this sort of -- this type of information could be
14 stored in a PIM. I don't know if they would be
15 thinking that this person was referring to a PIM. A
16 PIM is used, as far as I recall, only in very
17 specific situations.

18 By MR. LAROQUE:

19 Q. Would they have understood that gamma
20 value, target color space, contrast, and sharpness
21 could be stored in a PIM?

22 A. Sorry. Just to be clear, when -- when you
23 were using the word PIM, I am going to think about
24 the -- and maybe this is not what I said before so
25 that's why I'm trying to be clear. When you use the

1 word PIM, I'm thinking about the specific thing that
2 the industry knew as PIM. Like I said, I believe it
3 was from Epson, that particular structure. You
4 know, I know we kind of equated that before in terms
5 of in this broader concept of using the patent which
6 was image processing control data.

7 You know, if -- if you're asking your
8 questions in terms of would a person of
9 understanding in this stuff be understanding this
10 could be image processing control information, yes,
11 I think they would understand that they are talking
12 about image processing control information as that
13 term is used in the '082. I don't know if they
14 would be thinking about the specifics of a PIM as
15 used by, I believe, Epson.

16 Q. Okay.

17 A. Hopefully that's clear.

18 Q. It is. Thank you.

19 All right. I would like to introduce
20 another exhibit. This is Exhibit 1006. Let me find
21 my copy of it.

22 (Whereupon, Stevenson Exhibit 1006 was marked for
23 identification.)

24 By MR. LAROQUE:

25 Q. This is labeled already Google Exhibit 1006

1 in the footer. It is another published US patent
2 application. Was published -- excuse me,
3 publication number US 2001/0025303 and it lists as
4 inventor Fisher, et al.

5 Do you have a copy of this
6 exhibit, Dr. Stevenson?

7 A. I do except it doesn't have a footer as you
8 suggested but I think otherwise it looks similar.

9 Q. But the publication number matches.

10 A. Yes.

11 Q. And you've seen this exhibit before?

12 A. Yes.

13 Q. You've reviewed and relied on this exhibit
14 in your declaration as part of your declaration;
15 correct?

16 A. Yes.

17 Q. All right. And if you would turn in
18 this -- actually, if you would turn in your
19 declaration, Exhibit 1003, to paragraph 73.

20 A. Okay.

21 Q. And you are in this section of your
22 declaration describing this Fisher reference;
23 correct?

24 A. Yes. Yes. So this would be where I first
25 talk about and give a -- kind of a high overview of

1 what the disclosure of Fisher contains.

2 Q. And at paragraph 73 you say, "The ancillary
3 data module 416 includes a download manager 512. It
4 may access various --

5 A. Sorry. Sorry. That -- you said 5 --
6 auxiliary manager 512. I don't see that.

7 Q. Okay. Sorry. It's -- it's -- it's not the
8 first sentence, it's the second sentence.

9 A. Oh, okay.

10 Q. Yeah. So I pointed you to the wrong place.
11 But I'll go ahead and read it again.

12 "The ancillary data module 416 includes a
13 download manager 512 that may access various
14 ancillary data files 418 from a location like an
15 Internet server and responsively identify and store
16 the downloaded ancillary data files 418 into memory
17 [346] of camera device 110."

18 Do you see that?

19 A. Yes.

20 Q. And I'm wondering what you mean by the term
21 "responsively identify" there?

22 MR. HIGH: Objection. Form.

23 THE WITNESS: Well I'm quoting Fisher so
24 I'm using the term as -- as he used it in that
25 context.

1 By MR. LAROQUE:

2 Q. And do you have an understanding of what --
3 what a person of ordinary skill in the art reading
4 Fisher would have understood that term to mean?

5 A. That -- that -- the quote I'm using comes
6 from paragraph 37. It looks like to be the last
7 part of that paragraph which is talking about Figure
8 5 and it's talking about the operation of this
9 auxiliary data manager. So it's talking about a
10 particular type of operation that -- that in this
11 embodiment software is able to do.

12 Q. And Fisher uses the term "responsively
13 identify" here; right, download manager may then
14 responsively identify. And I'm wondering, do you
15 have an understanding of what that identification
16 is -- is responsive to?

17 A. I mean I would have to probably reread
18 Fisher to give you a complete answer, and I never
19 tried to identify exactly all the ways that Fisher
20 may responsively identify. You know, without
21 rereading it, I recall a discussion of a descriptor
22 and using the descriptor information to decide what
23 the download and what -- you know was put into the
24 system. But I believe there is other -- other ideas
25 also expressed in Fisher.

1 Q. Let's talk about those descriptors that you
2 just mentioned. If you look in Fisher at Exhibit
3 1006 at paragraph 49. Let me know when you're
4 there.

5 A. I'm there.

6 Q. And it says, "In the Figure 7 embodiment,
7 ancillary data files 418 preferably may include
8 individual sets of data 1," and there's a number
9 associated with that, it's "(714(a)) through
10 N," which is "(714(c)), that each preferably
11 corresponds with a specific type of ancillary data."

12 Do you see that?

13 A. Yes.

14 Q. And then it goes on to say, "In the Figure
15 7 embodiment, ancillary data files 418 may
16 preferably also include a descriptor 1," that has
17 the number "(712(a)) through a descriptor N," that
18 has the number "(712(c)) that are each preferably
19 associated with a different respective set of data
20 714."

21 Do you see that?

22 A. Yes.

23 Q. So if you would turn now to Figure 7 of
24 Fisher which is at page 8.

25 A. I'm there.

1 Q. Okay. Do you see at the top there is --
2 there is -- there's a series of boxes here and at
3 the top there is a box with the label "Ancillary
4 Data Files?"

5 A. Yes.

6 Q. And do you see below that box Ancillary
7 Data Files there are two boxes. On the left side
8 there is "Descriptor 1" and on the right side there
9 is "Data 1?"

10 A. Yes.

11 Q. So as -- as described by Fisher at the
12 paragraph that we just read, Descriptor 1 with the
13 number 712(a) is associated with Data 1 with the
14 number 714(a)?

15 A. I think that paragraph refers -- uses --
16 refers to the relationship as corresponds, but I
17 view that as kind of the same sort of way I was
18 using the word associated before.

19 Q. Okay. So the ancillary data file,
20 ancillary data file 1 would consist here of
21 descriptor 1 and data 1; is that right?

22 MR. HIGH: Objection. Form.

23 THE WITNESS: So you're saying your -- your
24 question saying that, you know, what Fisher is
25 saying is that those -- those two types of

1 information all have to be in the same file? Is
2 that what your question is?

3 By MR. LAROQUE:

4 Q. My question is, are those two types of
5 information part of the ancillary data file?

6 A. Which ancillary data file? There is --
7 there is potentially lots of data files ancillary
8 data files.

9 Q. So let's -- let's -- let's look -- let's
10 focus on Figure 7 then and the first row below that
11 Ancillary Data Files heading? Again, it says
12 Descriptor 1 and Data 1; right?

13 A. Yes.

14 Q. So do you understand those two boxes to be
15 describing an ancillary data file?

16 A. Just one ancillary data file.

17 Q. Correct. Just one ancillary data file?

18 A. I don't see anything that says it has to be
19 in a single -- those two pieces of information have
20 to be in the same file. I think that would be --
21 someone could understand that they could be. I
22 don't think they -- I don't see where it says that
23 they have to be or they should be.

24 Q. Do you know whether Fisher discloses
25 those -- those pieces of information, the descriptor

1 and the data, say descriptor 1 and data 1 in Figure
2 7, as being in separate files?

3 A. I don't recall one way or the other. I
4 hadn't thought about that question, whether they had
5 to be in the same file or -- or not until you asked
6 it. So I would have to reread Fisher to answer your
7 question I guess.

8 Q. So let me take a step back. If we go back
9 to paragraph 49 of Fisher and we look again at the
10 last sentence there, it says, "In the Figure 7
11 embodiment, ancillary data files 418 may preferably
12 also include a descriptor 1 (712(a)) through
13 descriptor N (712(c)) that are each preferably
14 associated with a different respective set of data
15 714;" right? We looked at that earlier.

16 A. Yes.

17 Q. And so it says that the ancillary data
18 files may preferably include a descriptor;
19 correct?

20 A. Right. And that's why I answered my
21 question the way -- your previous question the way I
22 did. That's an idea, that's an embodiment that they
23 could be in the same file. I don't see where
24 they -- it says it has to be.

25 Q. Okay.

1 A. That's the way I took the question.

2 Q. Okay. Let's -- if you would look at
3 paragraph 41 of Fisher which is on the previous
4 page, page 12. Let me know when you're there.

5 A. I'm there.

6 Q. And that paragraph says, "Referring now to
7 Figure 6, a block diagram for one embodiment of the
8 Figure 3 I/O interface(s) 348 is shown in accordance
9 with the present invention."

10 Do you see that?

11 A. Yes. Let me just get to Figure 6 so I can
12 see what it's referring to.

13 Q. Sure. Yep. And that's where I'm going
14 next.

15 A. Okay. I'm at Figure 6.

16 Q. Okay. And do you see in -- in Figure 6
17 there is a 628 is -- is one of the features, if you
18 will, in the figure and that's labeled "Printer?"

19 A. I see that.

20 Q. Okay. So with that in mind, if we go back
21 to paragraph 41. And that paragraph goes on to say
22 at the second sentence, "In the Figure 6 embodiment,
23 I/O interface 348 preferably may communicate with
24 various input or output entities that may include
25 but are not limited to networks 612, a host computer

1 616, a printer 628, wireless communication
2 632, removable storage media 638, and a user
3 interface 640."

4 Do you see that?

5 A. Yes.

6 Q. So that refers in that paragraph to printer
7 628; right?

8 A. Amongst other things, yes.

9 Q. Are you aware of any other disclosure in
10 Fisher of a printer?

11 A. I would have to reread Fisher. I don't
12 have it memorized that way.

13 Q. All right. But sitting here right now
14 you're not aware of a specific instance?

15 A. I didn't try to memorize all the references
16 to printer so I would just reread the patent.

17 Q. Understood. I want to circle briefly back
18 to our discussion earlier of -- of ancillary data
19 files. And we were talking about -- let me get back
20 there. We were talking about Figure 7 of -- of
21 Fisher. And I'm wondering, as taught by
22 Fisher, does an ancillary data file have to include
23 both data and a descriptor?

24 MR. HIGH: Objection. Form.

25 THE WITNESS: As we discussed before, that

1 was a preferred embodiment discussed in paragraph
2 49. You know, without rereading the patent, I don't
3 think I could answer your question to say does it --
4 just because it uses the word preferably, I would
5 say no, but maybe there is some other disclosure
6 within Fisher that says that but I would have to
7 look for that, I guess.

8 By MR. LAROQUE:

9 Q. Okay. But you're not aware of a disclosure
10 in Fisher that says that an ancillary -- that an
11 ancillary data file has to include a descriptor.

12 MR. HIGH: Objection. Form.

13 THE WITNESS: Someone reading Fisher I
14 would -- I believe -- well my opinion would -- would
15 understand, you know, based on like paragraph 49
16 that it's an embodiment and a preferred embodiment
17 of the inventor to have it in one file, but at least
18 there I don't see any restriction of it having to be
19 in that file or someplace else.

20 By MR. LAROQUE:

21 Q. But you said a person of ordinary skill in
22 the art would understand that as an embodiment that
23 it's in one file. My question is a little bit
24 different.

25 Would a person of ordinary skill in the art

1 understand that there has to be a descriptor
2 associated with the data at all in an ancillary data
3 file?

4 MR. HIGH: Objection. Form.

5 THE WITNESS: Well, I -- sorry, you kind of
6 confused two concepts a little bit. You used the
7 word associated, which I view as broader than
8 something that's in a file.

9 MR. LAROQUE: Uh-huh.

10 THE WITNESS: And then you kind of limit it
11 at the end with the word in a file.

12 By MR. LAROQUE:

13 Q. I can ask it differently to -- to -- I
14 think I can clear up that confusion.

15 Would a person of ordinary skill in the art
16 reading Fisher understand that -- that the data in
17 an ancillary data file has to have a descriptor
18 associated with it somewhere or would a person of
19 ordinary skill in the art understand that -- that
20 you may not need a descriptor associated with the
21 data at all?

22 MR. HIGH: Objection. Form.

23 THE WITNESS: Certainly I recall from the
24 teachings of Fisher that, you know, that it
25 definitely teaches this idea that having this data

1 files and associated file descriptor. Whether they
2 also -- because that is what I relied on to form
3 part of my opinion. Whether it also teaches this
4 other concept of whether you don't have to have a
5 descriptor at all, I would have to probably reread
6 Fisher since I didn't rely on that and I don't -- I
7 don't recall. I would just have to look at Fisher
8 again.

9 By MR. LAROQUE:

10 Q. Okay. If you would turn in Fisher to
11 paragraph 33 which is at page 12.

12 A. Okay.

13 Q. And paragraph 33 says -- the second
14 sentence says, "In accordance with the present
15 invention, ancillary data module 416 may preferably
16 control and coordinate ancillary data management
17 procedures to download various types of ancillary
18 data from various external data sources and camera
19 device 110."

20 Do you see that?

21 A. Yes.

22 Q. And then it concludes, "The operation and
23 functionality of ancillary data module 416 is
24 further discussed below in conjunction with Figures
25 5 through 8."

1 Do you see that?

2 A. Yes.

3 Q. So if you would turn to Figure 5 of Fisher
4 which is at page 6. And do you see a stack of boxes
5 here and the top most box is labeled "Ancillary Data
6 Module?"

7 A. Yes.

8 Q. So do you understand this -- this figure to
9 be of a schematic diagram, if you will, of the
10 ancillary data module?

11 A. I'm not sure what you mean by "schematic
12 diagram." You know, it's described as a block
13 diagram for embodiment of an ancillary data module
14 in accordance with the present invention.

15 Q. That's -- that's fair.

16 Do you see 512 is a box there and that's
17 labeled "Download Manager?"

18 A. Yes.

19 Q. So what's your understanding of the purpose
20 of the download manager as taught by Fisher?

21 A. So in paragraph 37 of Fisher -- he ex- --
22 the inventors explained that a "Download manager 512
23 preferably may coordinate the accessing, selecting,
24 downloading, analyzing, and storing of various types
25 of" auxiliary "data files 418 from any appropriate

1 data source." So that is kind of a high level view
2 of what 512 is.

3 Q. Okay. So -- so 512 can coordinate, access,
4 select, download, analyze, and store different
5 ancillary data files from -- from a data source; is
6 that right?

7 A. That's how this embodiment of Fisher
8 discusses 512.

9 Q. And an appropriate data source, let's use
10 the wording used by Fisher here, could that be a
11 location on the Internet?

12 A. I think I would give that particular
13 example. And then in the next sentence, yes. And
14 in the next sentence it says, "For example, download
15 manager 416 may access various" auxiliary "data
16 files 418 from a location or service on a
17 distributed computer network such as the Internet.

18 Q. Okay. And the next sentence
19 says, "Download manager 512 may then responsively
20 identify and store the downloaded ancillary data
21 files 418 into memory 116 of camera device 110."

22 Do you see that?

23 A. I see that sentence, yes.

24 Q. And so another thing that the download
25 manager can do is identify and store a downloaded

1 ancillary data file in memory on the camera?

2 A. In this particular embodiment, that's how
3 this particular block has described some of the
4 functionality that is described as what it can do.

5 Q. Are you aware of any disclosure in Fisher
6 of uploading ancillary data files from the camera to
7 another location?

8 MR. HIGH: Objection. Form.

9 THE WITNESS: I don't -- it doesn't appear
10 I relied on Fisher for any sort of uploading that I
11 could find. I was looking for my declaration to see
12 if I can find where I might refer to it. So I don't
13 rely on Fisher for uploading. So without rereading
14 Fisher, I don't know if I would be able to answer
15 your question.

16 By MR. LAROQUE:

17 Q. Okay. You're not aware of any specific
18 instances sitting there right now where Fisher
19 discloses uploading ancillary data files?

20 A. I don't see where I -- if there is
21 someplace where I rely on it in my declaration that
22 might help me find some reference for you, you know,
23 it's either in my declaration or it's not.
24 Outside -- outside of that context, I don't think
25 I -- I certainly didn't look at the -- you know, I

1 don't recall without, you know, rereading Fisher
2 whether there is any reference to uploading of the
3 auxiliary data.

4 Q. Okay. You can set aside Fisher for now.
5 And I'm going to bring in another exhibit here.
6 It's stamped Google Exhibit 1007.

7 (Whereupon, Stevenson Exhibit 1007 was marked for
8 identification.)

9 By MR. LAROQUE:

10 Q. And it is US Patent No. 6,788,305 with
11 inventor Ohga, O-h-g-a.

12 Do you have this document, Dr. Stevenson?

13 A. Yes.

14 Q. Do you recognize this document?

15 A. Yes.

16 Q. This is a patent that you reviewed and --
17 and relied on in forming the opinions in your
18 declaration; correct?

19 A. Yes.

20 Q. I would like you to -- excuse me -- turn to
21 column 3 of Exhibit 1007 and specifically at line 6.
22 Let me know when you're there.

23 A. Okay.

24 Q. It says, "Figure 4 is a view for explaining
25 the flow of data in this embodiment. Reference

1 symbol J1 denotes, e.g., image data stored in the
2 WWW server S1."

3 Do you see that?

4 A. Yes.

5 Q. It goes on to describe the image data. And
6 then it says, "An input profile P1 of the device
7 that inputs the image data J1 is also stored in,
8 e.g., WWW server S1."

9 Do you see that?

10 A. Yes.

11 Q. So it describes this input profile P1, and
12 that's the input profile of the device that inputs
13 the image data; is that right?

14 A. Yes. It's described in that last sentence
15 of paragraph that we've been looking at.

16 Q. And that input device could be a digital
17 still camera, a DSC, for example?

18 A. That's one of the examples it gives.

19 Q. It could be a video camera or an image
20 scanner?

21 A. Those are two of the other examples it
22 gives.

23 Q. All right. If you go on down paragraph --
24 I'm sorry -- column 3 to line -- about line 41 in
25 the middle of the paragraph. And it starts "More

1 specifically."

2 Do you see that?

3 A. I see that.

4 Q. It says, "More specifically, a designated
5 one of a plurality of profiles on the WWW server S1
6 is downloaded in accordance with the designation of
7 the input profile on the HTML document H1 in step
8 S42."

9 Do you see that?

10 A. Yes.

11 Q. And then it says, "The format of the
12 profile matches or complies with that specified by
13 international color consortium (ICC.)"

14 Do you see that?

15 A. Yes.

16 Q. Okay. So this paragraph is describing in
17 part how the input profile is downloaded from the
18 server?

19 A. That's part of it -- what this paragraph
20 describes. It describes other things.

21 Q. Okay. And it says the input profile
22 matches or complies with that specified by ICC. So
23 if I call that profile an ICC profile, will -- will
24 you understand what I'm talking about?

25 A. Are you talking about specifically the

1 specifications issued by that organization?

2 Q. Yes, I am.

3 A. Okay. So I understand what an ICC file is
4 and, you know, what sort of information or similar
5 information that it can contain.

6 Q. So let's talk about that a little bit more.
7 What is your understanding of what an ICC profile
8 is?

9 A. It's a data file. Well, let me start with
10 the International Color Consortium. That is an
11 organization that has tried to -- I believe it was
12 set up by a couple companies that were trying to
13 coordinate transfer color information. I think the
14 website is color.org for the organization, if I
15 remember correctly. And they have been -- you know,
16 back when I was kind of very closely doing this work
17 with Apple in the early '90s or mid '90s, you know,
18 they were one of the ones that kind of were
19 outputting -- had specifications about what sort of
20 information you want to have into -- in a -- that
21 you want to profile about an input or an output
22 device and it came up with this file structure.
23 And, you know, the file names have a .ICC at the
24 end.

25 And there is a series of specifications

1 dating back to the -- I don't know when the first
2 one is but it's certainly in the '90s at some point
3 and is still used today. So there is at least four
4 or five different levels of specification they have.
5 You know, and then, you know, there is one from this
6 time frame probably the most relevant that you can
7 look at and they have specification, it has all
8 sorts of information about what can be in one of
9 those files, but it certainly has things about color
10 spaces and how to represent colors in various color
11 spaces, things like gamma values will be in it and
12 things like that.

13 Q. And you recall you mentioned these -- these
14 couple of companies that -- that got ICC started.
15 Do you recall if there was a particular problem that
16 they were trying to solve with -- with these ICC
17 profiles?

18 A. Well there was this problem I talked about
19 before that, you know, when I was working with Apple
20 and I was kind of realizing in the industry that it
21 didn't take anyone, you know, long to realize you
22 take a random camera and you put -- output that on a
23 display or a printer and it just looked different
24 color-wise in the early '90s and '80s. And so how
25 to -- how to coordinate all that information given

1 you had all these different manufacturers of cameras
2 and printers and display systems and other input and
3 output devices, there needed to be some coordination
4 of how to describe color.

5 And so I don't know if that is their only,
6 you know, objective of that organization but that
7 certainly was my -- my interaction was mostly around
8 that part of it.

9 Q. Okay. And you said when -- when you would
10 look at one of these images on -- on an output
11 device that it would -- it would look different, I
12 think is what you said.

13 A. Yeah. Back in, you know, before this
14 problem started to be addressed in the '80s, just
15 the -- what you saw on the screen or what you
16 captured and what you outputted could look
17 drastically different just color-wise and tonal-wise
18 and that was not desirable at all.

19 Q. Okay.

20 A. So there was a process of -- a fairly, you
21 know, hard process you might say of color
22 calibrating that we were doing at that time frame in
23 order to get good looking images and, you know,
24 there was a lot of incentive in the -- in the kind
25 of industrial space to automate that for the average

1 user.

2 Q. You mentioned that these ICC profiles have
3 a .ICC file extension?

4 A. Yeah, I mean I'm not sure that is the only
5 thing they can have, but certainly the ones I
6 remember using back then had that extension.

7 Q. And so have you actually worked directly
8 with these color profiles in -- in your
9 experience?

10 A. Yes, certainly.

11 Q. Can you tell me a little bit about the work
12 that -- that you did with these profiles?

13 A. You know, I was mostly a user of the
14 profiles. I was -- you know, at the time as I
15 mentioned I was working with Apple and focused on,
16 you know, I say their product line how to -- how
17 to -- how to coordinate all that information, you
18 might say, so that, you know, you took a -- you
19 scanned in on an Apple scanner and you printed on an
20 Apple printer you wanted the image to look good,
21 right.

22 And so now Apple -- someone came up with a
23 different solution called ColorSync at the time but,
24 you know, kind of the -- the way that was, say, done
25 by the more professionals was with the ICC profiles

1 so I was using those profiles in that time frame a
2 fair amount in order to compare how well we were
3 doing with the ColorSync algorithms.

4 Q. Okay. Do you recall what the file format
5 is for these ICC profiles?

6 A. I -- I -- I don't try to memorize that
7 information. It's fairly complex. I just -- any
8 question about that I would just refer you to the
9 specification because the specification puts it all
10 out there and they are meant to be pretty open so
11 everyone understands what they are so they are
12 pretty descriptive.

13 Q. Okay. So is it fair to say that they
14 are -- they are pretty specialized?

15 MR. HIGH: Objection. Form.

16 THE WITNESS: I'm not sure what you mean by
17 "specialized."

18 By MR. LAROQUE:

19 Q. Well, are they -- are they specific to
20 this -- this color matching goal that you were
21 talking about?

22 A. Well, they certainly could be used for
23 other things. That was certainly, you know, the way
24 I was -- you know, the problem I was focused on and
25 why I was most familiar with them in that time

1 frame. But you could -- you could use them for
2 other things certainly.

3 Q. Okay. Do you have any recollection of what
4 those other things would be?

5 A. If you wanted to just say if you wanted to
6 compare some input devices and see what sort of
7 colors they could capture, you could look at their
8 ICC profiles and understand what they -- you know,
9 what they at least claim they were capturing within
10 the profile.

11 Q. Would it have information about the color
12 space for -- for the device?

13 A. Yeah, typically.

14 Q. All right.

15 A. I don't know what was required, you know,
16 but certainly the ones I looked at most certainly
17 had it.

18 Q. If you go back to Exhibit 1007 and if we go
19 on top the next paragraph still in column 3.

20 A. I'm sorry. Okay. Yeah. All right. Still
21 in column 3. Okay.

22 Q. Yeah. And I'm looking at line 48 starting
23 "In STEP S43."

24 A. Okay.

25 Q. It says, "In step S43, a profile of, e.g.,

1 a monitor connected to the client computer is
2 acquired by one of the following methods. The
3 obtained profile was passed to the CMM program M1."

4 Do you see that?

5 A. Yes.

6 Q. Do you understand that that obtained
7 profile is also an ICC profile like we've been
8 discussing?

9 A. I think -- yeah, I think that is certainly
10 a possibility. I don't know if it's required to be
11 an ICC profile.

12 Q. Is that profile the profile of -- of -- in
13 this embodiment as described the profile of the
14 monitor that is connected to the client computer?

15 A. I think that's the -- you know, the -- the
16 example that's talked about in this paragraph that
17 starts at 48. It starts with a profile of, for
18 example, a monitor. So I think that's kind of what
19 that paragraph is talking about. I don't think
20 that's -- in the context of the teachings it's not
21 limited to a monitor but that paragraph is talking
22 about a profile of a monitor.

23 Q. Okay. And is that profile specific to the
24 monitor? Does it specifically describe properties
25 of that monitor?

1 A. You know, it depends. There is some
2 monitors that basically would provide with you a
3 very specific color profile for it, and so in some
4 cases it would be, but there are other monitors
5 that, you know, probably weren't as careful about
6 things and they would just use some more generic
7 profile information and so in that case it wasn't
8 specific to a particular monitor.

9 Q. Okay. But those -- those monitors that
10 might use more generic information, the output
11 profile that they would use would still describe
12 properties of that monitor; correct?

13 MR. HIGH: Objection. Form.

14 THE WITNESS: It would describe some of the
15 properties. Probably not as much as one that was
16 specifically designed by a monitor manufacturer and
17 probably not as accurate, but it would typically
18 still have some properties certainly.

19 By MR. LAROQUE:

20 Q. Do you know if you were to say -- if you
21 were to, say, buy a new monitor, a different brand,
22 let's say, a different kind of monitor, and perform
23 this same step again that's disclosed by -- by
24 Ohga, would you need to download a different profile
25 that corresponds to that new monitor?

1 A. Are we talking back in 2002?

2 Q. Correct.

3 A. You know, these monitors worked without
4 worrying about the color and you could certainly use
5 a monitor off the shelf without doing what's
6 discussed within something like Ohga. This was
7 about doing better, right, trying to get things to,
8 you know, match up and -- and -- and look more like
9 the person who captured the image intended. In that
10 case, certainly that time frame I was downloading
11 monitor profiles regularly. Sometimes they were
12 shipped on CDs that came with the monitors. So
13 there is various ways you can acquire them.

14 MR. LAROQUE: I do have a few more
15 questions but we have been going another hour.
16 Should we -- should we take another short break; is
17 that okay?

18 THE WITNESS: Sure. Sounds good.

19 MR. LAROQUE: All right. Thank you.

20 COURT REPORTER: We're off the record.

21 (Recess.)

22 COURT REPORTER: We're back on the record.
23 Please proceed.

24 By MR. LAROQUE:

25 Q. Hi. Welcome back, Dr. Stevenson.

1 Before the break you mentioned that you had
2 some prior experience working with ICC profiles for
3 monitors.

4 Do you recall that?

5 A. Amongst other things, but yes, I worked
6 with monitors.

7 Q. And you mentioned at least one way of -- of
8 getting these ICC profiles that sometimes I think
9 you said they would be shipped on -- on -- the ICC
10 profile would be shipped on a CD with the monitor.

11 Do you remember that?

12 A. Yes.

13 Q. Do you remember any of the other ways that
14 you would obtain an ICC profile for a monitor?

15 A. I -- I haven't done the research to know
16 when I did various things. I know I downloaded them
17 off the Internet at times. I would think by 2002 I
18 was probably doing that. You know, sometimes
19 because of the community I was working in people
20 would email them to me. So, you know, and I got
21 them that way also.

22 Q. You recall when you would download them
23 from the Internet, for example, you -- you had to --
24 you had to know what kind of monitor you were using
25 in order to figure out what the right ICC profile to

1 download was; correct?

2 A. Well, the -- again, I haven't done the
3 looking at exactly when these steps -- you know,
4 when these things came about. You know, you're
5 pulling on 20 year old memories, right --

6 Q. I understand.

7 A. -- I haven't thought about since then. I
8 know at times, you know, it was fairly -- I recall
9 at times where I would, you know, run a set-up
10 program that was provided on a CD but then it would
11 offer the option of updating, you know, information
12 like that the profile -- the color profiles and so
13 it would go off to the Internet and -- and -- and
14 get that information that way. So that -- that --
15 that -- in that case I did not need to know anything
16 about the monitor, the installation software had
17 figured that all out.

18 Q. But the profiles that the installation
19 software would go and get off the Internet were the
20 profiles that were appropriate for that monitor; is
21 that fair?

22 A. Whatever the manufacturer felt was the most
23 appropriate profile was -- you know, was directed by
24 the manufacturer.

25 Q. That would be specified --

1 A. In that example, yeah.

2 Q. That would be specified in advance by the
3 manufacturer.

4 MR. HIGH: Objection. Form.

5 THE WITNESS: Yeah, I don't -- I'm not sure
6 I know all the options that were available, you
7 know, whether you could do that or not or do
8 anything else.

9 By MR. LAROQUE:

10 Q. Do you -- do you recall downloading --
11 specifically recall downloading these profiles
12 yourself from the Internet?

13 MR. HIGH: Objection. Form.

14 THE WITNESS: Yeah, I know I have gone out
15 and, you know, there is times in that time frame
16 where I was interested in monitors I may necessarily
17 had not even purchased and I was interested in
18 understanding some aspects of them so I don't, I
19 think, like get profiles that way that were
20 associated with them.

21 By MR. LAROQUE:

22 Q. Okay. If you would go to -- back to
23 Exhibit 1007, the Ohga patent, and if you would look
24 again at column 3 at the bottom toward the bottom
25 starting around line 50?

1 A. Okay.

2 Q. And actually, let's back up and -- and look
3 at a passage that we read earlier but starting
4 around like 47 it says, "In step S43, a profile of,
5 e.g., a monitor connected to the client computer is
6 acquired by one of the following methods."

7 Do you see that?

8 A. No, I don't see that.

9 Q. I'm sorry. So column 3 starting around
10 line 47, 48 starts "In step S43?"

11 A. Oh, I thought you told me to go back a
12 paragraph. Sorry.

13 Q. Oh, no. Yeah.

14 A. Oh, okay. Okay. Okay. I think I'm in the
15 right spot now. So starting at line 47.

16 Q. Yeah. It says, "In step S43, a profile of,
17 e.g., a monitor connected to the client computer is
18 acquired by one of the following methods;" right?

19 A. Yes.

20 Q. And then as you read down column 3 into
21 column 4, it sets out four different methods for
22 acquiring the ICC profile for the monitor connected
23 to the client computer; is that right?

24 MR. HIGH: Objection. Form.

25 THE WITNESS: Yeah, I see those four and I

1 think I've done all four myself so.

2 By MR. LAROQUE:

3 Q. In -- I am wondering do any of these four
4 methods depend on the input profile? Or maybe a
5 cleaner way of asking that, in order to obtain the
6 output profile by any of those four methods, do --
7 do you have to have the input profile?

8 A. There could be advantages to having that
9 information. There is -- you could be more
10 intelligent about how you pick your output profile
11 you want if you know what the input characteristics
12 are in the input profile. But, you know, you could
13 also not know that information and still make a
14 choice if you wanted to.

15 Q. Okay. When we were talking earlier about
16 the input profile, we were looking at a disclosure
17 in Ohga that said an input profile P1 of the device
18 that inputs the image data J1 is also stored in,
19 e.g., the WWW server S1.

20 Do you remember that?

21 A. I remember that discussion.

22 Q. And similar question there. In order to
23 get that input profile, do you have to know anything
24 about the output device, the monitor, for example?

25 A. Depending on what you're trying to

1 accomplish there is -- there is advantages. If you
2 know the output, you could use that information to
3 help select a -- the input monitor profile, or not
4 the -- the input profile. You know, these things
5 were -- if you understood what you were doing
6 completely from end to end, you could -- you could
7 pick a profile that would work better for your
8 situation. If you -- if you didn't or if you were
9 trying to be flexible to accommodate a bunch of
10 different output models, for instance, you didn't
11 necessarily have to do that.

12 Q. Okay. If you go back a page earlier in
13 Exhibit 1007, column 2. And if you look at the
14 paragraph starting around line 46 it says,
15 "Referring to Figure 8, a CPU 100 controls the
16 overall apparatus in accordance with the program
17 stored in a ROM 101, hard disc 106, and the like
18 using a RAM 102 as a work memory, and executes
19 various kinds of processes such as a process that
20 pertains to color matching."

21 Do you see that?

22 A. Yes.

23 Q. And do you have an understanding of what
24 the term "color matching" means here?

25 A. It's a general term that is used to discuss

1 this problem of getting input and output colors to
2 match.

3 Q. And this is the problem that we were
4 talking about earlier that these ICC profiles were
5 developed to address; is that right?

6 A. You know, as I said, I think they can be
7 used for other things but there is this part of the
8 problem they were -- they were trying to address.

9 Q. Do those ICC profiles contain information
10 about the color characteristics of their respective
11 devices?

12 A. You know, it's -- certainly -- certainly
13 they most definitely can. Whether it's required, I
14 would look at the specification to see whether it
15 had to or not. Some of the ones I was using and I
16 found useful in the work I was doing and useful for
17 color matching would have that sort of information.

18 Q. Do you recall whether ICC profiles would
19 contain information about image contrast, for
20 example, in addition to image color?

21 A. I know for sure it had information about
22 the tonal curve that might be applied, which is you
23 might say a -- when you adjust contrast, you are
24 adjusting the tonal curve. So you might say it's
25 more detailed information. I don't recall if it had

1 directly, like, a contrast value but it certainly
2 had the tonal curve from which you can, you know,
3 ascertain what the contrast is.

4 Q. And that would be the -- the tonal curve of
5 the -- of the device that the ICC profile describes?

6 A. It's -- you know, if it describes the
7 device or something else, it's -- that is kind of up
8 to the person who generates the profile. You know,
9 certainly there were situations where it was
10 describing a particular device, but the -- as I
11 recall the specification, without looking at it, it
12 was more flexible than just that.

13 Q. Do you -- do you recall any examples of --
14 of -- of what else those ICC profiles could describe
15 besides the device?

16 A. Well, I mean, it describes a -- you know,
17 it describes what it describes you might say.
18 It's -- you know, you just have to look at the
19 specification. They were used quite often to
20 describe devices. I don't know if -- I haven't
21 investigated whether -- you know, how other -- what
22 other contexts they were used in.

23 You know, sitting here today without having
24 looked at the specification and, you know, in 20
25 years, you know, I don't know if -- you know, what

1 other devices would make -- would make the most
2 sense that might be used or what other situations it
3 might make sense to be used in. But as I recall,
4 they were relatively general so people could
5 certainly use them for other things outside of
6 describing a device.

7 Q. Do you recall whether ICC profiles for
8 DSCs, for example, would contain information about
9 the -- the shutter speed of -- of that DSC?

10 A. I would have to go back and look at the
11 specification. I don't recall that.

12 Q. Do you recall whether the ICC profile for a
13 DSC could have had information describing exposure
14 times?

15 A. I would have to look at them -- look at the
16 specification whether it included or not.

17 MR. LAROQUE: Okay. All right. Give me
18 just a moment.

19 I don't have any further questions. I will
20 pass the witness.

21 MR. HIGH: Can we take about a 15-minute
22 break?

23 MR. LAROQUE: That works.

24 MR. HIGH: Thanks.

25 COURT REPORTER: We're off the record.

1 (Recess.)

2 COURT REPORTER: We're back on the record.
3 Please continue, Counsel.

4 MR. HIGH: No questions from me, so I think
5 that concludes the deposition.

6 MR. LAROQUE: All right. Thank you,
7 Dr. Stevenson.

8 THE WITNESS: Sure.

9 COURT REPORTER: This concludes the
10 deposition.

11 (Proceedings concluded.)

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1 CERTIFICATE OF STENOGRAPHIC REPORTER

2

3

4 I, BURGUNDY B. RYAN, a Certified Shorthand
5 Reporter, hereby certify that the witness in the
6 foregoing deposition,

7 ROBERT STEVENSON, Ph.D.,
8 was by me duly sworn to tell the truth, the whole
9 truth, and nothing but the truth, in the
10 within-entitled cause; that said deposition was
11 taken at the time and place therein named; that the
12 testimony of said witness was stenographically
13 reported by me, a disinterested person, and was
14 thereafter transcribed into typewriting.

15 I further certify that I am not of counsel
16 or attorney for either or any of the parties to said
17 deposition, nor in any way interested in the outcome
18 of the cause named in said caption.

19

20 DATED: Monday, April 21, 2025.

21



22

23 Burgundy B. Ryan, CSR No. 11373, RPR

24

25

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Conducted on April 18, 2025

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