

UNITED STATES INTERNATIONAL TRADE COMMISSION

In the Matter of:	)	Investigation No.
CERTAIN CAMERAS, CAMERA SYSTEMS,	)	337-TA-1400
AND ACCESSORIES USED THEREWITH	)	

REVISED AND CORRECTED TRANSCRIPT OPEN/CLOSED SESSIONS

Pages: 922 through 1226
Place: Washington, D.C.
Date: January 16, 2025

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contracts@hrccourtreporters.com

1 and I'm a senior member of the ACM.

2 MS. LI: Your Honor, we submit Mr. Goodin as an
3 expert in video and image processing and stabilization in
4 this investigation.

5 JUDGE JOHNSON HINES: Any objection?

6 MR. PAK: No objection.

7 JUDGE JOHNSON HINES: Thank you. So tendered.

8 BY MS. LI:

9 Q. Now, Mr. Goodin, you're here to offer opinions
10 regarding GoPro's '894, '840, and '832 patents; correct?

11 A. That's correct.

12 Q. Can you please summarize your opinion for the
13 '894 patent at a high level?

14 A. So, first, it's my opinion that none of the
15 accused products have direct infringement of the asserted
16 claims of the '894 patent for no determining and observed
17 trajectory based on the position information. For no
18 determining and capture trajectory based on a look-ahead of
19 the observed trajectory, and no capture trajectory is
20 determined to include a path that minimizes a combination
21 of rotational velocity and rotational acceleration.

22 I have more, but I'll detail those later in my
23 recitation.

24 Further, there is no induced infringement of the
25 claims of the '894 patent.

1 The asserted claims of the '894 patent are
2 invalid over the references of Pixel 2 and Kwatra and over
3 the reference of Bell and Kwatra.

4 Then the -- Insta's redesigns removed the
5 alleged look-ahead feature, and thus, Insta's redesigns do
6 not infringe any of the claims of the '894 patent.

7 Q. Can you also describe -- can you also summarize
8 your opinions for the '840 patent?

9 A. So for the '840 patent, it's my opinion that
10 there is no direct infringement of the asserted claims of
11 the '840 patent by any of the accused products.

12 This is for the following reasons: There's no
13 determine a smooth trajectory based on a look-ahead of the
14 trajectory.

15 No low-light high-pass parameter, no
16 weight-balance parameter, no stickiness parameter, and no
17 temporal horizon of motion experienced enabling
18 approximation of the intended motion.

19 Further, there's no induced infringements.

20 For tech DI, it's my opinion that GoPro has not
21 shown that their tech DI products determine -- do a
22 determination of the smooth trajectory based on the
23 look-ahead of the trajectory, includes use of a temporal
24 horizon of motion experienced by the image capture device,
25 the temporal horizon enabling approximation of intentional

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1 Do you see that?

2 A. Yes. I see that.

3 Q. Specifically, dP/dt and d squared P/dt squared.

4 Do you see that?

5 A. That's correct.

6 Q. But you understand, sir, that "P" here in Kwatra
7 is representing a linear path model.

8 Do you understand that?

9 A. No, I don't understand that.

10 It's representing a combination of linear and
11 rotational motion.

12 Q. Let's go to your deposition transcript, at pages
13 169, 1 through 19.

14 You were being asked about the Kwatra
15 references, reference Figures 8A and 8B.

16 "Question: Figures 8A and 8B are detecting or
17 modeling a motion or a period of time. Fair?

18 Answer: Yes. It appears that Figures 8A and 8B
19 are representing motion for a period of time."

20 Did I read that correctly?

21 A. You did.

22 Q. "Question: Okay. And those are motion in X and
23 motion in Y; correct?

24 Answer: Yes. It appears in Figures 8A as
25 motion in X and Figure 8B as motion in Y.

1 Question: And a person of ordinary skill in the
2 art would interpret that to mean translational motion;
3 fair?

4 Answer: So, yes, Figure 8A and Figure 8B appear
5 to be dealing with translational motion."

6 Did I read that correctly?

7 A. You did.

8 Q. Now, let's go to the '832 patent.

9 Claim 1, please. I want to focus on Claim
10 1[d(i)].

11 Do you see at the top of this claim element, it
12 says, "Determine a viewing window for the visual content as
13 a function of progress through the progress length."

14 Do you see that?

15 A. I do.

16 Q. Your opinion is that the progress length
17 language in this claim limitation imposes a playback
18 requirement; is that correct?

19 A. That's correct.

20 Q. Thus, you claim that the claimed invention is
21 limited to post-capture horizon leveling, and does not
22 cover real-time horizon leveling; correct?

23 A. That's correct.

24 Q. As part of your investigation and invalidity
25 analysis in this case, you had alleged that claims of the