

In the Matter Of:

Motorola Mobility LLC, et al. vs

Multifold Int'l Inc. Pte. Ltd.

RAJEEV SURATI

November 04, 2025



1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3 Case No. IPR2025-00038

4

5 -----

6 MOTOROLA MOBILITY LLC and GOOGLE LLC,

7 Petitioners,

8 -v-

9 MULTIFOLD INTERNATIONAL INCORPORATED PTE. LTD.,

10 Patent Owner.

11 -----

12

13

14

15 REMOTE TESTIMONY OF RAJEEV SURATI, PhD

16 VOLUME I

17 NOVEMBER 4, 2025 - 9:00 A.M. ET

18

19

20

21

22 JOB NO. 2025-1002570

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

DEPOSITION of RAJEEV SURATI, PhD, before S.
Arielle Santos, Certified Court Reporter,
Certified LiveNote Reporter and Notary Public.

REMOTE APPEARANCES:

COUNSEL FOR MOTOROLA:

BY - T. VANN PEARCE, JR.

BY - DANA SUBLETT

ORRICK, HERRINGTON

2100 Pennsylvania Avenue NW

Washington, D.C. 20037

COUNSEL FOR GOOGLE:

BY - QUADEER AHMED

PAUL HASTINGS

2050 M Street NW

Washington, DC 20036

1 COUNSEL FOR MULTIFOLD:

2 BY - STEPHEN SCHREINER

3 CARMICHAEL IP

4 8607 Westwood Center Drive, Suite 270

5 Tysons, VA 22182

6

7

8

9 ALSO PRESENT:

10 NATHANIEL OLIVA, Monitor

11

12

13

14

15

16

17

18

19

20

21

22

1		5
2	INDEX	
3	RAJEEV SURATI, PhD	6
4	BY T. VANN PEARCE, JR.:	6
5	BY STEPHEN SCHREINER	128
6	BY T. VANN PEARCE, JR.:	135
7		
8	EXHIBIT MARKED - ATTACHED	
9	Exhibit PAPER 8 - IPR Paper No. 8	31
10		
11	EXHIBITS PREVIOUSLY MARKED - REFERENCED	
12	Exhibit 2002	11
13	Exhibit 1001	17
14	Exhibit 1004	36
15	Exhibit 1005	61
16		
17		
18		
19		
20		
21		
22		

1 RAJEEV SURATI, PhD, Affirmed, Testifies as

2 Follows:

3 THE WITNESS: I do.

4

5 EXAMINATION

6 BY T. VANN PEARCE, JR.:

7 Q Good morning, sir.

8 A Hi. How are you?

9 Q I am doing well.

10 Could you state your full name?

11 A Yes. My birth name is Rajeev,
12 and my last name is Surati. It's spelled
13 R-A-J-E-E-V, and the last name is
14 S-U-R-A-T-I.

15 Q Where are you today?

16 A I am in at the MIT Engine in
17 Cambridge, Massachusetts.

18 Q No one else is in the room with
19 you right now, correct?

20 A No.

21 Q And if somebody did come in,
22 could you let us know?

1 A Of course.

2 Q Great.

3 You have got --

4 (Simultaneous Crosstalk.)

5 You have got a laptop open in
6 front of you, I assume, or a computer of
7 some sort?

8 A I do and I am just deleting all
9 the applications that are open. I am
10 almost done.

11 Q That was my next question is
12 whether you have anything open besides
13 the Zoom interface.

14 A Yes, it's going to be -- give me
15 a second.

16 Okay. So basically, I keep two
17 things open. One, Zoom, and the finder
18 window in case I need to open a file.

19 Q Okay.

20 Do you have any files open right
21 now?

22 A No.

1 Q Do you have any paper documents
2 in the room with you?

3 A I don't plan to.

4 Q And then besides the computer
5 that you are using for the deposition, do
6 you have a phone with you?

7 A I do, so let me turn the ringer
8 off.

9 Okay.

10 Q And just to confirm, while we
11 are having the deposition today, you
12 won't communicate with anybody through
13 other means unless -- if there is an
14 emergency, let us know or something like
15 that. But otherwise, you're not doing to
16 do that.

17 A Yeah. I do plan on having a --
18 I'm sorry about this, but I need to spend
19 half an hour between 11:00 and 1 11:30 on
20 a call, but other than, that I am free.

21 Q Okay.

22 When we get to 11:00, we can

1 take a break and it will just be a little
2 bit longer break than normal.

3 A Sounds good.

4 Q You have been deposed a number
5 of times, right?

6 A Yes, sir.

7 Q So we will go through the normal
8 preliminaries.

9 If you don't understand any of
10 my questions, please let me know. Okay?

11 A Absolutely.

12 Q And if you answer the question,
13 I will assume that you understood it. Is
14 that fair?

15 A That is fair.

16 Q Do you understand that during
17 any breaks in the deposition, you are not
18 supposed to be discussing the substance
19 of your testimony with anyone?

20 A I do.

21 Q And you understand that you're
22 testifying under oath today, right?

1 A I do, sir.

2 Q Is there any reason why you
3 cannot give accurate and complete
4 testimony today?

5 A Not that I am aware of.

6 Q Okay.

7 Now, you have been retained by
8 Multifold International Incorporated PTE
9 Limited to serve as an expert witness in
10 this case, right?

11 A I have been retained by them,
12 yes. I believe that's correct.

13 Q I will refer to them today as
14 "Multifold" for short. Okay?

15 A Okay.

16 Q So I represent Motorola Mobility
17 LLC.

18 A Hm-hm.

19 Q Do you understand that Motorola
20 and Google are the petitioners in this
21 IPR?

22 A I do, sir.

1 Q So I may refer to them as
2 "petitioners" for today.

3 A Okay.

4 Q Now, what I am going to do now
5 is drop into the chat an exhibit.

6 A Okay.

7 Q Bear with me just one moment.

8 A Okay. That's downloaded.

9 Q So let me know when you have
10 that document open in front of you.

11 A I now have it in front of me,
12 sir.

13 Q What is that document?

14 A Just one second.

15 Looks like it's my signed
16 submitted declaration related to IPR
17 2025-000338 that I was retained to
18 provide to write to the petitioners and
19 the patent office, I guess.

20 Q And it's marked as Exhibit 2002
21 on the first page, right?

22 A That's correct.

1 Q Your signature is on the
2 document on page 99, right?

3 A (Reviewing.)

4 Q Sorry. Did you answer?

5 A Yes, I did. But, yes.

6 Q Okay.

7 It didn't show up on the
8 transcript, so...

9 A I think --

10 Q So you signed this declaration
11 on August 25th of this year, right?

12 A That's correct.

13 Q Does this declaration accurately
14 state your opinions in this case with
15 respect to the issues that it addresses?

16 A I believe that's correct. I
17 have one correction that I noticed while
18 I was reviewing it.

19 Q Okay.

20 What is that correction?

21 A It's -- I intended to write
22 petitioners, but on page 9, you can say,

1 I understand that LG, it should have been
2 should been, that I understand
3 petitioners have petitioner -- sorry, I
4 am not sure how the grammar works there.

5 If you see paragraph 30.

6 Q Yes.

7 A If you see the word "LG," I
8 should have used the word "petitioners"
9 and "have."

10 Q Other than that typo, were there
11 any other changes that you thought you
12 needed to make to this declaration?

13 A I don't think so.

14 Q And does the declaration state
15 the bases for your opinions in this case?

16 A I think that's fair.

17 Q On pages 3 and 4 of the
18 declaration, you list materials that you
19 considered in connection with forming
20 your opinions, right?

21 A That's right.

22 Q Did you review any other

1 materials in connection with forming your
2 opinions that are not listed here?

3 A I think in paragraph 11, "I
4 state I have considered other materials,
5 such as websites and text materials in
6 doing background research on the issues
7 presented in the IPR." But I wouldn't
8 say they are the bases, I would just say
9 that I did consider other materials.

10 Q Is there any way to know what
11 those other materials were?

12 A I honestly can't recall. I did
13 some look-ups related to the iPhone from
14 2007 and 2008. That is the best that I
15 can recall.

16 Q So you did talk about the iPhone
17 in your declaration, right?

18 A I did.

19 Q We will get to that in a minute.

20 But just so I understand, you
21 think you did some online searching the
22 web to find information about the iPhone

1 circa 2007, 2008, 2009, right?

2 A I just wanted to verify what I
3 had believed to be true -- not
4 understood, but what I did know to be
5 true at the time about the iPhone.

6 Q Were those Apple websites, do
7 you recall?

8 A I can't really recall. I think
9 they were articles and pictures. There
10 may have been an instance where I was on
11 the Apple website, but I can't really
12 recall.

13 Q Could have been Apple websites;
14 could have been some other third-party
15 websites. Is that fair?

16 A Yeah, that eventually ended up
17 at the Apple website.

18 Q You also mentioned in your
19 declaration, your experience using an
20 iPhone around that time, right?

21 A I do, sir.

22 Q I assumed you still don't have

1 your phone from 2007, 2008, 2009, right?

2 A I have seen it, but I didn't --
3 when I was looking around, I couldn't
4 find it. My wife probably put it
5 somewhere.

6 Q In other words, you weren't
7 looking at or using that phone when you
8 were coming up with your opinions in this
9 case, right?

10 A That's right.

11 Q And did you review any documents
12 besides the ones listed here in your
13 declaration, in connection with preparing
14 for your deposition today?

15 A Other than what I stated before,
16 I don't believe I have looked at other
17 documents to form the basis of my
18 opinions. I -- if there is something I
19 missed because I reference it in the
20 document, which you can check yourself,
21 then I missed it and I looked at that.
22 But beyond that, I think it is fair to

1 say that this is the list of documents.

2 Q I assumed you did some
3 preparation for today's deposition,
4 right?

5 A I did.

6 Q Other than attorneys, did you
7 speak with anyone in connection with
8 preparing for today's deposition?

9 A Not at all.

10 Q I am putting the next exhibit
11 into the chat.

12 Could you let me know when
13 you're able to download that document.

14 A Yes.

15 Q This exhibit has been previously
16 marked as Exhibit 1001 in this
17 proceeding.

18 Do you recognize this to be the
19 patent -- the Multifold patent that is at
20 issue in the IPR?

21 A Yes. This appears to be Patent
22 Number 8,836,842 which is the -- I

1 believe the topic of the IPR.

2 Q And we will call that the '842
3 patent for short today. Okay?

4 A Okay.

5 Q Can you turn to column 39 of the
6 patent, which is the page 60 out of 61 on
7 the PDF.

8 A I am on column 39.

9 Q There's a list of claims here,
10 right?

11 A That's correct.

12 Q You got a Claim 1.
13 Do you see the last two lines of
14 Claim 1, where it reads, quote, wherein
15 in each image capture mode a display on
16 the first or second screen is different.

17 Do you see that?

18 A I do.

19 Q If you go to the top of --
20 actually the bottom of column 39, going
21 on to the top of column 40.

22 Do you see Claim 11?

1 A I do.

2 Q The last three lines of Claim
3 11, starting with wherein, it reads,
4 quote, wherein in each image capture mode
5 a display on the first or second screen
6 is different. Right?

7 A Yes, sir.

8 Q The two limitations that I just
9 read that both start with wherein, those
10 are the same language, right?

11 A (Reviewing.) Just one second.

12 Yes, sir.

13 Q You discuss that language in
14 your declarations at some length, right?

15 A I do.

16 Q And you applied the same
17 meaning, the same understanding of the
18 two wherein clauses in Claims 1 and 11,
19 right?

20 A I believe I did, yes.

21 Q We will probably be talking
22 about those limitations a lot today. So

1 for short, I might call them "the wherein
2 limitation."

3 A Okay.

4 Q Just so you know what I am
5 talking about when I say the wherein
6 limitation, if that's fair.

7 A Okay.

8 Q Now, your understanding of the
9 wherein limitation is it requires a
10 different display on the first screen of
11 the device between image capture modes or
12 a different display on the second screen
13 between image capture modes, right?

14 A I think that's correct.

15 Q Okay.

16 If a screen display is an image
17 in one image capture mode and is blank in
18 another image capture mode, that will
19 still meet the wherein limitation, right?

20 STEPHEN SCHREINER:

21 Objection. Form.

22 THE WITNESS: So you are

1 saying that the comparison
2 between -- you are saying it could
3 meet the wherein different, if
4 you're looking at two displays and
5 they happen to be different? Is
6 that what you are asking?

7 BY T. VANN PEARCE:

8 Q To be more precise, the two
9 displays are different in that one of
10 them is showing something, the other one
11 is not showing anything.

12 That still could meet the claim
13 limitation, right?

14 STEPHEN SCHREINER:

15 Objection. Form, scope.

16 THE WITNESS: Yeah, I don't
17 think I made an opinion on that.
18 I think I talked about looking at
19 two different screens at different
20 times to see if they are
21 different.

22 BY T. VANN PEARCE:

1 Q Right.

2 If at one time the screen is
3 displaying an image and at the other time
4 the screen is not displaying anything,
5 it's blank, that would meet the wherein
6 limitation, right?

7 STEPHEN SCHREINER:

8 Objection. Form, scope.

9 THE WITNESS: I think it
10 could. It would depend on all the
11 other circumstances surrounding
12 it, but sure.

13 BY T. VANN PEARCE:

14 Q In other words, you are not
15 contending that -- well, withdraw that.
16 I will ask again.

17 It's not your understanding of
18 the wherein limitation that in both
19 modes, a screen must actively be
20 displaying something in order to meet the
21 claim language, right?

22 STEPHEN SCHREINER:

1 Objection. Form.

2 THE WITNESS: Yeah, I
3 haven't, I believe, made an
4 opinion on that. But I think
5 that's fair to say.

6 BY T. VANN PEARCE:

7 Q Let's take a look at your
8 declaration.

9 If you could go to paragraph 91,
10 this is on page 39 of the PDF, going on
11 to page 40. Just let me know when you're
12 there.

13 A Yeah.

14 Q Okay.

15 You have shown here a number of
16 figures from the '842 patent that you
17 have annotated, right?

18 A That's right.

19 Q You have annotated these to show
20 that they are depicting image capture
21 mode 1, image capture mode 2, image
22 capture mode 3. Right?

1 A That's right.

2 Q Now, if we look at image capture
3 mode 3, the first screen in image capture
4 mode 3 is showing a previous view of an
5 outward facing image, right?

6 A Hm-hm.

7 Q Now, at the bottom of that page,
8 you see paragraph 94, right?

9 A Hm.

10 Q Paragraph 94 quotes at some
11 length from the '842 patent, right?

12 A Yeah.

13 Q Then we go to -- and that
14 paragraph 94 is describing the figures we
15 just looked at, figures 14 through 16,
16 right? Among other things?

17 STEPHEN SCHREINER:

18 Objection. Form.

19 T. VANN PEARCE: Sorry. Did
20 he answer?

21 THE WITNESS: No. I wanted
22 to finish looking at.

1 BY T. VANN PEARCE:

2 Q Okay.

3 A If I look at paragraph 94, you
4 are saying it talks about figures 13
5 through -- figures 14 through figures 16,
6 or something else?

7 Q Right.

8 That's part of what is described
9 here, right?

10 STEPHEN SCHREINER:

11 Objection. Form.

12 THE WITNESS: (Reviewing.)

13 So if you include -- (Reviewing)
14 -- if you include paragraph 94, I
15 believe figures 13, 14 through 16B
16 are all discussed.

17 BY T. VANN PEARCE:

18 Q In paragraph 95, which is on
19 page 42 of the PDF, you have an annotated
20 figure 18 of the '842 patent, right?

21 A Yes, sir.

22 Q And this is annotated to show

1 that it's depicting another image capture
2 mode, image capture mode number 4, right?

3 A Yes.

4 Q This mode is self-portrait mode;
5 is that right?

6 A I think that's correct.

7 Q In paragraph 97, the last
8 sentence, you wrote, quote, Also, the
9 first screen is a display of the camera
10 user, which is different from the
11 displays in figure 14B/15B/16B, right?

12 A Right.

13 Q So the first screen in image
14 capture mode 4 is a different display
15 than the first screen in image capture
16 mode 3, which you show on page 36, right?

17 A I think that's correct.

18 Q You understand that the Patent
19 Trial and Appeal Board -- which I may
20 call "the board" for short -- found a
21 reasonable likelihood that the
22 petitioners would prevail in showing the

1 Claim 1 of the '842 patent was
2 unpatentable, right?

3 A I do understand.

4 Q And you disagree with the
5 board's conclusion in that regard?

6 STEPHEN SCHREINER:

7 Objection. Form.

8 THE WITNESS: So I have
9 written a report that effectively
10 -- in summary, you could say I do
11 disagree with what they concluded
12 that -- well, I guess -- I guess I
13 disagreed with their conclusion
14 that it was -- that even after --
15 that to proceed in that, they may
16 have thought -- they said that
17 they thought there was a
18 likelihood.

19 I don't think that that's
20 actually true, but I understand
21 why they thought there was a
22 likelihood and why they went ahead

1 with it. But what I am presenting
2 in this is an argument about why
3 those patent claims are not
4 invalid.

5 BY T. VANN PEARCE:

6 Q Is it your understanding that
7 the board construed the wherein
8 limitation in reaching its conclusion?

9 A Just one second there.

10 (Reviewing.)

11 I think I address this in
12 paragraph 107 through 111 about their
13 construction; they thought that the
14 patent owner's construction was
15 improperly incorporating a limitation
16 from specification, and thus the term
17 broadly construed to merely require this
18 by on the first or second screen is
19 different in each image capture mode.

20 So that's what they felt was
21 wrong with that construction, and based
22 on that, they didn't accept the

1 construction and thought there would
2 be -- that based on that construction,
3 there was a strong likelihood that
4 independent Claim 1 and 11 would be
5 considered -- be invalid in view of the
6 prior art.

7 Q You said "based on that
8 construction."

9 Do you understand that the board
10 adopted a construction of the wherein
11 limitation?

12 STEPHEN SCHREINER:
13 Objection. Form. Calls for legal
14 conclusion.

15 THE WITNESS: (Reviewing.)
16 Just one second.

17 BY T. VANN PEARCE:

18 Q Sure.

19 A (Reviewing.) So I think they
20 adopted it, according to page 10, the
21 paragraph starts with, For the purpose of
22 institution, we adopt petitioner's

1 definition of a person of ordinary skill
2 in the art because it is consistent with
3 the level of skill -- I'm sorry, that's
4 not what I meant to do. Sorry.

5 Q So just I want to be clear, what
6 document are you looking at?

7 A I'm sorry, I am looking at -- I
8 wish I -- this is the institution.

9 Q Okay.

10 So you're looking at the board's
11 institution --

12 (Simultaneous Crosstalk.)

13 A I'm sorry, I pulled that up. I
14 should not have pulled that up without
15 telling you, but I did. I am just trying
16 to look at it and double check.

17 Q So I am happy to mark that as an
18 exhibit, and I will go ahead and do that
19 now.

20 And I know you know this, if you
21 could just stick to looking at the
22 exhibits we have in the deposition so we

1 all know what you're looking at --

2 (Simultaneous Crosstalk.)

3 A Okay.

4 Q -- I would appreciate it.

5 T. VANN PEARCE: Let me go
6 ahead and mark the institution
7 decision. I am dropping into the
8 chat, it's Paper 8 in the IPR
9 proceeding.

10 (Exhibit PAPER 8 - IPR Paper
11 No. 8 is marked.)

12 THE WITNESS: Yeah.

13 BY T. VANN PEARCE:

14 Q Do you have that document open?

15 A Yeah. I think I would go so far
16 as saying they construed it in order
17 to -- construed for the purpose of -- you
18 know -- they construed it enough so that
19 they, based on that construction, they
20 decided it was institutable.

21 I don't know that I would say
22 that's their final -- final construction

1 because they still have to go through the
2 IPR and we make arguments about it. But
3 for the purpose of instituting it, I
4 would say they adopted that construction.

5 Q You say they adopted "that
6 construction."

7 What is "that construction"?
8 What is the construction?

9 A The using the wherein that you
10 said we could shorten with wherein.

11 Q Right, that is the term.

12 And what is the construction
13 that you understand the board adopted in
14 the institution decision?

15 A Oh.

16 STEPHEN SCHREINER:

17 Objection. Form, legal
18 conclusion.

19 THE WITNESS: Yeah, I would
20 say they didn't choose -- they
21 felt that the limitation was
22 incorporated -- that that -- the

1 board indicated that a patent
2 owner's construction was
3 improperly incorporating a
4 limitation for the specification,
5 thus term is broadly construed to
6 merely require the display on the
7 first or second screen is
8 different in each image capture
9 mode.

10 That's probably the best I
11 can do -- which would be --

12 BY T. VANN PEARCE:

13 Q What you just said, was that
14 reading from your declaration?

15 A Yes, sir.

16 Q The word "broadly" that you just
17 mentioned is in the institution decision
18 itself, right?

19 A That's right.

20 Q That's your interpretation of
21 the board's decision, right?

22 A I think that's right.

1 Q Do you understand that the board
2 did not adopt an explicit construction of
3 the wherein limitation?

4 STEPHEN SCHREINER:
5 Objection. Form. Legal
6 conclusion.

7 THE WITNESS: Yeah, that's
8 probably a little beyond my legal
9 ability.

10 I could say they that
11 instituted it based on their
12 understanding of the construction
13 they used, in that it's different
14 and less limiting than what I did.
15 Because I -- they said that the --
16 the patent owners incorporated or
17 chose to read an extraneous
18 limitation into a claim from the
19 specification.

20 I guess what I would say is
21 just -- patent owner's
22 construction is narrower than the

1 claim language and incorrectly
2 adds a requirement for a different
3 display on the first screen
4 between image capture modes or a
5 different display on the second
6 screen between image capture
7 modes.

8 So in the preliminary
9 response they state that. I don't
10 know what the paragraph number is,
11 but it's page 8.

12 BY T. VANN PEARCE:

13 Q Is it your understanding -- let
14 me withdraw and I will just say, the
15 questions I'm asking, I'm just asking for
16 your understanding of the board's
17 institution decision that you had in
18 forming your opinions in this case, okay?

19 A Yeah.

20 Q Is it your understanding that
21 the board's institution decision
22 interpreted the wherein limitation to

1 compare a first screen to a second screen
2 on the device in the prior art?

3 A I think that's how I understood
4 it.

5 Q And that understanding is part
6 of the basis for your disagreement with
7 the board, right?

8 A That's correct.

9 Q I am going to put in the chat
10 the next exhibit, which has previously
11 been marked as Exhibit 1004. Just let me
12 know when you're able to open that?

13 A Yeah, I see it now.

14 Okay. It's open.

15 Q Do you recognize Exhibit 1004 as
16 a US Patent Application Publication?

17 A I do.

18 Q The inventors are named Chin, et
19 al., right?

20 A I think that's correct.

21 Q I will refer to this today as
22 "Chin," okay?

1 A Okay.

2 Q You understand this is one of
3 the prior art references that was
4 presented in the IPR petition?

5 A I do.

6 Q You discussed this Chin
7 reference at some length in your
8 declaration, right?

9 A I do, in fact.

10 Q If you turn to the second page,
11 do you see Figure 1 of Chin?

12 A I do.

13 Q You understand Figure 1 to be
14 depicting an embodiment of Chin's
15 invention, right?

16 A I do.

17 Q And if you flip to page 10 of
18 the PDF, do you see Figure 9?

19 A I do.

20 Q Figure 9 is a flowchart that's
21 an example of a method of controlling the
22 device shown in Figure 1 of Chin, right?

1 A Yep.

2 Q Figure 9, Step S150, it says,
3 "self-photographing mode?"

4 Do you see that?

5 A I do.

6 Q This is a step in the flowchart
7 that describes determining whether the
8 device is in self-photographing mode or
9 not, right?

10 A That's correct.

11 Q If we flip back to the '842
12 patent for a minute.

13 A Okay.

14 Q If you get back to the claim
15 language.

16 A Hm-hm.

17 Q Looking at Claim 1.

18 A Okay.

19 Q Last limitation, we looked at
20 the wherein clause before, right?

21 A Right.

22 Q The first part of that

1 limitation before you get to the wherein
2 clause, reads, quote, based on one or
3 more of the image capture function
4 configuration, a device orientation, and
5 a device state entering one of one or
6 more image capture modes, right?

7 A Yeah.

8 Q You are not disputing that Chin
9 discloses that part of Claim 1, right?

10 STEPHEN SCHREINER:

11 Objection -- objection. Form.

12 THE WITNESS: At this time,
13 no.

14 BY T. VANN PEARCE:

15 Q Your understanding is that Chin
16 discloses entering into self-photograph
17 mode, right?

18 A That's what the diagram shows.

19 Q And you also understand that
20 Chin discloses entering into a normal
21 outward-facing photograph mode, right?

22 A Yes, sir.

1 Q So you agree Chin discloses
2 entering into two different image capture
3 modes, right?

4 STEPHEN SCHREINER:

5 Objection. Form.

6 THE WITNESS: I mean, I think
7 that's fair.

8 BY T. VANN PEARCE:

9 Q Looking back at Chin Figure 1.

10 A Wait. Can you repeat that
11 question because I had the other patent
12 in mind when I was discussing it.

13 Can you re-read it to make sure
14 I answer it.

15 Q Repeat --

16 A The last question you asked me
17 before this one. Because I started
18 thinking about the other patent when I
19 answered your question and I want to make
20 sure I answered it correctly.

21 Q The question I asked was: So
22 you agree that Chin discloses entering

1 into two different image capture modes,
2 right?

3 A Oh, okay.

4 Q Your answer is?

5 STEPHEN SCHREINER: The
6 objection is form and scope.

7 THE WITNESS: Oh. Just one
8 second here.

9 Is there a place where I say
10 that explicitly, that opinion?

11 BY T. VANN PEARCE:

12 Q You mean in your declaration?

13 A Yeah.

14 Q Well, can you answer the
15 question now, without looking at the
16 declaration?

17 A I'm asking it because I don't
18 recall taking that position in the
19 declaration, or I need to think about
20 whether it discloses those two things.

21 I point out why I don't think it
22 meets the wherein limitation, but I don't

1 know that I have stated what you said.

2 Q Whether you stated that
3 explicitly in your declaration or not, my
4 question to you now is: You agree that
5 Chin discloses entering into two
6 different image capture modes, correct?

7 STEPHEN SCHREINER:

8 Objection. Scope.

9 THE WITNESS: Yeah. So I
10 think -- I think what I agree with
11 is that there's a diagram -- just
12 a moment.

13 So I would say that there's a
14 reference to a first image capture
15 mode and second image capture mode
16 in Figure 6, which is -- which is
17 literally that what you just said.
18 I don't know if I would apply the
19 same meaning to it, in view of the
20 patent, and I haven't considered
21 that. I have just looked at -- I
22 can confirm that it says what you

1 just described. But I don't know
2 if I have gone to the extent of
3 saying, well, Chin -- Chin
4 discloses system with first and
5 second screen, where the displays
6 are different completely,
7 partially, because I don't know
8 what is on the other screens when
9 it's showing things.

10 And that's one of my
11 questions, about whether that
12 disclosure is being made. I don't
13 know if that helped you, but
14 that's a question I have.

15 So I am looking at Figure 6
16 on page 58.

17 BY T. VANN PEARCE:

18 Q Figure 6 on page 58 of your --
19 of your declaration.

20 A Yes, sir.

21 Q Just to make sure we are
22 oriented.

1 Figure 6 on page 58 is from a
2 different reference, that's from
3 Whitehorn.

4 A Oh, I am sorry. Why do I do
5 this.

6 Q If you go to page 49 of your
7 declaration.

8 A Okay. I'm sorry about that.

9 Q It's okay.

10 A I don't know where my head went.

11 Q So page 49 has Figure 9 of Chin,
12 the flowchart we were just talking about.

13 A Yeah.

14 Q I understand your last answer to
15 be more precise, maybe, than my question.

16 Setting aside the wherein
17 limitation in the displays --

18 A Okay.

19 Q -- you agree Chin discloses
20 entering into two different image capture
21 modes, right?

22 STEPHEN SCHREINER: Again,

1 objection. Scope --

2 THE WITNESS: I'm sorry.

3 STEPHEN SCHREINER: Madam

4 Reporter, scope and form.

5 THE WITNESS: So if I look at

6 the claims, right, you are saying

7 if I take out -- I mean, I don't

8 know that I did that analysis so I

9 don't want to give you

10 off-the-cuff answer. That's kind

11 of where I would say, I certainly

12 explained why I didn't think the

13 claim limitation was meant by

14 Chin, the entire claim limitation

15 was by Chin, but I don't recall

16 providing an opinion, specific to

17 limitations 1A through 1D.

18 BY T. VANN PEARCE:

19 Q Okay. So looking still at

20 Figure 9 of Chin, step S150. If you turn

21 to Chin in paragraph 77, which is on page

22 17 of the PDF.

1 A Okay.

2 Q Could you just read the first
3 sentence -- you don't have to read it out
4 loud, just to yourself. Let me know when
5 you are done.

6 A (Reviewing.)

7 Okay. I think I read it.

8 Q This passage from Chin discloses
9 that the device in Chin judges whether
10 the portable information terminal is set
11 or being used in a self-photographing
12 mode, right?

13 A I think that's correct.

14 Q So the device disclosed in Chin
15 would know whether or not it's in a
16 self-photographing mode, right?

17 A I think that.

18 STEPHEN SCHREINER:

19 Objection. Form.

20 Objection. Form.

21 THE WITNESS: Did you get
22 that?

1 BY T. VANN PEARCE:

2 Q No, I think he spoke over your
3 answer. If you could repeat your answer.

4 A So, yes, the document can detect
5 whether a user has selected being in
6 self-photographing mode or that it's
7 automatically selected.

8 Q Your last answer, you said the
9 document can detect. You meant the
10 device can detect?

11 A The device, sorry. Pardon me.

12 Q The self-photographing mode in
13 Chin is depicted in Figure 5, right?

14 A (Reviewing.) Yes, I think so.

15 Q Figure 5 of Chin shows there's a
16 display unit 51, right?

17 A Yep.

18 Q And that's described in Chin as
19 the first display unit, right?

20 A Right.

21 Q I'm sorry, I misspoke.

22 Figure 5 shows display unit 52,

1 right?

2 A (Reviewing.) Yeah, that's
3 correct.

4 Q 52 is called the second display
5 unit in Chin, right?

6 A (Reviewing.) Just give me a
7 second. (Reviewing.)

8 Q If it helps, you can look at
9 paragraph 45 of Chin, for example.

10 A Yeah, I am just double-checking
11 here. (Reviewing.) Yep.

12 Q If we go back to Figure 9, we
13 talked a little bit about step S150 which
14 describes the device determining whether
15 or not it's in the self- photographing
16 mode, right?

17 A That's right.

18 Q Depending on that determination,
19 two different paths are shown, right?

20 A Right.

21 Q In one of those paths, Chin
22 discloses display images on second

1 display unit before photographing if the
2 answer is yes. Right?

3 A Right.

4 Q If the answer is no, Chin
5 discloses display images on first display
6 before photographing, right?

7 A Right.

8 Q So Chin Figure 9 has different
9 descriptions for what the device
10 displays, depending on the image capture
11 mode, right?

12 A I think it has -- if the
13 image -- it decides what to do based
14 on -- sorry, decides to display image.

15 (Reporter Clarification.)

16 THE WITNESS: Yeah. It says
17 it will display images on a second
18 display unit before photographing,
19 and then based on whether the
20 user, or it has automatically
21 selected self-photographing mode
22 by default, or it will select the

1 other one, which is it will
2 display images on the first
3 display unit before photographing.

4 It doesn't say in either case
5 what the other display will do in
6 that circumstance.

7 BY T. VANN PEARCE:

8 Q Right.

9 You would agree that Chin's
10 Figure 9 explicitly describes a
11 difference in the display between the two
12 modes, though, right?

13 STEPHEN SCHREINER:

14 Objection. Form.

15 THE WITNESS: I think
16 literally what you are saying, if
17 you talk about what it describes,
18 it's making a differentiation
19 between it having a different
20 output on one screen, whether it's
21 in -- versus another based on
22 whether it's in self-photographing

1 mode.

2 But I don't think it goes on
3 to say what I think we mean in --
4 in the Sirpal patent '842, where
5 we are talking about the same
6 screen where this is talking about
7 two different screens.

8 BY T. VANN PEARCE:

9 Q Is it your opinion that the two
10 pathways shown in Figure 9 of Chin could
11 be the same, the display could be the
12 same on both pathways?

13 STEPHEN SCHREINER:

14 Objection. Form.

15 THE WITNESS: I think it is
16 potentially possible.

17 BY T. VANN PEARCE:

18 Q There's nothing in Chin that
19 discloses that the first display unit
20 would display an image in the
21 self-photographing mode, right?

22 A I think that's correct.

1 Q There's nothing in Chin that
2 discloses that the second display unit
3 would display an image in the
4 outward-facing mode, right?

5 A That's correct.

6 Q You would agree that in the
7 self-photographing mode, the first
8 display unit could not display anything,
9 right?

10 A So I think it is a choice that
11 could be made. So yes.

12 Q And likewise, you would agree
13 that in the outward-facing mode, the
14 second display unit could not display
15 anything, right?

16 A That's a possibility, but I
17 don't know that it would -- one would do
18 that.

19 Q In the self-photographing
20 mode -- let me withdraw that.

21 Let's take a look at Figure 1 of
22 Chin.

1 Do you understand what is shown
2 with the label 40 to be the digital
3 camera --

4 (Reporter Clarification.)

5 BY T. VANN PEARCE:

6 Q -- the digital camera in Chin?

7 A Yes.

8 Q And the answer was yes, right?

9 A Yes.

10 Q The digital camera in Chin's
11 device is on the same side as the second
12 display unit 52, right?

13 A Yes, sir.

14 Q And when the device is folded so
15 that the two displays are on the outside,
16 the digital camera would be on the
17 opposite side of the device as the first
18 display unit 51, right?

19 A That's correct.

20 Q So when Chin is in the
21 self-photographing mode, the second
22 display unit 52 would be displaying an

1 image of the user, right?

2 A That's right.

3 Q In your view, display 51, which
4 is facing outward, could also be showing
5 an image of the user, the same image as
6 52, right?

7 A That's right.

8 Q In that circumstance, the
9 display would not be -- withdraw that.

10 In that circumstance, display
11 unit 51 would not be showing an
12 outward-facing image, right?

13 STEPHEN SCHREINER:

14 Objection. Form, scope.

15 THE WITNESS: I mean, I
16 didn't opine on that. I would say
17 that it -- it says what to do with
18 screen 1 -- display 2 or display
19 52, when it's in self -- when it's
20 in the image -- just one second.

21 So I guess it is saying
22 explicitly in the image capture

1 function mode of self --
2 self-photographing, it would
3 display the image of the user. I
4 guess when it's in that mode, it
5 could display the picture of the
6 user, it's displaying whatever the
7 camera sees. And similarly, in
8 the next case on the opposite
9 side, it's seeing whatever the
10 camera sees.

11 BY T. VANN PEARCE:

12 Q Right.

13 So if display 51 is showing an
14 image, it would be showing the same image
15 as what is on display 52, right?

16 STEPHEN SCHREINER:

17 Objection. Scope.

18 THE WITNESS: I don't know
19 what it would display, but it
20 could.

21 BY T. VANN PEARCE:

22 Q Well, display --

1 (Simultaneous Crosstalk.)

2 A -- 51 or 52 or maybe you asked
3 something different. I didn't
4 understand.

5 Q Sorry, that I spoke over you. I
6 apologize.

7 So in the case of image 52 is
8 showing is in self-photographing mode, it
9 would show whatever the camera sees?

10 A On display 2. If it's in
11 outward-focusing camera function mode, it
12 would show, again, what the camera sees.
13 But I don't think it makes any comment
14 about what the displays show when it's in
15 a different -- when the screen is
16 opposite to the camera function mode.

17 Like, if it's
18 self-photographing, it would show you --
19 it could be used to see when the camera
20 is facing you, what is being displayed.
21 Similarly, the user who is looking at it
22 -- in camera -- in image capture function

1 mode 2, if there is someone looking at
2 it, would show the picture of that person
3 on the camera, but it would show it on
4 figure -- on display 1.

5 Q Let me try to understand the
6 last part of your answer.

7 In self-photographing mode,
8 display 51 which is facing away from the
9 user, in your view, could be showing the
10 same image as display 52, right?

11 A That's correct.

12 STEPHEN SCHREINER:

13 Objection. Scope.

14 BY T. VANN PEARCE:

15 Q In that circumstance, though, 51
16 would not be showing an outward-facing
17 image, right?

18 STEPHEN SCHREINER:

19 Objection. Form.

20 THE WITNESS: If it happens
21 to be pointed at the person, yes,
22 it would be showing the person.

1 If it happens to be facing
2 outward, and it's in
3 self-photographing mode, it would
4 only show on the display facing
5 away from the user what is on --
6 what the camera is seeing.

7 BY T. VANN PEARCE:

8 Q In either circumstance, then,
9 display 51, like display 52, would be
10 showing what the camera is seeing, right?

11 STEPHEN SCHREINER:

12 Objection. Scope.

13 THE WITNESS: Yeah. I don't
14 know that I opined on that, but it
15 could do that.

16 BY T. VANN PEARCE:

17 Q Is there a way that you can see
18 the device in Figure 51 would be showing
19 self-photograph on screen 52 and at the
20 same time, an outward-facing image on
21 screen 51?

22 STEPHEN SCHREINER:

1 Objection. Scope.

2 THE WITNESS: Yeah. That
3 last piece, what did you say, our
4 facing image?

5 BY T. VANN PEARCE:

6 Q Right. Let me re-ask the
7 question so it's clear.

8 Is there a way that you can see
9 that the device shown in Figure 1 would
10 be showing self-photograph on screen 52
11 and at the same time, an outward facing
12 image on screen 51?

13 STEPHEN SCHREINER:

14 Objection. Scope, form.

15 THE WITNESS: I don't know
16 that I opined on that. Can you
17 point me to the place --

18 BY T. VANN PEARCE:

19 Q No. I am asking based on your
20 understanding of the reference.

21 Do you see where that would be
22 possible?

1 STEPHEN SCHREINER:

2 Objection. Form, scope.

3 THE WITNESS: I need to think
4 about that.

5 BY T. VANN PEARCE:

6 Q Okay.

7 A Yeah. I don't -- I haven't done
8 that analysis per se so I don't want to
9 give you off-the-cuff answer.

10 Q So sitting here today, you can't
11 answer that question?

12 A Without a lot of consideration,
13 no.

14 Q The device in Figure 1 has one
15 camera, right?

16 A That's correct.

17 T. VANN PEARCE: We have been
18 going a little more than an hour.

19 I am going to switch to another
20 topic, if you want to take a short
21 break, we can do that. I know you
22 have a call at 11:00, maybe we can

1 get in 30 -- take a ten-minute
2 break now, get another 35 minutes
3 in, then break for the call.

4 Does that make sense?

5 THE WITNESS: Yeah, thank
6 you.

7 THE REPORTER: Off the
8 record.

9 (Whereupon a Recess Commenced
10 at 10:13 a.m. and Testimony
11 Recommenced at 10:26 a.m. EST.)

12 BY T. VANN PEARCE:

13 Q I have placed into the chat
14 another exhibit, it's been marked
15 previously as Exhibit 1005.

16 Dr. Surati, can you take a look
17 at that and let me know when you got it
18 open.

19 A Sure. (Reviewing.) I have it
20 open.

21 Q Do you recognize this as another
22 one of the prior art references that was

1 presented in the IPR petition in this
2 case?

3 A Yeah, I believe this was called
4 the Whitehorn reference.

5 Q You reviewed this reference in
6 connection with forming your opinions,
7 right?

8 A I did.

9 Q Figures 1 through 5 of Whitehorn
10 are pictorial representations of a
11 handheld device, right?

12 A I think that's correct.

13 Q Figure 6 of Whitehorn is a
14 flowchart showing a method of operation
15 of that device shown in Figure 1 through
16 5, right?

17 A That's correct.

18 Q Whitehorn discloses that the
19 device entering a first image capture
20 mode as shown in step 604 of Figure 6,
21 right?

22 A That's correct.

1 STEPHEN SCHREINER:

2 Objection. Form, scope.

3 BY T. VANN PEARCE:

4 Q Whitehorn also discloses that
5 the device enters a second image capture
6 mode in step 608, right?

7 A Step 608 says, "enter second
8 image capture mode and display
9 information on top large screen."

10 I am not sure it's the same
11 image capture mode discussed in -- in the
12 '482 patent, but literally, that's what
13 it says.

14 Q Your understanding of Whitehorn
15 is that it discloses the device entering
16 into two different image capture modes,
17 right?

18 A (Reviewing.) I think that's
19 correct. There's literally a disclosure
20 with two different image capture modes in
21 Figure 6.

22 Q Figure 6, at step 604, says that

1 in the first image capture mode the
2 device will display information on small
3 screen interface, right?

4 A (Reviewing.) Yeah. It says,
5 "enter first image capture mode and
6 display information on small screen
7 interface."

8 Q Step 608, Whitehorn Figure 6
9 says that in the second image capture
10 mode the device will display information
11 on top large screen interface, right?

12 A It literally says, "Enter second
13 image capture mode and display
14 information on top large screen interface
15 in a second orientation," yes.

16 Q Small screen interface and top
17 large interface are two different screens
18 in the Whitehorn device, right?

19 A I think that's correct.

20 Q Whitehorn Figure 6 does have
21 different descriptions for what the
22 device displays, depending on the image

1 capture mode, right?

2 A Just a second. (Reviewing.)

3 So it discloses that it would
4 definitely will display information on
5 one screen, like the top large screen or
6 small screen interface, when things are
7 in their respective image capture modes
8 as it thinks about image capture modes.
9 It doesn't say what the other displays
10 will show.

11 Q The description in Whitehorn
12 itself is different in terms of what it
13 says about the display of information in
14 the two image capture modes, right?

15 STEPHEN SCHREINER:

16 Objection. Form.

17 THE WITNESS: Yeah, there's a
18 difference. It says in one mode
19 it will at least display on small
20 screen, and the other mode, it
21 will at least display on the top
22 large screen.

1 BY T. VANN PEARCE:

2 Q In step 608, the display of
3 information on the top large screen is
4 conditioned upon the top cover being in a
5 certain position, right?

6 A So it literally says that, yes.

7 Enter second image capture mode
8 and display information on top large
9 screen interface on second orientation,
10 if top cover is not folded onto bottom
11 cover, and there is more than --

12 (Reporter Clarification.)

13 THE WITNESS: And there is
14 more than plus or minus 45 degrees
15 of rotation about the sub-hinge
16 with respect to home position.

17 BY T. VANN PEARCE:

18 Q Can you turn to your
19 declaration.

20 A Okay. Yep.

21 Q It's page 88 of the PDF,
22 paragraph 217.

1 Do you see that?

2 A (Reviewing.) Yep. 217 you
3 said?

4 Q Yeah, paragraph 217.

5 A Oh, okay. Let me go back. I
6 misinterpreted what you said. Okay.

7 Q You're talking about the first
8 image capture mode in Whitehorn, right?

9 A Right.

10 Q And you mention that in that
11 mode the small screen will display
12 preview of the image being captured,
13 right?

14 A That's right.

15 Q You say, "Whitehorn does not
16 disclose what, if anything, is displayed
17 on the top large screen 128." Right?

18 A That's right.

19 Q In the first image capture mode,
20 the large screen 128 could show nothing,
21 right?

22 A Yes, it could show nothing.

1 Q In this first image capture
2 mode, the top large screen is folded over
3 so that it's not visible to the user,
4 right?

5 A That's correct.

6 Q So the top large screen in the
7 first image capture mode could be
8 displaying something or not.

9 Those are two options, right?

10 A That's right.

11 Q In the second image capture mode
12 of Whitehorn -- let me point you to the
13 right paragraph of your declaration, just
14 give me a moment. I think it is actually
15 earlier in the declaration.

16 It's on page 61 of the PDF.

17 A Okay. I am on page 61.

18 Q Actually, I'm sorry, page 60.
19 One page before that.

20 A Hm-hm.

21 Q So here, you're showing an
22 annotated Figure 5 of Whitehorn, right?

1 A Yep.

2 Q This would be an example of
3 Whitehorn being in the second image
4 capture mode, right?

5 STEPHEN SCHREINER:

6 Objection. Form.

7 What page are we looking at?

8 T. VANN PEARCE: We are
9 looking at page -- so it's page 56
10 of the declaration, page 60 of PDF
11 document of his declaration.

12 THE WITNESS: When I look
13 at --

14 (Simultaneous Crosstalk.)

15 STEPHEN SCHREINER: Thank
16 you.

17 THE WITNESS: -- page 60 and
18 look at paragraph 143, is that
19 what I should be looking at?

20 BY T. VANN PEARCE:

21 Q No, I'm sorry.

22 It's page 56. If you look at

1 the numbers, I was giving you the number
2 of the PDF, sometimes I find that easier
3 to make the record clear.

4 It's paragraph 135 and then
5 there's a figure above that.

6 A Yep.

7 Q Okay.

8 Let me know when you're there.

9 A I am there, sir.

10 Q Okay. Great. Sorry about that.

11 Figure 5 is shown here and you
12 have annotated that, right?

13 A Hm-hm.

14 Q Figure 5 is an example of the
15 device in the second image capture mode,
16 right?

17 A I think that's correct.

18 Q The top large screen 128, which
19 you have annotated, is visible to the
20 user, right?

21 A Hm-hm. Yes.

22 Q Now, in this second image

1 capture mode, the small screen interface

2 118 could be showing nothing, right?

3 STEPHEN SCHREINER:

4 Objection. Form, scope.

5 THE WITNESS: (Reviewing.)

6 So I don't know that I explicitly

7 say anything, but it could be

8 displaying nothing. It could be

9 displaying something.

10 BY T. VANN PEARCE:

11 Q In the next paragraph on page 57

12 of your declaration, paragraph 136, you

13 have a quote from Whitehorn, right?

14 A Yep.

15 Q The quote is, quote, users may

16 prefer this [second image capture] mode

17 when viewing images on the top large

18 screen interface 128 would be more

19 convenient than viewing them on the small

20 screen interface 118. Right?

21 A That's true.

22 Q You understand that quote from

1 Whitehorn to be saying that in the second
2 image capture mode, users would be
3 expected to view the top large screen
4 interface 128 and not the small screen
5 interface 118?

6 A I don't know if I use the word
7 expected, but I say it's saying it's more
8 convenient to view the large screen than
9 the small screen and would depend on the
10 circumstance. But, yes.

11 Q The purpose of the second image
12 capture mode is to give the user the
13 opportunity to view the image through the
14 large screen interface 128, right?

15 A The purpose of what?

16 Q The purpose of the second image
17 capture mode is to give the user the
18 opportunity to view the image through the
19 top large screen interface 128, right?

20 A I think that's at least that.

21 Q In your opinion, the top large
22 screen interface could display a preview

1 image in the first image capture mode,
2 right?

3 That is the mode where the top
4 screen is folded over and shut?

5 A Yeah. So for example, it could
6 be folded over and stacked shut like you
7 said. But there are reasons why, even
8 though it's shut, it might be active.

9 Q You talk about that as an
10 exemplary scenario in your declaration,
11 right?

12 A I think so. You know, for
13 example, with cameras, you might be
14 interested in the heat that's on the
15 system and you might want a constant
16 light source be sensed by a photodiode to
17 help you correct the color imagery of the
18 image. That's one example why you might
19 do that.

20 But I don't think I say that
21 in -- in my declaration, but it's
22 certainly something that I, as a person

1 of ordinary skill in the art, would know.

2 Q If both the small screen
3 interface and the top large screen
4 interface are showing a preview image in
5 both the first and second image capture
6 modes, there would be no difference
7 between the first and second capture
8 modes, right?

9 STEPHEN SCHREINER:

10 Objection. Form.

11 THE WITNESS: You mean if in
12 both circumstances they were both
13 displaying what the camera sees,
14 then there would be no obvious
15 difference between the two, other
16 than they are physically
17 configured differently?

18 Is that what you are saying?

19 BY T. VANN PEARCE:

20 Q Correct.

21 Is that your understanding?

22 A Certainly possible, yes.

1 Q Well, besides the physical
2 configuration difference, what, if
3 anything, would be the difference between
4 the two image capture modes in that
5 circumstance?

6 STEPHEN SCHREINER:

7 Objection. Form.

8 THE WITNESS: I think there's
9 just a physical difference. I
10 don't know what other one I would
11 point to.

12 BY T. VANN PEARCE:

13 Q If you turn to Whitehorn
14 paragraph 28 -- so that's Exhibit 1005,
15 paragraph 28.

16 A Yep. (Reviewing.)

17 Q I'm sorry, paragraph 27.

18 It's the paragraph that
19 describes the first image capture mode,
20 I'm sorry about that.

21 Do you see the last sentence of
22 the paragraph which says, quote, Users

1 may prefer this mode out of convenience
2 or due to bright lighting conditions
3 which would otherwise obscure images
4 displayed on one of the large screen
5 interfaces --

6 (Reporter Clarification.)

7 BY T. VANN PEARCE:

8 Q -- 124 and 128?

9 A I see that.

10 Q Okay.

11 You understand that in this
12 first image capture mode, the users would
13 not be viewing an image on the large
14 screen interfaces?

15 A It says the users may prefer
16 this mode out of convenience. So I don't
17 know that it says they wouldn't. I just
18 say they would -- they may prefer to.

19 Q In this mode, the large screen
20 interfaces are not visible, right?

21 A In the first capture mode.

22 Q The prior sentence reads, quote,

1 In this mode, users are capturing images
2 with the image capture device 116 while
3 looking through the small screen
4 interface 118 in what is being captured.
5 Right?

6 A That's correct.

7 Q So you would expect that in this
8 mode, the users would be looking at the
9 small screen interface 118, right?

10 A I think the user could do that
11 and that would be the preference of
12 what -- the preference that's stated.

13 But again, there are other
14 reasons why that image inside that system
15 might be different than being off.

16 Q If you look down to paragraph 31
17 of Whitehorn.

18 A Hm-hm.

19 Q I will just read the first two
20 sentences. It says, quote, Those skilled
21 in the art will know that the various
22 given -- I'm sorry. Let me start over.

1 Withdraw that.

2 "Those skilled in the art will
3 know that the values given for degrees of
4 rotation, home position, image
5 orientation, and information displayed
6 and/or received on the screen interfaces,
7 as discussed herein are preferred but not
8 required. Other embodiments of the
9 present invention may vary these elements
10 to fit any particular design."

11 Do you see that?

12 A I see that.

13 Q Do you have any basis to
14 disagree with that statement?

15 A Not at this time.

16 Q You understand Whitehorn is
17 teaching that those skilled in the art
18 might vary the information displayed on
19 the screen as compared to the embodiments
20 that are explicitly disclosed?

21 A I understand that.

22 Q You understand Whitehorn is

1 teaching that the device might be
2 modified to either display or not display
3 information on a particular screen?

4 STEPHEN SCHREINER:

5 Objection. Form, scope.

6 THE WITNESS: I don't think
7 that it teaches that, but it
8 certainly allows for that.

9 BY T. VANN PEARCE:

10 Q A person of skill in the art
11 would understand that that is an
12 allowable way to modify the disclosure of
13 Whitehorn, right?

14 STEPHEN SCHREINER:

15 Objection. Form, scope.

16 THE WITNESS: I would say
17 that the person of ordinary skill
18 in the art could do what you
19 discussed. I haven't really
20 opined on whether they would.

21 And I would say that -- yeah,
22 I would just say certainly

1 possibility within the scope of
2 this patent.

3 BY T. VANN PEARCE:

4 Q Do you see, going on to
5 paragraph 31, you can just read it to
6 yourself, I won't read it aloud. But it
7 discusses one possible modification of
8 replacing the second handheld mode with a
9 simultaneous handheld image capture mode?

10 A (Reviewing.) Yes.

11 Q The second handheld mode is
12 described in the preceding paragraph 30,
13 right?

14 A (Reviewing.) I read that, yes.

15 Q Paragraph 30 describes that in
16 the second handheld mode, information is
17 displayed on the top large screen
18 interface 128, right?

19 A Yep.

20 Q In paragraph 31, the
21 modification, the simultaneous handheld
22 image capture mode would display

1 information on both the top large screen

2 interface 128 and the small screen

3 interface 118, right?

4 A I think that's correct.

5 Q In the second handheld mode, the

6 one described in paragraph 30,

7 information is not displayed on the small

8 screen interface 118, right?

9 STEPHEN SCHREINER:

10 Objection, form. Scope.

11 THE WITNESS: (Reviewing.)

12 So you are saying that does it

13 disclose that the small screen

14 isn't showing anything in

15 paragraph 30?

16 BY T. VANN PEARCE:

17 Q Yeah. In paragraph 30's

18 embodiment.

19 A Yeah.

20 Q Information is not displayed on

21 the small screen interface 118. Is that

22 your understanding?

1 STEPHEN SCHREINER:

2 Objection. Scope -- objection.

3 Scope.

4 THE WITNESS: Yeah, I don't
5 know if I opined on that. I would
6 just say it doesn't say anything
7 about the small screen in
8 paragraph 30.

9 BY T. VANN PEARCE:

10 Q It does say something about the
11 small screen in paragraph 31, when it
12 describes modifying paragraph 30, right?

13 A It does.

14 Q You would understand that to
15 mean that the paragraph 30 embodiment is
16 not displaying information on the small
17 screen, right?

18 STEPHEN SCHREINER:

19 Objection. Scope. Asked and
20 answered.

21 THE WITNESS: Yeah, I think I
22 answered that.

1 BY T. VANN PEARCE:

2 Q Just what is the answer for the
3 record?

4 A I think in 30, they don't
5 disclose what would happen with the small
6 screen interface in terms of what it
7 would actually display, whether it would
8 be the preview information, some other
9 information, or if it --

10 (Reporter Clarification.)

11 THE WITNESS: If it was
12 preview information, some other
13 information, or if it was off.

14 BY T. VANN PEARCE:

15 Q All right. So let's -- you can
16 put Whitehorn away for a minute. Move on
17 to a little different topic for the next
18 10 minutes or so. I know you have got to
19 take a break.

20 You talked about early iPhones
21 in your declaration, right?

22 A Right.

1 Q So iPhone circa 2010 was a
2 single screen device, right?

3 A Yes, sir.

4 Q It's not a dual screen device,
5 like what is described in the '842
6 patent, right?

7 A I think that's correct.

8 Q iPhones, as of that time -- let
9 me withdraw that you and re-ask the
10 question.

11 The iPhones as of that time
12 would lock after some period of time and
13 the screen would turn off, right?

14 A Sure.

15 Q iPhone settings would allow the
16 user to determine how long the screen
17 would stay on before it would lock,
18 right?

19 A I think so.

20 Q The person skilled in the art
21 would understand a mobile device's screen
22 could be designed to turn off, right?

1 A Sure.

2 Q That was within the knowledge of
3 a POSITA. You would agree with that?

4 A I think that's true.

5 Q It requires power to keep a
6 mobile device's screen on, right?

7 A Sure.

8 Q The longer that mobile device
9 screen is, the faster the battery would
10 drain; is that fair?

11 A That's true.

12 Q In 2011, around the time of the
13 '842 patent's invention, the battery
14 capacity of mobile devices was limited,
15 right?

16 A Yes.

17 Q It's still limited today, right?
18 It's better but still limited, right?

19 A Sure.

20 Q You would agree that extending
21 battery life is a goal for mobile
22 devices. That's a desirable attribute?

1 A It's a trade off. But
2 generally, people try to reduce the
3 amount of power used to get the job done.

4 Q Turning off a screen on mobile
5 device that is not being viewed would
6 have the benefit of limiting unnecessary
7 battery consumption; is that fair to say?

8 A It could have that benefit, but
9 it would have to be weighed against other
10 benefits about keeping that on.

11 Q But at least one reason why you
12 might in some circumstances want to turn
13 off a screen that's not being viewed is
14 to save battery life; is that fair to
15 say?

16 A You could do that.

17 Q Let's go to your declaration,
18 moving to a different claim element.
19 This is on page 72.

20 Here, ^ and in some other places
21 in your declaration, you discuss whether
22 Chin disclosed a touchscreen interface

1 and controls on a touchscreen, right?

2 A That's correct.

3 Q Okay.

4 Now, Chin had two display units,
5 51, 52, we looked at earlier, right?

6 A Right.

7 Q You would agree that Chin
8 discloses that those two display units
9 could be an LCD screen, right?

10 A I think that's fair.

11 Q At the time of the invention of
12 the '842 patent, it was known in the art
13 that LCD devices could be touchscreens,
14 right?

15 STEPHEN SCHREINER:

16 Objection. Scope.

17 THE WITNESS: Did I make that
18 statement somewhere? I don't
19 recall.

20 BY T. VANN PEARCE:

21 Q I'm asking you as a person
22 skilled in the art at the time, it was

1 known in the art that LCD devices could
2 be touchscreens, right?

3 STEPHEN SCHREINER:

4 Objection. Scope.

5 THE WITNESS: Could you point
6 me in my report where I say that?

7 BY T. VANN PEARCE:

8 Q Is that something that you can
9 answer sitting here today, whether there
10 was a touchscreen LCD known in 2010?

11 A I think that it's fair to say
12 there are LCD touchscreens out there at
13 that time.

14 Q You discussed iPhones in your
15 declaration, right?

16 A I did.

17 Q Starting from the first iPhones,
18 those included a touchscreen display,
19 right?

20 A I think that's correct.

21 Q And the touchscreen was used to
22 control the device, right?

1 A Sure.

2 Q Including the capture images,
3 right?

4 A Sure.

5 Q And the touchscreen would
6 include a gesture capture region, right?

7 STEPHEN SCHREINER:

8 Objection. Form.

9 THE WITNESS: You could do
10 something on the screen with
11 regard to touching it and
12 gesturing.

13 BY T. VANN PEARCE:

14 Q And the purpose of a touchscreen
15 is to allow the user to control the
16 device with touch inputs, right?

17 A A touchscreen allows for what
18 you described.

19 Q If you look at Chin, in
20 paragraph 61 --

21 A Of which -- look at paragraph 61
22 of Chin?

1 Q Yes, which is on page 16 of the
2 PDF.

3 A Okay.

4 Q Just let me know when you're
5 there.

6 A I am.

7 Q Okay.

8 It talks about here a second
9 button unit of Chin, right?

10 A Hm-hm.

11 Q And the last sentence says that
12 the structure of the second button unit
13 is not limited to the structure described
14 above and that it may be embodied by
15 using different components such as a
16 touchscreen-type liquid crystal display,
17 right?

18 A Sure.

19 Q So you would agree there's a
20 disclosure in Chin that an LCD could be a
21 touchscreen, right?

22 A (Reviewing.)

1 STEPHEN SCHREINER:

2 Objection. Form.

3 THE WITNESS: One second.

4 So it's talking about the
5 second button unit, which is
6 physically below the display. Is
7 that correct?

8 It's physically below the
9 display and it's suggesting that
10 you could use a touchscreen-type
11 liquid display in its place.

12 BY T. VANN PEARCE:

13 Q I know you have got to go, last
14 question then we can take a break.

15 A Go ahead.

16 Q Confirming: Chin does disclose
17 that liquid crystal displays could be
18 touchscreen-type, right?

19 STEPHEN SCHREINER:

20 Objection.

21 THE WITNESS: It discloses
22 that you could replace button --

1 button unit, the second button
2 unit is not limited to the above
3 structure and may be embodied by
4 using different components such as
5 a touchscreen-type liquid crystal
6 display.

7 T. VANN PEARCE: Why don't we
8 break since I know you have a
9 call. We can reconvene at 11:30.

10 THE WITNESS: Thanks.

11 THE REPORTER: Off the
12 record.

13 (Whereupon a Recess Commenced
14 at 10:59 a.m. and Testimony
15 Recommenced at 11:38 a.m. EST.)

16 BY T. VANN PEARCE:

17 Q Welcome back.

18 We were talking about the Chin
19 reference before we took a break.

20 A Yep.

21 Q If you could put that back in
22 front of you, and in particular, I would

1 like to direct your attention to
2 paragraph 46. Let me know when you're
3 there.

4 A Yep. One second.

5 Yep, I am here.

6 Q The last sentence of paragraph
7 46 reads, quote, However, the present
8 invention is not limited to the
9 illustrated configuration of display
10 apparatuses, (i.e., the first display
11 unit 51 and the second display unit 52).
12 Furthermore, the display apparatuses are
13 not limited to LCD apparatuses, and an
14 organic light-emitting diode (OLED) can
15 also be used as the first display unit 51
16 and the second display 52.

17 Do you see that?

18 A I do.

19 Q Do you agree based on this
20 disclosure, a POSITA would understand a
21 modification of the displays taught in
22 Chin is possible?

1 STEPHEN SCHREINER:

2 Objection. Form.

3 THE WITNESS: (Reviewing.)

4 So I read it discloses that you
5 could use other kinds of displays
6 in different arrangements.

7 BY T. VANN PEARCE:

8 Q Before the break, we were
9 looking at paragraph 61 of Chin,
10 discussing the button unit.

11 Do you recall that?

12 A Hm-hm.

13 Q And would you agree based on the
14 disclosure in paragraph 61, a POSITA
15 would understand that it would be
16 possible to modify the configuration of
17 the button unit?

18 A (Reviewing.) I would agree it
19 states that the structure of the second
20 button unit is not limited to the above
21 structure and may be embodied and
22 modified by using a different component,

1 such as a touchscreen-type liquid crystal
2 display for that touchscreen -- that
3 third component -- the button unit,
4 sorry.

5 Q If you turn to your declaration,
6 paragraph 204, which is on page 80?

7 A Just one second. Okay.

8 Q Now, in this section you're
9 responding to the argument in the IPR
10 petition about modifying the disclosure
11 of Chin such that the display units would
12 be touchscreen devices, right?

13 A Yep.

14 Q And it's your opinion it would
15 not have been obvious to modify Chin to
16 make either of the display units a
17 touchscreen device; is that correct?

18 A That's right.

19 Q You say in paragraph 206, that a
20 POSITA would not make that modification
21 because it is contrary to the design
22 principal of Chin to separate the display

1 function from the control function,
2 right?

3 A Right.

4 Q Is it your understanding that
5 the petitioners proposed modification to
6 Chin would eliminate the button Unit 33A
7 that's on the connecting unit 30 in Chin?

8 A (Reviewing.) I would just say
9 that -- I would say it's definitely the
10 case if you removed it, that wouldn't be
11 a good -- that would be a tough
12 modification to make because it
13 eliminates features that exist in the
14 current unit that have some advantages.

15 Q Are you done with your answer or
16 was that --

17 A I am done with my answer, as
18 best as I could understand what you are
19 asking.

20 Q Sure. Let me back up.

21 So you understand that the
22 petition presents an obviousness argument

1 with respect to the set?

2 A Right.

3 Q I want to make sure I understand
4 your understanding to that argument.

5 A Right.

6 Q Do you understand the petition
7 to be proposing a modification to Chin
8 that would eliminate the button Unit 33A
9 on the connecting unit 30?

10 A Let me just look at this.

11 (Reviewing.)

12 I guess what I state here is on
13 paragraph 206, "However, my opinion is
14 that a POSITA would not make that
15 modification because it is contrary to
16 the design principal of Chin to separate
17 the display function from the control
18 function."

19 So I am saying that absent -- I
20 mean, it could require that you remove
21 it. But again, it's also potentially
22 applicable to say, well, the design

1 principle of the system as it's shown,
2 doesn't have a touch element with the
3 liquid crystal screen. All it says is
4 the button could be replaced by
5 touchscreen -- sorry touchscreen liquid
6 crystal screen, but doesn't -- it doesn't
7 talk about making a modification for
8 display 1 or display 2, or screen 1 or
9 screen 2 to have touch on it.

10 (Reporter Clarification.)

11 THE WITNESS: 206.

12 BY T. VANN PEARCE:

13 Q In your reading of Chin, Chin
14 does not expressly talk about display 1
15 or display 2 being a touchscreen, right?

16 A It doesn't explicitly state that
17 either display 1 or display 2 is a
18 touchscreen.

19 Q Then in your reading of Chin, it
20 also would not be obvious to modify
21 display 1 or display 2, right?

22 A Well, the arguments presented

1 are not -- you know, you have to provide
2 a reason to -- you have to have a
3 disclosure or some person of the ordinary
4 skill in the art saying this is obvious
5 to do and there would have to be a reason
6 to combine them, and then there would
7 have to be some -- there have to be
8 motivation to combine them.

9 And -- yeah, I would like to
10 understand, like -- I didn't see anything
11 where an advantage was given. So just
12 going through those arguments -- just one
13 second. (Reviewing.)

14 I'm sorry. I guess that last
15 piece is, you know, would you do it as
16 opposed to could you do it. I didn't see
17 any kind of argument made about you would
18 do it as opposed to you could do it.

19 Q You understand that a claim
20 could be obvious based on a modification
21 of a reference, even if the reference
22 does not provide an express motivation to

1 make the modification, right?

2 A I understand that, yeah.

3 Q Going back to what we were
4 talking about a minute ago, then. Is it
5 your understanding that the proposed
6 modification in the petition is to
7 eliminate the button Unit 33A on the
8 connecting unit 30?

9 A I don't know that it
10 specifically is that, but I would say
11 that the modification that's proposed is
12 to add something to the displays, and I
13 think that's contrary to the design
14 principle to keep those two things
15 separate.

16 And the claim terms require that
17 we talk about display 1 and display 2 or
18 screen 1 or screen 2, and those, in order
19 to meet the claims, need to have some
20 sort of touch on them. And so I am just
21 looking at what I understand about what
22 the design was.

1 They made a very explicit
2 decision not to put touch on that screen.
3 So you start there and you go, why didn't
4 they do that? And then the last bit is,
5 well, they could -- you know, certainly
6 they could, but the fact they didn't
7 originally, you know, requires some
8 reasoning as to why you want to add it.
9 And I didn't see anything necessarily,
10 hindsight or something like that, as to
11 why you would add it that way, given the
12 way they with doing touch was totally
13 separate.

14 Q You mentioned in your last
15 answer the modification being contrary to
16 the design principle in Chin, right?

17 A Hm-hm.

18 Q You talk about that in paragraph
19 207 of your declaration, right?

20 A Yep.

21 Q In that paragraph, you quote
22 from a portion of Chin paragraph 9,

1 right?

2 A Let me see where I wrote that.

3 But yeah, yeah, Chin 0009.

4 Q Let's take a look at paragraph
5 9, if you can get that back in front of
6 you.

7 A Just a second here. (Reviewing.)
8 Okay.

9 Q You quoted a portion of this
10 first sentence that began with, "buttons
11 disposed," right?

12 A Yep.

13 Q I am going to read the entire
14 sentence. The entire sentence reads,
15 quote, Also, if the portable information
16 terminal is operated in a folded state so
17 as not to externally expose the display
18 apparatus, buttons disposed on a lateral
19 surface of the display apparatus (or the
20 second panel) are not externally exposed,
21 and thus, are inaccessible which makes it
22 difficult to operate the portable

1 information terminal. Right?

2 A Right.

3 Q This is describing a
4 circumstance where the display apparatus
5 is not externally exposed, correct?

6 A Yep.

7 Q Can you turn to Figure 5 of
8 Chin.

9 A (Reviewing.) Yeah, I am looking
10 at it.

11 Q In Figure 5 of Chin, the second
12 display unit 52 is externally exposed,
13 right?

14 A That's right.

15 Q If Figure 6 of Chin, the display
16 unit 51 is externally exposed; is that
17 right?

18 A That's right.

19 Q If you turn to paragraph 225 of
20 your declaration. Here, we are talking
21 about a different limitation of Claim 11.

22 A Okay. Just give me one second.

1 Q Yeah, of course.

2 A (Reviewing.) You said paragraph
3 225?

4 Q Yes.

5 A (Reviewing.) Yep.

6 Q In this paragraph, you're
7 discussing language from Claim 11 of the
8 '842 patent which you have quoted here.

9 A Hm-hm.

10 Q Quote, the second screen faces
11 an opposite direction from the first
12 screen when the device is closed. Right?

13 A Right.

14 Q You're talking about the
15 Whitehorn reference, right?

16 A Right.

17 Q You say that, "Whitehorn's first
18 image capture mode has the bottom large
19 screen 124 and top large screen 128 are
20 facing towards each other, not facing
21 away from each other as claimed." Right?

22 A Right.

1 Q The claim language doesn't say
2 facing away from each other, right?

3 A (Reviewing.) Right.

4 Q The claim language says faces an
5 opposite direction, right?

6 A Okay.

7 Q Is that correct?

8 A It does.

9 Q In your opinion, a person of
10 ordinary skill would understand two
11 screens facing each other are not facing
12 in opposite directions; is that correct?

13 A (Reviewing.) So -- just one
14 second here. One second. (Reviewing.)

15 So just so I am clear, the
16 question is, do I understand whether the
17 limitation could be met by -- that the --
18 I am saying the limitation can only be
19 met if the opposite directions are facing
20 away from each other, as opposed to
21 facing each other so that you can't
22 interact with it.

1 Q Were you asking me to clarify
2 the question?

3 A I'm asking you because I can't
4 recall the question completely, but I
5 wanted to clarify it so I understand.

6 Q Sure. Let me -- couple of
7 minutes ago -- let me re-ask the
8 question. If you need further
9 verification, let me know, okay?

10 A Okay.

11 Q In your opinion, a person of
12 ordinary skill would understand that two
13 screens facing each other are not facing
14 in opposite directions; is that correct?

15 A I see. I think what I would say
16 is that the way I was trying to
17 invalidate Claim 11 was to say that the
18 claim requires that you be able to
19 receive user interface input to --

20 (Reporter Clarification.)

21 THE WITNESS: -- execute an
22 image capture function, and I was

1 just trying to say that that one
2 would understand in that
3 circumstance, that that would
4 require the screen faces are in
5 opposite direction in order to
6 enable that. If they are not,
7 then -- then that limitation
8 couldn't be met which would be
9 11B.

10 STEPHEN SCHREINER: Could we
11 take a second to correct the
12 record so I don't want have to do
13 redirect.

14 He misstated something in his
15 answer, I think both you and I
16 saw.

17 T. VANN PEARCE: About
18 invalidating Claim 11?

19 STEPHEN SCHREINER: Correct.

20 T. VANN PEARCE: Yeah, I
21 assumed he's not trying to
22 invalidate Claim 11.

1 THE WITNESS: I didn't say

2 that. I meant to validate.

3 BY T. VANN PEARCE:

4 Q That's fine.

5 So let me make sure I understand
6 your last answer. Dr. Surati, is it your
7 opinion that in Claim 11 of the '842
8 patent, the language, the second screen
9 faces in opposite direction from the
10 first screen is used in a limited way to
11 only refer to the screens facing away
12 from one another?

13 STEPHEN SCHREINER:

14 Objection. Form.

15 THE WITNESS: I would just
16 say when I read the claims as a
17 whole and consider that
18 limitation, I could see the
19 limitation being met, if they were
20 in this opposite direction facing
21 each other, except for the fact
22 that you can't -- the claim

1 further requires receiving a user
2 interface input to execute the
3 image capture function.

4 I am simply saying to meet
5 the whole thing, the reason I
6 interpret it the way I did and
7 gave that example, I am expecting
8 the user to be able to interact
9 with the screens and the -- so
10 when it talks about facing in
11 opposite direction, to me, that
12 implies that they are facing in
13 opposite direction and not closed
14 against each other. They are not
15 facing each other. They are
16 facing outwards.

17 BY T. VANN PEARCE:

18 Q You would agree the ordinary
19 meaning of opposite direction, outside
20 the context of the patent, could
21 encompass two things that are
22 face-to-face with each other, right?

1 A Absolutely.

2 STEPHEN SCHREINER:

3 Objection. Scope.

4 BY T. VANN PEARCE:

5 Q Like you and I are talking to
6 each other, we are facing in opposite
7 directions, right?

8 STEPHEN SCHREINER:

9 Objection. Form.

10 BY T. VANN PEARCE:

11 Q I withdraw that question.

12 Assume I was in the room instead
13 of Zoom and we were face-to-face, we
14 would be facing the opposite direction?

15 STEPHEN SCHREINER:

16 Objection. Form, scope.

17 THE WITNESS: Yeah. I don't
18 know that I opined on that
19 particular thing.

20 I would just say I gave you
21 an answer about why the prior art
22 that you are talking about doesn't

1 invalidate patent Claim 11. I
2 just was merely saying if they
3 were facing each other and you
4 were just looking at that part of
5 the claim, you could say that they
6 were in opposite directions.

7 But in order to meet the
8 claim, you still have to have a
9 user interface. So that implies
10 what is meant by that, it's --
11 considering the claim as a whole,
12 is they would be facing outward.

13 BY T. VANN PEARCE:

14 Q Do you understand Claim 11 of
15 the '842 patent to require a user
16 interface from the first screen or the
17 second screen when the device is in a
18 closed state?

19 A Well, I think that's what I am
20 trying to say. I don't think you can
21 give user interface input when the device
22 is in a closed state as shown.

1 Q You understand that claims have
2 to be interpreted the same way for
3 purposes of evaluating both infringement
4 and validity, right?

5 A To a large extent, yes.

6 Q So if Multifold were to argue
7 two screens facing each other in a closed
8 position in a Motorola phone were facing
9 in opposite directions, as claimed in
10 Claim 11, you would disagree with that,
11 right?

12 STEPHEN SCHREINER:

13 Objection. Scope.

14 THE WITNESS: I don't think I
15 opined on that. I would have to
16 see the particular situation.

17 BY T. VANN PEARCE:

18 Q You did submit a declaration in
19 the District Court litigation in this
20 case, right?

21 A I -- I haven't refreshed my
22 memory. I don't recall.

1 Is there a particular one you
2 can point me to?

3 Q Have you ever seen any of the
4 infringement contentions that were
5 submitted in the District Court case
6 between Multifold and Motorola and
7 Google?

8 A I have not.

9 Q You would agree that the device
10 in Claim 11 of the '842 patent could be
11 in other configurations besides a closed
12 configuration, right?

13 A If you mean by the screens are
14 facing each other versus facing apart,
15 there seems to be an indication that --
16 in the patent, that the screens could
17 face away from each other and that would
18 be considered a different configuration.

19 Q I had a different question in
20 mind so let me ask it a little
21 differently.

22 Why don't we look at Claim 11 of

1 the '842 patent.

2 A Okay.

3 Q Let me know when you're there.

4 A I am here.

5 Q Okay.

6 The second limitation reads, a
7 second screen -- wherein, the second
8 screen faces in an opposite direction
9 from the first screen when the device is
10 closed. Right?

11 A Yep.

12 Q Your interpretation of that
13 language in the context of the claim, is
14 that the first screen and the second
15 screen have to be facing away from each
16 other, right?

17 A That's right.

18 Q And that is the closed
19 configuration claimed here in Claim 11,
20 right?

21 A I am not sure I agree with what
22 you said.

1 So if they are facing away from
2 each other, then it's -- I guess it is
3 closed. I guess -- let's back up.

4 So I guess I don't completely
5 understand.

6 Q Let me ask it a little different
7 question.

8 The device in Claim 11 does not
9 have to be in a closed configuration all
10 the time, right?

11 STEPHEN SCHREINER:
12 Objection. Scope. Legal
13 conclusion.

14 THE WITNESS: I would just
15 say that it would depend on the
16 device. But a device that
17 potentially meets all these claim
18 limitations could have other
19 configurations.

20 BY T. VANN PEARCE:

21 Q In fact, Claim 11 goes on to say
22 that the devices process is operable to

1 determine one or more of an image capture
2 function configuration device orientation
3 in a device state, right?

4 A Just one second. So that would
5 be the 11D. It could -- the processors
6 are operable to limitation 11E, 11F and
7 11G and 11H.

8 So yeah, I believe, as you
9 stated, that if that included those
10 things, what you said is true.

11 Q That means that the device could
12 have different device orientations,
13 right?

14 STEPHEN SCHREINER:
15 Objection. Calls for legal
16 conclusion, scope, form.

17 THE WITNESS: Yeah, I
18 don't -- (Reviewing.)

19 I don't think I opined on
20 that in a particular way here,
21 looking at paragraph 225, 226,
22 227.

1 BY T. VANN PEARCE:

2 Q Well, you have opined, though,
3 that the device -- withdraw that.

4 You have opined as to your
5 understanding of the meaning of opposite
6 direction in Claim 11, right?

7 A Sure.

8 Q Your understanding of the
9 meaning of opposite direction of Claim 11
10 is that the two screens are facing away
11 from each other, right?

12 A Right.

13 Q And the basis for that, at least
14 in part, is because the screen has to be
15 visible or accessible to the user in
16 order to allow user input in your
17 opinion, right?

18 A Right.

19 Q My question to you is, the
20 device in Claim 11 does not have to be in
21 a closed state all the time, correct?

22 A I don't think it's a

1 requirement.

2 Q In fact, the '842 patent, if you
3 look at, for example, Figure 3A, shows a
4 number of different device orientations
5 in various stages of open, closed,
6 partially opened, et cetera, right?

7 A It does.

8 Q Okay.

9 You are not interpreting Claim
10 11 to exclude those different device
11 orientations, right?

12 STEPHEN SCHREINER:
13 Objection. Scope, legal
14 conclusion, form.

15 THE WITNESS: Yeah, I don't
16 know that I gave an opinion on
17 that. I would have to think about
18 it. I would have to -- I guess I
19 don't want to give an off-the-cuff
20 answer to you about that.

21 BY T. VANN PEARCE:

22 Q That's my question.

1 You have not given an opinion
2 that Claim 11 is limited to just a closed
3 state, correct?

4 A I don't think so.

5 Q Now, turning back to your
6 declaration, paragraph 229.

7 A Just one second. (Reviewing.)

8 Yep. I am looking at it.

9 Sorry.

10 Q Here, you're discussing other
11 language in Claim 11 with, "image capture
12 lens is associated with the second
13 screen." Right?

14 A Right.

15 Q Is your contention that the
16 Whitehorn reference does not disclose an
17 image capture lens associated with a
18 second screen, right?

19 A Yeah.

20 Q And your understanding of the
21 claim term associated excludes physically
22 separate components from being associated

1 with each other, correct?

2 A (Reviewing.) I am just saying,
3 you know, in paragraph 230, Petitioners'
4 argument for the image capture lens is
5 associated with second screen -- and the
6 limitation fails because it's based on
7 the second image capture mode of
8 Whitehorn, which conflicts with the
9 petitioners' reliance on the first image
10 capture mode or second handheld mode for
11 second screen faces an opposite direction
12 from the first screen when the device is
13 closed.

14 And I say, Also, the second
15 image capture mode of Whitehorn does not
16 disclose an image capture lens is
17 associated with the second screen. The
18 '842 patent discloses an image capture
19 lens -- 168 on screen 104 as depicted.

20 According to the petitioners'
21 argument, the alleged second screen in
22 Whitehorn is a top large screen. But

1 image capture device (alleged image
2 capture lens) is part of hinge 104. It's
3 not part of the top large screen -- hinge
4 104 and top large 128 are physically
5 separate components.

6 So I think -- I think that's --
7 that's what I said.

8 Q Okay.

9 In that last paragraph you just
10 read, paragraph 232 of your declaration,
11 you noted hinge 104 and top large screen
12 128 are physically separate components,
13 right?

14 A That's right.

15 Q And the image captured device as
16 part of the hinge 104?

17 A Hm-hm.

18 Q Image capture device is also
19 then physically separate from the top
20 large screen, correct?

21 A That's right.

22 Q For that reason, in your

1 opinion, the image capture device is not
2 associated with the top large screen,
3 correct?

4 A Yeah, that's what I said.

5 Q Right.

6 So in your opinion, associated
7 as used in the claim would exclude
8 physically separate components, right?

9 A Based on what I said, yes.

10 Q You would agree that the images
11 that are captured by the image captured
12 device are displayed on the top large
13 screen in Whitehorn second image capture
14 mode there, right?

15 A I do agree with that.

16 Q Can you turn to Whitehorn, which
17 is Exhibit 1005. Look at Figure 4.

18 A Just a moment, okay.

19 (Reviewing.)

20 What was the figure in
21 Whitehorn?

22 Q Figure 4.

1 A I am looking at it.

2 Q Okay.

3 Figure 4 showing the Whitehorn
4 device in the first image capture mode
5 where the two large screens are folded on
6 each other, right?

7 A Right.

8 Q Okay.

9 That's depicted here in Figure
10 4, right?

11 A Right.

12 Q Okay.

13 In this depiction of Figure 4,
14 would you agree that the width of the
15 device is less than the height of the
16 device?

17 A Sure.

18 Q Going back to that point about
19 the meaning of "associated," we look at
20 paragraph 231 of your declaration.

21 A Okay.

22 Q You here discuss a figure from

1 the '842 patent Figure 1A, right?

2 A Right.

3 Q This figure is informing your
4 understanding of the meaning of "the
5 associated" in the '842 patent; is that
6 fair to say?

7 A Yes.

8 Q Does the term "associated" in
9 the '842 patent have a narrower meaning
10 than the ordinary meaning of "associated"
11 in the art?

12 STEPHEN SCHREINER:

13 Objection. Scope.

14 THE WITNESS: I don't think I
15 have made an opinion on that.

16 BY T. VANN PEARCE:

17 Q You have made an opinion,
18 though, as to the meaning of
19 "associated."

20 We just talked about that,
21 right?

22 A Right.

1 Q Okay.

2 That opinion is informed by what
3 is in the patent, right?

4 A Sure.

5 Q Is that opinion also informed by
6 some other source or is it based on what
7 you are reading in the '842 patent?

8 STEPHEN SCHREINER:
9 Objection. Form, scope.

10 THE WITNESS: I mean, it's
11 informed by what I am reading in
12 the patent, at least, and then it
13 depends on the claim I am reading
14 it out of and the context of that
15 claim.

16 BY T. VANN PEARCE:

17 Q Do you have an understanding of
18 whether the term "associated" has an
19 ordinary meaning in the art, outside of
20 the context of the '842 patent?

21 A I think it -- I don't know that
22 I gave a particular opinion about it. I

1 used it, but I think in the context of
2 this patent, it's what I described here.

3 Q Do you agree a person of
4 ordinary skill in the art would
5 understand that two things could be
6 associated with each other, if, for
7 example, they are electrically connected,
8 if not physically connected?

9 A I think --
10 (Simultaneous Crosstalk.)

11 STEPHEN SCHREINER:
12 Objection. Objection. Scope.

13 THE WITNESS: Yeah, I haven't
14 given an opinion, but I would just
15 simply say that I would say that
16 it's possible that one could make
17 that -- draw that conclusion for
18 particular situations and it's
19 certainly possible, I guess.

20 BY T. VANN PEARCE:

21 Q In the context of the '842
22 patent, though, you think a narrower

1 interpretation of "associated" would
2 apply, right?

3 A I guess it's what I said.

4 T. VANN PEARCE: So why don't
5 we take five-minute break. I will
6 see if I have any other questions,
7 and then if so, I will ask those.
8 If not, we can wrap up or at least
9 I will pass the witness.

10 Is that okay?

11 THE WITNESS: Yeah.

12 STEPHEN SCHREINER: Sounds
13 good.

14 THE REPORTER: Off the
15 record.

16 (Whereupon a Recess Commenced
17 at 12:21 p.m. and Testimony
18 Recommenced at 12:26 p.m. EST.)

19 T. VANN PEARCE: So Dr.
20 Surati, thanks so much for your
21 time this morning. I have no
22 further questions at this time.

1 I pass the witness.

2 STEPHEN SCHREINER: Sure. I
3 will take -- I have just got a
4 couple of follow-up questions on
5 redirect, Vann.

6 Let me take a brief break and
7 then we will get back on the
8 record and take care of that.

9 T. VANN PEARCE: Okay.

10 STEPHEN SCHREINER: Okay.

11 Thank you.

12 THE REPORTER: Off the
13 record.

14 (Whereupon a Recess Commenced
15 at 12:27 p.m. and Testimony
16 Recommenced at 12:35 p.m. EST.)

17

18 EXAMINATION

19 BY STEPHEN SCHREINER:

20 Q This is Steve Schreiner on
21 behalf of Multifold. I have just a
22 couple of questions for redirect.

1 Dr. Surati, do you remember
2 talking about limitation 11B? And I am
3 referring to paragraph 225 of your
4 declaration.

5 A Right.

6 Q If you could take a look at
7 that.

8 And is it correct -- am I
9 correct from your testimony a few moments
10 ago, that you interpret limitation 11B
11 which states, quote, The second screen
12 faces in opposite direction from the
13 first screen when the device is closed,
14 closed quote, as meaning that the two
15 screens are facing away from each other?

16 T. VANN PEARCE: Objection.

17 Leading.

18 THE WITNESS: I do.

19 BY STEPHEN SCHREINER:

20 Q Okay. And is that based on the
21 claim language?

22 A It's based on the --

1 T. VANN PEARCE: Objection.

2 Leading.

3 THE WITNESS: It's based on
4 the claim language and it's also
5 based on specification.

6 BY STEPHEN SCHREINER:

7 Q In fact, you refer to the
8 specification in your declaration in
9 paragraph 226, right?

10 A I do.

11 T. VANN PEARCE: Objection.

12 Leading.

13 BY STEPHEN SCHREINER:

14 Q And is your position that this
15 limitation means the two screens are
16 facing away from each other, supported by
17 that specification, that passage that you
18 cite in paragraph 226?

19 A Yes, I do.

20 Q And that's why you cited that
21 passage of the specification, right?

22 T. VANN PEARCE: Objection.

1 Leading.

2 THE WITNESS: Yeah, that's
3 right.

4 BY STEPHEN SCHREINER:

5 Q So just to make it clear, in
6 short, you're saying limitation 11B
7 requires that the two screens are facing
8 away from each other, right?

9 T. VANN PEARCE: Objection.

10 Leading.

11 THE WITNESS: Yep. Sorry.

12 Yes.

13 BY STEPHEN SCHREINER:

14 Q So if two screens are facing
15 each other, do they meet the requirement
16 that they are facing away from each
17 other?

18 A If they are facing each other, I
19 don't -- like I said in 227, they don't
20 meet that limitation.

21 Q And in Whitehorn, the Whitehorn
22 reference -- do you recall Figure 1 of

1 the Whitehorn reference, the first image
2 capture mode?

3 A Yep.

4 Q In that image capture mode, are
5 the two screens facing each other?

6 A They are.

7 Q So does that configuration meet
8 your interpretation of limitation 11B?

9 A No, it does not.

10 Q So if you said or suggested in
11 your prior testimony that in Whitehorn,
12 where the two screens are facing each
13 other, it might meet the claim language,
14 was that correct?

15 A I don't think so.

16 T. VANN PEARCE: Objection to
17 form.

18 THE WITNESS: Yeah, I don't
19 think so.

20 BY STEPHEN SCHREINER:

21 Q If you said that, that would
22 have been a mistake. Fair to say?

1 A Yeah.

2 T. VANN PEARCE: Objection.

3 Leading.

4 STEPHEN SCHREINER: Thank
5 you.

6 BY STEPHEN SCHREINER:

7 Q Do you recall we also talked
8 about Claim 5 of the '842 patent. And
9 Claim 5 states, quote, wherein a lens is
10 associated with either of the first or
11 second screen.

12 Do you recall that?

13 A I do.

14 Q And you gave an opinion that in
15 the context of Claim 5 in Whitehorn, you
16 did not believe that Whitehorn's first
17 image capture mode, Figure 1, met the
18 limitation of Claim 5, correct?

19 T. VANN PEARCE: Objection.

20 Leading, scope.

21 THE WITNESS: That's right.

22 BY STEPHEN SCHREINER:

1 Q Now, did you give an
2 interpretation that "associated" within
3 Claim 5 is limited to being physically
4 connected?

5 T. VANN PEARCE: Objection.
6 Scope.

7 THE WITNESS: So I merely
8 said in paragraph 232, I made the
9 statement that they are physically
10 separate components, but I did not
11 say that was limiting.

12 BY STEPHEN SCHREINER:

13 Q Right.
14 So two things could be
15 associated with each other by virtue of
16 being, let's say, electrically connected.
17 Fair to say?

18 A Right.

19 T. VANN PEARCE: Objection.
20 Leading.

21 BY STEPHEN SCHREINER:

22 Q So to be clear, you did not give

1 an opinion that -- you don't hold the
2 opinion that in Claim 5, "associated
3 with" is limited to a physical
4 connection. Fair to say?

5 T. VANN PEARCE: Objection.
6 Form, leading.

7 THE WITNESS: Right.

8 STEPHEN SCHREINER: I will
9 pass the witness.

10

11

12 FURTHER EXAMINATION

13 BY T. VANN PEARCE, JR.:

14 Q Dr. Surati, did you discuss the
15 substance of your testimony with counsel
16 during the break we just took?

17 A I did.

18 Q What did you talk about?

19 STEPHEN SCHREINER: I
20 instruct the witness not to
21 answer. Privileged. Work
22 product.

1 T. VANN PEARCE: I disagree
2 with that. It's not privileged if
3 you are discussing the substance
4 of the testimony during the break.
5 I disagree that's privileged.

6 STEPHEN SCHREINER: I think
7 it is privileged and I am
8 instructing him not to answer.

9 T. VANN PEARCE: Okay. I am
10 going to state for the record that
11 that is not privileged, that
12 during a break in the testimony
13 the witness should not be
14 conferring about the substance of
15 the testimony. That's improper.

16 STEPHEN SCHREINER: No,
17 that's incorrect. Under the trial
18 practice guide, the other party --
19 the party proffering the witness,
20 can confer with the witness at the
21 end of cross-examination.

22 T. VANN PEARCE: So just so I

1 have a clean record on this. My
2 question that I asked was -- so I
3 asked Dr. Surati: Did you discuss
4 the substance of your testimony
5 with counsel during the break we
6 just took?

7 You answered: I did.

8 The question was: What did
9 you talk about?

10 You instructed witness not to
11 answer.

12 BY T. VANN PEARCE:

13 Q Dr. Surati, are you following
14 that instruction?

15 A I am.

16 Q Okay.

17 T. VANN PEARCE: Okay. I
18 don't have any further questions,
19 but I will reserve all rights on
20 that point.

21 STEPHEN SCHREINER: Sure.

22 THE REPORTER: Off the

1 record.

2 Mr. Schreiner, will you be
3 ordering a rough draft and
4 five-day delivery?

5 STEPHEN SCHREINER: We don't
6 need any sort of accelerated
7 delivery of the transcript.

8 THE REPORTER: Mr. Ahmed,
9 will you be ordering a rough draft
10 and five-day delivery.

11 QUADEER AHMED: We don't need
12 anything. Thanks for asking.

13 T. VANN PEARCE: Five-day
14 delivery. Is that five business
15 days?

16 THE REPORTER: Yes.

17 T. VANN PEARCE: So that
18 would be the 11th then?

19 THE REPORTER: Yes, the 11th.
20 Do you need it sooner?

21 I can give it to you
22 tomorrow, Thursday, or Friday.

1 T. VANN PEARCE: If we get it
2 by Friday, that would be great.

3 THE REPORTER: Okay.

4 T. VANN PEARCE: Thank you.

5 (Whereupon Testimony Concluded at 12:44
6 p.m. EST.)

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

ACKNOWLEDGEMENT

STATE OF _____

COUNTY OF _____

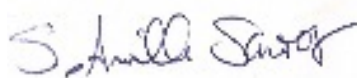
I, the undersigned, hereby
certify that I have read the transcript
of my testimony taken under oath in my
deposition; that the transcript is a true
and complete and correct record of my
testimony, and that the answers on the
record as given by me are true and
correct.

RAJEEV SURATI, PhD

Signed and subscribed to before
me this _____ day of _____,
20__.

Notary Public

1 I, S. Arielle Santos, CSR, CLR, do
2 hereby certify:
3 That prior to being examined, the witness
4 named in the forgoing deposition, was by me
5 duly affirmed to testify the truth, the whole
6 truth, and nothing but the truth.
7 That said deposition was taken before me at
8 the time and place set forth and was taken
9 down by me in shorthand and thereafter
10 reduced to computerized transcription under
11 my direction and supervision, and I hereby
12 certify the foregoing deposition is a full,
13 true and correct transcript of my shorthand
14 notes so taken.
15 I further certify that I am neither counsel
16 for nor related to any party to said action
17 nor in anywise interested in the outcome
18 thereof.

19 
20 _____

21 S. Arielle Santos, CSR
22

0 0009 102:3 1 1 8:19 18:12,14 19:18 23:21 27:1 29:4 37:11,13,22 38:17 39:9 40:9 52:21 54:18 57:4 59:9 60:14 62:9,15 98:8, 14,17,21 100:17,18 131:22 133:17 10 29:20 37:17 83:18 1001 17:16 1004 36:11,15 1005 61:15 75:14 122:17 104 120:19 121:2,4,11,16 107 28:12 10:13 61:10 10:26 61:11 10:59 92:14 11 14:3 18:22 19:3,18 29:4 103:21 104:7 106:17 107:18,22 108:7 111:1, 14 112:10 113:10,22 114:19 115:8,21 117:6,9,20 118:10 119:2,11 111 28:12 116 77:2 118 71:2,20 72:5 77:4,9 81:3,8,21 11:00 8:19,22 60:22 11:30 8:19 92:9 11:38 92:15 11B 107:9 129:2,10 131:6 132:8 11D 116:5 11E 116:6 11F 116:6 11G 116:7 11H 116:7 11th 138:18,19 124 76:8 104:19 128 67:17,20 70:18 71:18 72:4,14,19 76:8 80:18 81:2 104:19 121:4,12 12:21 127:17 12:26 127:18 12:27 128:15	12:35 128:16 12:44 139:5 13 25:4,15 135 70:4 136 71:12 14 24:15 25:5,15 143 69:18 14B/15B/16B 26:11 16 24:15 25:5 90:1 168 120:19 16B 25:15 17 45:22 18 25:20 1A 45:17 124:1 1D 45:17 2 2 23:21 54:18 56:10 57:1 98:8,9,15, 17,21 100:17,18 2002 11:20 2007 14:14 15:1 16:1 2008 14:14 15:1 16:1 2009 15:1 16:1 2010 84:1 88:10 2011 85:12 2025-000338 11:17 204 95:6 206 95:19 97:13 98:11 207 101:19 217 66:22 67:2,4 225 103:19 104:3 116:21 129:3 226 116:21 130:9,18 227 116:22 131:19 229 119:6 230 120:3 231 123:20 232 121:10 134:8 25th 12:11 27 75:17	28 75:14,15 3 3 13:17 23:22 24:3,4 26:16 30 13:5 61:1 80:12,15 81:6,15 82:8, 12,15 83:4 96:7 97:9 100:8 30's 81:17 31 77:16 80:5,20 82:11 33A 96:6 97:8 100:7 35 61:2 36 26:16 39 18:5,8,20 23:10 3A 118:3 4 4 13:17 26:2,14 122:17,22 123:3,10, 13 40 18:21 23:11 53:2 42 25:19 45 48:9 66:14 46 93:2,7 482 63:12 49 44:6,11 5 5 47:13,15,22 62:9,16 68:22 70:11,14 103:7,11 133:8,9,15,18 134:3 135:2 51 47:16 53:18 54:3,11 55:13 56:2 57:8,15 58:9,18,21 59:12 87:5 93:11, 15 103:16 52 47:22 48:4 53:12,22 54:6,19 55:15 56:2,7 57:10 58:9,19 59:10 87:5 93:11,16 103:12 56 69:9,22 57 71:11 58 43:16,18 44:1 6 6 42:16 43:15,18 44:1 62:13,20 63:21, 22 64:8,20 103:15 60 18:6 68:18 69:10,17
---	--	--

604 62:20 63:22 608 63:6,7 64:8 66:2 61 18:6 68:16,17 89:20,21 94:9,14 7 72 86:19 77 45:21 8 8 31:8,10,11 35:11 8,836,842 17:22 80 95:6 842 18:2 23:16 24:11 25:20 27:1 38:11 51:4 84:5 85:13 87:12 104:8 108:7 111:15 113:10 114:1 118:2 120:18 124:1,5,9 125:7,20 126:21 133:8 88 66:21 9 9 12:22 37:18,20 38:2 44:11 45:20 48:12 49:8 50:10 51:10 101:22 102:5 91 23:9 94 24:8,10,14 25:3,14 95 25:18 97 26:7 99 12:2 A a.m. 61:10,11 92:14,15 ability 34:9 absent 97:19 Absolutely 9:11 110:1 accelerated 138:6 accept 28:22 accessible 117:15 accurate 10:3 accurately 12:13 active 73:8 actively 22:19	add 100:12 101:8,11 address 28:11 addresses 12:15 adds 35:2 adopt 29:22 34:2 adopted 29:10,20 32:4,5,13 advantage 99:11 advantages 96:14 Affirmed 6:1 agree 40:1,22 42:4,10 44:19 50:9 52:6,12 85:3,20 87:7 90:19 93:19 94:13,18 109:18 113:9 114:21 122:10,15 123:14 126:3 ahead 27:22 30:18 31:6 91:15 Ahmed 138:8,11 alleged 120:21 121:1 allowable 79:12 aloud 80:6 amount 86:3 analysis 45:8 60:8 and/or 78:6 annotated 23:17,19 25:19,22 68:22 70:12,19 apologize 56:6 apparatus 102:18,19 103:4 apparatuses 93:10,12,13 Appeal 26:19 appears 17:21 Apple 15:6,11,13,17 applicable 97:22 Application 36:16 applications 7:9 applied 19:16 apply 42:18 127:2 argue 112:6 argument 28:2 95:9 96:22 97:4 99:17 120:4,21 arguments 32:2 98:22 99:12 arrangements 94:6 art 29:6 30:2 36:2 37:3 61:22 74:1 77:21 78:2,17 79:10,18 84:20 87:12,	22 88:1 99:4 110:21 124:11 125:19 126:4 articles 15:9 assume 7:6 9:13 110:12 assumed 15:22 17:2 107:21 attention 93:1 attorneys 17:6 attribute 85:22 August 12:11 automatically 47:7 49:20 aware 10:5 B back 38:11,14 40:9 48:12 67:5 92:17, 21 96:20 100:3 102:5 115:3 119:5 123:18 128:7 background 14:6 based 28:21 29:2,7 31:19 34:11 39:2 49:13,19 50:21 59:19 93:19 94:13 99:20 120:6 122:9 125:6 129:20,22 130:3,5 bases 13:15 14:8 basically 7:16 basis 16:17 36:6 78:13 117:13 battery 85:9,13,21 86:7,14 Bear 11:7 began 102:10 behalf 128:21 believed 15:3 benefit 86:6,8 benefits 86:10 birth 6:11 bit 9:2 48:13 101:4 blank 20:17 22:5 board 26:19,20 28:7 29:9 32:13 33:1 34:1 36:7 board's 27:5 30:10 33:21 35:16,21 bottom 18:20 24:7 66:10 104:18 break 9:1,2 60:21 61:2,3 83:19 91:14 92:8,19 94:8 127:5 128:6 135:16 136:4,12 137:5
--	---	--

breaks 9:17 bright 76:2 broadly 28:17 33:5,16 business 138:14 button 90:9,12 91:5,22 92:1 94:10, 17,20 95:3 96:6 97:8 98:4 100:7 buttons 102:10,18 C call 8:20 18:2 20:1 26:20 60:22 61:3 92:9 called 48:4 62:3 Calls 29:13 116:15 Cambridge 6:17 camera 26:9 53:3,6,10,16 55:7,10 56:9,11,12,16,19,22 57:3 58:6,10 60:15 74:13 cameras 73:13 capacity 85:14 capture 18:15 19:4 20:11,13,17,18 23:20,21,22 24:2,3 26:1,2,14,15 28:19 33:8 35:4,6 39:3,6 40:2 41:1 42:6,14,15 44:20 49:10 54:22 56:22 62:19 63:5,8,11,16,20 64:1,5,9,13 65:1,7,8,14 66:7 67:8,19 68:1,7,11 69:4 70:15 71:1,16 72:2,12,17 73:1 74:5,7 75:4,19 76:12,21 77:2 80:9,22 89:2,6 104:18 106:22 109:3 116:1 119:11,17 120:4,7,10,15,16,18 121:1, 2,18 122:1,13 123:4 132:2,4 133:17 captured 67:12 77:4 121:15 122:11 capturing 77:1 care 128:8 case 7:18 10:10 12:14 13:15 16:9 35:18 50:4 55:8 56:7 62:2 96:10 112:20 113:5 cetera 118:6 chat 11:5 17:11 31:8 36:9 61:13 check 16:20 30:16 Chin 36:18,22 37:6,11,22 39:8,15,20 40:1,9,22 42:5 43:3 44:11,19 45:14, 15,20,21 46:8,9,14 47:13,15,18 48:5, 9,21 49:4,8 51:10,18 52:1,22 53:6,20 86:22 87:4,7 89:19,22 90:9,20 91:16 92:18 93:22 94:9 95:11,15,22 96:6,7 97:7,16 98:13,19 101:16,22 102:3 103:8,11,15	Chin's 37:14 50:9 53:10 choice 52:10 choose 32:20 chose 34:17 circa 15:1 84:1 circumstance 50:6 54:8,10 57:15 58:8 72:10 75:5 103:4 107:3 circumstances 22:11 74:12 86:12 cite 130:18 cited 130:20 claim 18:12,14,22 19:2 21:12 22:21 27:1 29:4 34:18 35:1 38:14,17 39:9 45:13,14 86:18 99:19 100:16 103:21 104:7 105:1,4 106:17,18 107:18,22 108:7,22 111:1,5,8,11,14 112:10 113:10,22 114:13,19 115:8,17,21 117:6,9,20 118:9 119:2,11,21 122:7 125:13,15 129:21 130:4 132:13 133:8,9,15,18 134:3 135:2 claimed 104:21 112:9 114:19 claims 18:9 19:18 28:3 45:6 100:19 108:16 112:1 Clarification 49:15 53:4 66:12 76:6 83:10 98:10 106:20 clarify 106:1,5 clause 38:20 39:2 clauses 19:18 clean 137:1 clear 30:5 59:7 70:3 105:15 131:5 134:22 closed 104:12 109:13 111:18,22 112:7 113:11 114:10,18 115:3,9 117:21 118:5 119:2 120:13 129:13,14 color 73:17 column 18:5,8,20,21 combine 99:6,8 Commenced 61:9 92:13 127:16 128:14 comment 56:13 communicate 8:12 compare 36:1 compared 78:19 comparison 21:1 complete 10:3	completely 43:6 106:4 115:4 component 94:22 95:3 components 90:15 92:4 119:22 121:5,12 122:8 134:10 computer 7:6 8:4 concluded 27:11 139:5 conclusion 27:5,13 28:8 29:14 32:18 34:6 115:13 116:16 118:14 126:17 conditioned 66:4 conditions 76:2 confer 136:20 conferring 136:14 configuration 39:4 75:2 93:9 94:16 113:12,18 114:19 115:9 116:2 132:7 configurations 113:11 115:19 configured 74:17 confirm 8:10 42:22 Confirming 91:16 conflicts 120:8 connected 126:7,8 134:4,16 connecting 96:7 97:9 100:8 connection 13:19 14:1 16:13 17:7 62:6 135:4 consideration 60:12 considered 13:19 14:4 29:5 42:20 113:18 consistent 30:2 constant 73:15 construction 28:13,14,21 29:1,2,8, 10 31:19,22 32:4,6,7,8,12 33:2 34:2, 12,22 construed 28:7,17 31:16,17,18 33:5 consumption 86:7 contending 22:15 contention 119:15 contentions 113:4 context 109:20 114:13 125:14,20 126:1,21 133:15 contrary 95:21 97:15 100:13 101:15 control 88:22 89:15 96:1 97:17 controlling 37:21
--	---	--

controls 87:1
convenience 76:1,16
convenient 71:19 72:8
correct 6:19 10:12 11:22 12:12,16
18:11 20:14 26:6,17 36:8,20 38:10
42:6 46:13 48:3 51:22 52:5 53:19
57:11 60:16 62:12,17,22 63:19 64:19
68:5 70:17 73:17 74:20 77:6 81:4
84:7 87:2 88:20 91:7 95:17 103:5
105:7,12 106:14 107:11,19 117:21
119:3 120:1 121:20 122:3 129:8,9
132:14 133:18
correction 12:17,20
correctly 40:20
counsel 135:15 137:5
couple 106:6 128:4,22
Court 112:19 113:5
cover 66:4,10,11
cross-examination 136:21
Crosstalk 7:4 30:12 31:2 56:1 69:14
126:10
crystal 90:16 91:17 92:5 95:1 98:3,6
current 96:14

D

days 138:15
decided 31:20
decides 49:13,14
decision 31:7 32:14 33:17,21 35:17,
21 101:2
declaration 11:16 12:10,13 13:12,
14,18 14:17 15:19 16:13 23:8 33:14
37:8 41:12,16,19 42:3 43:19 44:7
66:19 68:13,15 69:10,11 71:12 73:10,
21 83:21 86:17,21 88:15 95:5 101:19
103:20 112:18 119:6 121:10 123:20
129:4 130:8
declarations 19:14
default 49:22
definition 30:1
degrees 66:14 78:3
deleting 7:8
delivery 138:4,7,10,14
depend 22:10 72:9 115:15

depending 48:18 49:10 64:22
depends 125:13
depicted 47:13 120:19 123:9
depicting 23:20 26:1 37:14
depiction 123:13
deposed 9:4
deposition 8:5,11 9:17 16:14 17:3,8
30:22
describes 38:7 48:14 50:10,17
75:19 80:15 82:12
describing 24:14 103:3
description 65:11
descriptions 49:9 64:21
design 78:10 95:21 97:16,22 100:13,
22 101:16
designed 84:22
desirable 85:22
detect 47:4,9,10
determination 48:18
determine 84:16 116:1
determining 38:7 48:14
device 20:11 36:2 37:22 38:8 39:4,5
46:9,14 47:10,11 48:14 49:9 53:11,
14,17 58:18 59:9 60:14 62:11,15,19
63:5,15 64:2,10,18,22 70:15 77:2
79:1 84:2,4 85:8 86:5 88:22 89:16
95:17 104:12 111:17,21 113:9 114:9
115:8,16 116:2,3,11,12 117:3,20
118:4,10 120:12 121:1,15,18 122:1,
12 123:4,15,16 129:13
device's 84:21 85:6
devices 85:14,22 87:13 88:1 95:12
115:22
diagram 39:18 42:11
difference 50:11 65:18 74:6,15 75:2,
3,9
differentiation 50:18
differently 74:17 113:21
difficult 102:22
digital 53:2,6,10,16
diode 93:14
direct 93:1
direction 104:11 105:5 107:5 108:9,
20 109:11,13,19 110:14 114:8 117:6,

9 120:11 129:12
directions 105:12,19 106:14 110:7
111:6 112:9
disagree 27:4,11 78:14 112:10
136:1,5
disagreed 27:13
disagreement 36:6
disclose 67:16 81:13 83:5 91:16
119:16 120:16
disclosed 46:14 78:20 86:22
discloses 39:9,16,20 40:1,22 41:20
42:5 43:4 44:19 46:8 48:22 49:5
51:19 52:2 62:18 63:4,15 65:3 87:8
91:21 94:4 120:18
disclosure 43:12 63:19 79:12 90:20
93:20 94:14 95:10 99:3
discuss 19:13 86:21 123:22 135:14
137:3
discussed 25:16 37:6 63:11 78:7
79:19 88:14
discusses 80:7
discussing 9:18 40:12 94:10 104:7
119:10 136:3
display 18:15 19:5 20:10,12,16 26:9,
14 33:6 35:3,5 47:16,19,22 48:4,22
49:1,5,14,17,18 50:2,3,5,11 51:11,19,
20 52:2,3,8,14 53:12,18,22 54:3,9,10,
18 55:3,5,13,15,19,22 56:10 57:4,8,
10 58:4,9 63:8 64:2,6,10,13 65:4,13,
19,21 66:2,8 67:11 72:22 79:2 80:22
83:7 87:4,8 88:18 90:16 91:6,9,11
92:6 93:9,10,11,12,15,16 95:2,11,16,
22 97:17 98:8,14,15,17,21 100:17
102:17,19 103:4,12,15
displayed 56:20 67:16 76:4 78:5,18
80:17 81:7,20 122:12
displaying 22:3,4,20 53:22 55:6
68:8 71:8,9 74:13 82:16
displays 21:4,9 26:11 43:5 44:17
49:10 53:15 56:14 64:22 65:9 91:17
93:21 94:5 100:12
disposed 102:11,18
disputing 39:8
District 112:19 113:5
document 11:10,13 12:2 16:20
17:13 30:6 31:14 47:4,9 69:11
documents 8:1 16:11,17 17:1

double 30:16 double-checking 48:10 download 17:13 downloaded 11:8 draft 138:3,9 drain 85:10 draw 126:17 drop 11:5 dropping 31:7 dual 84:4 due 76:2	eventually 15:16 EXAMINATION 6:5 128:18 135:12 exclude 118:10 122:7 excludes 119:21 execute 106:21 109:2 exemplary 73:10 exhibit 11:5,20 17:10,15,16 30:18 31:10 36:10,11,15 61:14,15 75:14 122:17 exhibits 30:22 exist 96:13 expect 77:7 expected 72:3,7 expecting 109:7 experience 15:19 expert 10:9 explained 45:12 explicit 34:2 101:1 explicitly 41:10 42:3 50:10 54:22 71:6 78:20 98:16 expose 102:17 exposed 102:20 103:5,12,16 express 99:22 expressly 98:14 extending 85:20 extent 43:2 112:5 externally 102:17,20 103:5,12,16 extraneous 34:17	fails 120:6 fair 9:14,15 13:16 15:15 16:22 20:6 23:5 40:7 85:10 86:7,14 87:10 88:11 124:6 132:22 134:17 135:4 faster 85:9 features 96:13 felt 28:20 32:21 figure 25:20 26:11 37:11,13,18,20,22 38:2 40:9 42:16 43:15,18 44:1,11 45:20 47:13,15,22 48:12 49:8 50:10 51:10 52:21 57:4 58:18 59:9 60:14 62:13,15,20 63:21,22 64:8,20 68:22 70:5,11,14 103:7,11,15 118:3 122:17, 20,22 123:3,9,13,22 124:1,3 131:22 133:17 figures 23:16 24:14,15 25:4,5,15 62:9 file 7:18 files 7:20 final 31:22 find 14:22 16:4 70:2 finder 7:17 fine 108:4 finish 24:22 fit 78:10 five-day 138:4,10,13 five-minute 127:5 flip 37:17 38:11 flowchart 37:20 38:6 44:12 62:14 folded 53:14 66:10 68:2 73:4,6 102:16 123:5 follow-up 128:4 form 16:17 20:21 21:15 22:8 23:1 24:18 25:11 27:7 29:13 32:17 34:5 39:11 40:5 41:6 45:4 46:19,20 50:14 51:14 54:14 57:19 59:14 60:2 63:2 65:16 69:6 71:4 74:10 75:7 79:5,15 81:10 89:8 91:2 94:2 108:14 110:9,16 116:16 118:14 125:9 132:17 135:6 forming 13:19 14:1 35:18 62:6 found 26:20 free 8:20 Friday 138:22 139:2 front 7:6 11:10,11 92:22 102:5
E		
earlier 68:15 87:5 early 83:20 easier 70:2 effectively 27:9 electrically 126:7 134:16 element 86:18 98:2 elements 78:9 eliminate 96:6 97:8 100:7 eliminates 96:13 embodied 90:14 92:3 94:21 embodiment 37:14 81:18 82:15 embodiments 78:8,19 emergency 8:14 enable 107:6 encompass 109:21 end 136:21 ended 15:16 Engine 6:16 enter 63:7 64:5,12 66:7 entering 39:5,16,20 40:2,22 42:5 44:20 62:19 63:15 enters 63:5 entire 45:14 102:13,14 EST 61:11 92:15 127:18 128:16 139:6 evaluating 112:3	face 113:17 face-to-face 109:22 110:13 faces 104:10 105:4 107:4 108:9 114:8 120:11 129:12 facing 24:5 54:4 56:20 57:8 58:1,4 59:4,11 104:20 105:2,11,19,21 106:13 108:11,20 109:10,12,15,16 110:6,14 111:3,12 112:7,8 113:14 114:15 115:1 117:10 129:15 130:16 131:7,14,16,18 132:5,12 fact 37:9 101:6 108:21 115:21 118:2 130:7	
F		

full 6:10**function** 39:3 55:1 56:11,16,22 96:1
97:17,18 106:22 109:3 116:2

G

gave 109:7 110:20 118:16 125:22
133:14**generally** 86:2**gesture** 89:6**gesturing** 89:12**give** 7:14 10:3 45:9 48:6 60:9 68:14
72:12,17 103:22 111:21 118:19
134:1,22 138:21**giving** 70:1**goal** 85:21**good** 6:7 9:3 96:11 127:13**Google** 10:20 113:7**grammar** 13:4**great** 7:2 70:10 139:2**guess** 11:19 27:12 34:20 54:21 55:4
97:12 99:14 115:2,3,4 118:18 126:19
127:3**guide** 136:18

H

half 8:19**handheld** 62:11 80:8,9,11,16,21
81:5 120:10**happen** 21:5 83:5**happy** 30:17**head** 44:10**heat** 73:14**height** 123:15**helped** 43:13**helps** 48:8**hindsight** 101:10**hinge** 121:2,3,11,16**Hm** 24:9**Hm-hm** 10:18 24:6 38:16 68:20
70:13,21 77:18 90:10 94:12 101:17
104:9 121:17**hold** 135:1**home** 66:16 78:4**honestly** 14:12**hour** 8:19 60:18

I

i.e 93:10**illustrated** 93:9**image** 18:15 19:4 20:11,13,16,17,18
22:3 23:20,21 24:2,3,5 26:1,2,13,15
28:19 33:8 35:4,6 39:3,6 40:2 41:1
42:6,14,15 44:20 49:10,13,14 51:20
52:3 54:1,5,12,20,22 55:3,14 56:7,22
57:10,17 58:20 59:4,12 62:19 63:5,8,
11,16,20 64:1,5,9,13,22 65:7,8,14
66:7 67:8,12,19 68:1,7,11 69:3 70:15,
22 71:16 72:2,11,13,16,18 73:1,18
74:4,5 75:4,19 76:12,13 77:2,14 78:4
80:9,22 104:18 106:22 109:3 116:1
119:11,17 120:4,7,9,15,16,18 121:1,
15,18 122:1,11,13 123:4 132:1,4
133:17**imagery** 73:17**images** 48:22 49:5,17 50:2 71:17
76:3 77:1 89:2 122:10**implies** 109:12 111:9**improper** 136:15**improperly** 28:15 33:3**inaccessible** 102:21**include** 25:13,14 89:6**included** 88:18 116:9**Including** 89:2**incorporated** 10:8 32:22 34:16**incorporating** 28:15 33:3**incorrect** 136:17**incorrectly** 35:1**independent** 29:4**indication** 113:15**information** 14:22 46:10 63:9 64:2,
6,10,14 65:4,13 66:3,8 78:5,18 79:3
80:16 81:1,7,20 82:16 83:8,9,12,13
102:15 103:1**informed** 125:2,5,11**informing** 124:3**infringement** 112:3 113:4**input** 106:19 109:2 111:21 117:16**inputs** 89:16**inside** 77:14**instance** 15:10**institutable** 31:20**instituted** 34:11**instituting** 32:3**institution** 29:22 30:8,11 31:6 32:14
33:17 35:17,21**instruct** 135:20**instructed** 137:10**instructing** 136:8**instruction** 137:14**intended** 12:21**interact** 105:22 109:8**interested** 73:14**interface** 7:13 64:3,7,11,14,16,17
65:6 66:9 71:1,18,20 72:4,5,14,19,22
74:3,4 77:4,9 80:18 81:2,3,8,21 83:6
86:22 106:19 109:2 111:9,16,21**interfaces** 76:5,14,20 78:6**International** 10:8**interpret** 109:6 129:10**interpretation** 33:20 114:12 127:1
132:8 134:2**interpreted** 35:22 112:2**interpreting** 118:9**invalid** 28:4 29:5**invalidate** 106:17 107:22 111:1**invalidating** 107:18**invention** 37:15 78:9 85:13 87:11
93:8**inventors** 36:18**iphone** 14:13,16,22 15:5,20 84:1,15**iphones** 83:20 84:8,11 88:14,17**IPR** 10:21 11:16 14:7 17:20 18:1
31:8,10 32:2 37:4 62:1 95:9**issue** 17:20**issues** 12:15 14:6

J	35:22 38:19 39:1 41:22 44:17 45:13, 14 103:21 105:17,18 107:7 108:18,19 114:6 116:6 120:6 129:2,10 130:15 131:6,20 132:8 133:18	means 8:13 116:11 130:15 meant 30:4 45:13 47:9 108:2 111:10 meet 20:19 21:3,12 22:5,20 100:19 109:4 111:7 131:15,20 132:7,13 meets 41:22 115:17 memory 112:22 mention 67:10 mentioned 15:18 33:17 101:14 met 105:17,19 107:8 108:19 133:17 method 37:21 62:14 mind 40:12 113:20 minus 66:14 minute 14:19 38:12 83:16 100:4 minutes 61:2 83:18 106:7 misinterpreted 67:6 missed 16:19,21 misspoke 47:21 misstated 107:14 mistake 132:22 MIT 6:16 mobile 84:21 85:6,8,14,21 86:4 Mobility 10:16 mode 18:15 19:4 20:17,18 23:21,22 24:3,4 26:2,4,14,16 28:19 33:9 38:3,8 39:17,21 42:15 46:12,16 47:6,12 48:16 49:11,21 51:1,21 52:4,7,13,20 53:21 55:1,4 56:8,11,16 57:1,7 58:3 62:20 63:6,8,11 64:1,5,10,13 65:1,18, 20 66:7 67:8,11,19 68:2,7,11 69:4 70:15 71:1,16 72:2,12,17 73:1,3 75:19 76:1,12,16,19,21 77:1,8 80:8,9, 11,16,22 81:5 104:18 120:7,10,15 122:14 123:4 132:2,4 133:17 modes 20:11,13 22:19 35:4,7 39:6 40:3 41:1 42:6 44:21 50:12 63:16,20 65:7,8,14 74:6,8 75:4 modification 80:7,21 93:21 95:20 96:5,12 97:7,15 98:7 99:20 100:1,6, 11 101:15 modified 79:2 94:22 modify 79:12 94:16 95:15 98:20 modifying 82:12 95:10 moment 11:7 42:12 68:14 122:18 moments 129:9
job 86:3 JR 6:6 135:13 judges 46:9	limitations 19:8,22 45:17 115:18 limited 10:9 85:14,17,18 90:13 92:2 93:8,13 94:20 108:10 119:2 134:3 135:3 limiting 34:14 86:6 134:11 lines 18:13 19:2 liquid 90:16 91:11,17 92:5 95:1 98:3, 5 list 13:18 17:1 18:9 listed 14:2 16:12 literally 42:17 50:16 63:12,19 64:12 66:6 litigation 112:19 LLC 10:17 lock 84:12,17 long 84:16 longer 9:2 85:8 look-ups 14:13 looked 16:16,21 24:15 38:19 42:21 87:5 lot 19:22 60:12 loud 46:4	
K		
keeping 86:10 kind 45:10 99:17 kinds 94:5 knowledge 85:2		
L		
label 53:2 language 19:10,13 22:21 35:1 38:15 104:7 105:1,4 108:8 114:13 119:11 129:21 130:4 132:13 laptop 7:5 large 63:9 64:11,14,17 65:5,22 66:3, 8 67:17,20 68:2,6 70:18 71:17 72:3,8, 14,19,21 74:3 76:4,13,19 80:17 81:1 104:18,19 112:5 120:22 121:3,4,11, 20 122:2,12 123:5 lateral 102:18 LCD 87:9,13 88:1,10,12 90:20 93:13 leading 129:17 130:2,12 131:1,10 133:3,20 134:20 135:6 legal 29:13 32:17 34:5,8 115:12 116:15 118:13 length 19:14 24:11 37:7 lens 119:12,17 120:4,16,19 121:2 133:9 level 30:3 LG 13:1,7 life 85:21 86:14 light 73:16 light-emitting 93:14 lighting 76:2 likelihood 26:21 27:18,22 29:3 likewise 52:12 limitation 20:2,6,9,19 21:13 22:6,18 28:8,15 29:11 32:21 33:4 34:3,18	Madam 45:3 made 21:17 23:3 43:12 52:11 99:17 101:1 124:15,17 134:8 make 13:12 32:2 40:13,19 43:21 61:4 70:3 87:17 95:16,20 96:12 97:3,14 100:1 108:5 126:16 131:5 makes 56:13 102:21 making 50:18 98:7 mark 30:17 31:6 marked 11:20 17:16 31:11 36:11 61:14 Massachusetts 6:17 materials 13:18 14:1,4,5,9,11 meaning 19:17 42:19 109:19 117:5,9 123:19 124:4,9,10,18 125:19 129:14	
M		

morning 6:7 127:21

motivation 99:8,22

Motorola 10:16,19 112:8 113:6

Move 83:16

moving 86:18

Multifold 10:8,14 17:19 112:6 113:6
128:21

N

named 36:18

narrower 34:22 124:9 126:22

necessarily 101:9

needed 13:12

normal 9:2,7 39:20

noted 121:11

noticed 12:17

number 9:4 17:22 23:15 26:2 35:10
70:1 118:4

numbers 70:1

O

oath 9:22

objection 20:21 21:15 22:8 23:1
24:18 25:11 27:7 29:13 32:17 34:5
39:11 40:5 41:6 42:8 45:1 46:19,20
50:14 51:14 54:14 55:17 57:13,19
58:12 59:1,14 60:2 63:2 65:16 69:6
71:4 74:10 75:7 79:5,15 81:10 82:2,
19 87:16 88:4 89:8 91:2,20 94:2
108:14 110:3,9,16 112:13 115:12
116:15 118:13 124:13 125:9 126:12
129:16 130:1,11,22 131:9 132:16
133:2,19 134:5,19 135:5

obscure 76:3

obvious 74:14 95:15 98:20 99:4,20

obviousness 96:22

off-the-cuff 45:10 60:9 118:19

office 11:19

OLED 93:14

online 14:21

open 7:5,9,12,17,18,20 11:10 31:14
36:12,14 61:18,20 118:5

opened 118:6

operable 115:22 116:6

operate 102:22

operated 102:16

operation 62:14

opine 54:16

opined 58:14 59:16 79:20 82:5
110:18 112:15 116:19 117:2,4

opinion 21:17 23:4 41:10 45:16 51:9
72:21 95:14 97:13 105:9 106:11
108:7 117:17 118:16 119:1 122:1,6
124:15,17 125:2,5,22 126:14 133:14
135:1,2

opinions 12:14 13:15,20 14:2 16:8,
18 35:18 62:6

opportunity 72:13,18

opposed 99:16,18 105:20

opposite 53:17 55:8 56:16 104:11
105:5,12,19 106:14 107:5 108:9,20
109:11,13,19 110:6,14 111:6 112:9
114:8 117:5,9 120:11 129:12

options 68:9

order 22:20 31:16 100:18 107:5
111:7 117:16

ordering 138:3,9

ordinary 30:1 74:1 79:17 99:3
105:10 106:12 109:18 124:10 125:19
126:4

organic 93:14

orientation 39:4 64:15 66:9 78:5
116:2

orientations 116:12 118:4,11

oriented 43:22

originally 101:7

output 50:20

outward 24:5 54:4 58:2 59:11
111:12

outward-facing 39:21 52:4,13
54:12 57:16 58:20

outward-focusing 56:11

outwards 109:16

owner's 28:14 33:2 34:21

owners 34:16

P

p.m. 127:17,18 128:15,16 139:6

pages 13:17

panel 102:20

paper 8:1 31:8,10

paragraph 13:5 14:3 23:9 24:8,10,
14 25:3,14,18 26:7 28:12 29:21 35:10
45:21 48:9 66:22 67:4 68:13 69:18
70:4 71:11,12 75:14,15,17,18,22
77:16 80:5,12,15,20 81:6,15,17 82:8,
11,12,15 89:20,21 93:2,6 94:9,14
95:6,19 97:13 101:18,21,22 102:4
103:19 104:2,6 116:21 119:6 120:3
121:9,10 123:20 129:3 130:9,18
134:8

Pardon 47:11

part 25:8 36:5 38:22 39:9 57:6 111:4
117:14 121:2,3,16

partially 43:7 118:6

party 136:18,19

pass 127:9 128:1 135:9

passage 46:8 130:17,21

patent 11:19 17:19,21 18:3,6 23:16
24:11 25:20 26:18 27:1 28:3,14 33:1
34:16,21 36:16 38:12 40:11,18 42:20
51:4 63:12 80:2 84:6 87:12 104:8
108:8 109:20 111:1,15 113:10,16
114:1 118:2 120:18 124:1,5,9 125:3,
7,12,20 126:2,22 133:8

patent's 85:13

paths 48:19,21

pathways 51:10,12

PDF 18:7 23:10 25:19 37:18 45:22
66:21 68:16 69:10 70:2 90:2

PEARCE 6:6 21:7,22 22:13 23:6
24:19 25:1,17 28:5 29:17 31:5,13
33:12 35:12 39:14 40:8 41:11 43:17
45:18 47:1 50:7 51:8,17 53:5 55:11,
21 57:14 58:7,16 59:5,18 60:5,17
61:12 63:3 66:1,17 69:8,20 71:10
74:19 75:12 76:7 79:9 80:3 81:16
82:9 83:1,14 87:20 88:7 89:13 91:12
92:7,16 94:7 98:12 107:17,20 108:3
109:17 110:4,10 111:13 112:17
115:20 117:1 118:21 124:16 125:16
126:20 127:4,19 128:9 129:16 130:1,
11,22 131:9 132:16 133:2,19 134:5,
19 135:5,13 136:1,9,22 137:12,17

138:13,17 139:1,4 people 86:2 period 84:12 person 30:1 57:2,21,22 73:22 79:10, 17 84:20 87:21 99:3 105:9 106:11 126:3 petition 37:4 62:1 95:10 96:22 97:6 100:6 petitioner 13:3 petitioner's 29:22 petitioners 10:20 11:2,18 12:22 13:3,8 26:22 96:5 petitioners' 120:3,9,20 Phd 6:1 phone 8:6 16:1,7 112:8 photodiode 73:16 photograph 39:21 photographing 48:15 49:1,6,18 50:3 physical 75:1,9 135:3 physically 74:16 91:6,8 119:21 121:4,12,19 122:8 126:8 134:3,9 pictorial 62:10 picture 55:5 57:2 pictures 15:9 piece 59:3 99:15 place 41:9 59:17 91:11 places 86:20 plan 8:3,17 point 41:21 59:17 68:12 75:11 88:5 113:2 123:18 137:20 pointed 57:21 portable 46:10 102:15,22 portion 101:22 102:9 POSITA 85:3 93:20 94:14 95:20 97:14 position 41:18 66:5,16 78:4 112:8 130:14 possibility 52:16 80:1 potentially 51:16 97:21 115:17 power 85:5 86:3 practice 136:18	preceding 80:12 precise 21:8 44:15 prefer 71:16 76:1,15,18 preference 77:11,12 preferred 78:7 preliminaries 9:8 preliminary 35:8 preparation 17:3 preparing 16:13 17:8 present 78:9 93:7 presented 14:7 37:4 62:1 98:22 presenting 28:1 presents 96:22 prevail 26:22 preview 67:12 72:22 74:4 83:8,12 previous 24:4 previously 17:15 36:10 61:15 principal 95:22 97:16 principle 98:1 100:14 101:16 prior 29:6 36:2 37:3 61:22 76:22 110:21 132:11 privileged 135:21 136:2,5,7,11 proceed 27:15 proceeding 17:17 31:9 process 115:22 processors 116:5 product 135:22 proffering 136:19 proposed 96:5 100:5,11 proposing 97:7 provide 11:18 99:1,22 providing 45:16 PTE 10:8 Publication 36:16 pulled 30:13,14 purpose 29:21 31:17 32:3 72:11,15, 16 89:14 purposes 112:3 put 16:4 36:9 83:16 92:21 101:2	putting 17:10 Q QUADEER 138:11 question 7:11 9:12 40:11,16,19,21 41:15 42:4 43:14 44:15 59:7 60:11 84:10 91:14 105:16 106:2,4,8 110:11 113:19 115:7 117:19 118:22 137:2,8 questions 9:10 35:15 43:11 127:6, 22 128:4,22 137:18 quote 18:14 19:4 26:8 39:2 71:13,15, 22 75:22 76:22 77:20 93:7 101:21 102:15 104:10 129:11,14 133:9 quoted 102:9 104:8 quotes 24:10 R R-A-J-E-E-V 6:13 Rajeev 6:1,11 re-ask 59:6 84:9 106:7 re-read 40:13 reaching 28:8 read 19:9 34:17 46:2,3,7 77:19 80:5, 6,14 94:4 102:13 108:16 121:10 reading 33:14 98:13,19 125:7,11,13 reads 18:14 19:3 39:2 76:22 93:7 102:14 114:6 reason 10:2 86:11 99:2,5 109:5 121:22 reasonable 26:21 reasoning 101:8 reasons 73:7 77:14 recall 14:12,15 15:7,8,12 41:18 45:15 87:19 94:11 106:4 112:22 131:22 133:7,12 receive 106:19 received 78:6 receiving 109:1 Recess 61:9 92:13 127:16 128:14 recognize 17:18 36:15 61:21 Recommended 61:11 92:15 127:18 128:16
--	---	--

reconvene 92:9 record 61:8 70:3 83:3 92:12 107:12 127:15 128:8,13 136:10 137:1 138:1 redirect 107:13 128:5,22 reduce 86:2 refer 10:13 11:1 36:21 108:11 130:7 reference 16:19 37:7 42:14 44:2 59:20 62:4,5 92:19 99:21 104:15 119:16 131:22 132:1 references 37:3 61:22 referring 129:3 refreshed 112:21 regard 27:5 89:11 region 89:6 related 11:16 14:13 reliance 120:9 remember 129:1 remove 97:20 removed 96:10 repeat 40:10,15 47:3 replace 91:22 replaced 98:4 replacing 80:8 report 27:9 88:6 reporter 45:4 49:15 53:4 61:7 66:12 76:6 83:10 92:11 98:10 106:20 127:14 128:12 137:22 138:8,16,19 139:3 represent 10:16 representations 62:10 require 28:17 33:6 97:20 100:16 107:4 111:15 required 78:8 requirement 35:2 118:1 131:15 requires 20:9 85:5 101:7 106:18 109:1 131:7 research 14:6 reserve 137:19 respect 12:15 66:16 97:1 respective 65:7 responding 95:9	response 35:9 retained 10:7,11 11:17 review 13:22 16:11 reviewed 62:5 reviewing 12:3,18 19:11 25:12,13 28:10 29:15,19 46:6 47:14 48:2,6,7, 11 61:19 63:18 64:4 65:2 67:2 71:5 75:16 80:10,14 81:11 90:22 94:3,18 96:8 97:11 99:13 102:7 103:9 104:2,5 105:3,13,14 116:18 119:7 120:2 122:19 rights 137:19 ringer 8:7 room 6:18 8:2 110:12 rotation 66:15 78:4 rough 138:3,9 S S-U-R-A-T-I 6:14 S150 38:2 45:20 48:13 save 86:14 scenario 73:10 Schreiner 20:20 21:14 22:7,22 24:17 25:10 27:6 29:12 32:16 34:4 39:10 40:4 41:5 42:7 44:22 45:3 46:18 50:13 51:13 54:13 55:16 57:12,18 58:11,22 59:13 60:1 63:1 65:15 69:5, 15 71:3 74:9 75:6 79:4,14 81:9 82:1, 18 87:15 88:3 89:7 91:1,19 94:1 107:10,19 108:13 110:2,8,15 112:12 115:11 116:14 118:12 124:12 125:8 126:11 127:12 128:2,10,19,20 129:19 130:6,13 131:4,13 132:20 133:4,6,22 134:12,21 135:8,19 136:6,16 137:21 138:2,5 scope 21:15 22:8 41:6 42:8 45:1,4 54:14 55:17 57:13 58:12 59:1,14 60:2 63:2 71:4 79:5,15 80:1 81:10 82:2,3, 19 87:16 88:4 110:3,16 112:13 115:12 116:16 118:13 124:13 125:9 126:12 133:20 134:6 screen 18:16 19:5 20:10,12,16 22:2, 4,19 24:3 26:9,13,15 28:18 33:7 35:3, 6 36:1 43:5 50:20 51:6 54:18 56:15 58:19,21 59:10,12 63:9 64:3,6,11,14, 16 65:5,6,20,22 66:3,9 67:11,17,20 68:2,6 70:18 71:1,18,20 72:3,4,8,9, 14,19,22 73:4 74:2,3 76:4,14,19 77:3, 9 78:6,19 79:3 80:17 81:1,2,8,13,21	82:7,11,17 83:6 84:2,4,13,16,21 85:6, 9 86:4,13 87:9 89:10 98:3,6,8,9 100:18 101:2 104:10,12,19 107:4 108:8,10 111:16,17 114:7,8,9,14,15 117:14 119:13,18 120:5,11,12,17,19, 21,22 121:3,11,20 122:2,13 129:11, 13 133:11 screens 21:19 43:8 51:7 64:17 105:11 106:13 108:11 109:9 112:7 113:13,16 117:10 123:5 129:15 130:15 131:7,14 132:5,12 searching 14:21 section 95:8 sees 55:7,10 56:9,12 74:13 select 49:22 selected 47:5,7 49:21 self- 48:15 self-photograph 39:16 58:19 59:10 self-photographing 38:3,8 46:11, 16 47:6,12 49:21 50:22 51:21 52:7,19 53:21 55:2 56:8,18 57:7 58:3 self-portrait 26:4 sense 61:4 sensed 73:16 sentence 26:8 46:3 75:21 76:22 90:11 93:6 102:10,14 sentences 77:20 separate 95:22 97:16 100:15 101:13 119:22 121:5,12,19 122:8 134:10 serve 10:9 set 46:10 97:1 Setting 44:16 settings 84:15 short 10:14 18:3 20:1 26:20 60:20 131:6 shorten 32:10 show 12:7 23:19 25:22 26:16 56:9, 12,14,18 57:2,3 58:4 65:10 67:20,22 showing 21:10,11 24:4 26:22 43:9 54:4,11 55:13,14 56:8 57:9,16,22 58:10,18 59:10 62:14 68:21 71:2 74:4 81:14 123:3 shown 23:15 37:22 48:19 51:10 53:1 59:9 62:15,20 70:11 98:1 111:22 shows 39:18 47:15,22 118:3
--	--	--

shut 73:4,6,8 side 53:11,17 55:9 signature 12:1 signed 11:15 12:10 similarly 55:7 56:21 simply 109:4 126:15 simultaneous 7:4 30:12 31:2 56:1 69:14 80:9,21 126:10 single 84:2 sir 6:7 9:6 10:1,22 11:12 15:21 19:7, 12 25:21 33:15 39:22 43:20 53:13 70:9 84:3 Sirpal 51:4 sitting 60:10 88:9 situation 112:16 situations 126:18 skill 30:1,3 74:1 79:10,17 99:4 105:10 106:12 126:4 skilled 77:20 78:2,17 84:20 87:22 small 64:2,6,16 65:6,19 67:11 71:1, 19 72:4,9 74:2 77:3,9 81:2,7,13,21 82:7,11,16 83:5 sooner 138:20 sort 7:7 100:20 138:6 Sounds 9:3 127:12 source 73:16 125:6 speak 17:7 specific 45:16 specifically 100:10 specification 28:16 33:4 34:19 130:5,8,17,21 spelled 6:12 spend 8:18 spoke 47:2 56:5 stacked 73:6 stages 118:5 start 19:9 77:22 101:3 started 40:17 starting 19:3 88:17 starts 29:21 state 6:10 12:14 13:14 14:4 35:9 39:5 97:12 98:16 102:16 111:18,22 116:3	117:21 119:3 136:10 stated 16:15 42:1,2 77:12 116:9 statement 78:14 87:18 134:9 states 94:19 129:11 133:9 stay 84:17 step 38:2,6 45:20 48:13 62:20 63:6,7, 22 64:8 66:2 STEPHEN 20:20 21:14 22:7,22 24:17 25:10 27:6 29:12 32:16 34:4 39:10 40:4 41:5 42:7 44:22 45:3 46:18 50:13 51:13 54:13 55:16 57:12, 18 58:11,22 59:13 60:1 63:1 65:15 69:5,15 71:3 74:9 75:6 79:4,14 81:9 82:1,18 87:15 88:3 89:7 91:1,19 94:1 107:10,19 108:13 110:2,8,15 112:12 115:11 116:14 118:12 124:12 125:8 126:11 127:12 128:2,10,19 129:19 130:6,13 131:4,13 132:20 133:4,6,22 134:12,21 135:8,19 136:6,16 137:21 138:5 Steve 128:20 stick 30:21 strong 29:3 structure 90:12,13 92:3 94:19,21 sub-hinge 66:15 submit 112:18 submitted 11:16 113:5 substance 9:18 135:15 136:3,14 137:4 suggested 132:10 suggesting 91:9 summary 27:10 supported 130:16 supposed 9:18 Surati 6:1,12 61:16 108:6 127:20 129:1 135:14 137:3,13 surface 102:19 surrounding 22:11 switch 60:19 system 43:4 73:15 77:14 98:1 T taking 41:18 talk 14:16 50:17 73:9 98:7,14 100:17	101:18 135:18 137:9 talked 21:18 48:13 83:20 124:20 133:7 talking 19:21 20:5 44:12 51:5,6 67:7 91:4 92:18 100:4 103:20 104:14 110:5,22 129:2 talks 25:4 90:8 109:10 taught 93:21 teaches 79:7 teaching 78:17 79:1 telling 30:15 ten-minute 61:1 term 28:16 32:11 33:5 119:21 124:8 125:18 terminal 46:10 102:16 103:1 terms 65:12 83:6 100:16 Testifies 6:1 testifying 9:22 testimony 9:19 10:4 61:10 92:14 127:17 128:15 129:9 132:11 135:15 136:4,12,15 137:4 139:5 text 14:5 thing 109:5 110:19 things 7:17 24:16 41:20 43:9 65:6 100:14 109:21 116:10 126:5 134:14 thinking 40:18 thinks 65:8 third-party 15:14 thought 13:11 27:16,17,21 28:13 29:1 Thursday 138:22 time 15:5,20 22:2,3 39:12 58:20 59:11 78:15 84:8,11,12 85:12 87:11, 22 88:13 115:10 117:21 127:21,22 times 9:5 21:20 today 6:15 8:11 9:22 10:4,13 11:2 16:14 18:3 19:22 36:21 60:10 85:17 88:9 today's 17:3,8 tomorrow 138:22 top 18:19,21 63:9 64:11,14,16 65:5, 21 66:3,4,8,10 67:17 68:2,6 70:18 71:17 72:3,19,21 73:3 74:3 80:17 81:1 104:19 120:22 121:3,4,11,19
--	--	---

122:2,12 topic 18:1 60:20 83:17 totally 101:12 touch 89:16 98:2,9 100:20 101:2,12 touching 89:11 touchscreen 86:22 87:1 88:10,18, 21 89:5,14,17 90:21 95:2,12,17 98:5, 15,18 touchscreen-type 90:16 91:10,18 92:5 95:1 touchscreens 87:13 88:2,12 tough 96:11 trade 86:1 transcript 12:8 138:7 trial 26:19 136:17 true 15:3,5 27:20 71:21 85:4,11 116:10 turn 8:7 18:5 37:10 45:20 66:18 75:13 84:13,22 86:12 95:5 103:7,19 122:16 turning 86:4 119:5 typo 13:10 U understand 9:9,16,21 10:19 13:1,2 14:20 26:18 27:3,20 29:9 32:13 34:1 37:2,13 39:19 44:14 53:1 56:4 57:5 71:22 76:11 78:16,21,22 79:11 82:14 84:21 93:20 94:15 96:18,21 97:3,6 99:10,19 100:2,21 105:10,16 106:5, 12 107:2 108:5 111:14 112:1 115:5 126:5 understanding 19:17 20:8 22:17 28:6 34:12 35:13,16,20 36:5 39:15 59:20 63:14 74:21 81:22 96:4 97:4 100:5 117:5,8 119:20 124:4 125:17 understood 9:13 15:4 36:3 unit 47:16,19,22 48:5 49:1,18 50:3 51:19 52:2,8,14 53:12,18,22 54:11 90:9,12 91:5 92:1,2 93:11,15 94:10, 17,20 95:3 96:6,7,14 97:8,9 100:7,8 103:12,16 units 87:4,8 95:11,16 unnecessary 86:6 unpatentable 27:2	user 26:10 47:5 49:20 54:1,5 55:3,6 56:21 57:9 58:5 68:3 70:20 72:12,17 77:10 84:16 89:15 106:19 109:1,8 111:9,15,21 117:15,16 users 71:15 72:2 75:22 76:12,15 77:1,8 V validate 108:2 validity 112:4 values 78:3 Vann 6:6 21:7,22 22:13 23:6 24:19 25:1,17 28:5 29:17 31:5,13 33:12 35:12 39:14 40:8 41:11 43:17 45:18 47:1 50:7 51:8,17 53:5 55:11,21 57:14 58:7,16 59:5,18 60:5,17 61:12 63:3 66:1,17 69:8,20 71:10 74:19 75:12 76:7 79:9 80:3 81:16 82:9 83:1, 14 87:20 88:7 89:13 91:12 92:7,16 94:7 98:12 107:17,20 108:3 109:17 110:4,10 111:13 112:17 115:20 117:1 118:21 124:16 125:16 126:20 127:4, 19 128:5,9 129:16 130:1,11,22 131:9 132:16 133:2,19 134:5,19 135:5,13 136:1,9,22 137:12,17 138:13,17 139:1,4 vary 78:9,18 verification 106:9 verify 15:2 versus 50:21 113:14 view 24:4 29:5 42:19 54:3 57:9 72:3, 8,13,18 viewed 86:5,13 viewing 71:17,19 76:13 virtue 134:15 visible 68:3 70:19 76:20 117:15 W Wait 40:10 wanted 15:2 24:21 106:5 web 14:22 website 15:11,17 websites 14:5 15:6,13,15 weighed 86:9 Whitehorn 44:3 62:4,9,13,18 63:4,	14 64:8,18,20 65:11 67:8,15 68:12,22 69:3 71:13 72:1 75:13 77:17 78:16,22 79:13 83:16 104:15 119:16 120:8,15, 22 122:13,16,21 123:3 131:21 132:1, 11 133:15 Whitehorn's 104:17 133:16 width 123:14 wife 16:4 window 7:18 withdraw 22:15 35:14 52:20 54:9 78:1 84:9 110:11 117:3 word 13:7,8 33:16 72:6 words 16:6 22:14 Work 135:21 works 13:4 wrap 127:8 write 11:18 12:21 written 27:9 wrong 28:21 wrote 26:8 102:2 Y year 12:11 Z Zoom 7:13,17 110:13
--	---	---