

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

ORIGINAL

MOTOROLA MOBILITY LLC AND GOOGLE LLC,
Petitioners

v.

MULTIFOLD INTERNATIONAL INC. PTE. LTD.,
Patent Owner

Case IPR2025-00060

U.S. Patent No. 8,842,080

DEPOSITION OF DR. SANDEEP CHATTERJEE
TAKEN REMOTELY BY VIDEOCONFERENCE

August 1, 2025

Reported by: Mary Ann Payonk

Job No. 2597

August 1, 2025

9:00 a.m. Eastern

DEPOSITION OF DR. SANDEEP CHATTERJEE, taken
remotely by videoconference pursuant to Notice and
agreement of counsel, stenographically reported by Mary
Ann Payonk, Shorthand Reporter and Notary Public, CA CSR
No. 13431.

All attorneys participating in this deposition
acknowledge that the reporter is not physically present
in the deposition room and there is no objection to the
oath being administered remotely.

1 APPEARANCES:

2 ON BEHALF OF MOTOROLA:

3 GEOFFREY MOSS, ESQ.

4 ORRICK, HERRINGTON & SUTCLIFFE LLP

5 2050 Main Street, Suite 1100

6 Irvine, CA 92614

7
8 ON BEHALF OF MULTIFOLD:

9 MINGHUI YANG, ESQ.

10 CARMICHAEL IP, PLLC

11 8607 Westwood Center Drive, Suite 270

12 Tysons, VA 22182

13
14 ON BEHALF OF GOOGLE:

15 DANIEL ZEILBERGER, ESQ.

16 QUADEER AHMED, ESQ.

17 PAUL HASTINGS LLP

18 2050 M Street, N.W.

19 Washington, D.C. 20036

20
21 ALSO PRESENT:

22 Anniliese Coleman, BlueBear Law

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1 THE REPORTER: My name is Mary Ann Payonk, and
2 my California license number is 13431. I will now swear
3 the witness.

4 DR. SANDEEP CHATTERJEE,

5 called as a witness, having been duly
6 sworn, was examined and testified as
7 follows:

8 EXAMINATION

9 BY ATTORNEY YANG:

10 Q. Good morning, Dr. Chatterjee. And how are you
11 today?

12 A. Good morning. I'm doing well, thank you.

13 Q. That's good.

14 Do you understand that you are under oath?

15 A. I do.

16 Q. And do you understand that you are required to
17 answer my questions unless petitioner's counsel
18 explicitly instructs you not to?

19 A. I do.

20 Q. Is there any reason that you cannot give
21 truthful, complete, and accurate testimony today?

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

23 Q. And can you confirm that you have no
24 applications open other than Zoom?

25 A. The only thing that's running on this computer

1 is the Zoom window, and there is a Windows Explorer
2 window with the files.

3 Q. By "files," do you mean the exhibits submitted
4 in IPR2025-0060?

5 A. Yes. Not all of them, just the ones -- my
6 declaration and then the ones that are cited therein.

7 Q. Okay, thank you.

8 And can you confirm that you will not look at
9 any materials unless asked to do so?

10 ATTORNEY ZEILBERGER: I'll object to the form
11 of the question.

12 A. So I'm not sure I understand what you're
13 asking me. Like, if I -- I have not memorized
14 everything in my declaration or the patents and the
15 prior art, so if you ask me something, I may need to
16 refer back to refresh my memory.

17 BY ATTORNEY YANG:

18 Q. Okay. Would you let me know when you're
19 refreshing your memory and looking at any particular
20 document?

21 A. Sure. I can do that.

22 Q. Thank you. I appreciate it.

23 At a deposition earlier this week for another
24 IPR, I believe you said that you testified in District
25 Court, State Court, IPRs, and the ITC.

1 Is that correct?

2 ATTORNEY ZEILBERGER: Object to form.

3 THE WITNESS: Say that again.

4 BY ATTORNEY YANG:

5 Q. I believe you testified earlier this week in
6 another deposition that you have testified in District
7 Courts, State Courts, IPRs, and the ITC.

8 ATTORNEY ZEILBERGER: Same objection.

9 A. To the -- I couldn't hear exactly to the
10 extent that you were saying plural for "State Courts."
11 I think it's only a single State Court. But yes, the
12 four, I have testified at.

13 BY ATTORNEY YANG:

14 Q. And what single State Court would that be?

15 A. That was -- it's a California State Court.

16 Q. Did you submit expert reports in District
17 Court?

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. With regards to patent cases, for example,
20 yes, I have submitted expert reports.

21 BY ATTORNEY YANG:

22 Q. Did you submit expert reports in the
23 California State Court?

24 A. I believe I did, yes.

25 Q. Did opposing counsel in a District Court ever

1 move to exclude any of your expert reports?

2 ATTORNEY ZEILBERGER: Objection, form.

3 A. Did they move to exclude any of my reports or
4 opinions in the report?

5 Is that what you're asking?

6 BY ATTORNEY YANG:

7 Q. I'm asking if they moved to exclude any
8 portion of your report.

9 ATTORNEY ZEILBERGER: Objection, form.

10 A. I know there have been some times -- I don't
11 believe that I would know every time, but I believe
12 there have been times that opposing counsel has moved to
13 exclude. But as far as I'm aware, no Court has ever
14 granted that based on any methodology issues that I
15 have.

16 BY ATTORNEY YANG:

17 Q. Has any judge granted a motion to exclude a
18 portion of your expert testimony for any reason?

19 ATTORNEY ZEILBERGER: Objection, form. Also
20 object to the extent it calls for a legal conclusion.

21 A. So I'm not sure I fully understand your
22 question. But I know, for example, in one case I had
23 submitted a rebuttal report and the other side moved to
24 exclude one of my opinions as not being a rebuttal
25 report, but an affirmative -- not being a rebuttal

1 opinion, but an affirmative opinion. And so that's an
2 example of what, as far as I'm aware, a judge has
3 granted, saying that since I was disclosed as a rebuttal
4 expert, my opinions have to be limited to rebuttal
5 opinions.

6 BY ATTORNEY YANG:

7 Q. Is that the only instance, or are there other
8 examples?

9 ATTORNEY ZEILBERGER: Objection, form.

10 A. Well, when you're saying -- are you -- so when
11 you're saying "exclude," I -- again, I'm not really
12 sure, like I said, for the last question, I'm not sure
13 what you mean by "exclude." But I think off the top of
14 my head, that's one example I can think about.

15 But I have -- for example, I believe last year
16 or the year before that, there was a case where the
17 other side filed a Daubert. And there was a long
18 Daubert hearing and immediately after that, the judge
19 denied the motion against me, saying that I'm highly
20 qualified on those topics.

21 BY ATTORNEY YANG:

22 Q. Well, my question was actually, can you think
23 of any other examples besides the one that you gave
24 where a judge excluded any portion of your expert
25 report?

1 ATTORNEY ZEILBERGER: Objection, form. Asked
2 and answered.

3 ATTORNEY YANG: And that's not a valid
4 objection, by the way.

5 A. Off the top of my head right now, I don't
6 remember others.

7 BY ATTORNEY YANG:

8 Q. Okay. And what did you do to prepare for this
9 deposition?

10 A. I reviewed my declaration and the relevant
11 documents.

12 Q. Okay. Which documents are the relevant
13 documents?

14 A. For example, the documents cited in my
15 declaration.

16 Q. Did you speak to anyone who is not an attorney
17 to prepare for this deposition?

18 A. I did not.

19 Q. Did you review Exhibit 1001, the '080 patent,
20 to prepare for this deposition?

21 A. Yes, I did.

22 Q. And how long did you review the '080 patent to
23 prepare for this deposition?

24 A. I went back through it a number of times.

25 Q. Do you have an estimate, a rough estimate of

1 how many hours that took?

2 A. So is your question for going through it like
3 from the beginning to the end, or even when I'm looking
4 back to it throughout, reading my declaration, and other
5 preparation?

6 Q. My question is counting all the time that you
7 looked at the '080 patent, approximately how many hours
8 would that be?

9 A. I really couldn't tell you, but it was several
10 hours, I would guess.

11 Q. Would it be more than 10?

12 A. Just for the '080 patent? I don't know. I
13 have not kept track of that. But maybe less than that.
14 Again, I just don't remember.

15 Q. Okay. When you were reviewing the '080
16 patent, did you read the entirety of the '080 patent
17 from front to back or did you skim it?

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. So is your question now in preparation for the
20 depo, or before in preparation for the declaration, or
21 what is your question?

22 BY ATTORNEY YANG:

23 Q. Well, let's break that up.

24 In preparation for your depo, did you review
25 the '080 patent in its entirety?

1 A. I did.

2 Q. And in preparing your declaration, did you
3 also review the '080 patent in its entirety?

4 A. I did.

5 Q. So is it fair to say that you're familiar with
6 the '080 patent?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. I've reviewed the '080 patent many times.
9 (Exhibit No. 1001, previously marked, was
10 referenced and indexed.)

11 BY ATTORNEY YANG:

12 Q. Okay. Could you please take a look at the
13 '080 patent, which is Exhibit 1001.

14 Do you have a copy of it?

15 A. I have -- like earlier this week, I have a
16 hard copy printout in front of me of my declaration and
17 I have -- like I mentioned to you, I have a Windows
18 Explorer folder that has my declaration, including the
19 exhibits cited in my declaration in electronic form.

20 Q. I see.

21 In that case, can you please open whichever
22 file contains Exhibit 1001, the '080 patent.

23 A. Okay.

24 Q. And once it's open, can you confirm for me
25 that it's an unmarked copy?

1 A. Okay, I've scrolled through it. I did not see
2 any marks or anything on it.

3 Q. Okay, thank you. I appreciate that.
4 Do you personally know the inventor of the
5 '080 patent?

6 A. I don't believe so.

7 Q. And were you aware of the '080 patent -- not
8 the disclosures, but the patent itself -- prior to your
9 work for this IPR?

10 A. I don't believe so.

11 Q. Okay. Could I direct you to column 4. And
12 let me know when you get there.

13 A. Okay, I'm at column 4.

14 Q. If you scroll down to line 18, once you're
15 there, you'll see that the last two words of line 18
16 starts with: As used herein, the term "display" is
17 intended to connote device hardware, whereas "screen" is
18 intended to connote the display image produced on the
19 display.

20 Do you see that?

21 A. I do.

22 Q. Do you agree with that statement?

23 ATTORNEY ZEILBERGER: Objection, form.

24 A. Is your question do I agree that that sentence
25 appears in column 4?

1 BY ATTORNEY YANG:

2 Q. No. My question is do you agree that that
3 statement is correct?

4 ATTORNEY ZEILBERGER: Objection, form.

5 A. I don't understand what you mean, that that
6 statement is correct. It appears in the column, and you
7 read from it.

8 BY ATTORNEY YANG:

9 Q. Well, let me rephrase my question.
10 Do you have any reason to believe that that
11 statement is not correct?

12 ATTORNEY ZEILBERGER: Objection, form.

13 A. I don't understand your question. This is a
14 patent, and this is a sentence within the specification
15 of a patent, so I'm not sure I understand your question.
16 I did agree with you that it appears in column 4.

17 BY ATTORNEY YANG:

18 Q. Wouldn't you agree that sometimes, a patent
19 could have a sentence that's not correct? For example,
20 a patent could say that the sun is green.

21 ATTORNEY ZEILBERGER: Objection, form. Scope.

22 A. Can you show me that patent? I'd like to read
23 what it says around that to understand what it means
24 when it says the sun is green.

25 BY ATTORNEY YANG:

1 Q. Is it your understanding that every sentence
2 in a patent is always correct?

3 ATTORNEY ZEILBERGER: Objection, form.

4 A. I -- again, can you show me what you're asking
5 me so I can evaluate it and answer the question?

6 BY ATTORNEY YANG:

7 Q. I'm asking you about your understanding of
8 the -- of what a patent is.

9 Is it your understanding that any statement
10 written in a patent is always correct?

11 ATTORNEY ZEILBERGER: Objection, form. Scope.

12 A. I don't know how to answer that. It seems
13 like it's a hypothetical that's outside of the '080
14 patent and opinions I've set forth.

15 But I don't know how to answer that extremely
16 broad hypothetical without seeing an example, at least,
17 of what you're talking about.

18 Like, you mentioned a patent stating that the
19 sun is green. If it says before that a picture
20 displayed of the sun can be changed on the display to be
21 green, I think that that could be a correct statement,
22 and that's my whole point, that unless I see this patent
23 that you're talking about that says the sun is green, I
24 can't really answer the question without reading the
25 other portions of the patent and what it's saying.

1 BY ATTORNEY YANG:

2 Q. My question isn't directed to whether a -- the
3 last question wasn't directed to whether any specific
4 statement of a patent was correct. My question is
5 directed to your understanding of patents generally.

6 Do you understand a sentence in a patent
7 generally to be always correct --

8 ATTORNEY ZEILBERGER: Objection.

9 Q. -- or can a sentence in a patent be wrong?

10 ATTORNEY ZEILBERGER: Objection, form. Scope.

11 A. That's exactly my point. I just explained to
12 you that based on the context and what the patent is
13 saying, I would need to understand that to answer your
14 question.

15 I just gave you an example of when you
16 mentioned a sentence that says the sun is green, if the
17 sentence before that is talking about displaying a
18 picture of the sun in a -- in some kind of a monitor or
19 something like that and then changing the color to
20 green, then I believe that that could be a true
21 statement and correct statement.

22 So it depends on what the patent says. I've
23 never seen a patent that only has a single sentence, if
24 that is what you're asking.

25 BY ATTORNEY YANG:

1 Q. Let me ask this then.

2 Is it your testimony that, based on context,
3 every sentence of a patent is correct?

4 ATTORNEY ZEILBERGER: Objection, scope.

5 A. Well, can you show me the patent that you want
6 me to look at in the context and then answer your
7 question?

8 BY ATTORNEY YANG:

9 Q. Sure. Let's look at column 4, line 18 of the
10 '080 patent.

11 A. Okay, like 18 states: Operative to display a
12 displayed image or screen.

13 Q. No, after that. The sentence starting with
14 "As used herein."

15 ATTORNEY ZEILBERGER: Objection, form.

16 A. Okay. And what is your question?

17 BY ATTORNEY YANG:

18 Q. Based on the context that you read around it,
19 is that sentence correct?

20 ATTORNEY ZEILBERGER: Objection, form.

21 A. I still don't know what you mean by is it
22 correct. It's a sentence in the patent.

23 BY ATTORNEY YANG:

24 Q. Didn't you testify just before that if you
25 look at a sentence and its context you would be able to

1 tell me if it's correct or not?

2 ATTORNEY ZEILBERGER: Objection, form.

3 A. But I don't understand what you're saying,
4 what your question is with regards to is it correct.

5 BY ATTORNEY YANG:

6 Q. My question is, do you have any reason to
7 doubt that the sentence is correct?

8 ATTORNEY ZEILBERGER: Same objection.

9 A. I don't understand how -- like, I've already
10 answered for you that the sentence appears in column 4
11 of the '080 patent. I don't understand. It's simply
12 saying as used herein, the term "display" is intended to
13 connote device hardware, whereas "screen" is intended to
14 connote the displayed image produced on the display.

15 And I recall that I do cite to this portion
16 in -- of the '080 patent in my declaration. So if your
17 question is did I cite to it, yes, I did cite to it as
18 far as I remember it within my declaration.

19 BY ATTORNEY YANG:

20 Q. Okay. In the context of the '080 patent, is a
21 screen -- I'm sorry. Is the term "display" a physical
22 display?

23 A. Well, as stated -- and you just pointed me to
24 this portion of column 4 -- it states: As used herein,
25 the term "display" is intended to connote device

1 hardware.

2 Q. Does this statement also apply to the claims
3 of the '080 patent?

4 A. What does that mean, does this statement apply
5 to the claims? This is not the claims. The claims
6 appear toward the end of the patent.

7 Q. The statement says: The term "display" is
8 intended to connote device hardware.

9 Does that statement apply if the term
10 "display" appears in the claims?

11 A. I'm still confused by your question. I'm
12 going to go to the portion -- and you asked me to inform
13 you when I'm looking at documents. I'm looking at the
14 hard copy of my declaration.

15 And so I'm looking at paragraph 53. And about
16 a little bit less than halfway into paragraph 53, I
17 state: Regarding the display term, the '080 patent
18 states that, quote, as used herein, the term "display"
19 is intended to connote device hardware, whereas, quote,
20 "screen" is intended to connote the displayed image
21 produced on the display. And that, open quote: In this
22 regard, a display is a physical hardware that is
23 operable to render a screen. And it has citations to
24 column 4 of the '080 patent.

25 Q. Okay. First of all, I'd like to strike that

1 testimony because your declaration hasn't been entered
2 as an exhibit in this deposition yet; and second,
3 because it's nonresponsive to my question.

4 My question was, does that statement apply to
5 the claims of the '080 patent?

6 ATTORNEY ZEILBERGER: Objection, form.

7 A. So again, like I mentioned the other day, your
8 questions are very confusing. But if you're asking
9 whether the term "display" in the claims would at least
10 include this, then if -- to the extent that is your
11 question, then I believe that it would at least include
12 this.

13 And as I stated in paragraph 53 of my
14 declaration, I've also been asked to consider an
15 alternative interpretation of display where the first
16 display and second display in Claim 12 read on a single
17 physical display divided into two or more logical
18 displays.

19 BY ATTORNEY YANG:

20 Q. Okay. Could you turn back to column 4 of the
21 '080 patent.

22 A. Okay, I'm there.

23 Q. Do you see the second part of that sentence
24 starting on line 20 that says: "Screen" is intended to
25 connote the displayed image produced on the display?

1 A. I do see that. I think there's a "whereas"
2 before that, but yes, I do see that.

3 Q. Does this mean that a screen is the
4 information displayed on a physical -- does this mean
5 the term "screen" as used in the '080 patent is the
6 information displayed on a physical screen?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. Line 20 states: Whereas "screen" is intended
9 to connote the displayed image produced on the display.

10 BY ATTORNEY YANG:

11 Q. So I just want to confirm. It says "produced
12 on the display." Does that mean that the image is on a
13 physical display?

14 A. Well, that would be one example of it, yes.

15 Q. Are you aware of any examples where a screen
16 is not on a physical display in the '080 patent?

17 A. Again, I've reviewed the '080 patent many
18 times but I've not memorized everything within it. If
19 you point me to something, I'm happy to take a look at
20 it.

21 Q. Well, why don't you review the '080 patent now
22 and, if you can, identify any examples where a screen is
23 not information displayed on a physical screen.

24 ATTORNEY ZEILBERGER: I object to the form of
25 the question.

1 THE WITNESS: Can we take a rest room break,
2 please?

3 ATTORNEY YANG: Yeah, sure. 10 minutes, and
4 come back at 10:10 be okay?

5 THE WITNESS: Sure.

6 ATTORNEY YANG: Okay.

7 (Recess taken.)

8 THE REPORTER: It's 10:10 Eastern, and we're
9 back on the record.

10 THE WITNESS: Can you remind me of your
11 question, counsel?

12 BY ATTORNEY YANG:

13 Q. Before I do that, Dr. Chatterjee, during the
14 break, did you speak with anyone about your deposition?

15 A. No.

16 Q. Okay. So my question was after reviewing the
17 '080 patent, are you aware of any disclosure in the '080
18 patent where a screen is not displayed on a physical
19 screen?

20 ATTORNEY ZEILBERGER: I object to the form of
21 the question.

22 A. I think I heard your question differently
23 before, but I'm -- I'm really confused by your question.
24 You're saying whether a screen is displayed on a
25 physical screen?

1 BY ATTORNEY YANG:

2 Q. That is my question.

3 My question is, if you look at column 4 of the
4 '080 patent --

5 A. I thought you asked me to review the entirety
6 of the '080 patent.

7 Q. I did.

8 A. That's what I'm --

9 Q. I did. And now --

10 A. -- doing.

11 Q. -- I'm directing you to the specific line that
12 was the premise of my question.

13 On line 20, it says: Where a screen is
14 intended to connote the display image produced on the
15 display. And you'll see above that, it says: The
16 display is intended to connote device hardware.

17 So my question was whether a screen is
18 intended to connote the image produced on the hardware
19 or the physical display?

20 ATTORNEY ZEILBERGER: Object to the form of
21 the question.

22 A. That's a very different question than what you
23 asked.

24 BY ATTORNEY YANG:

25 Q. That is -- that is a corollary of the question

1 I asked you. The question I asked you was are you aware
2 of any examples in the '080 patent where a screen is not
3 displayed on a physical screen.

4 ATTORNEY ZEILBERGER: Is that a question,
5 counsel?

6 ATTORNEY YANG: If Dr. Chatterjee would like
7 to answer that question, I would appreciate it.

8 ATTORNEY ZEILBERGER: I didn't hear a
9 question. But to the extent it is a question, I'll
10 object to the form of the question.

11 A. So I think you're asking about a physical
12 screen. And you asked me to sit here and go word for
13 word through the entirety of the '080 patent. I'm about
14 a little bit less than halfway through. I have not seen
15 reference to a physical screen so far.

16 Would you like me to continue going word for
17 word through the rest of the '080 patent?

18 BY ATTORNEY YANG:

19 Q. If you need to to answer my question, please
20 go ahead.

21 A. Well, but just to be clear, which question?
22 Because you keep on changing the question.

23 Q. My question is, are you aware of any
24 disclosure in the '080 patent where a screen is not
25 displayed on a physical screen?

1 ATTORNEY ZEILBERGER: I object to the form of
2 the question.

3 A. But to be clear, you're asking about a
4 physical screen. Because before, you asked about a
5 physical display, so I want to be clear about what
6 you're asking me to look for.

7 BY ATTORNEY YANG:

8 Q. Right now, are you saying that a physical
9 screen and a physical display are not synonymous?

10 ATTORNEY ZEILBERGER: I object to the form of
11 the question.

12 A. I'm saying that you keep on changing the
13 question and then -- so you're asking me to answer your
14 question. I'm trying to get clarity on what your
15 question is.

16 BY ATTORNEY YANG:

17 Q. My question is, are you aware of any
18 disclosure in the '080 patent where a screen is not
19 displayed on a physical device, hardware or screen? And
20 I use those terms interchangeably, but if you would like
21 to take them piecemeal, that's fine.

22 ATTORNEY ZEILBERGER: I object to the form of
23 the question.

24 A. To be clear again, now you've changed the
25 question again for the third time.

1 BY ATTORNEY YANG:

2 Q. Let me repeat it then.

3 After reviewing the '080 patent, are you aware
4 of any disclosure in the '080 patent where a screen is
5 not displayed on a physical screen?

6 ATTORNEY ZEILBERGER: I object to the form of
7 the question.

8 A. So to make this simpler, do you want me to
9 search for "physical screen"?

10 Is that what you want me to do?

11 BY ATTORNEY YANG:

12 Q. My -- I want you to answer the question. If
13 you need to read the '080 patent to answer the question,
14 that's fine, but I'd like you to answer the question.

15 ATTORNEY ZEILBERGER: Same objection.

16 A. So I think again I'm still very confused
17 because you keep on changing the question that you're
18 asking. So I didn't -- I'm going to do a search for
19 "physical screen" because that seems to be what you're
20 asking me to do.

21 So I did a search in the PDF search bar of
22 "physical," space, "screen," and it's showing "No
23 results found."

24 BY ATTORNEY YANG:

25 Q. Okay. So in response to my question, are you

1 aware of any disclosure in the '080 patent where a
2 screen is not displayed on a physical screen, your
3 answer would be "No results found"?

4 ATTORNEY ZEILBERGER: Objection,
5 mischaracterizes.

6 A. My answer is what I just explained to you,
7 that I understand your question to be asking me to
8 search for the term "physical screen."

9 And I did that in the PDF reader that I have
10 open. And when I typed in "physical," space, "screen,"
11 I got "No results found."

12 BY ATTORNEY YANG:

13 Q. Okay. Now I'm going to ask a different
14 question.

15 Are you aware of any disclosure in the '080
16 patent where a screen is not displayed on a physical
17 display?

18 A. So I did a search for "physical display," and
19 I got "physical," space, "display," and it's showing one
20 hit. And that hit is at column 9, line 15.

21 Q. Does column 9, line 15 provide an example of
22 displaying a screen on a physical display?

23 A. So to the extent I understood your question,
24 if you look back to column 4, line 20, it states:
25 Whereas "screen" is intended to connote the displayed

1 image produced on the display.

2 Q. And on -- the word "display" in the clause
3 "produced on the display," is that display a physical
4 display?

5 A. Well, the first part of that sentence in
6 column 4 starting at around line 18: As used herein,
7 the term "display" is intended to connote device
8 hardware, whereas "screen" is intended to connote the
9 displayed image produced on the display.

10 Q. And my question is the word "display" in the
11 clause "produced on the display," is that the term
12 "display" that is in -- the term "display" is intended
13 to connote device hardware?

14 A. I think that would be an example of it, yes.

15 Q. In the context of the '080 patent, are there
16 examples where the screen is hardware?

17 A. So it seems like that's kind of going back to
18 the question you asked me a few minutes ago, to do a
19 search for "physical screen."

20 Q. And did you find any examples where the screen
21 is hardware?

22 A. Well, I think I explained to you a few minutes
23 ago that I did a search in the PDF search tool for
24 "physical," space, "screen" and I did not find any hits.

25 I'll do it again to double-check. It's

1 showing -- for "physical," space, "screen," it's showing
2 "No results found."

3 Q. I believe you said earlier that you reviewed
4 the first half of the patent. During that review, did
5 you find any example -- find any examples where the
6 screen is hardware?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. So I think when I searched right now for
9 "physical," space, "screen," it searched the entirety of
10 the PDF document.

11 BY ATTORNEY YANG:

12 Q. My question isn't on what you searched now.
13 My question is what you -- on what you reviewed of the
14 '080 patent in the last half hour.

15 When you reviewed the '080 patent, did you
16 find any examples where the screen was not hardware?

17 ATTORNEY ZEILBERGER: Objection.

18 BY ATTORNEY YANG:

19 Q. I'm sorry, where the screen is hardware.

20 ATTORNEY ZEILBERGER: Objection, form.

21 A. I just wanted to repeat that your questions
22 are very confusing, and you keep on changing them. But
23 with that caveat, I don't recall right now seeing, at
24 least in the portions that I quickly went through, it
25 saying that the screen is hardware. But again, I've

1 only reviewed a portion of it, and I've reviewed it
2 quickly.

3 BY ATTORNEY YANG:

4 Q. Okay. If you feel like you need to review any
5 other portions or take more time to review, please let
6 me know and you're certainly free to do that.

7 A. I think my main issue is that the questions
8 are very confusing, and you seem to be going back and
9 forth, and so that's really the issue.

10 Q. I think the issue is you're reviewing it for a
11 while and then I'm repeating the question and it's no
12 longer fresh on your mind.

13 ATTORNEY ZEILBERGER: Counsel, that
14 mischaracterizes the record.

15 THE WITNESS: I think, like I explained to
16 you, you keep on changing the question and so I think
17 that's really an issue. And the questions are very
18 confusing to begin with.

19 BY ATTORNEY YANG:

20 Q. Could I direct you to column 13, line 35.

21 A. Okay, I'm at column 13.

22 Q. In this paragraph, it starts with: To this
23 end, a screen may include an icon which indicates to a
24 user the state of the screen, e.g., be it in an expanded
25 mode, unexpanded mode, or expanding mode.

1 Do you see that?

2 A. I do.

3 Q. What is an icon?

4 A. To be clear, you're asking within -- since you
5 directed me to column 13, I'm understanding your
6 question to be within the context of the '080 patent.

7 Q. Yes. Let me rephrase that question.

8 What is an icon in the context of the '080
9 patent?

10 A. So if you read a few lines down, starting at
11 around line 43 of column 13, it states: An icon 500 is
12 provided on the first screen 156A and may indicate to a
13 user that the application 156 may be expanded.

14 It continues on: The icon 500 may be located
15 along a periphery of the first display 102. For
16 instance, as shown, the icon 500 may be arranged along a
17 top portion of the display.

18 And I think this is in reference to Figure 5.
19 And so if you go to Figure 5, you can see that icon 500
20 is labeled in the figure.

21 Q. Okay. Is what you just read about icon 500
22 how a person of ordinary skill would understand the term
23 "icon" in the context of the '080 patent?

24 ATTORNEY ZEILBERGER: Objection, form.

25 A. So I'm not sure if you're asking if it would

1 only be what I read. There's other pages in the patent,
2 but the icon would be understood to at least include
3 this.

4 BY ATTORNEY YANG:

5 Q. My question, what is an icon in the context of
6 the '080 patent, covers the entirety of the '080 patent.
7 I wasn't looking for a specific example.

8 A. I'm sorry, say that again.

9 Q. My question, what is an icon in the context of
10 the '080 patent, was asking about the entirety of the
11 '080 patent. I wasn't looking for a specific example.

12 ATTORNEY ZEILBERGER: Objection, form.

13 A. I'm not sure I understand your question. But
14 what I explained to you is that the icon would be
15 understood to at least include what I read to you and
16 what is shown in Figure 5.

17 And for purposes of my expert declaration,
18 I've used that and I've shown that in the relevant prior
19 art, there is disclosure that would be understood by one
20 of ordinary skill to disclose what I just explained to
21 you with regards to icon.

22 BY ATTORNEY YANG:

23 Q. Okay. Are you able to answer my question
24 without using "at least include"?

25 ATTORNEY ZEILBERGER: Objection, form.

1 A. Well, okay. If you don't want me to use that
2 phrase, which I'm -- again, I'm very confused by this
3 question, why you're asking me to not use particular
4 English words in responding to you.

5 But with regards to the analysis that I've
6 done in my expert declaration with regards to patent
7 '080, I've looked at the disclosure with regards to icon
8 500 in the '080 patent and I've shown that in the
9 relevant prior art there, the disclosure in the relevant
10 prior art would be understood by one of ordinary skill
11 to disclose the, for example, icon 500.

12 BY ATTORNEY YANG:

13 Q. Okay. I'm going to ask a slightly different
14 question.

15 What is an icon in the context of the '080
16 patent without using the phrase "at least include"?

17 ATTORNEY ZEILBERGER: I object to the form of
18 the question. I also object to the extent counsel is
19 instructing the witness that he's not allowed to answer
20 in whichever way he sees fit.

21 ATTORNEY YANG: And that's a speaking
22 objection and so I'm going to object to all of that.

23 ATTORNEY ZEILBERGER: That's your opinion.

24 ATTORNEY YANG: You can look at the Trial
25 Practice Guide.

1 ATTORNEY ZEILBERGER: Counsel, you're not
2 allowed to tell the witness what he's allowed to say.

3 ATTORNEY YANG: And you're not allowed to
4 object with speaking objections.

5 THE WITNESS: Can you repeat your question?
6 Because again, I'm very confused. You seem to be
7 telling me to answer or not answer your question in some
8 way, and I'm very confused.

9 ATTORNEY YANG: Sure.

10 BY ATTORNEY YANG:

11 Q. My question is what is an icon in the context
12 of the '080 patent without using the phrase "at least
13 include"?

14 ATTORNEY ZEILBERGER: Same objections.

15 A. So I think I would direct you back to
16 column 13, line 43, where it states: An icon 500 is
17 provided on the first screen 156A and may indicate to a
18 user that the application 156 may be expanded. The icon
19 500 may be located along a periphery of the first
20 display 102. For instance, as shown, the icon 500 may
21 be arranged along a top portion of the display. The
22 icon 500 may be provided adjacent to or superimposed on
23 a status bar 550, and then it continues on.

24 And then, like I said, Figure 5 seems to have
25 icon 500 labeled and so that would be an example of what

1 one of ordinary skill would understand the icon to be.

2 BY ATTORNEY YANG:

3 Q. Okay. Is that how the term "icon" is
4 interpreted in Claim 1 of the '080 patent?

5 ATTORNEY ZEILBERGER: Objection, form.

6 A. So I think my discussion of icon in Claim 1
7 starts around page 35 of my declaration, which is
8 starting at around paragraph 68. And here, I state in
9 paragraph 68, the first sentence, Ogawa discloses this
10 limitation. And then I show side by side with regards
11 to the '080 patent and Ogawa and why one of ordinary
12 skill would understand Ogawa to disclose that
13 limitation.

14 ATTORNEY YANG: I'm going to strike that
15 answer because I haven't asked about Ogawa.

16 BY ATTORNEY YANG:

17 Q. My question verbatim, repeated, is, is that
18 how "icon" would be interpreted in Claim 1 of the '080
19 patent? The word "Ogawa" didn't appear in that
20 question.

21 ATTORNEY ZEILBERGER: Objection, form.

22 A. So I'm -- again, I'm confused by your
23 question. So are you asking whether the disclosure that
24 I read from column 13 and Figure 5, whether those are
25 examples of the claimed icon?

1 BY ATTORNEY YANG:

2 Q. Okay, let me rephrase my question.

3 My question is, is the disclosure you read
4 about "icon," is that how "icon" would be interpreted in
5 Claim 1 of the '080 patent?

6 ATTORNEY ZEILBERGER: Objection, form.

7 A. The term "icon" would be understood to at
8 least include what I read and what I showed you in
9 Figure 5.

10 BY ATTORNEY YANG:

11 Q. Okay. Let me direct you to column 6, line 13.
12 And let me know when you're there.

13 A. Okay, I'm at column 6.

14 Q. Starting at line 13, it says: The handheld
15 computing device 100 may further include one or more
16 input devices that may be used to receive user inputs.
17 These input devices may be operative to receive gesture
18 inputs from a user and accordingly, may be referred to
19 generally as gesture sensors.

20 Do you see those two sentences?

21 A. I do.

22 Q. What is a gesture in the context of the '080
23 patent?

24 A. Well, if you continue reading in that same
25 column, it states: A number of different types of

1 gesture sensors may be provided. Some examples include
2 but are not limited to traditional input devices,
3 keypads, trackballs, etc., touch-sensitive devices,
4 optical sensors, e.g., a camera or the like, etc. And
5 so it provides examples of gesture sensors.

6 Q. And the disclosure you just read about
7 gestures, is that how the term "gesture" would be
8 interpreted in the claims of the '080 patent?

9 ATTORNEY ZEILBERGER: Objection, form.

10 A. If you look at paragraph 74 of my declaration,
11 I'm stating -- I'm stating Ogawa's pen detection unit 21
12 which detects contact/touch between the pen 12 and
13 display input surface 13 corresponds to a gesture sensor
14 and is consistent with the '080 patent's disclosure,
15 which describes that the gesture sensor may be a
16 touch-sensitive device or other sensor operable to
17 detect user inputs in the form of a gesture. And then
18 I'm citing -- and I have a number of citations -- to the
19 '080 patent.

20 ATTORNEY YANG: So again, I'm going to strike
21 that answer because again, I didn't ask about Ogawa.

22 BY ATTORNEY YANG:

23 Q. And my question was, is the disclosure you
24 just read about "gesture," is that how the term
25 "gesture" would be interpreted in the claims of the '080

1 patent?

2 ATTORNEY ZEILBERGER: Objection, form.

3 A. So I'm not -- I answered your question by
4 talking both about Ogawa and the '080 patent. So if
5 you're telling me to ignore both Ogawa and the '080
6 patent, I'm not sure how to answer your question.

7 BY ATTORNEY YANG:

8 Q. Well, I'm telling you ignore Ogawa, because
9 that was not part of my question.

10 A. But then I also gave you citations to the '080
11 patent and I read directly from that.

12 Q. So then are the citations that you gave me how
13 a person of ordinary skill would understand the term
14 "gesture" in the claims of the '080 patent?

15 ATTORNEY ZEILBERGER: Objection, form.

16 A. Well, the citation that I gave you, and I'll
17 read it again, states: The '080 patent's disclosure
18 which describes that the, quote, gesture sensor may be a
19 touch-sensitive device ... or other sensor operable to
20 detect user inputs in the form of a gesture. And I have
21 citations there in paragraph 74. So one of ordinary
22 skill would understand those, what I -- what I read from
23 the quoted portions, to be examples of a gesture sensor.

24 BY ATTORNEY YANG:

25 Q. Okay. Could I direct you to column 11, line

1 22. And let me know when you're there.

2 A. Okay, I'm there, column 11.

3 Q. Okay. In column 11, line 22, it says:
4 Figures 3I through K depict the potential arrangements
5 of the screens of a multi-screen application 152.

6 Do you see that?

7 A. I do.

8 Q. What is a multi-screen application?

9 A. It seems to refer to multi-screen application
10 as 152, and then there is a lot of disclosure from the
11 next sentence onwards and then continues on from even
12 the next paragraph, which states: For example, the
13 multi-screen application 152 may be maximized from a
14 single-screen mode displayed in a single display to two
15 screens displayed in two displays such that a parent
16 screen is displayed in the first display and a node
17 screen, e.g., a child screen is expanded into the second
18 display. So there's a lot of disclosure in that column.

19 Q. Okay. Is what you just read your answer to my
20 question what is a multi-screen application?

21 ATTORNEY ZEILBERGER: Objection, form.

22 A. So I think I understood your question to be
23 within the '080 patent. And I read directly from the
24 '080 patent and I explained that there's other portions
25 that I did not read, which are right after the two lines

1 that you pointed me to in column 11.

2 BY ATTORNEY YANG:

3 Q. Okay. Since you pointed out that my original
4 question wasn't restricted to the '080 patent, I'd now
5 like to ask what is a multi-screen application in the
6 context of the '080 patent?

7 ATTORNEY ZEILBERGER: Objection,
8 mischaracterizes.

9 A. I don't understand your question. I just
10 explained to you that I answered understanding your
11 question to be within the context of the '080 patent.

12 BY ATTORNEY YANG:

13 Q. I see. And I'm sorry, could you repeat that
14 answer again?

15 ATTORNEY ZEILBERGER: Objection.

16 ATTORNEY YANG: The answer to the question
17 what is a multi-screen application in the context of the
18 '080 patent?

19 ATTORNEY ZEILBERGER: Objection, form.

20 THE WITNESS: Sorry, say that again.

21 BY ATTORNEY YANG:

22 Q. Could you please repeat your answer to my
23 question what is a multi-screen application in the
24 context of the '080 patent?

25 ATTORNEY ZEILBERGER: Objection, form. Also

1 object to scope.

2 A. So understanding your question, which now
3 you've made it express, to be within the context of the
4 '080 patent, I directed you to portions of the '080
5 patent that discuss the multi-screen application, which
6 seems to be identified as 152, and provides examples of
7 a multi-screen application.

8 BY ATTORNEY YANG:

9 Q. Okay. Could you turn to column 9, line 29.
10 And let me know when you're there.

11 A. I'm there.

12 Q. So the last -- starting with the last three
13 words on line 29 of column 9, it says: A single-screen
14 application is intended to describe an application that
15 is capable of producing a screen that may occupy only a
16 single display at a time.

17 Do you see that?

18 A. I do.

19 Q. Is that what a single-screen application is
20 within the context of the '080 patent?

21 ATTORNEY ZEILBERGER: Objection. Form and
22 scope.

23 A. Within the '080 patent, that is a line within
24 the specification of the '080 patent.

25 BY ATTORNEY YANG:

1 Q. Okay. I'll ask a slightly different question.

2 Is that sentence how a person of ordinary
3 skill would understand the term "single-screen
4 application" within the context of the '080 patent?

5 ATTORNEY ZEILBERGER: Objection, scope.

6 A. Can you show me where in my declaration I'm
7 opining on this?

8 BY ATTORNEY YANG:

9 Q. Well, didn't you testify that you've reviewed
10 the '080 patent --

11 ATTORNEY ZEILBERGER: Objection.

12 Q. -- in its entirety? And this is a sentence
13 within the '080 patent.

14 ATTORNEY ZEILBERGER: Objection, form. Scope.

15 A. So I think I testified I've reviewed the '080
16 patent many times and so that's why I'm asking. Can you
17 show me where I've provided this opinion so I can go
18 back and refresh my memory? So that's what I'm asking.

19 BY ATTORNEY YANG:

20 Q. Well, my question is your understanding of
21 this term. And for my benefit, because I want to
22 confirm that that is what a single-screen application
23 is, it's -- I don't think it's -- I don't think there's
24 a specific cite to it in your declaration. But I do
25 want to understand the '080 patent. And you've

1 testified that you've reviewed the '080 patent in its
2 entirety, and you also testified that you're an expert
3 in this field.

4 ATTORNEY ZEILBERGER: I object to the scope of
5 the question, to the extent that's a question.

6 ATTORNEY YANG: That was not a question.

7 BY ATTORNEY YANG:

8 Q. The pending question is, is that sentence how
9 a person of ordinary skill would understand the term
10 "single-screen application" within the context of the
11 '080 patent?

12 ATTORNEY ZEILBERGER: Objection to the scope
13 of the question.

14 A. And I've asked you to show me, point me to
15 where in my declaration I've opined on this so I can
16 refresh my memory.

17 I don't perform expert analyses within a
18 minute. I actually spend hours and days and days and
19 weeks analyzing this. I take my job seriously, and so
20 that's why I'm asking you, to the extent I've opined on
21 this. If you can show me in my declaration, I can
22 refresh my memory and answer your question.

23 BY ATTORNEY YANG:

24 Q. You're an expert in this field, right? So I'd
25 like for you to tell me what a person of ordinary skill,

1 reading this sentence, would understand.

2 ATTORNEY ZEILBERGER: Objection, scope and
3 form.

4 A. So just reading that sentence? So you're
5 asking me outside of the '080 patent in a vacuum if this
6 sentence existed?

7 BY ATTORNEY YANG:

8 Q. Now I'm asking you -- you've testified that
9 you read the entirety of the '080 patent. Having read
10 the entirety of the '080 patent, I'm asking you how a
11 person of ordinary skill would understand this sentence.

12 ATTORNEY ZEILBERGER: Objection, scope and
13 form and argumentative.

14 ATTORNEY YANG: Also, that wasn't a question.

15 THE WITNESS: Okay.

16 ATTORNEY YANG: Please answer my question,
17 though.

18 ATTORNEY ZEILBERGER: You just said it's not a
19 question, counsel.

20 ATTORNEY YANG: I do have a question where
21 Dr. Chatterjee is asking clarifications of but hasn't
22 answered yet.

23 BY ATTORNEY YANG:

24 Q. The question I have outstanding is, is that
25 sentence how a person of ordinary skill would understand

1 the term "single-screen application" within the context
2 of the '080 patent?

3 ATTORNEY ZEILBERGER: Objection. Form and
4 scope.

5 A. So I don't think I asked for clarification. I
6 asked you to my client me to my expert declaration where
7 I've opined on this so I can refresh my memory. And
8 I've explained to you that I take my job seriously and I
9 don't render off-the-cuff opinions. And so if you could
10 point me to where I've analyzed this issue, I can take a
11 look at it and I'll be happy to answer your question.

12 BY ATTORNEY YANG:

13 Q. So it's your -- are you refusing to answer my
14 question without being directed to your declaration?

15 ATTORNEY ZEILBERGER: Objection,
16 mischaracterizes. Argumentative. Scope. Form.

17 A. I think I've asked you multiple times to
18 direct me to where I've opined on this so I can refresh
19 my memory, and I think it seems like you don't -- you're
20 not going to direct me, so I don't know how to answer
21 this question.

22 BY ATTORNEY YANG:

23 Q. If I do not direct you, are you refusing to
24 answer this question?

25 ATTORNEY ZEILBERGER: Same objections.

1 A. I'm not refusing to answer your question. I'm
2 actually saying I'd be very happy to answer your
3 question.

4 BY ATTORNEY YANG:

5 Q. Then please --

6 A. You seem to be --

7 Q. -- go ahead.

8 A. You seem to be -- you seem to be not pointing
9 me to my declaration where I've opined on this and so it
10 seems like you're refusing to direct me to my
11 declaration.

12 Q. I don't need to direct you to your
13 declaration, but you need to answer my question. Please
14 answer my question.

15 ATTORNEY ZEILBERGER: Objection,
16 argumentative. Scope. Form.

17 ATTORNEY YANG: Also, that wasn't a question.
18 But the same question is still outstanding.

19 ATTORNEY ZEILBERGER: Same objections. I'm
20 very confused what the question is.

21 BY ATTORNEY YANG:

22 Q. The question is, is that sentence how a person
23 of ordinary skill would understand the term
24 "single-screen application" within the context of the
25 '080 patent?

1 ATTORNEY ZEILBERGER: Objection, scope. Form.

2 A. So is this a question? Because you keep on
3 saying it's not a question and then a question. But
4 again, if you can point me to where I've opined on this,
5 I can review that and refresh my memory and answer your
6 question, to the extent it was a question.

7 BY ATTORNEY YANG:

8 Q. So let me make it clear.

9 The question is, is that sentence how a person
10 of ordinary skill would understand the term
11 "single-screen application" within the context of the
12 '080 patent?

13 That is the question outstanding that you are
14 not answered yet. Please answer it.

15 ATTORNEY ZEILBERGER: Objection,
16 mischaracterizes. Argumentative. Scope. Form.

17 A. So are you asking whether just that sentence,
18 and ignoring everything else in the '080 patent, would
19 be used by one of ordinary skill? I'm -- again, I'm
20 confused by your question. You keep on saying "would
21 that sentence." So are you asking ignoring the entirety
22 of the disclosure of the '080 patent?

23 BY ATTORNEY YANG:

24 Q. Keep in mind the end of my sentence was
25 "within the context of the '080 patent." I will repeat

1 my sentence again. I'm sorry, I will repeat my question
2 again.

3 My question is, is that sentence how a person
4 of ordinary skill would understand the term
5 "single-screen application" within the context of the
6 '080 patent?

7 ATTORNEY ZEILBERGER: Objection, scope. Form.

8 A. But you're also saying "is that sentence," so
9 I'm understanding that to mean that if there's nothing
10 else in the '080 patent.

11 BY ATTORNEY YANG:

12 Q. I mean, okay. Is there anything else in the
13 '080 patent?

14 ATTORNEY ZEILBERGER: Objection, form. Scope.

15 A. It seems to be a 21-page reference.

16 BY ATTORNEY YANG:

17 Q. And you've represented that you've reviewed
18 this 21-page reference multiple times for at least --

19 ATTORNEY ZEILBERGER: Same objections.

20 Q. -- approximately 10 hours. That is your
21 testimony, isn't it?

22 ATTORNEY ZEILBERGER: Objection, scope. Form.
23 Mischaracterizes.

24 A. Yeah, I don't think I said that. And then --
25 but like I'm saying, your question is very confusing and

1 you're not clarifying the question for me. You keep on
2 stating that I've reviewed the '080 patent, which I have
3 done, but I'm not understanding your question and you're
4 not showing me where in my declaration I've opined on
5 this.

6 BY ATTORNEY YANG:

7 Q. This is a question directed to the patent,
8 which you've testified that you've reviewed. And you've
9 testified that you're an expert. So please answer the
10 question now that you've reviewed the patent.

11 ATTORNEY ZEILBERGER: Objection, scope. Form.

12 A. So again, I asked for clarification. You keep
13 on repeating the same question without clarifying.
14 Like, my understanding of a deposition is when I ask for
15 clarification because I'm not understanding a confusing
16 question that you would clarify the question.

17 BY ATTORNEY YANG:

18 Q. Okay, let me ask, how are you asking for
19 clarification? Are you -- you've repeatedly asked me to
20 point to your declaration. This question has nothing to
21 do with your declaration. Is that the clarification
22 you're asking for?

23 ATTORNEY ZEILBERGER: Counsel, we need to
24 discuss this. We can go off the record if you want.
25 But you're expressly saying you're asking about

1 questions not relating to his declaration. That's not
2 the purpose for what we're here for today.

3 ATTORNEY YANG: I never said this question
4 wasn't related to his declaration. I said I'm not going
5 to point to his declaration. I want him to answer from
6 the patent.

7 ATTORNEY ZEILBERGER: You said --

8 ATTORNEY YANG: -- the part about --

9 (Simultaneous speaking.)

10 ATTORNEY ZEILBERGER: Counsel, I'm looking at
11 the transcript. You said, "This question has nothing to
12 do with your declaration."

13 ATTORNEY YANG: This question is not -- I'm
14 not going to direct the witness to his declaration.

15 ATTORNEY ZEILBERGER: I'm not saying you --

16 ATTORNEY YANG: I'm --

17 ATTORNEY ZEILBERGER: -- have to direct the --

18 ATTORNEY YANG: -- the patent.

19 ATTORNEY ZEILBERGER: -- witness to the --

20 THE REPORTER: One at a time, please, for the
21 record. Thank you.

22 ATTORNEY ZEILBERGER: I'm not saying you have
23 to direct the witness to the question, counsel, but if
24 you are saying that you're examining the witness
25 relating to material that has nothing to do with his

1 declaration, as you said, that is improper.

2 ATTORNEY YANG: Yes or no. Did the witness
3 review this, the '080 patent? Are you representing --

4 ATTORNEY ZEILBERGER: Is there a question --

5 ATTORNEY YANG: -- that --

6 ATTORNEY ZEILBERGER: -- counsel?

7 (Simultaneous speaking.)

8 ATTORNEY YANG: Yes.

9 THE WITNESS: I --

10 THE REPORTER: One at a time, please, for the
11 record. Thank you.

12 THE WITNESS: I reviewed the '080 patent
13 multiple times.

14 ATTORNEY YANG: Therefore, anything in the
15 '080 patent is fair game for me to ask about.

16 ATTORNEY ZEILBERGER: Is there a question
17 pending?

18 ATTORNEY YANG: Are you instructing the
19 witness not to answer my questions?

20 ATTORNEY ZEILBERGER: I'm -- I never said such
21 a thing, counsel. I only said that if you intend to
22 expressly examine the witness on what you believe has,
23 quote, nothing to do with his declaration, then we might
24 have to call the Board.

25 ATTORNEY YANG: Do we need to call the Board?

1 I will represent that this question is related to the
2 '080 patent, of which the witness has opined on and has
3 represented that he's reviewed. Do we need to call the
4 Board on that?

5 ATTORNEY ZEILBERGER: Only if you're expressly
6 intending to examine him on material that you believe
7 has nothing to do with his declaration. If you're
8 withdrawing that representation or if you're --

9 ATTORNEY YANG: I am withdrawing that
10 representation.

11 ATTORNEY ZEILBERGER: Counsel, please stop
12 interrupting me. If you do intend to examine him based
13 on his declaration, we're free to proceed. If you
14 intend to, as you said, examine him based on material
15 that you believe has nothing to do with his declaration,
16 then we need to call the Board. It's up to you.

17 ATTORNEY YANG: You know what? Let's call the
18 Board.

19 ATTORNEY ZEILBERGER: Okay. To be clear --

20 ATTORNEY YANG: Let's --

21 ATTORNEY ZEILBERGER: To be clear, I'm not
22 instructing the witness not to answer. But, as I said,
23 if you want to call the Board because you believe you're
24 allowed to examine him based on the --

25 ATTORNEY YANG: On the '080 patent.

1 ATTORNEY ZEILBERGER: Counsel, please stop
2 interrupting me. That's the fifth time. If you believe
3 you're allowed to examine him based on what you think
4 has nothing to do with his declaration, that is an issue
5 we need to get -- need to get feedback from the Board
6 on.

7 ATTORNEY YANG: Okay, now I get to talk.
8 First of all, I've withdrawn that representation.
9 Second of all, this issue has to do with the '080
10 patent, which the witness has opined on and which the
11 witness has represented that he's reviewed the entirety
12 of. I'm not pulling another patent out of thin air to
13 ask him about. This is the same -- this the very exact
14 patent that's at issue in this proceeding, which he's
15 represented that he's reviewed. So do you think we need
16 to call the Board on this?

17 ATTORNEY ZEILBERGER: Well, now for the first
18 time you've changed your position and withdrawn your
19 representation so I think we can proceed. Of course,
20 I'll maintain my scope objections.

21 ATTORNEY YANG: That's fine. Are we still on
22 the record?

23 THE REPORTER: We have not gone off the
24 record.

25 ATTORNEY YANG: Okay.

1 BY ATTORNEY YANG:

2 Q. So thank you, Dr. Chatterjee. Could you
3 please answer my question then?

4 ATTORNEY ZEILBERGER: I object to the form of
5 the question and the scope of the question.

6 A. So I think where we left off was I repeatedly
7 asked you for clarification, which you have not
8 provided.

9 BY ATTORNEY YANG:

10 Q. Okay. So I'd like to ask for clarification on
11 your clarification, request for clarification.

12 Are you asking me to direct you to your
13 declaration or are you asking some other clarification?

14 A. Well, I have -- the first request is your
15 question is very confusing because you're saying within
16 the context of the '080 patent, but then you're limiting
17 me to a single sentence within it, and so that's one
18 clarification.

19 And then the second one is, like I stated, I'd
20 like to see what my analysis and opinion was so that I
21 can accurately and correctly answer your question. And
22 that's why I asked you to point me to where in my
23 declaration I talk about this.

24 Q. Okay, so I'm going to tackle your first and
25 second clarifications one at a time, if that's fine with

1 you.

2 So for your second clarification, I am not
3 going to direct you to your declaration because this
4 question is based on your -- is on the understanding --
5 your understanding of this patent.

6 I'd like to understand how you understand this
7 patent. I'm not going to direct you to your
8 declaration, and nothing in the rules requires me to do
9 so.

10 So for the first clarification, what would
11 help you understand this question better?

12 Are you saying that this question, the
13 question is limited to the sentence that I read to you?

14 A. That seems to be in your question, so yes.

15 Q. Okay. Let me ask it different then. Sorry,
16 let me ask it a different way then.

17 Would a person of ordinary skill understand
18 the term "single-screen application" within the context
19 of the '080 patent to include that sentence?

20 ATTORNEY ZEILBERGER: Objection, scope. Form.

21 A. Which sentence are we -- are we looking at
22 line 29? Is that what you directed me to?

23 BY ATTORNEY YANG:

24 Q. Let me read the sentence again just for
25 clarity. The sentence is on column 9, line 29, with

1 the -- starting with the last three words: A
2 single-screen application is intended to describe an
3 application that is capable of producing a screen that
4 may occupy only a single display at a time.

5 That's the sentence.

6 ATTORNEY ZEILBERGER: Object to the form and
7 scope of the question, to the extent that is a question.

8 A. So to the extent I understood your question, I
9 believe, given that that sentence appears in column 9 of
10 the '080 patent, one of ordinary skill would consider
11 that within the remainder of the context of the '080
12 patent.

13 BY ATTORNEY YANG:

14 Q. Okay. And what is an application within that
15 sentence?

16 ATTORNEY ZEILBERGER: Object to the form of
17 the question.

18 A. That sentence seems to state a single-screen
19 application is intended to describe an application that
20 is capable of producing a screen that may occupy only a
21 single display at a time.

22 BY ATTORNEY YANG:

23 Q. And my question is -- was, what is an
24 application within the context of the '080 patent?

25 A. Okay, that seems to be a different question

1 than what you asked me so let me try to answer that
2 question.

3 If you look at column 4, line 26: A screen
4 may be associated with an application and/or an
5 operating system executing on the handheld computing
6 device 100. For instance, application screens or
7 desktop screens may be displayed. An application may
8 have various kinds of screens that are capable of being
9 manipulated, as will be described further below.

10 And then continuing on to the next paragraph
11 starting at line 35: A screen may be associated with an
12 operating system, an application, or the like. In some
13 instances, a screen may include interactive features,
14 e.g., buttons, text fields, toggles.

15 So there's disclosure in the portions that I
16 read to you as well as other portions that talk about an
17 application.

18 Q. I believe you said "that talk about an
19 application." How does it talk about an application?

20 A. That it describes an application in the
21 specification of the '080 patent.

22 Q. And how does it describe an application in the
23 specification of the '080 patent?

24 ATTORNEY ZEILBERGER: Objection, form.

25 A. I just answered for you that there is

1 disclosure in the '080 patent, including what I just
2 read to you, that describes and provides examples of
3 applications in the '080 patent.

4 BY ATTORNEY YANG:

5 Q. You did, but my question wasn't is there
6 disclosure. My question is, how does the '080 patent
7 describe an application?

8 ATTORNEY ZEILBERGER: Objection, form.

9 A. I just read you some disclosure from the
10 specification of the '080 patent.

11 BY ATTORNEY YANG:

12 Q. So your answer to my question how does the
13 '080 patent describe an application, your answer would
14 be what you read to me?

15 ATTORNEY ZEILBERGER: Objection, form.

16 A. Those are examples of the disclosure of an
17 application in the '080 patent, yes.

18 BY ATTORNEY YANG:

19 Q. Okay. In the context of the '080 patent, is
20 an operating system synonymous with an application?

21 ATTORNEY ZEILBERGER: Objection, form.

22 A. Well, even what I read to you from column 4,
23 line 26 states: A screen may be associated with an
24 application and/or an operating system executing on the
25 handheld computing device 100.

1 So that was an example. It's talking about an
2 application and an operating system.

3 BY ATTORNEY YANG:

4 Q. And my question is, are they the same thing?

5 ATTORNEY ZEILBERGER: Objection, form.

6 A. So are you asking within that sentence where
7 it's saying a screen may be associated with an
8 application and/or an operating system? So that seems
9 to say that a screen may be associated with an
10 application and an operating system.

11 BY ATTORNEY YANG:

12 Q. Yes, but my question wasn't about the screen.
13 My question is, is an operating system the same thing as
14 an application?

15 ATTORNEY ZEILBERGER: Objection, form.

16 A. I think -- so I'm -- are you asking in terms
17 of how, for example, computing systems operate and
18 whether operating systems and applications have
19 different functionalities?

20 Or are you -- what is your question?

21 BY ATTORNEY YANG:

22 Q. My question is are they -- are they the same
23 thing?

24 Are applications and operating systems the
25 same thing?

1 Is one the same as the other?

2 ATTORNEY ZEILBERGER: Objection, form.

3 A. From what perspective?

4 BY ATTORNEY YANG:

5 Q. From the perspective of the '080 patent.

6 ATTORNEY ZEILBERGER: Same objection.

7 A. I don't understand how to answer that question
8 by just saying from the perspective of the '080 patent.
9 For example, if your question is from the perspective of
10 whether there is source code that is used to develop an
11 operating system in an application, so from that
12 perspective, yes, source code is used or may be used to
13 develop an application and to develop an operating
14 system.

15 BY ATTORNEY YANG:

16 Q. Okay. Why would the '080 patent say
17 application and/or operating system if they are the same
18 thing?

19 ATTORNEY ZEILBERGER: Objection, form.

20 A. Are you trying to say that I said that they're
21 the same thing? Because I'm not --

22 BY ATTORNEY YANG:

23 Q. No, I'm saying assuming that they are the same
24 thing, why would the '080 patent use application and/or
25 operating system?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. So are you asking then from the perspective of
3 what I just explained to you, that source code can be
4 written to develop an application and source code can be
5 written to develop an operating system, from that
6 perspective, why the '080 is talking about application
7 and/or operating system?

8 BY ATTORNEY YANG:

9 Q. Sure. With that understanding, please answer.

10 A. I think what it's saying is that there may be
11 screens associated with an application and/or an
12 operating system. It's not really going into -- again,
13 at least this portion -- I haven't memorized the
14 entirety of the '080, but this portion, it's not talking
15 about whether applications are developed using source
16 code and how -- and whether operating systems can also
17 be developed using source code, but it's saying here a
18 screen may be associated with an application and/or an
19 operating system executing on the handheld computing
20 device 100.

21 Q. Okay. Do you recall that in the '080 patent
22 applications can be either single screen or
23 multi-screen?

24 ATTORNEY ZEILBERGER: Objection, form.

25 A. Are you reminding me of what we talked about

1 like for the last -- 10 minutes ago, the disclosures in
2 the different portions of the -- I guess column 9 that
3 you were directing me to?

4 BY ATTORNEY YANG:

5 Q. I'm reminding you that the '080 patent
6 discloses both single-screen applications and
7 multi-screen applications. You would agree with that,
8 right? That it discloses both single-screen
9 applications and multi-screen applications?

10 ATTORNEY ZEILBERGER: Objection, form.

11 A. Oh, column 9, line 28 of the '080 patent
12 states single-screen applications and multi-screen
13 applications may be provided, if that answers your
14 question.

15 BY ATTORNEY YANG:

16 Q. Okay. So in the '080 patent, since an
17 application can be either single-screen or multi-screen,
18 would you agree that an application is not limited to a
19 single screen?

20 ATTORNEY ZEILBERGER: Objection, form. Scope.

21 A. Say that again.

22 BY ATTORNEY YANG:

23 Q. Okay, in the '080 patent, since an application
24 can be either single-screen or multi-screen, would you
25 agree that an application is not limited to a single

1 screen?

2 A. I would agree that column 9 of the '080 patent
3 line 28 states single-screen applications and
4 multi-screen applications may be provided.

5 Q. And in the '080 patent, would you agree that
6 an application is not limited to two screens?

7 ATTORNEY ZEILBERGER: Objection, form and
8 scope.

9 A. Can you show me where you're reading from?

10 BY ATTORNEY YANG:

11 Q. Well, it says multi-screen application. I
12 just want to confirm that when it says single-screen and
13 multi-screen application, it's not limited to two
14 screens. It could be one screen; it could be three
15 screens; it could be five screens.

16 ATTORNEY ZEILBERGER: Objection, form. Scope.

17 A. So column 9, line 32 states: A multi-screen
18 application is intended to describe an application that
19 is capable of producing one or more screens that may
20 simultaneously occupy multiple displays.

21 ATTORNEY ZEILBERGER: Counsel, we've been
22 going for over an hour. Why don't we take a break?

23 ATTORNEY YANG: I have one more question, and
24 then we can take a break.

25 BY ATTORNEY YANG:

1 Q. So based on what you just read, would you
2 agree that a single-screen application is also an
3 example of a multi-screen application?

4 ATTORNEY ZEILBERGER: Objection, form. Scope.

5 A. Can you point me to my declaration again?
6 These seem to be analyses that you're asking me, and I
7 want to review what I've analyzed and written because
8 I -- if you can point me to my declaration, that would
9 be helpful.

10 BY ATTORNEY YANG:

11 Q. I am not going to point you to your
12 declaration. I just want to see -- I want to see what
13 your understanding of the '080 patent is.

14 ATTORNEY ZEILBERGER: Same objections.

15 A. So again, column 9, line 29 states: A
16 single-screen application is intended to describe an
17 application that is capable of producing a screen that
18 may occupy only a single display at a time.

19 And then it continues on: A multiscreen
20 application is intended to describe an application that
21 is capable of producing one or more screens that may
22 simultaneously occupy multiple displays.

23 ATTORNEY ZEILBERGER: Counsel, when do you
24 want to come back on the record?

25 ATTORNEY YANG: That's fine. Do you want to

1 do 11:20?

2 ATTORNEY ZEILBERGER: I think it's 11:20 right
3 now.

4 ATTORNEY YANG: Oh. Okay, 11:30?

5 ATTORNEY ZEILBERGER: Sure.

6 ATTORNEY YANG: Thank you.

7 (Recess taken.)

8 BY ATTORNEY YANG:

9 Q. Dr. Chatterjee, during the break, did you
10 speak with anyone about this deposition?

11 A. No.

12 Q. Okay. I believe we were looking at column 9,
13 line 32 of the '080 patent, and I believe you pointed
14 out that a multi-screen application is intended to
15 describe an application that is capable of producing one
16 or more screens that may simultaneously occupy multiple
17 displays.

18 Do you see that?

19 A. Column 9, line 32 onwards, yes.

20 Q. Okay. And I guess the question is does one or
21 more displays in -- I'm sorry, does one or more screens
22 in that sentence mean that a single-screen application
23 is an example of a multi-screen application?

24 ATTORNEY ZEILBERGER: Objection. Scope.
25 Form. Relevance.

1 A. So again I'm confused by your question. You
2 said "in that sentence," but that sentence is talking
3 about a multi-screen application. The sentence -- the
4 two sentences before that are talking about
5 single-screen applications, so I don't know how to
6 answer your question if it's limited to that sentence
7 that doesn't talk about it.

8 BY ATTORNEY YANG:

9 Q. Well, let me break it down for you.

10 You see that that sentence says: A
11 multi-screen application is intended to describe an
12 application that is capable of producing one or more
13 screens that may simultaneously occupy multiple
14 displays.

15 Do you see that?

16 A. Yes.

17 Q. Would you agree that producing one screen
18 satisfies producing one or more screens?

19 ATTORNEY ZEILBERGER: Objection. Form.
20 Scope. Relevance.

21 A. What was your question? Was your question
22 whether one or more means one or more?

23 BY ATTORNEY YANG:

24 Q. Yes. My question is whether one is included
25 in the one or more.

1 ATTORNEY ZEILBERGER: Same objections.

2 Q. Whether just one is included in one or more.

3 ATTORNEY ZEILBERGER: Same objections.

4 A. I think to the extent you're asking the
5 general question, I believe that the phrase "one or
6 more" means one or more.

7 BY ATTORNEY YANG:

8 Q. So if a multi-screen application produces just
9 one screen, is producing just one screen also a
10 single-screen application?

11 ATTORNEY ZEILBERGER: Objection. Scope.
12 Relevance.

13 A. So to be clear, the answer I gave you was just
14 about the general phrase "one or more," and now you seem
15 to be bringing it to the actual language here.

16 But I want to sort of clarify that you didn't
17 read the entire sentence. If you're talking about the
18 "one or more," it's not just saying producing one or
19 more screens, it's saying producing one or more screens
20 that may simultaneously occupy multiple displays.

21 BY ATTORNEY YANG:

22 Q. Okay. Reading the complete sentence, how
23 would you answer my question?

24 ATTORNEY ZEILBERGER: Objection. Form.
25 Scope. Relevance.

1 A. Can you repeat your question? Because I think
2 your question just read the first part of the sentence.

3 BY ATTORNEY YANG:

4 Q. My question was, is a multi-screen application
5 that produces one screen also a single-screen
6 application?

7 ATTORNEY ZEILBERGER: Objection. Scope.
8 Relevance.

9 A. But that's where I'm not -- I'm getting
10 confused again by your question because you're not
11 reading the entirety of the sentence. What it's saying
12 is a multi-screen application is intended to describe an
13 application that is capable of producing one or more
14 screens that may simultaneously occupy multiple
15 displays.

16 BY ATTORNEY YANG:

17 Q. So are you saying that a multi-screen
18 application that produces just one screen is not a
19 single-screen application?

20 ATTORNEY ZEILBERGER: Objection. Scope.
21 Relevance. Form.

22 A. I'm saying that you seem to be redefining
23 multi-screen application from what is written in the
24 '080 patent.

25 BY ATTORNEY YANG:

1 Q. Okay, let me ask a slightly different
2 question.

3 Is a multi-screen application that produces
4 one or -- one -- just one screen that occupies multiple
5 displays a single-screen application?

6 ATTORNEY ZEILBERGER: Objection. Scope.
7 Relevance. Form.

8 A. So the column 9, line 29 onwards is stating --
9 is saying a single-screen application is intended to
10 describe an application that is capable of producing a
11 screen that may occupy only a single display at a time.
12 A multi-screen application is intended to describe an
13 application that is capable of producing one or more
14 screens that may simultaneously occupy multiple
15 displays.

16 BY ATTORNEY YANG:

17 Q. Is that your answer to my question?

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. Yes, I believe that was my answer to your
20 question.

21 BY ATTORNEY YANG:

22 Q. Okay, thank you.

23 Could I direct you to column 13, line 66.

24 A. Column 13, line 66?

25 Q. Yes. It's the cut-off paragraph at the bottom

1 of column 13 starting with "A second display 104." And
2 let me know when you're there.

3 A. Okay, I'm there.

4 Q. So this paragraph says: A second display 104,
5 including a desktop screen 138, is also visible to a
6 user. Upon initiation of expansion of the -- and then
7 it goes on to column 14 -- application 156 into the
8 second display 104 shown in Figure 5B, the icon 500 may
9 morph into icon 500 prime as the second screen 156B of
10 application 156 begins to expand into the second display
11 104.

12 Do you see that?

13 A. Yes.

14 Q. And my question is what does the term "morph"
15 mean in this context?

16 A. So as I state at the bottom of paragraph 85 of
17 my declaration, I write: The '080 patent discloses
18 that, similar to Ogawa, the morphing of its icon 500 to
19 icon 500 prime includes elongating the width of the
20 substantially rectangular icon 500 as shown below.

21 And I show annotated Figures 5A and 5B.

22 Q. Okay. Could I direct you to column 15.

23 A. Okay, I'm there.

24 Q. Looking at line 6 of column 15, it says: The
25 morphing comprising changing the shape and size of the

1 icon.

2 Do you see that?

3 A. I do.

4 Q. And what does the term "shape" mean in this
5 context?

6 A. So if you look at paragraph 86 of my
7 declaration, I write: Thus, similar to the '080
8 patent's disclosure, the shape and size of the shaded
9 portion of access bar 42 changes commensurate with the
10 size of the first screen 13A, changing from 4B to 4C as
11 part of the morphing of access bar 42, to indicate that
12 Ogawa's program is in a second state corresponding to
13 the second window size.

14 And then I have a lot of citations.

15 And then paragraph 87, I state: I have been
16 asked to consider a scenario where the '080 patent's
17 description of an aspect ratio of icon 500 prime in
18 Figure 5B changing relative to the aspect ratio of icon
19 500, 5A. In that scenario, Ogawa discloses the same
20 features as it discloses the aspect ratio of the colored
21 shaded portion of access bar 42 in Figure 4C changes
22 relative to the aspect ratio of the colored shaded
23 portion of access bar 42 in Figure 4B.

24 And then I continue. And then later on in my
25 declaration, I also address the shape through

1 disclosures in Choi.

2 Q. Okay. Could I direct you to Claim 4 of the
3 '080 patent? And let me know when you're there.

4 A. I'm there.

5 Q. Claim 4 says: The method of Claim 1 -- I'm
6 sorry. The method according to Claim 1 wherein the
7 first display condition includes displaying the
8 application in at least a first and second display.

9 Do you see that?

10 A. I do. The claim continues, but I see the
11 first part of it, yes.

12 Q. Right. My question is, is an application
13 displayed in at least a first and second display a
14 multi-screen application?

15 ATTORNEY ZEILBERGER: Objection. Scope.
16 Relevance. Form.

17 A. I don't see the term "multi-screen
18 application" appearing in Claim 4.

19 BY ATTORNEY YANG:

20 Q. It doesn't. My question is what the claim --
21 what that claim language means. My question is, is the
22 claim language the application that's displayed in at
23 least a first and second display, is that a multi-screen
24 application disclosed by the '080 patent?

25 ATTORNEY ZEILBERGER: Objection. Scope,

1 relevance, and form.

2 A. Claim 4 is reciting: The method according to
3 Claim 1 wherein the first display condition includes
4 displaying the application in at least a first and
5 second display and wherein the modifying includes
6 minimizing the application to occupy only one of the
7 first and second displays.

8 So for purposes of that claim, and like you
9 just explained to me that the term "multi-screen
10 application" does not appear there, the analysis I've
11 performed in my declaration is based on what the claim
12 actually says, Claim 4 actually says in the '080 patent,
13 not if it said different things. Like, not if the claim
14 were a different claim. I did not perform that
15 analysis.

16 BY ATTORNEY YANG:

17 Q. Did you read Claim 4 in the context of the
18 '080 patent?

19 A. Claim 4 appears in the '080 patent.

20 Q. Let me rephrase that and ask a different
21 question.

22 Did you read Claim 4 in the context of the
23 '080 patent's specification?

24 A. I'm not sure I understand that question. I
25 think you pointed me to column 15. Claim 4, that

1 appears in column 15.

2 Are you asking me if the same words appear in
3 the specification?

4 Q. I'm actually asking you, looking at column 9,
5 line 32, where it says: A multi-screen application is
6 intended to describe an application that is capable of
7 producing one or more screens that may simultaneously
8 occupy multiple displays.

9 Based on the disclosure in column 9, line 32,
10 is Claim 4 where it says "displaying the application in
11 at least a first and second display," is that
12 application a multi-screen application?

13 ATTORNEY ZEILBERGER: Objection. Form, scope,
14 and relevance.

15 A. So again, you seem to have admitted that
16 multi-screen application is not recited in Claim 4 so
17 you seem to be asking me if Claim 4 were a different
18 claim. But the analysis that I performed for purposes
19 of this IPR is based on what Claim 4 of the '080 patent
20 actually recites and not if it was some different claim.
21 BY ATTORNEY YANG:

22 Q. I'm actually asking you to interpret Claim 4
23 in view of column line -- 9, line 32. Does column 9,
24 line 32 guide your interpretation of Claim 4?

25 ATTORNEY ZEILBERGER: Objection, form.

1 A. Could you explain what you mean by does it
2 guide my interpretation of Claim 4? You've told me
3 multiple times Claim 4 does not include the term or it
4 does not recite the term "multi-screen application," so
5 I -- you continue to keep on asking me, I guess, if
6 Claim 4 were written to have different language. But
7 again, the analysis that I've performed for purposes of
8 this declaration is based on what Claim 4 of the '080
9 patent actually says, not if it were written in a
10 different way.

11 BY ATTORNEY YANG:

12 Q. Okay. I'm going to ask you a different
13 question now.

14 Did you consider the sentence in column 9,
15 line 32 when analyzing Claim 4?

16 ATTORNEY ZEILBERGER: Objection, form.

17 A. I considered the totality of the '080 patent
18 in my analysis. And with regards to the analysis that I
19 performed, which is set forth in my declaration, the
20 analysis that I performed was that I looked at certain
21 prior art and I explained why one of ordinary skill, in
22 reviewing those certain prior art, would understand
23 Claim 4 to have been disclosed by -- disclosed -- I'm
24 just looking for Claim 4.

25 Yes, I'm looking at page 68. And there, I'm

1 looking at Claim 4, and I say in paragraph 127: Ogawa
2 in view of Yook discloses and/or suggests this
3 limitation.

4 So the analysis I performed, at least as shown
5 in page 68, I demonstrate that Ogawa in view of Yook
6 discloses and/or suggests Claim 4.

7 Talking about Claim 4, I was just quickly
8 looking through it right now. I wanted to -- when I was
9 reviewing my declaration and preparing for the depo
10 today, I did find two very minor typos that I wanted to
11 just make sure we're on the same page about.

12 And so on page 78, footnote 12, on the third
13 line, it talks about Claim 4, but it should say Claim 5.
14 I believe it's pretty clear from where it -- where that
15 footnote is located.

16 And then another quick, very minor typo is on
17 page 42, the second sentence. Inside the parentheses,
18 it says "which not includes." It should be "which now
19 includes." So the T in "not" should be a W for "now."

20 Q. I appreciate those clarifications, but you
21 didn't mention column 9, line 32 in your answer so I
22 just want to confirm that you did consider column 9,
23 line 32 when analyzing Claim 4.

24 A. I think I'm confused, because I think my
25 answer was I considered the totality of the '080 patent.

1 And I believe column 9 appears within the '080 patent,
2 so I believe my answer did respond to that point.

3 Q. Okay, thank you. That was very clear then,
4 very helpful.

5 So when considering the sentence in column 9,
6 line 32 when analyzing Claim 4, did you consider whether
7 an application displayed in at least a first and second
8 display, whether that application is a multi-screen
9 application?

10 ATTORNEY ZEILBERGER: Objection. Scope.
11 Relevance. Form.

12 A. So are you asking about Claim 4 still?

13 BY ATTORNEY YANG:

14 Q. Yes.

15 A. So didn't you already tell me that
16 "multi-screen application" does not -- is not recited in
17 Claim 4?

18 Q. And you told me that you considered column 9,
19 line 32 when you were analyzing Claim 4.

20 A. I think I told you that I considered the
21 totality of the '080 patent.

22 Q. Which includes column 9, line 32, right?

23 A. I believe all of the columns are included in
24 the totality of the '080 patent.

25 Q. Right. So when you were analyzing Claim 4 in

1 view of column 9, line 32, did you consider whether an
2 application that is displayed on a first -- at least a
3 first and second display, whether that application is a
4 multi-screen application based on the disclosure in
5 column 9, line 32?

6 ATTORNEY ZEILBERGER: Objection. Scope,
7 relevance, and form.

8 A. Again, can you show me where multi-screen
9 application is recited?

10 BY ATTORNEY YANG:

11 Q. In column 9, line 32.

12 A. No, I'm asking the claim. You're asking me
13 with regards to Claim 4, correct?

14 Q. Yes. And you told me you considered column 9,
15 line 32 when analyzing Claim 4.

16 A. I told you I considered the totality of the
17 '080 patent.

18 Q. Which includes column 9, line 32.

19 A. Which includes every column and every line,
20 yes.

21 Q. So when you were analyzing column -- Claim
22 34 -- I'm sorry. When you were analyzing Claim 4 in
23 view of the totality of the patent, which includes
24 column 9, line 34, did you consider whether displaying
25 the -- the application that's displayed in at least a

1 first and second display is a multi-screen application
2 based on --

3 ATTORNEY ZEILBERGER: Objection.

4 ATTORNEY YANG: I'm sorry.

5 ATTORNEY ZEILBERGER: Are you done, counsel?

6 ATTORNEY YANG: Yes.

7 ATTORNEY ZEILBERGER: Objection. Form.
8 Scope. Relevance.

9 A. And again, I've asked you to show me where
10 it's recited in Claim 4, multi-screen application,
11 because I've read Claim 4 right now again and I'm not
12 seeing the claim term "multi-screen application" in
13 Claim 4.

14 BY ATTORNEY YANG:

15 Q. And I've told you it's in column 9, line 32.

16 A. So are you saying Claim 4 continues on to
17 column 9? I'm --

18 Q. No.

19 A. -- very confused by your question.

20 Q. You told me you considered column 9, line 32
21 when analyzing Claim 4, did you not?

22 A. I told you that I considered the totality of
23 the '080 patent in analyzing the -- all of the claims
24 that are set forth in my declaration.

25 Q. And the totality of the patent includes

1 column 9, line 32.

2 A. I would agree with you on that, yes.

3 Q. So therefore, when you analyzed Claim 4 based
4 on the totality of the patent, you analyzed it including
5 column 9, line 32.

6 A. Because it is part of the totality of the
7 patent, yes, I agree with you.

8 Q. So when you analyzed Claim 4 in view of
9 column 9, line 32, did you consider whether an
10 application that is displayed on at least a first and
11 second display is a multi-screen application?

12 ATTORNEY ZEILBERGER: Objection. Scope,
13 relevance, and form.

14 A. I've asked you to show me where in Claim 4
15 that term appears.

16 BY ATTORNEY YANG:

17 Q. And I've shown you that it's in column 9, line
18 32 --

19 ATTORNEY ZEILBERGER: Same --

20 Q. -- which you admitted to me that you
21 considered.

22 ATTORNEY ZEILBERGER: Same objections, to the
23 extent that's a question.

24 A. I think you answered my -- what I asked for
25 clarification is for you to show me where in Claim 4

1 that appears, and then you directed me to column 9. So
2 it seems like you're telling me if Claim 4 were written
3 differently to include different claim language,
4 including language from column 9, what would my analysis
5 be.

6 And I think I've answered for you that the
7 analysis that I've done for purposes of this declaration
8 are based on what the claims, the challenged claims of
9 the '080 patent actually say, not if they were written
10 to be something totally different.

11 BY ATTORNEY YANG:

12 Q. But you told me you analyzed Claim 4 in view
13 of the totality of the specification, which includes
14 column 9, line 32.

15 So I'm asking you, did you analyze Claim 4 in
16 view of column 9, line 32? And if you did, did you
17 consider the disclosure of multi-screen application in
18 column 9, line 32?

19 ATTORNEY ZEILBERGER: Objection, form.

20 A. I think I've answered for you already that I
21 considered the totality of the '080 patent in my
22 analysis of all of the challenged claims.

23 BY ATTORNEY YANG:

24 Q. Including column 9, line 32 for Claim 4, did
25 you not?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. I agree with you that column 9, line 32 is
3 part of the totality of the '080 patent.

4 BY ATTORNEY YANG:

5 Q. And based on your testimony, when -- and you
6 were analyzing Claim 4, you considered column 9, line
7 32. Correct?

8 ATTORNEY ZEILBERGER: Objection, form.

9 A. I considered the totality of the '080 patent,
10 which includes all of the columns, including column 9.

11 BY ATTORNEY YANG:

12 Q. So when you considered the totality of the
13 columns -- patent, including column 9, line 32, did you
14 consider whether an application that is displayed in at
15 least a first and second display is a multi-screen
16 application?

17 ATTORNEY ZEILBERGER: Objection. Scope.
18 Relevance.

19 A. So again, I'm very confused. But you're
20 asking me about Claim 4, correct?

21 BY ATTORNEY YANG:

22 Q. I'm asking you whether you considered Claim 4
23 based on the disclosure in column 9, line 32, which you
24 told me you have.

25 A. I --

1 ATTORNEY ZEILBERGER: The same objection.

2 A. I considered all of the claims in -- within
3 the context of the totality of the '080 patent.

4 BY ATTORNEY YANG:

5 Q. So having done that, is an application that is
6 displayed in a -- at least a first and second display,
7 is that application a multi-screen application?

8 ATTORNEY ZEILBERGER: Objection. Scope.
9 Relevance.

10 A. I don't see the claim term "multi-screen
11 application" in Claim 4. If you can point me to it, I
12 will review it.

13 I don't recall that -- I don't believe it
14 appears in that, and you seem to have admitted that it
15 does not appear there. And you seem to be asking me if
16 Claim 4 were written differently, and if it recited
17 totally different claim language. And I've explained to
18 you that the analysis that I did for purposes of my
19 declaration is based on what Claim 4 actually recites
20 and not if it were written to be something completely
21 different.

22 BY ATTORNEY YANG:

23 Q. But you told me you analyzed Claim 4.

24 When you analyzed Claim 4, you considered
25 column 9, line 32. That is what you told me.

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. I considered Claim 4 as it is actually written
3 in the '080 patent and not in some different Claim 4
4 that you seem to be suggesting. I'm very confused by
5 your question. I did analyze Claim 4 as it is written
6 in the '080 patent.

7 BY ATTORNEY YANG:

8 Q. When you analyzed Claim 4, did you consider
9 column 9, line 32?

10 ATTORNEY ZEILBERGER: Objection, form.

11 A. When I considered -- when I analyzed all of
12 the claims, I considered the totality of the '080
13 patent, which includes all of the columns, including
14 column 9.

15 BY ATTORNEY YANG:

16 Q. No, column 9, line 32 includes a multi-screen
17 application, does it not?

18 A. Column 9, line 32 states "a multi-screen
19 application is intended to," then it goes on to the next
20 line.

21 Q. So you considered -- when you were analyzing
22 Claim 4, you considered that sentence, did you not?
23 Because that sentence is column 9, line 32.

24 ATTORNEY ZEILBERGER: Objection, form.

25 A. I considered the totality of the '080 patent.

1 BY ATTORNEY YANG:

2 Q. Which includes that sentence.

3 ATTORNEY ZEILBERGER: Objection, form.

4 A. I think that's a phrase. But yes, I
5 considered the totality of the '080 patent, which
6 includes all of the columns and all of the lines of the
7 columns.

8 BY ATTORNEY YANG:

9 Q. And as a result of that, when you were
10 analyzing Claim 4, you considered a multi-screen
11 application, right? Because it -- a multi-screen
12 application appears in column 9, line 32, which you have
13 said you considered.

14 ATTORNEY ZEILBERGER: Objection, form.

15 A. And you're asking me about Claim 4, and I
16 don't believe the term "multi-screen application"
17 appears in Claim 4, which you seem to agree with me on.
18 But then you're asking me, it seems, that if Claim 4
19 were written differently to include different claim
20 language, what would my analysis be. And I think I've
21 explained to you that the analysis that I performed in
22 my declaration is based on what Claim 4 actually recites
23 and not if it were written to say something completely
24 different.

25 BY ATTORNEY YANG:

1 Q. Oh, I disagree. I'm not -- I'm trying to
2 establish what you considered.

3 It seems to me like you did consider a
4 multi-screen application because you're telling me you
5 considered the entirety of the '080 patent when you were
6 analyzing Claim 4.

7 ATTORNEY ZEILBERGER: I object to the form to
8 the extent there's a question.

9 A. What is the question? I'm not following your
10 question.

11 BY ATTORNEY YANG:

12 Q. The question is did you consider the term
13 "multi-screen application" when you were analyzing
14 Claim 4?

15 A. I considered the totality of the '080 patent,
16 including all of the columns, including column 9. But
17 at the same time, I don't see the term "multi-screen
18 application" appearing in Claim 4 as written, at least
19 on the copy of the '080 patent that I have.

20 Q. Do you see the term "multi-screen application"
21 in column 9, line 32?

22 A. Are you saying that column 9, line 32 is a
23 part of Claim 4?

24 Q. I'm saying column 9, line 32 is part of the
25 '080 patent.

1 A. Okay, I agree with you. Column 9, line 32 is
2 part of the '080 patent.

3 Q. And column 9, line 32 says "multi-screen
4 application."

5 Do you agree with me there?

6 A. I think line 32 says "a multi-screen
7 application is intended to."

8 Q. And so you considered column 9, line 32,
9 including the disclosure of multi-screen application,
10 when analyzing Claim 4, did you?

11 Did you?

12 ATTORNEY ZEILBERGER: Objection, form.

13 A. I considered the totality of the '080 patent,
14 which includes column 9, yes.

15 BY ATTORNEY YANG:

16 Q. And that includes the disclosure of a
17 multi-screen application in column 9, right?

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. I did consider the totality of the '080
20 patent, including column 9, yes.

21 BY ATTORNEY YANG:

22 Q. So when considering column 9, line 32,
23 including the disclosure of multi-screen application in
24 analyzing Claim 4, did you consider whether an
25 application that is displayed in at least a first and

1 second display is a multi-screen application?

2 ATTORNEY ZEILBERGER: Objection. Scope.
3 Relevance. Form.

4 A. So let me read you what I have on -- for
5 Claim 4 in the version of the '080 patent that I have in
6 front of me. And I believe that's the version of the
7 '080 patent that I used for the analysis.

8 Claim 4 recites: The method according to
9 Claim 1 wherein the first display condition includes
10 displaying the application in at least a first and
11 second display and wherein the modifying includes
12 minimizing the application to occupy only one of the
13 first and second displays, period.

14 BY ATTORNEY YANG:

15 Q. Can you please read column 9, line 32 through
16 35.

17 A. Should I start from the beginning of the line
18 or from "A multi-screen application"?

19 Q. Either one is fine. Either one is fine.

20 A. ... display at a time, period. A multi-screen
21 application is intended to describe an application that
22 is capable of producing one or more screens that may
23 simultaneously occupy multiple displays, period.

24 Q. And you agree the words "multi-screen
25 application" appear in this, in what you've just read?

1 A. I agree that in column 9, line 32 to 35, as I
2 just read it, the term or the phrase "a multi-screen
3 application" does appear, yes.

4 Q. And so when you considered the '080 patent in
5 analyzing Claim 4, did you consider the sentence: A
6 multi-screen application is intended to describe an
7 application that is capable of producing one or more
8 screens that may simultaneously occupy multiple
9 displays?

10 Did you consider that sentence in analyzing
11 Claim 4?

12 ATTORNEY ZEILBERGER: Objection, form.

13 A. I considered the totality of the '080 patent
14 in the analysis of all of the claims, including Claim 4.
15 BY ATTORNEY YANG:

16 Q. And the totality of the '080 patent includes
17 that sentence. Correct?

18 A. The totality of the '080 patent includes all
19 of the claims, all of the lines, including that
20 sentence.

21 Q. Okay. So having considered that sentence when
22 analyzing Claim 4, did you consider whether an
23 application that is displayed in at least a first and
24 second display, whether that application is a
25 multi-screen application?

1 ATTORNEY ZEILBERGER: Objection. Scope,
2 relevance, and form.

3 A. Again, I'm looking at Claim 4 and I don't see
4 the term "multi-screen application" anywhere within it.

5 BY ATTORNEY YANG:

6 Q. Do you see the term "multi-screen application"
7 in column 9, line 32?

8 A. And again, I've asked you, so are you
9 redefining Claim 4 to include some other language that
10 is not in the version of the '080 patent that I have?

11 Q. I'm asking you whether a multi-screen
12 application qualifies as an application that is
13 displayed in at least a first and second display.

14 ATTORNEY ZEILBERGER: Objection. Scope,
15 relevance, and form.

16 A. So column 9, line 32 states: A multi-screen
17 application is intended to describe an application that
18 is capable of producing one or more screens that may
19 simultaneously occupy multiple displays, period. And
20 there are more sentences that go on.

21 BY ATTORNEY YANG:

22 Q. And based on what you just read, is a
23 multi-screen application an application that is
24 displayed in at least a first and second display?

25 ATTORNEY ZEILBERGER: Objection. Scope,

1 relevance, and form.

2 A. The specification in column 9 starting at line
3 32 states: A multi-screen application is intended to
4 describe an application that is capable of producing one
5 or more screens that may simultaneously occupy multiple
6 displays, period. And there are additional sentences
7 after that.

8 BY ATTORNEY YANG:

9 Q. So based on what you just read, is a
10 multi-screen application an application that is
11 displayed in at least a first and second display?

12 ATTORNEY ZEILBERGER: Objection. Scope,
13 relevance, and form.

14 A. What it states is a multi-screen application
15 is intended to describe an application that is capable
16 of producing one or more screens that may simultaneously
17 occupy multiple displays.

18 BY ATTORNEY YANG:

19 Q. Can you please read for me the definition --
20 the description of single-screen application in column
21 9.

22 ATTORNEY ZEILBERGER: Objection, form.

23 A. You want me to read from some line?

24 BY ATTORNEY YANG:

25 Q. From -- I'm sorry, you said you wanted a

1 specific line?

2 ATTORNEY ZEILBERGER: Objection, form.

3 BY ATTORNEY YANG:

4 Q. Yes. On line 27 starting at the middle with
5 single-screen applications. I'm sorry, line 29. It
6 says "A single-screen application." Starting there, can
7 you please read that.

8 A. A single-screen application is intended to
9 describe an application that is capable of producing a
10 screen that may occupy only a single display at a time,
11 period.

12 Q. So when an application is minimized to occupy
13 only one display, is that application a single-screen
14 application?

15 ATTORNEY ZEILBERGER: Objection. Scope.
16 Relevance.

17 A. Are we talking about Claim 4?

18 BY ATTORNEY YANG:

19 Q. If you want to look at Claim 4, that's fine.

20 ATTORNEY ZEILBERGER: Objection, form.

21 A. I've read Claim 4. I don't see the term
22 "single-screen application" in Claim 4. Can you show me
23 where that is?

24 BY ATTORNEY YANG:

25 Q. I've shown you in column 9, line 29 that it

1 says: A single-screen application is intended to
2 describe an application that is capable of producing a
3 screen that may occupy only a single display at a time.

4 I've shown -- you've read that as well, right?

5 A. But that's not in -- that's not in Claim 4.
6 That's in column 9, line 29.

7 Q. Which you considered when analyzing Claim 4,
8 right?

9 A. I considered the totality of the patent in
10 analyzing all of the claims.

11 Q. So when you considered the patent, is a
12 single -- when you considered the patent, when an
13 application is minimized to occupy only one of the first
14 and second displays, is that a single-screen
15 application?

16 ATTORNEY ZEILBERGER: Objection. Scope,
17 relevance, and form.

18 A. Can you -- I'm not -- I'm not understanding.
19 When you said that when I considered the patent. I
20 considered the claims in the challenged claims and I
21 considered the totality of the '080 patent, but what is
22 it that you're asking? I'm not understanding your --
23 you said when I considered the patent.

24 BY ATTORNEY YANG:

25 Q. Well, let me break it down. Sorry, let me

1 break it down.

2 Let's start with column 9, line 29. It says:
3 A single-screen application is intended to describe an
4 application that is capable of producing a screen that
5 may occupy only a single display at a time.

6 You see that, right?

7 A. I do see that in column 9, line 29 to 32.

8 Q. And you agree that sentence is part of the
9 '080 patent.

10 A. That sentence is part of the specification of
11 the '080 patent, yes.

12 Q. And you considered the specification of the
13 '080 patent when you were analyzing Claim 4.

14 A. I considered the totality of the '080 patent
15 in analyzing all of the claims, including Claim 4.

16 Q. So you considered that sentence when analyzing
17 Claim 4.

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. I'm not understanding when you say I
20 considered that sentence. Are you saying I considered
21 only that sentence when analyzing Claim 4?

22 BY ATTORNEY YANG:

23 Q. No. I'm saying you considered that sentence
24 and the rest of the specification when analyzing
25 Claim 4.

1 Is that right?

2 A. I think I considered that sentence, the rest
3 of the specification, the claims. I think I've told you
4 that I considered the totality of the '080 patent in my
5 analysis.

6 Q. Okay. Since that sentence is included in what
7 you considered when analyzing Claim 4, did you consider
8 when an application is minimized to occupy only one of
9 the first and second displays, is that application a
10 single-screen application?

11 ATTORNEY ZEILBERGER: Objection. Scope.
12 Relevance. Form.

13 A. Can you show me where in Claim 4 the term
14 "single-screen application" appears?

15 BY ATTORNEY YANG:

16 Q. It appears on column 9, line 29.

17 A. So in response to my question where in Claim 4
18 it appears, you respond it appears in column 9. So
19 again, I analyzed the claims as they are written, not if
20 they were modified to mean something completely
21 different. That seems to be where the confusion is.
22 You seem to be redefining Claim 4 as if it were a
23 totally different claim.

24 The analysis I performed for purposes of my
25 declaration and what I'm prepared to testify to today is

1 for the claims as they are written in the '080 patent,
2 not if they were completely modified to mean something
3 completely different.

4 Q. I'm not modifying Claim 4. I'm asking you
5 whether you analyzed Claim 4 in view of column 9, line
6 29. And by "in view of," I mean whether you considered
7 it when analyzing Claim 4.

8 ATTORNEY ZEILBERGER: Objection, form.

9 A. Can you say that again, please?

10 BY ATTORNEY YANG:

11 Q. Sure. You testified that you considered
12 column 9, line 29 when you analyzed Claim 4, right?

13 A. I testified for my analysis of all of the
14 claims I considered the totality of the '080 patent,
15 which includes all of the columns and includes column 9.

16 Q. So when you were analyzing Claim 4, and by
17 considering column 9, line 29, did you consider whether
18 an application that is minimized to occupy only one of
19 the first and second displays is a single-screen
20 application?

21 ATTORNEY ZEILBERGER: Objection. Scope,
22 relevance, and form.

23 A. And again, I don't see where in Claim 4 the
24 term "single-screen application" appears.

25 BY ATTORNEY YANG:

1 Q. It appears in column 9, line 29. We've
2 established that.

3 A. Under your redefined Claim 4.

4 Q. No. I'm asking whether column 9, line 29 is
5 an example of the language in Claim 4.

6 ATTORNEY ZEILBERGER: Objection, form.

7 A. Claim 4 simply states -- and I'm reading from
8 the -- after the "and" -- wherein the modifying includes
9 minimizing the application to occupy only one of the
10 first and second displays. That's what it states.

11 BY ATTORNEY YANG:

12 Q. It does. And I'm asking whether the
13 application that occupies only one of the first and
14 second displays is a single-screen application.

15 ATTORNEY ZEILBERGER: Objection. Scope.
16 Relevance. Form.

17 A. I'm still not understanding. You seem to be
18 conceding that that language does not appear in Claim 4,
19 but you're asking me about that language, but then
20 you're also saying that you're not changing Claim 4.

21 Q. I am not.

22 A. So it's confusing.

23 Q. I've asked you about the exact language of
24 Claim 4. I'm asking you whether the application that
25 occupies only one of the first and second displays, is

1 that application a single-screen application?

2 ATTORNEY ZEILBERGER: Objection. Scope,
3 relevance, and form.

4 A. And I'm continuing to be perplexed and
5 confused by the question because I don't see that term
6 appearing here.

7 The analysis I've done is based on what the
8 Claim 4 claim language is. And I've shown, for example,
9 on the page that I pointed out to you why, as an
10 example, Ogawa in view of Yook discloses and/or suggests
11 Claim 4, which depends from Claim 1.

12 BY ATTORNEY YANG:

13 Q. Your answer just now said what the claim
14 language is.

15 Did you consider the specification as well in
16 the analysis?

17 ATTORNEY ZEILBERGER: Objection, form.

18 A. I think I've told you about 20 times already
19 that I considered the totality of the '080 patent in
20 performing my analysis. And I think I've told you also
21 equal number of times that I don't see that language in
22 Claim 4.

23 BY ATTORNEY YANG:

24 Q. But you agree that that language appears in
25 column 9, line 30 -- I'm sorry, line 29?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. I think the phrase "single-screen application"
3 appears not only in column 9, line 32, but I think it
4 appears elsewhere throughout -- or else -- other parts
5 of the specification as well.

6 BY ATTORNEY YANG:

7 Q. So you agree that you considered a
8 single-screen application when analyzing Claim 4.

9 ATTORNEY ZEILBERGER: Objection, form.

10 A. I considered the totality of the '080 patent,
11 and I considered the -- the actually as-written Claim 4,
12 not a modification of Claim 4.

13 BY ATTORNEY YANG:

14 Q. So because you considered a single-screen
15 application in the specification, did you consider
16 whether an application that is minimized to occupy only
17 one of the first and second displays is a single-screen
18 application?

19 ATTORNEY ZEILBERGER: Objection. Scope.
20 Relevance. Form.

21 A. And I don't see that language in Claim 4.

22 BY ATTORNEY YANG:

23 Q. And you told me you considered that language
24 because it appears in the specification.

25 ATTORNEY ZEILBERGER: Objection, form.

1 A. I told you that I considered the totality of
2 the '080 in analyzing all of the claims that I've
3 analyzed.

4 BY ATTORNEY YANG:

5 Q. And because that language appears in the
6 totality of the specification, you must have analyzed it
7 in analyzing Claim 4. Correct?

8 ATTORNEY ZEILBERGER: Objection, form.

9 A. I reviewed all of the columns and all of the
10 lines in my analysis of the challenged claims. Again,
11 as I've stated, I don't see that language in Claim 4 so
12 I don't see -- I don't understand your question, and I
13 believe that's -- I've tried to make it very clear why I
14 don't understand your question.

15 BY ATTORNEY YANG:

16 Q. Well, now you've changed the answer. You just
17 said that you reviewed all the columns.

18 Did you consider all the columns when
19 analyzing Claim 4?

20 ATTORNEY ZEILBERGER: Objection, form.

21 A. I considered the totality of the '080 patent.

22 BY ATTORNEY YANG:

23 Q. That was not my question. My question is did
24 you consider all the columns when analyzing Claim 4?

25 A. I considered the totality of the '080 patent,

1 which includes all of the columns.

2 Q. And because you considered all the columns,
3 you considered the single-screen application in
4 column 9, line 32 through 35, right?

5 A. As part of my analysis, I considered the
6 totality of the '080 patent. But I don't see for
7 Claim 4 where single-screen application is recited.

8 Q. So your testimony is you considered the
9 single-screen application in column 9 as part of your
10 analysis of Claim 4.

11 Is that right?

12 ATTORNEY ZEILBERGER: Objection, form.

13 A. My testimony is that I considered the totality
14 of the '080 patent in my analysis. I don't see the
15 claim term "single-screen application" anywhere in
16 Claim 4, and you seem to have agreed with me that it
17 does not appear there.

18 BY ATTORNEY YANG:

19 Q. Well, my question is, did you consider the
20 single-screen application in column 9 in your analysis
21 of Claim 4?

22 ATTORNEY ZEILBERGER: Objection, form.

23 A. So I think I'm understanding your question
24 now. So I wanted to point out that in column 10, not
25 only in column 9, but in column 10, it also talks about

1 single-screen application.

2 BY ATTORNEY YANG:

3 Q. That's fair.

4 So you considered the single-screen
5 application in both columns 9 and 10 in your analysis of
6 Claim 4.

7 Is that right?

8 A. I think I did a search for single screen, and
9 I think at least the term "single screen" appears in
10 column 11 as well. So I think now I'm understanding
11 your question. The term "single screen" does appear in
12 multiple columns, so I agree with you that the term
13 "single screen" appears in column 9, column 10, column
14 11. There may be more, but these are the three columns
15 that I see when I did a search using the PDF tool for
16 the term "single," space, "screen."

17 ATTORNEY ZEILBERGER: Counsel, we've been
18 going for just over an hour, and it's 12:30 PM Eastern
19 Time. Shall we break for lunch?

20 ATTORNEY YANG: Okay. How long do you want?

21 ATTORNEY ZEILBERGER: 1 o'clock?

22 ATTORNEY YANG: Can we do 1:10?

23 ATTORNEY ZEILBERGER: You need 40 minutes?

24 ATTORNEY YANG: Yeah. I'm in kind of a,
25 unfortunately, very bad location.

1 ATTORNEY ZEILBERGER: Okay. How about we
2 say -- we can say 1:10, but if you finish earlier, let
3 us know.

4 ATTORNEY YANG: Okay, thank you.
5 (Recess taken.)

6 BY ATTORNEY YANG:

7 Q. Welcome back, Dr. Chatterjee.

8 During the break, did you speak with anyone
9 about this deposition?

10 A. I did not.

11 Q. Okay. Could we go back to the '080 patent?
12 Before we took a break, I think you said that you
13 considered the disclosure of a single-screen application
14 in the sentence starting at column 9, line 29 in your
15 analysis of Claim 4.

16 Do I have that right?

17 A. I think I told you that I considered the
18 totality of the '080 patent, including all of the
19 columns and all of the lines.

20 Q. So because you considered the disclosure in
21 the sentence starting at column 9, line 29 in your
22 analysis of Claim 4, did you consider whether an
23 application that occupies only one of the first and
24 second displays is a single-screen application?

25 ATTORNEY ZEILBERGER: Objection. Scope.

1 Relevance. Form.

2 A. Can you show me where in Claim 4 it recites
3 single-screen application?

4 BY ATTORNEY YANG:

5 Q. I've shown you that the patent recites
6 single-screen application in column 9, line 29, which
7 you told me you considered when analyzing Claim 4.

8 ATTORNEY ZEILBERGER: Same objections, to the
9 extent that is a question.

10 BY ATTORNEY YANG:

11 Q. Did you have another question or are you going
12 to answer mine?

13 A. Oh, I didn't hear you. What was your
14 question? I answered your question already.

15 Q. My question was because you considered the
16 disclosure in the sentence starting at column 9, line 29
17 in your analysis of Claim 4, did you consider whether an
18 application that occupies only one of the first and
19 second displays is a single-screen application?

20 ATTORNEY ZEILBERGER: Objection. Scope.
21 Relevance. Form.

22 A. Can you show me where in Claim 4 single-screen
23 application is recited?

24 BY ATTORNEY YANG:

25 Q. I showed you that single-screen application is

1 recited in column 9, line 29, which you represented to
2 me you considered when analyzing Claim 4.

3 A. So again, it seems like you're changing the
4 claim to include what's in column 9, because when I
5 asked you where in column -- where in Claim 4 does it
6 recite that, you directed me to column 9.

7 So again, as I answered for you prior to our
8 lunch break, the analysis that I performed is based on
9 what the claims actually recite and not if the claims
10 recited something completely different.

11 Q. Well, I'm going to strike that answer as
12 nonresponsive because I'm asking whether the disclosure
13 in column 9, line 29 is an example of Claim 4's
14 application that occupies only one of the first and
15 second displays.

16 ATTORNEY ZEILBERGER: Objection, form.

17 A. Can you ask me the question again? You're
18 saying whether -- what is an example of what?

19 BY ATTORNEY YANG:

20 Q. Is the disclosure in column 9, line 29 an
21 example of Claim 4's application that occupies only one
22 of the first and second displays?

23 A. So I think the analysis that I performed for
24 this IPR is looking at certain prior art, and I rendered
25 opinions what one of ordinary skill would understand

1 from those prior art references.

2 And so what the analysis that I performed was
3 with regards to Claim 4, I explained to you, as set
4 forth in page 68, Ogawa in view of Yook discloses and/or
5 suggests the limitation for Claim 4. And so that's the
6 analysis that I performed, and that's when I also
7 reviewed the totality of the '080 patent.

8 And so I still don't see the term
9 "single-screen application" in the claim language, at
10 least for Claim 4. And I think you've conceded that it
11 does not appear there. And so I'm still perplexed by
12 the question to the extent that you're not changing the
13 Claim 4 language to say something completely different.

14 Q. Did you consider whether the '080
15 specification supports the claims?

16 ATTORNEY ZEILBERGER: Objection, scope.

17 THE WITNESS: So are you asking in general or
18 for Claim 4?

19 ATTORNEY YANG: Okay, let me strike my
20 previous question and rephrase it.

21 BY ATTORNEY YANG:

22 Q. Did you consider whether the '080
23 specifications supports Claim 4?

24 ATTORNEY ZEILBERGER: Objection, form.

25 A. So Claim 4 is a dependent claim that depends

1 from Claim 1. As part of my other answers to a number
2 of your questions, I showed you where I'm citing back to
3 the '080 patent. And I showed in my declaration and I
4 also explained to you today how the disclosures from the
5 '080 patent, how one of ordinary skill would understand
6 the disclosures in the prior art to be consistent with
7 the disclosures in the '080 patent. And so I did that
8 already for Claim 1, and I'm looking through my analysis
9 for Claim 4.

10 Ask me your question again. You're asking me
11 whether, for example, minimizing the application to
12 occupy only one of the first and second displays, is
13 that described? Is that your question?

14 BY ATTORNEY YANG:

15 Q. The question that you are responding to was
16 did you consider whether the '080 specification supports
17 Claim 4?

18 ATTORNEY ZEILBERGER: Objection. Form.
19 Scope.

20 A. So, for example, for that part of the Claim 4
21 that I just read to you, if you look at column 14, line
22 12 states: This may additionally indicate to a user
23 that the application may be minimized to occupy only the
24 single display. That's one example.

25 And then column 3, line 12, the modifying may

1 include minimizing the application to occupy only one of
2 the first and second displays.

3 BY ATTORNEY YANG:

4 Q. The examples that you just gave did not
5 mention a single-screen application.

6 Is that right?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. I think your question was related to Claim 4.
9 And again, I don't see the term "single-screen
10 application" in Claim 4.

11 BY ATTORNEY YANG:

12 Q. So is it fair to say you did not consider a
13 single-screen application in analyzing Claim 4?

14 ATTORNEY ZEILBERGER: Objection, scope. Form.

15 A. I considered the totality of the '080 patent
16 in my analysis of the claims.

17 BY ATTORNEY YANG:

18 Q. Did you consider a single-screen application
19 in analyzing Claim 4?

20 ATTORNEY ZEILBERGER: Objection, form.

21 A. Can you show me in the actually as-written
22 Claim 4 of the '080 patent where it recites
23 single-screen application?

24 BY ATTORNEY YANG:

25 Q. That's not necessary.

1 I'm asking you whether you considered that
2 term when you were analyzing Claim 4.

3 ATTORNEY ZEILBERGER: Objection. Form and
4 scope.

5 A. I considered the totality of the '080 patent
6 in analyzing the claims, so I'm -- I continue to be
7 extremely perplexed and confused by your question.

8 BY ATTORNEY YANG:

9 Q. So then if you did consider a single-screen
10 application in analyzing Claim 4, why would you need to
11 know whether single-screen application occurs in the
12 text of Claim 4 to answer my question?

13 ATTORNEY ZEILBERGER: Objection. Form.
14 Scope.

15 A. Because the analysis that I performed is based
16 on what the claims recite, and you seem to be telling me
17 to perform new analysis on the fly based on a completely
18 different claim, which is not as recited in the '080
19 patent.

20 BY ATTORNEY YANG:

21 Q. Because you're representing to me you already
22 made the analysis. You're representing to me that you
23 considered a single-screen application in analyzing
24 Claim 4, so I'm asking you --

25 ATTORNEY ZEILBERGER: Objection.

1 Q. -- the details of the analysis that you're
2 telling me you did.

3 ATTORNEY ZEILBERGER: To the extent that's a
4 question, I object to the form.

5 A. I think I answered for you that I considered
6 the totality of the '080 patent. I don't recall telling
7 you that I considered only one sentence of the '080
8 patent and deleting the rest of the '080 patent in
9 performing my analysis.

10 BY ATTORNEY YANG:

11 Q. My question -- my question was based on that
12 sentence and the rest of the '080 patent, did you
13 analyze a single screen -- did you consider a
14 single-screen application in analyzing Claim 4?

15 ATTORNEY ZEILBERGER: Objection. Form.
16 Scope.

17 A. In analyzing Claim 4, I analyzed the actual
18 words and the actual claim language for Claim 4, not a
19 different claim that you seem to be defining now.

20 BY ATTORNEY YANG:

21 Q. My question wasn't using the word "analyzed,"
22 my question was using the word "consider."

23 Did you consider a single-screen application
24 when you analyzed Claim 4?

25 ATTORNEY ZEILBERGER: Object to form, and

1 object to counsel's misrepresentation of the question.
2 You did use the word "analyze."

3 ATTORNEY YANG: Right, in analyzing Claim 4.
4 BY ATTORNEY YANG:

5 Q. My question was did you consider a
6 single-screen application in analyzing Claim 4? So
7 "consider" is on single-screen application.

8 ATTORNEY ZEILBERGER: Objection. Form.
9 Scope.

10 A. So you're asking me whether I considered only
11 one line of the spec without everything else in the
12 spec?

13 BY ATTORNEY YANG:

14 Q. No. I'm asking you whether you considered
15 that line together with everything else.

16 A. I considered the totality of the '080 patent,
17 which I've answered for you numerous times.

18 Q. Therefore, that line is among the things you
19 considered in analyzing Claim 4. Correct?

20 A. I considered the entirety, the totality of the
21 '080 patent.

22 Q. And so since that line is among the things you
23 considered, you've considered it, right?

24 ATTORNEY ZEILBERGER: Objection to form.

25 A. Since that line appears within the

1 specification of the '080 patent and I've represented to
2 you that I have considered the totality of the '080
3 patent, I agree that I have considered the totality of
4 the '080 patent in my analysis.

5 BY ATTORNEY YANG:

6 Q. And since you've considered that line, did you
7 consider whether an application that occupies only one
8 of the first and second displays is a single-screen
9 application?

10 ATTORNEY ZEILBERGER: Objection. Form.
11 Scope. Relevance.

12 A. For purposes of the declaration that I
13 submitted and the analysis that I performed and what I'm
14 prepared to testify today to is based on Claim 4 as it
15 is written in the '080 patent and whether certain prior
16 art references disclose and/or suggest the claims as
17 they are written.

18 BY ATTORNEY YANG:

19 Q. Are you not prepared to testify on whether the
20 specification of the '080 patent supports the claims?

21 ATTORNEY ZEILBERGER: Objection. Form.
22 Scope.

23 A. I think I gave you an example of portions from
24 the spec for the minimizing portion of Claim 4. Are you
25 asking me to give you other examples? I think I gave

1 you two examples.

2 BY ATTORNEY YANG:

3 Q. No. My question is whether the single-screen
4 application is an example of the minimized portion of
5 the application in Claim 4.

6 ATTORNEY ZEILBERGER: Objection, form.

7 A. Again, I'm -- I continue to be perplexed and
8 confused. I did the analysis based on what Claim 4 is
9 reciting right now, and that's the analysis I performed
10 based on the prior art.

11 And I stated, for example, on page 68, that
12 Ogawa in view of Yook discloses and/or suggests this
13 limitation.

14 BY ATTORNEY YANG:

15 Q. But my question is whether the single-screen
16 application example in the specification supports
17 Claim 4, not what the prior art suggests about Claim 4.
18 It's limited to the example in the specification and
19 whether that example supports Claim 4.

20 ATTORNEY ZEILBERGER: Objection. Form.
21 Scope.

22 A. So I think I gave you an example from, I
23 believe, another column that talked about minimizing the
24 application. And so I think what I've done in my
25 declaration is I've seen that, consistent with

1 disclosures in the '080 patent, one of ordinary skill
2 would understand certain prior art references, for
3 example, Ogawa in view of Yook, to disclose and/or
4 suggest Claim 4.

5 And so -- and I've shown that there's
6 disclosure. One of ordinary skill would understand
7 disclosure from, for example, Ogawa to be consistent
8 with disclosure in the '080 patent.

9 And so I believe that's the analysis that I've
10 done. It seems like you're asking me if there's other
11 analyses that I could have done, but I've done the
12 analyses that I believe is necessary here showing that
13 one of ordinary skill would understand the disclosures
14 from prior art, such as Ogawa, to disclose teachings
15 that are consistent with what the teaches or discloses.

16 BY ATTORNEY YANG:

17 Q. Because I'm trying to confirm whether you did
18 that analysis or not. If you say analyses you could
19 have done, are those -- then are you saying that you
20 didn't do certain analyses? And I'm trying to figure
21 out if the question I'm asking falls into -- falls in as
22 an example of an analysis that you did not do.

23 ATTORNEY ZEILBERGER: I object to the form of
24 the question, to the extent that is a question.

25 A. I think I've done the specific analyses that

1 I've set forth in my declaration. There's a million
2 other analyses that I could have done that I did not do.

3 For example, I could have done analysis like
4 if Claim 4 were written completely different, what would
5 the -- what would be with regards to the prior art. I
6 did not perform that analysis.

7 I think I've explained to you the analysis I
8 performed is based on what Claim 4 actually does recite
9 right now and not if it were written completely
10 different.

11 Q. Okay. If you didn't perform that analysis for
12 whatever reason, I guess we can move on.

13 (Exhibit No. 1005, previously marked, was
14 referenced and indexed.)

15 BY ATTORNEY YANG:

16 Q. Could you please turn to Exhibit 1005, which
17 is the Ogawa reference.

18 A. Okay. Yeah, I'm there. Sorry.

19 Q. Do you personally know Ogawa?

20 A. Is your question whether I'm friends with
21 Ogawa?

22 Q. Well, not just friends, but do you know this
23 person? This person, Ogawa?

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

25 Q. Okay. Were you aware of Ogawa -- not the

1 disclosures, but the Japanese publication -- prior to
2 your work in this IPR?

3 A. I don't believe so.

4 Q. And you did review Ogawa to prepare for this
5 deposition, right?

6 A. To be clear, I reviewed the English certified
7 translation of Ogawa, not the Japanese version.

8 Q. That was actually going to be my next
9 question.

10 So I want to confirm that you read the English
11 text from page 1 to 13 and not any of the Japanese text
12 starting on page 14.

13 Is that right?

14 A. Well, I think I did look at those, but I don't
15 read Japanese. So yes, I did not really understand
16 anything from the Japanese portion.

17 Q. You just answered my next question too. My
18 next question was can you read Japanese, so thank you
19 for getting ahead of me.

20 Can I direct you to page 7.

21 A. Page 7 of 23 on the bottom?

22 Q. Yes, page 7 of 23 on the bottom. And I
23 believe at the top, there's a 7 in parentheses so it
24 should be the same page.

25 A. Okay, yes.

1 Q. And once you're there, Figure 1 is at the top
2 of the page.

3 Is that right?

4 A. It says Figure 1 in parentheses, in square
5 brackets on the top left of that page.

6 Q. Okay. Is Figure 1 an embodiment of Ogawa?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. So I'm looking at paragraph 11, and it states:
9 As depicted in Figure 1, the electronic device according
10 to the first embodiment of the present invention is
11 composed of an electronic device main body 11 and an
12 electronic pen 12 for inputting.

13 BY ATTORNEY YANG:

14 Q. And that paragraph 11 says that device -- the
15 device is 11 in Figure 1.

16 Is that right?

17 ATTORNEY ZEILBERGER: Objection, form.

18 A. It says electronic device main body 11.

19 BY ATTORNEY YANG:

20 Q. Okay. And is 13 a screen in Figure 1?

21 ATTORNEY ZEILBERGER: Objection, form.

22 A. So if you look at page 3 at the top, it
23 states: The electronic device main body 11 is formed
24 with a display input surface 13 in which a display
25 surface and an input surface are integrated.

1 BY ATTORNEY YANG:

2 Q. So based on what you just read, would a person
3 of ordinary skill understand 13 to be a physical display
4 or a physical screen?

5 ATTORNEY ZEILBERGER: Objection, form.

6 A. So what was your question? You seem to, like,
7 correct yourself. What was your question?

8 BY ATTORNEY YANG:

9 Q. Oh, no, I did not. It was a -- it was one or
10 the other.

11 Based on what you just read, would a person of
12 ordinary skill understand 13 to be a physical screen or
13 physical display?

14 ATTORNEY ZEILBERGER: Objection. Form.
15 Foundation.

16 A. You're asking about 13, correct, in Ogawa?

17 BY ATTORNEY YANG:

18 Q. I am.

19 A. Well, it states: Electronic device main body
20 11 is formed with a display input surface 13 in which a
21 display surface and an input surface are integrated.

22 Q. Let me ask a different question.

23 Is 13 physical or is 13 something that is
24 displayed?

25 ATTORNEY ZEILBERGER: Objection, form.

1 A. If you look at paragraph 13, it states: As
2 depicted in the figure, the pen detection unit 21
3 detects contact between the pen 12 and the display input
4 surface 13 and outputs a detection signal.

5 BY ATTORNEY YANG:

6 Q. It looked like you were still reading. I
7 didn't want to interrupt you.

8 A. Yeah, I was reading, but I think I answered
9 your question.

10 Q. You certainly read something I was going to
11 ask. What did -- what did what you read mean?

12 ATTORNEY ZEILBERGER: Objection, form.

13 A. What I read to you from paragraph 13, which is
14 as depicted in the figure, the pen detection unit 21
15 detects contact between the pen 12 and the display input
16 surface 13 and outputs a detection signal. So I think
17 your question was whether this display input surface 13
18 is an actual -- some surface. It is a surface. It's a
19 physical surface.

20 BY ATTORNEY YANG:

21 Q. Okay. That makes sense. Thank you.

22 Going back to paragraph 11, paragraph 11
23 mentions electronic pen 12.

24 Do you see that?

25 A. I do.

1 Q. And what is an electronic pen?

2 A. So I think electronic pen 12 is also discussed
3 elsewhere in Ogawa as being pen 12. And so I'm reading
4 from paragraph 13 of Ogawa, which states: The
5 coordinate reading unit 22 reads the coordinates of the
6 contact position between the pen 12 and the display
7 input surface 13 and outputs subordinates that were
8 read.

9 Q. Okay. Could I direct you to page 8. And
10 you'll see Figure 3 on page 8.

11 A. Okay, I see it.

12 Q. So my first question is what's shown in 28A is
13 not displayed on screen 13.

14 Is that right?

15 ATTORNEY ZEILBERGER: Objection, form and
16 foundation.

17 A. Where are you reading? So I can understand
18 what your question is.

19 BY ATTORNEY YANG:

20 Q. Well, my question is I'm looking at Figure 3A.
21 It has a first editing area of 27A and a second editing
22 area of 27B.

23 And my question is, is what we see in that
24 figure displayed on the display 13 of Ogawa's device?

25 ATTORNEY ZEILBERGER: Objection, form.

1 A. Are you asking whether that rectangle is shown
2 in Figure 1?

3 BY ATTORNEY YANG:

4 Q. I'm asking whether that rectangle would be
5 shown on the display 13 of Figure 1, yes.

6 ATTORNEY ZEILBERGER: Objection, form.

7 A. I'm not sure I understand. You're saying
8 whether the label first editing area and second editing
9 area would be displayed on Figure 1?

10 BY ATTORNEY YANG:

11 Q. I'm asking whether 27A and 27B in those
12 rectangles are displayed on the display of Figure 1.

13 ATTORNEY ZEILBERGER: Objection, form.

14 A. To the extent your question is whether 27A and
15 27B appear in Figure 1, they don't appear to have those
16 labels. The only labels in Figure 1 are 11, 12, and 13.

17 BY ATTORNEY YANG:

18 Q. Can I ask about Figure 3B? Is Figure 3B
19 displayed on display 13?

20 ATTORNEY ZEILBERGER: Objection, form.

21 A. Again I'm confused by your question. Are you
22 asking whether the labels 28A, B, and C appear in
23 Figure 1?

24 BY ATTORNEY YANG:

25 Q. No. I'm asking whether the splitting flag,

1 the active screen flag, and the splitting length are
2 displayed on display 13.

3 A. So I think your question is still very
4 confusing. It explains in paragraph 16 that a split
5 flag register 28A which stores a split flag indicating
6 whether or not the screen is split.

7 So is your question whether the register can
8 be seen through the display? This question, it's really
9 confusing.

10 Q. Yes, that is my question. My question is are
11 those registers displayed on display 13?

12 A. I don't understand the question. How do you
13 display a register?

14 Q. That's my question to you.

15 How do you display a register?

16 ATTORNEY ZEILBERGER: Objection, form.

17 A. So a register, it's stating which stores a
18 split flag indicating whether or not the screen is
19 split. So it seems like I -- I don't know how to answer
20 that question. You're -- you're asking whether a
21 register is displayed on the screen. So are you saying
22 if the screen is broken whether somebody can see a
23 register that may be underneath the screen? Is that
24 your question?

25 BY ATTORNEY YANG:

1 Q. No. My question is does Ogawa disclose
2 displaying Figure 3B on the screen of 13?

3 ATTORNEY ZEILBERGER: Objection, form.

4 A. That seems to be a very different question
5 than what you asked me before. It's --

6 BY ATTORNEY YANG:

7 Q. Okay, then I'll retract my previous question.
8 Please answer this one.

9 A. So you're asking whether Figure 3-1 shows
10 Figure 3B? And I think it's pretty obvious it shows
11 labels 11, 12, and 13.

12 Q. Okay. Then the question now is does Ogawa
13 disclose displaying Figure 3B in the display of 13?

14 A. So if I understood your question, can -- would
15 one of ordinary skill understand that you could have a
16 screen that says splitting flag, active screen flag? I
17 think potentially there can be an application or a
18 program, I believe, in Ogawa where you can, if you want,
19 you can -- a program can say splitting flag.

20 Q. And which program in Ogawa does that?

21 A. So this seems to be a different question yet
22 again.

23 Q. Right. It's a follow-up question. You said
24 there was a program in Ogawa that could potentially do
25 that. And my follow-up question is, which program in

1 Ogawa does that?

2 A. Well, I think I said "potentially do that,"
3 and you're asking "does that," so it's really misquoting
4 what I stated.

5 And so in terms of what Ogawa is talking
6 about, so Ogawa does disclose a program. And my point
7 was that one of ordinary skill would know that programs
8 can be written, for example, writing source code. And
9 to the extent your question was whether a program could
10 be written that uses -- that prints text that says
11 splitting flag, I believe one of ordinary skill would
12 understand that a program can be written that has text
13 that says splitting flag. But I don't understand the
14 relevance to this, of that, to any of the analysis that
15 I performed.

16 Q. Okay. Could you explain what splitting flags
17 27A is? I'm sorry, 28A.

18 A. So as I read to you from paragraph 16, split
19 flag register 28A which stores a split flag indicating
20 whether or not the screen is split.

21 Q. So is a flag just a yes or no whether the
22 screen is split?

23 A. I don't remember off the top of my head
24 whether it says whether the split flag is a Boolean or
25 something else. The disclosure is that a split flag

1 register 28A stores a split flag indicating whether or
2 not the screen is split.

3 Q. Okay. And can you explain what active screen
4 flag 28B is?

5 A. So again looking at paragraph 16, it states:
6 An active screen flag register 28B which stores an
7 active screen flag which specifies which of the two
8 screens generated by the split is active.

9 Q. And what would active screen flag 28B store if
10 there was no split?

11 A. Are you saying that there's disclosure in
12 Ogawa that says that?

13 Q. No. I'm asking what a person of ordinary
14 skill would understand, because Ogawa does disclose that
15 the screen may be a single screen without a split.

16 ATTORNEY ZEILBERGER: Objection, foundation
17 and form.

18 A. I did a search for 28B, and I think I got
19 three hits on the PDF search tool. The first one
20 states: An active screen flag register 28B which stores
21 an active screen flag which specifies which of the two
22 screens generated by the split is active.

23 The next one is in column -- in paragraph 23,
24 and it states: Next, a flag for making the left screen
25 13 active is set in the active screen flag register 28B,

1 step S8.

2 And then finally, in paragraph 30, it states:
3 If a determination is made that the active screen is to
4 be changed, the active flag set and the active screen
5 flag register 28B is changed.

6 Q. And is it fair to say that the three passages
7 that you just read don't tell us what the active screen
8 flag 28B is if there is no split?

9 ATTORNEY ZEILBERGER: Objection, form.

10 A. The three sentences that I read, going from
11 memory, I would agree with you don't say whether -- what
12 is stored in the active screen flag register 28B.

13 BY ATTORNEY YANG:

14 Q. Okay. And could you explain what the
15 splitting length 28C is?

16 A. So looking at paragraph 16, it states: A
17 split length register 28C which stores a split length
18 which indicates the size of the two screens formed by
19 the split.

20 Q. And that size is not a flag.

21 Is that right?

22 ATTORNEY ZEILBERGER: Objection, form.

23 A. I don't know how to answer that question.
24 Flags can be -- like I mentioned to you, I did not see
25 anything that said a flag is a Boolean, so let me search

1 for "Boolean." I didn't get any hits on Boolean.

2 Q. Okay, let me rephrase that. You would expect
3 split length 28C to be a value.

4 Is that right?

5 A. I don't really understand if you're making a
6 distinction that a Boolean is not a value. I don't
7 really understand what you mean by a value.

8 Q. This is a completely different question. It's
9 completely unrelated to the last one. I apologize.

10 My question was, you would expect splitting
11 length 28C to be a value.

12 Is that right?

13 ATTORNEY ZEILBERGER: Objection, form.

14 A. What do you mean by value?

15 BY ATTORNEY YANG:

16 Q. Some numerical value. It doesn't have to be
17 like an integer or a whole number, but some numerical
18 value.

19 A. So is your question whether a length can be
20 specified using some kind of encoding for -- without
21 using a numerical value?

22 Q. Sure. You can answer that.

23 Can 28C be encoded with -- as a length without
24 using a numerical value?

25 ATTORNEY ZEILBERGER: Objection, form.

1 A. Well, I think that's a different question.
2 You were asking me about, I thought, in general, and
3 that's what I was explaining to you. I think for Ogawa
4 28C, it's stating a split length register 28C which
5 stores a split length which indicates the size of the
6 two screens formed by the split.

7 BY ATTORNEY YANG:

8 Q. I'm just trying to understand. Is that a
9 value or is it something else?

10 ATTORNEY ZEILBERGER: Objection.

11 BY ATTORNEY YANG:

12 Q. Is it like a string? A Boolean?

13 ATTORNEY ZEILBERGER: Objection, form.

14 A. So I did a search for "28C." I did not see
15 anything, at least through that search, to indicate that
16 it -- that it's limited to an integer or that it cannot
17 be implemented with, for example, a string. I think
18 that was your example that you gave. I think it's just
19 simply stating that 28C is a split length register which
20 stores a split length which indicates the size of the
21 two screens formed by the split.

22 ATTORNEY ZEILBERGER: Counsel, we've been
23 going about an hour. Would it be a good time for a bio
24 break?

25 ATTORNEY YANG: Yeah, sure. 2:15 work?

1 ATTORNEY ZEILBERGER: Sure.

2 (Recess taken.)

3 BY ATTORNEY YANG:

4 Q. Dr. Chatterjee, during the break, did you
5 speak with anyone about this deposition?

6 A. I did not.

7 Q. Okay. And we are still looking at Ogawa.
8 Please let me know when you get to paragraph 17.

9 A. Okay, I'm there.

10 Q. Okay. On paragraph 17, on the fifth line, it
11 says: Depicted Figure 4A and access bar 42 is displayed
12 in a top line of the display area, the entire screen is
13 lowered by one line and the display surface is split
14 into two screens, 13A and 13B, almost symmetrically as
15 depicted in Figure 4B.

16 Do you see that?

17 ATTORNEY ZEILBERGER: Objection,
18 mischaracterizes.

19 A. Where did you read in paragraph 17? From the
20 third line down?

21 BY ATTORNEY YANG:

22 Q. From the fifth line starting with the word
23 "Depicted" in Figure 4A.

24 A. That seems to be in the middle of a sentence.

25 Q. Yeah. I was trying to just get the clause

1 starting with: An access bar 42 is displayed in a top
2 line of the display area, the entire screen is lowered
3 by one line and the display surface is split into two
4 screens, 13A and 13B, almost symmetrically as is
5 depicted in Figure 4B. Once you've seen that, I do have
6 a question.

7 So the question is when Ogawa uses the term
8 "entire screen," is that the entire physical screen 13?

9 ATTORNEY ZEILBERGER: Objection. Form,
10 foundation.

11 A. Is your question -- I think your question
12 perhaps is directed to Figure 4, which shows 42, and it
13 shows that one line that is referenced in paragraph 17
14 that you directed me to.

15 BY ATTORNEY YANG:

16 Q. Are you now looking at Figure 4?

17 A. I was. I'm looking back at the paragraph 17
18 again. So what is your question?

19 Q. My question is when Ogawa uses the term
20 "entire screen," is that the entire physical screen 13?

21 ATTORNEY ZEILBERGER: Objection. Form,
22 foundation.

23 A. Where do you see physical screen?

24 BY ATTORNEY YANG:

25 Q. I believe you testified earlier that 13 was

1 physical. Would you like to withdraw that testimony?

2 ATTORNEY ZEILBERGER: Objection. Counsel's
3 mischaracterizing his own question.

4 ATTORNEY YANG: And that again is a speaking
5 objection.

6 ATTORNEY ZEILBERGER: It's not an objection.
7 You're misleading the witness, counsel.

8 ATTORNEY YANG: Again, that's a speaking
9 objection.

10 THE WITNESS: So can you tell me when I said
11 that?

12 BY ATTORNEY YANG:

13 Q. I asked earlier based on what you -- based on
14 paragraph 11, would a person of ordinary skill
15 understand 13 to be a physical screen, or would 13 be
16 something that is displayed? And then you looked at
17 paragraph 11.

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. 13 is the display input surface 13.

20 BY ATTORNEY YANG:

21 Q. And the display input surface is a physical
22 surface.

23 Is that right?

24 ATTORNEY ZEILBERGER: Object to form.

25 A. Yeah, so I'm still not understanding. I asked

1 you to explain to me when I said that about screen, and
2 then you pointed me to 13, which is about the display
3 input surface 13.

4 BY ATTORNEY YANG:

5 Q. And I guess my question is, is display input
6 13 a physical surface?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. I'm really confused. I thought you were
9 telling me that I told you something before. I asked
10 you to explain to me when I said that, and now you seem
11 to be moving off the topic.

12 BY ATTORNEY YANG:

13 Q. Well, I'd like you to confirm that if you
14 haven't. If you don't think you've confirmed that, then
15 I'd like you to confirm it.

16 Is 13 a physical surface?

17 ATTORNEY ZEILBERGER: Objection, form.

18 A. Paragraph 11, it's talking about display input
19 surface 13.

20 BY ATTORNEY YANG:

21 Q. So the pending question is, is surface 13
22 physical or is it not physical?

23 ATTORNEY ZEILBERGER: Objection, form.

24 A. I think when I was answering this question
25 before, I directed you to paragraph 13, which states:

1 As depicted in the figure, the pen detection unit 21
2 detects contact between the pen 12 and the display input
3 surface 13 and outputs a detection signal.

4 BY ATTORNEY YANG:

5 Q. And based on that, a person of ordinary skill
6 would include that surface 13 as physical.

7 Is that right?

8 A. That it's a surface, yes.

9 Q. And then going back to my question about
10 paragraph 17, is the entire surface in the sentence of
11 paragraph 17 that we were looking at, does that refer to
12 the screen 13?

13 A. Where do you see screen 13? We just talked
14 about display input surface 13. You seem to be, like,
15 changing what Ogawa's disclosing as well.

16 Q. So are you saying that 13 is not a screen?

17 ATTORNEY ZEILBERGER: Objection, form.

18 A. 13 is in Ogawa. 13 is display input surface
19 13.

20 BY ATTORNEY YANG:

21 Q. That wasn't my question. My question is, is
22 it your testimony that 13 is not a screen?

23 ATTORNEY ZEILBERGER: Objection, form.

24 A. Are you asking if Ogawa were a different
25 patent?

1 BY ATTORNEY YANG:

2 Q. No. What I'm asking is I said 13 was a
3 screen, and then you said that Ogawa describes it as an
4 input surface.

5 So my question is am I incorrect to call 13 a
6 screen?

7 Is it not a screen?

8 ATTORNEY ZEILBERGER: Objection, form and
9 scope as phrased.

10 A. Ogawa says 13 is the display input surface.

11 BY ATTORNEY YANG:

12 Q. So is it incorrect to call 13 a screen?

13 ATTORNEY ZEILBERGER: Same objections.

14 A. But my point was that you keep on changing
15 what 13 is in Ogawa. I'm trying to say that Ogawa
16 describes what 13 is.

17 BY ATTORNEY YANG:

18 Q. I mean, I used "screen" for shorthand and now
19 I'm afraid that you don't think it is a screen.

20 Is it a screen?

21 Is 13 a screen or not?

22 ATTORNEY ZEILBERGER: Objection, form and
23 scope as phrased. Also object to counsel's colloquy.

24 A. Again I'm very confused by your question. Are
25 you asking in the context of what -- whether Ogawa's 13

1 is a screen?

2 BY ATTORNEY YANG:

3 Q. In the context of a person of ordinary skill
4 reading Ogawa, would a person of ordinary skill reading
5 Ogawa call 13 a screen?

6 ATTORNEY ZEILBERGER: Same objections.

7 A. Limited to Ogawa, a person of ordinary skill
8 would call 13 a display input surface because that's
9 what Ogawa explains 13 is.

10 BY ATTORNEY YANG:

11 Q. Yes, I agree that 13 is a display input
12 surface. My question was would a person of ordinary
13 skill call 13 a screen? Yes or no.

14 ATTORNEY ZEILBERGER: Objection, form, scope
15 as phrased.

16 A. Again, you're saying in the context of Ogawa,
17 so limited to Ogawa. It seems like you're again asking
18 me if Ogawa were to be modified to say different things,
19 how would I rewrite Ogawa. That seems to be your
20 question. I have not done that analysis to rewrite
21 Ogawa.

22 BY ATTORNEY YANG:

23 Q. Okay, let me ask this then. This is a
24 different question.

25 In paragraph 17, when Ogawa uses the term

1 "entire screen," is that the entire display input
2 surface 13?

3 A. Well, if you look at Figure 4B, it shows 42
4 and it shows 13A and 13B. And so as far as I understand
5 your question -- and it's extremely confusing, like many
6 of the other questions -- it shows that one line --
7 let's see. The lowering by one line, it's showing it
8 for both screens 13A and 13B.

9 Q. So I'm asking what entire screen is in
10 paragraph 17. Is it referring to 13?

11 Is it referring to just 13A?

12 Is it referring to just 13B?

13 ATTORNEY ZEILBERGER: Objection, form.

14 A. Is what referring to 13A, just 13B? I don't
15 understand the question.

16 BY ATTORNEY YANG:

17 Q. Do you see the words "entire screen" in
18 paragraph 17?

19 A. I see it after a comma, and then there's many
20 more words after that, yes.

21 Q. And I'm trying to understand what the entire
22 screen is.

23 What is the entire screen?

24 ATTORNEY ZEILBERGER: Objection, form.

25 A. Well, if you read the entirety of the sentence

1 rather than just a couple of words and cutting it off
2 there, it's saying the entire screen is lowered by one
3 line. And what I explained to you is if you look at
4 Figure 4B, it shows the lowering of that one line in
5 both 13A and 13B.

6 BY ATTORNEY YANG:

7 Q. And I'm trying to figure out which elements of
8 Figure 4 is the entire screen. Is it 13, or is it 13A,
9 or is it 13B?

10 ATTORNEY ZEILBERGER: Objection, form.

11 A. Again you seem to be changing the disclosure
12 of Ogawa. Ogawa says 13 is the display input surface.

13 BY ATTORNEY YANG:

14 Q. I don't believe I've -- I'm asking what Ogawa
15 means by "entire screen." I haven't changed anything.
16 I'm asking how a person of ordinary skill would
17 understand the term "entire screen" as used in paragraph
18 17.

19 A. And I answered that question already because
20 what it's saying in paragraph 17 is that it lowered by
21 one line. And I pointed you back to Figure 4B that
22 shows the lowering of one -- of that one line in 13A and
23 13B.

24 Q. And so which element in Figure 4B is the
25 entire screen? Which number is it?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. So again you seem to be saying to change the
3 disclosure of Ogawa. I don't see a number after what
4 Ogawa says in paragraph 17.

5 BY ATTORNEY YANG:

6 Q. Well, let me ask you this. Is the entire
7 screen that's shown in Figure -- any of Figure 4?

8 ATTORNEY ZEILBERGER: Objection, form.

9 A. It's not saying the entire screen, period.
10 It's saying is lowered by one line. And that's what I
11 showed you, that it's clear from Figure 4B what Ogawa's
12 talking about, that it's lowered by one line. And you
13 can see that in 13A and 13B in Figure 4.

14 BY ATTORNEY YANG:

15 Q. Except I'm trying to figure out what is
16 lowered by one line. Ogawa says the entire screen is
17 lowered by one line. What shown in Figure 4B is lowered
18 by one line? I can't tell.

19 ATTORNEY ZEILBERGER: Objection, form.

20 A. I'm still not understanding the question or
21 how I have not answered it already with regards to what
22 I explained to you with -- for Figure 4B.

23 BY ATTORNEY YANG:

24 Q. I'm asking you to identify the element in
25 Figure 4B that's lowered by one line. I actually don't

1 know what it is.

2 ATTORNEY ZEILBERGER: Objection, form.

3 A. Well, again looking at Figure 4B, you can see
4 that 13A and 13B, they have been lowered, and so I -- I
5 don't know how else to answer your question.

6 BY ATTORNEY YANG:

7 Q. So to make it clear for me, you're saying that
8 13A and 13B are both lowered. So the things that are
9 being lowered are 13A and 13B.

10 Is that right?

11 A. Again, I'm not really grasping your question,
12 how I'm not answer -- how I have not already answered
13 your question. I've pointed you to Figure 4B. It's
14 showing how 13A and B have been lowered, so I'm not
15 really understanding how else to answer your question.

16 Q. Well, first of all, I want to confirm that
17 your answer to my question is 13A and 13B.

18 ATTORNEY ZEILBERGER: Objection, form.

19 A. You've asked, like, many different questions
20 where you've modified them, changed the question every
21 time, so which is your question that you're saying?

22 BY ATTORNEY YANG:

23 Q. My question was, what is the element in Ogawa
24 Figure 4B that is lowered by one line?

25 A. Can you point me to where in my report, in my

1 declaration I'm talking about this?

2 Q. Well, you said that you've reviewed Ogawa.
3 And I'm trying to understand how Ogawa works and so I'm
4 trying to figure out what the figures -- what the
5 figures teach us and how they correspond to the
6 specification. And so since you've reviewed Ogawa, you
7 should be able to explain how Ogawa works.

8 A. And I think I have explained it to you
9 multiple times.

10 Q. So then answer my question.
11 What is the element in Ogawa Figure 4B that is
12 lowered by one line?

13 ATTORNEY ZEILBERGER: Objection, form.

14 A. And I've answered repeatedly looking at
15 Figure 4B that you can see that 13A and B have been
16 lowered.

17 BY ATTORNEY YANG:

18 Q. Okay. So then let me go -- let's go back to
19 paragraph 17. Ogawa says: The entire screen is lowered
20 by one line and the display surface is split into two
21 screens, 13A and 13B.

22 Do you see that?

23 A. Where are you reading?

24 Q. Paragraph 17.

25 A. Okay.

1 Q. And do you see the part where it says: The
2 entire screen is lowered by one line and the display
3 surface is split into two screens, 13A and 13B?

4 A. Yes. It continues. It doesn't end there.

5 Q. I agree.

6 But doesn't that suggest that the screen is --
7 the entire screen is lowered by one line first and then
8 the display surface is split into two screens, 13A and
9 13B?

10 ATTORNEY ZEILBERGER: Objection, form.

11 A. Where does it say that?

12 BY ATTORNEY YANG:

13 Q. Well, that's the order that the steps are
14 presented in. It says the entire screen is lowered by
15 one line. That's the first thing. And then it says the
16 display surface is split into two screens, 13A and 13B.

17 Isn't that the order Ogawa describes it in?

18 ATTORNEY ZEILBERGER: Objection. Foundation,
19 form.

20 A. Where are you reading that it's in order that
21 Ogawa is describing?

22 BY ATTORNEY YANG:

23 Q. Well, Ogawa says the entire screen is lowered
24 by one line, and then it says: And the display surface
25 is split into two screens, 13A and 13B, in that order.

1 That's the order that Ogawa -- that's the order of words
2 Ogawa uses.

3 ATTORNEY ZEILBERGER: Objection. Form,
4 foundation.

5 A. I'm not seeing where the "and then" -- you
6 seem to be adding some words into the specification of
7 Ogawa that don't exist.

8 BY ATTORNEY YANG:

9 Q. I didn't say "and then." I said Ogawa says
10 the entire screen is lowered by one line. That's the
11 first thing it says. Then it says: And the display
12 surface is split into two screens, 13A and 13B. That's
13 the second thing it says. That's the order it says
14 those two things in.

15 A. Well, to be --

16 ATTORNEY ZEILBERGER: Objection. Form,
17 foundation.

18 A. To be clear, the last question you asked me,
19 you did say "and then." But again, I don't see anything
20 where it's talking about "and then" or an ordered
21 operation. I don't see any of these words in 17.
22 Again, it seems like you're changing the spec.

23 BY ATTORNEY YANG:

24 Q. No. If I say a first thing, then I say a
25 second thing, does that mean the second thing can occur

1 before the first thing?

2 ATTORNEY ZEILBERGER: Objection, form. Scope.

3 A. Are you asking me in general, outside of the
4 scope of Ogawa?

5 BY ATTORNEY YANG:

6 Q. No, I'm asking you in the context of Ogawa.
7 Ogawa says two things. It says two things, and it says
8 them one before the other. And I'm asking you, can the
9 second thing occur before the first thing?

10 ATTORNEY ZEILBERGER: Objection. Form,
11 foundation.

12 A. I think this is a disclosure. It's -- I still
13 don't see anything where it's saying it's in order or it
14 happens in sequence. I think you're -- you continue to
15 be adding words into the spec similar to how you were
16 into the claim language of the '080 patent. So I don't
17 see these words, so -- and you're -- I've asked you to
18 point out where you're seeing these.

19 BY ATTORNEY YANG:

20 Q. Okay. Do you see the words "an access bar 42
21 is displayed in a top line of the display area"?

22 Do you see that?

23 A. I do.

24 Q. And is -- are those words before the words
25 "the entire screen is lowered by one line"?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. And there are other words before that; there
3 are other words after that.

4 BY ATTORNEY YANG:

5 Q. But those words are before the words "the
6 entire screen is lowered by one line," right?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. Those words are. There's a comma, and those
9 words are before that.

10 BY ATTORNEY YANG:

11 Q. So can you perform the entire screen is
12 lowered by one line before performing an access bar is
13 displayed in a top line of the display area?

14 ATTORNEY ZEILBERGER: Objection, form and
15 scope as phrased.

16 A. So again, I'm not really following where this
17 is in my declaration or in my opinions. I'm still not
18 seeing anything that's saying it's in this specific
19 order. I just don't see these words. Again, it seems
20 like you're adding words that don't exist into the
21 specification of Ogawa.

22 BY ATTORNEY YANG:

23 Q. I'm not adding words. I'm asking you these
24 words are written in that order. Can you perform the
25 steps out of order? I'm not asking does Ogawa say is

1 there -- there is an order. I'm asking can -- since
2 Ogawa wrote it this way, can you perform the steps out
3 of order?

4 ATTORNEY ZEILBERGER: Objection. Foundation
5 and form and scope.

6 A. So I don't remember off the top of my head if
7 somewhere else Ogawa says anything about this. But
8 you're showing me only portions of a sentence, and I
9 don't see where it's saying any of the things that you
10 seem to be adding into the sentence.

11 BY ATTORNEY YANG:

12 Q. I haven't added anything into the sentence. I
13 simply asked you does "an access bar 42 is displayed in
14 a top line of the display area," are those words before
15 "the entire screen is lowered by one line"? And you
16 agreed with me that they are.

17 So then I asked is there any reason why you
18 would perform the second step before the first step?
19 I'm not asking would you perform it, I said -- I'm
20 asking is there any reason why you wouldn't?

21 ATTORNEY ZEILBERGER: Objection. Foundation.
22 Form. Scope.

23 A. So you're asking based on the disclosure of
24 Ogawa.

25 Q. Yes, based on --

1 A. Or -- or at least based on this part of a
2 sentence in paragraph 17. I'm not seeing anything, at
3 least in this sentence, part of a sentence in paragraph
4 17, that is stating any order.

5 Q. No, I'm asking you is there a reason -- is
6 there -- would a person of ordinary skill perform these
7 steps out of the order that it's written in?

8 We agree it's written in an order, but my
9 question is, is there a reason a person of ordinary
10 skill would perform these steps out of the order it's
11 written in?

12 ATTORNEY ZEILBERGER: Objection,
13 mischaracterizes. Foundation. Form.

14 A. I don't know what you mean by we agree that
15 it's written in an order. I don't remember saying that.
16 You seem to be saying something else that I did not say.
17 BY ATTORNEY YANG:

18 Q. Well, you said the words "an access bar 42 is
19 displayed in a top line of the display area." Do those
20 words occur before the words "the entire screen is
21 lowered by one line"?

22 A. I don't know what you mean by "those words
23 occur." They may be written like that, but when
24 you're --

25 Q. Okay, but they are written like that. Would

1 you agree the sentence is written "An access bar 42 is
2 displayed in a top line of the display area," it's
3 written before "the entire screen is lowered by one
4 line"?

5 ATTORNEY ZEILBERGER: Counsel, please don't
6 cut off the witness again.

7 ATTORNEY YANG: And please stop making
8 speaking objections.

9 ATTORNEY ZEILBERGER: No, counsel. You don't
10 get to cut off the witness. That is a basic rule of
11 depositions. I'm not making a speaking objection. You
12 are not allowed to cut off the witness.

13 ATTORNEY YANG: If you want to call the Board
14 on it, please be my guest.

15 ATTORNEY ZEILBERGER: If you do it again, I
16 will, counsel. You're not allowed to cut off the
17 witness.

18 BY ATTORNEY YANG:

19 Q. Please answer my question.

20 A. What was the question? I answered for you
21 that what you stated was not what I stated, and then
22 I -- you cut me off, and then you answered -- you asked
23 another question.

24 And it seems like to the extent you're asking
25 whether the words "an access bar 42 is displayed in a

1 top line of the display area," and then there's a comma,
2 and then "the entire screen is lowered by one line,"
3 comma, I think it's written in black and white. I think
4 I -- I can see that it's written in black and white.

5 Q. And so would a person of ordinary skill,
6 reading this sentence, repeat these steps in the
7 order -- as they are -- as they are written?

8 A. What do you mean, repeat these steps? What
9 does it mean? Repeat them over and over again?

10 Q. Perform the steps, as in does the -- does "an
11 access bar 42 is displayed in a top line of the display
12 area," does that happen first and then this "entire
13 screen is lowered by one line"?

14 ATTORNEY ZEILBERGER: Objection, form.

15 A. Can you show me where it's saying that happens
16 first and then the entire screen is lowered by one line?
17 BY ATTORNEY YANG:

18 Q. That's my question to you.

19 Would a person of ordinary skill, reading
20 that, understand it that way, or no?

21 A. I think again, limited -- you're asking me to
22 just limit my answer to just that small portion of a
23 bigger sentence in paragraph 17, not looking at all of
24 Ogawa. All it's saying here is an access bar 42 is
25 displayed in a top line of the display area, comma, the

1 entire screen is lowered by one line, comma.

2 Q. And I'm trying to figure out is the access bar
3 is displayed, does that -- is that first?

4 Is the entire screen is lowered, is that
5 first?

6 Are these two simultaneous?

7 ATTORNEY ZEILBERGER: Objection, form.

8 A. With regards to what?

9 Are you asking if implementing it, it can be
10 implemented in different ways?

11 BY ATTORNEY YANG:

12 Q. I'm asking, reading this sentence, how would a
13 person of ordinary skill understand this sentence?

14 ATTORNEY ZEILBERGER: Objection, form.

15 A. I think one of ordinary skill in reading
16 just -- it's not even a sentence. You keep on referring
17 to it as a sentence. It's not. The sentence is
18 significantly bigger. Reading this phrase of a small
19 part of a sentence, they would -- one of ordinary skill
20 would just understand an access bar 42 is displayed in a
21 top line of the display area, the entire screen is
22 lowered by one line.

23 BY ATTORNEY YANG:

24 Q. And what does that mean?

25 A. It means that an access bar 42 is displayed in

1 a top line of the display area, the entire screen is
2 lowered by one line. And there's a comma in between
3 them, so these are different things.

4 And again, you're -- you're saying not within
5 the context of Ogawa. But simply this phrase within a
6 larger sentence, limited to that, I think one of
7 ordinary skill, it's -- it's like you're saying even
8 leave out the figures from Ogawa, leave everything out
9 from Ogawa except for that phrase. I think it would be
10 difficult for one of ordinary skill, just that phrase
11 without the rest of Ogawa, including the figures. So
12 again, it's a very confusing question that you're
13 asking.

14 Q. You said it would be very difficult for one of
15 ordinary skill. Very difficult for one of ordinary
16 skill to what?

17 ATTORNEY ZEILBERGER: Objection, form.

18 A. Well, if I read in a vacuum -- that's what
19 you're asking me, in a vacuum, without Ogawa, without
20 the figures of Ogawa, without the other explanations of
21 Ogawa, if I just read an access bar 42 is displayed in a
22 top line of the display area, comma, the entire screen
23 is lowered by one line, it would be very difficult for
24 anyone to understand what that is in a vacuum without
25 the figures and without the rest of Ogawa. So that's

1 why I'm saying it's very difficult, it's very confusing
2 to understand your questions and very difficult to
3 answer your questions.

4 BY ATTORNEY YANG:

5 Q. Okay. Then please consider Ogawa in its
6 totality with all of its disclosures and all of the
7 figures.

8 With that in mind, how would one of ordinary
9 skill understand this phrase?

10 A. They would understand it to say an access bar
11 42 is displayed in a top line of the display area, the
12 entire screen is lowered by one line. Right before
13 that, it's talking about Figure 4A. And before that,
14 it's talking about Figure 4. So one of ordinary skill
15 would look at Figure 4 and 4A and 4B and 4C and see that
16 it's lowered by a line, and I think that's -- that's the
17 understanding that one of ordinary skill would have
18 based on what is written there.

19 Q. And is it your opinion that one of ordinary
20 skill would not assign any order to these things even
21 though they're written in a -- that they're written --
22 the words occur in the way it's written?

23 ATTORNEY ZEILBERGER: Objection, form.

24 A. I think you said "the words occur in the way
25 it's written." You seem to be saying some way to

1 interpret that language.

2 BY ATTORNEY YANG:

3 Q. I'm saying the specific words in this
4 paragraph, the words are -- the words are one in front
5 of the -- one after another. You agree that these are
6 the words. And I'm asking, based on these words, would
7 a person of ordinary skill understand that these things
8 are in order or would the person of ordinary skill
9 understand that these things are not in order?

10 ATTORNEY ZEILBERGER: Objection, form.

11 A. So I think unless there's other places in
12 Ogawa that say something, I don't see -- in this, it's
13 simply stating an access bar 42 is displayed in a top
14 line of the display area, comma, the entire screen is
15 lowered by one line, comma, and it goes on and says
16 other things.

17 BY ATTORNEY YANG:

18 Q. So in your opinion, can the display surface be
19 split into two screens, 13A and 13B, before the entire
20 screen is lowered by one line?

21 A. If you look at Figure 4C, it's showing that
22 the pen 12 is being dragged, so it's already 13A and
23 13B. The split has already happened in that scenario.

24 Q. Wouldn't you agree that in Figure 4C, this
25 entire screen has already been lowered by one line?

1 A. Are you trying to ask me if Ogawa teaches that
2 you can only split the screen one time, that's it?

3 Q. No, that's not my question at all.

4 A. Then if that's not your question, then
5 scenario where the screen has been split into two
6 screens, 13A and 13B, and then you would be able to
7 press the menu item to go into the screen splitting
8 mode, so I think that answers your question.

9 Q. It doesn't, because you didn't address the
10 entire screen is lowered by one line.

11 ATTORNEY ZEILBERGER: Object to the form of
12 the question, to the extent that is a question.

13 A. You were asking me whether 13A and 13B can
14 exist, and then after that, whether split screen can be
15 selected. And I explained to you I believe even in
16 paragraph 17 it's stating when, quote, split screen is
17 selected with the pen 12, while a function operation
18 menu 41 is displayed as depicted in Figure 4A, an access
19 bar 42 is displayed in a top line of the display area,
20 the entire screen is lowered by one line and the display
21 surface is split into two screens, 13A and 13B, almost
22 symmetrically, as depicted in Figure 4B.

23 BY ATTORNEY YANG:

24 Q. I think the confusion is you misunderstood my
25 question. I did not ask about the split screen being

1 selected. That was brought up by you for the first
2 time.

3 I asked can the split -- can the display
4 surface is split into two screens, 13A and 13B, before
5 the entire screen is lowered by one line. I was asking
6 about the entire screen is lowered by one line, not
7 about selecting a split screen.

8 ATTORNEY ZEILBERGER: Objection to form.

9 A. So is your question whether split screen can
10 be selected without selecting split screen?

11 BY ATTORNEY YANG:

12 Q. My question has nothing to do with selecting a
13 split screen.

14 A. But the portion you're -- the sentence, the
15 phrase that you repeatedly are directing me to, the
16 sentence starts with when, quote, "split screen," end
17 quote, is selected with the pen 12. So you're saying
18 deleting that from the specification of Ogawa?

19 Q. Is it your testimony that the entire screen is
20 lowered only when the pen selects to split the screen?

21 THE REPORTER: Repeat the question please.

22 BY ATTORNEY YANG:

23 Q. Is it your testimony that the entire screen is
24 lowered by one line only occurs when the pen selects to
25 split the screen?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. I don't think I heard you say pen or pencil
3 asks to split the screen. Because the sentence in
4 paragraph 17 starts when, quote, "split screen," end
5 quote, is selected with the pen 12 while a function
6 operation menu 41 is displayed as depicted in Figure 4A,
7 and then it continues on with the phrase that you've
8 been asking me about.

9 BY ATTORNEY YANG:

10 Q. Let me rephrase that.

11 Is it your testimony that the entire screen is
12 lowered by one line requires when split screen is
13 selected with the pen 12 while a function operation menu
14 41 is displayed as depicted in Figure 4A?

15 ATTORNEY ZEILBERGER: Objection, form.

16 A. So are you asking whether Ogawa discloses
17 other ways to get to that?

18 BY ATTORNEY YANG:

19 Q. I'm asking whether Ogawa requires the entire
20 screen is lowered by one line, that requires when split
21 screen is selected with the pen 12 while a function
22 operation menu 41 is displayed as depicted at 4A.

23 ATTORNEY ZEILBERGER: Objection to form.

24 A. So Ogawa says when split screen is selected
25 with the pen 12 while a function operation menu 41 is

1 displayed as depicted in Figure 4A, so it says that.

2 BY ATTORNEY YANG:

3 Q. And so is it fair to say that there are no
4 embodiments other than that where the entire screen is
5 lowered by one line?

6 A. I don't remember off the top of my head.

7 Q. Could we please look at Figure 4B. And let me
8 know when you're there.

9 A. I'm there.

10 Q. Okay. In Figure 4B, do you see the shading of
11 bar 42 on the left before 44?

12 A. The version of the patent I have is in black
13 and white. I see a hatching, if that's what you meant.

14 Q. Yeah, let's go with hatching. Do you see the
15 hatching in bar 42 to the left of 44?

16 A. I see the hatching to the left of 44.

17 Q. Does the hatching indicate that 13A is active?

18 A. If you look at paragraph 17 -- sorry, it's in
19 paragraph 18. The portion of the access bar 42 located
20 on an active screen (the screen currently being
21 accessed) is colored (depicted with hatching in
22 Figure 4) to indicate an active state.

23 Q. So if 13B was in the active state, would the
24 hatching on bar 42 be to the right of 44?

25 A. Well, the next sentence states: The active

1 screen is switched by touching the display input surface
2 13 with the pen 12.

3 Q. And I'm trying to figure out where the
4 hatching would be on bar 42.

5 Would the hatching be in the same place or
6 would it be to the right of 44?

7 A. Is your question whether one of ordinary skill
8 would understand Ogawa to allow 44 to move to the left?

9 Q. My question is whether one of ordinary skill
10 would understand the hatching to move to the right if
11 13B was active.

12 ATTORNEY ZEILBERGER: Objection to form.

13 A. But going from 4B to 4C, you can see that the
14 hatching has moved to the right.

15 BY ATTORNEY YANG:

16 Q. In 4B and 4C, wouldn't you agree that the
17 active screen is 13A?

18 A. So based on the portion of paragraph 18 that I
19 pointed you to before, it's stating the portion of the
20 access bar 42 located on an active screen (the screen
21 currently being accessed) is colored (depicted with
22 hatching in Figure 4) to indicate an active state.

23 Q. So I'm trying to figure out if 13B was in the
24 active state and 13A was not active, where would the
25 hatching be?

1 ATTORNEY ZEILBERGER: Objection, form.

2 A. I'm not seeing any of the figures showing
3 that, so which figure are you looking at or which part
4 of the spec are you looking at?

5 BY ATTORNEY YANG:

6 Q. That's why I'm asking the question, because I
7 don't see any figure that shows that.

8 ATTORNEY ZEILBERGER: Objection to form.

9 A. As I've already explained to you, it's stating
10 in paragraph 18: The portion of the access bar 42
11 located on active screen (the screen currently being
12 accessed) is colored (depicted with hatching in
13 Figure 4) to indicate an active state. The active
14 screen is switched by touching the display input surface
15 13 with the pen.

16 BY ATTORNEY YANG:

17 Q. Again, my question is if 13B is in the active
18 state, where is the hatching?

19 ATTORNEY ZEILBERGER: Objection to form.

20 A. Well, as stated in paragraph 18, what I just
21 read to you, it's stating that the hatching indicates an
22 active state.

23 BY ATTORNEY YANG:

24 Q. So if 13B is active, where would the hatching
25 be? Would it still be --

1 ATTORNEY ZEILBERGER: Objection.

2 Q. -- where it is shown in Figure 4C?

3 ATTORNEY ZEILBERGER: Objection to form.

4 A. Figures 4A, B, and C are showing the split
5 screen when 13A is the -- is active, so I -- that's
6 where I'm not understanding the question. Again, you
7 seem to be saying to rewrite the figures and the
8 specification.

9 BY ATTORNEY YANG:

10 Q. So is it fair to say that Figure 4 does not
11 show 13B as active?

12 A. The program running in 13A would be understood
13 to be active.

14 Q. Does any figure in Ogawa show 13B as active?

15 ATTORNEY ZEILBERGER: Objection to form.

16 A. Well, for example, if you look at Figure 3,
17 it's showing the active screen flag. So depending on
18 the setting of active screen flag, that would -- that
19 would indicate if, for example, 13 -- the program
20 running at 13B is active.

21 ATTORNEY ZEILBERGER: Counsel, we've been
22 going over an hour. Shall we take a break?

23 ATTORNEY YANG: I have one more question, then
24 we can take a break.

25 BY ATTORNEY YANG:

1 Q. Does any figure in Ogawa show where the
2 hatching is when 13B is active?

3 ATTORNEY ZEILBERGER: Objection to form.

4 A. So I think, based on what I understand to be
5 hatching, Figure 4 is the only figure in Ogawa, leaving
6 aside the specification, but only limited to the figures
7 of Ogawa, only Figure 4 seems to show what I understand
8 to be hatching.

9 BY ATTORNEY YANG:

10 Q. I'm sorry, you said "seems to show." Seems to
11 show what?

12 A. What I understand to be hatching.

13 Q. And that hatching shows that 13A is active.
14 Is that right?

15 ATTORNEY ZEILBERGER: Objection to form.
16 Counsel, I thought you said you wanted to take a break
17 after the one question. Is that --

18 ATTORNEY YANG: So I have a follow-up.

19 A. So I already told you about paragraph 18. It
20 states: The portion of the access bar 42 located on an
21 active screen. The screen currently being accessed is
22 colored (depicted with hatching in Figure 4) to indicate
23 an active state.

24 ATTORNEY YANG: Okay, do you want to take a
25 break until 3:32?

1 ATTORNEY ZEILBERGER: Sure.

2 ATTORNEY YANG: Okay, thank you.

3 (Recess taken.)

4 BY ATTORNEY YANG:

5 Q. During the break, did you speak with anyone
6 about this deposition?

7 A. I did not.

8 Q. Okay. Could you please turn to page 4 of
9 Ogawa.

10 A. Okay, I'm there.

11 Q. And do you see paragraph 34 on the right side?

12 A. Yes, I see 34.

13 Q. And counting from paragraph -- the paragraph
14 34 number, going up nine lines into paragraph 33,
15 there's a line that says -- there's a line that says:
16 The first screen 13A is not affected. And right after
17 that is a sentence that starts "Therefore, two different
18 programs."

19 Do you see that?

20 A. Which is the first word of the line that
21 you're looking at, "The indicated"?

22 Q. The first -- the first word is "The first
23 screen 13A is not affected."

24 A. In paragraph 34?

25 Q. No, in paragraph 33. I was counting up nine

1 lines into paragraph 33.

2 A. Oh, okay. Okay, I've seen the -- I've read
3 the sentence starting with "Therefore."

4 Q. Okay. So the full sentence is: Therefore,
5 two different programs, such as a calendar and a
6 schedule, can be executed independently using the first
7 and second editing areas 27A and 27B and can be
8 displayed independently on the two split screens.

9 So my question is, is Ogawa limited to two
10 different programs displayed on the two split screens,
11 or can the same program be displayed on the two split
12 screens?

13 ATTORNEY ZEILBERGER: Objection to form.

14 A. Are you asking whether the same program has to
15 be in 13A and the same program has to be in 13B?

16 BY ATTORNEY YANG:

17 Q. I'm asking can the same program be on both
18 split screens, or does the sentence limit the split
19 screens to two different programs?

20 ATTORNEY ZEILBERGER: Objection to form.

21 A. So to the -- to the -- if I understood your
22 question correctly, if you read above in paragraph 33,
23 it's saying: For example, when the second screen 13B is
24 set to be active, data processing is performed using the
25 second editing area 27B. The display contents are

1 written to the second VRAM 29C. And furthermore, the
2 contents of the first and second VRAMs 29B, 29C are
3 combined in the actual VRAM 29A according to the
4 splitting ratio and displayed.

5 And if you skip forward a sentence, it's
6 saying: Therefore, even if a program different from the
7 program being processed on the first screen 13A is
8 executed, the first screen 13A is not affected.

9 Therefore, two different programs, such as a calendar
10 and a schedule, can be executed independently using the
11 first and second editing areas 27A and 27B and can be
12 displayed independently on the two split screens.

13 BY ATTORNEY YANG:

14 Q. I read the part of paragraph 33 that you just
15 read for us and I didn't see anywhere -- anything about
16 whether the same program can be displayed on the two
17 screens, so I wanted to know is Ogawa limited to two
18 different programs on the two split screens?

19 ATTORNEY ZEILBERGER: Objection to form.

20 A. So are you asking about instances?

21 BY ATTORNEY YANG:

22 Q. I'm asking whether the same program can be on
23 two screens, because Ogawa says two different programs
24 can be on two screens. And I just wanted to know is it
25 limited that way? Can you have two -- can you have the

1 same program on two screens?

2 ATTORNEY ZEILBERGER: Objection to form.

3 A. And that's my question. When you were talking
4 about the same program, are you talking about instances
5 of the program?

6 Q. I'm talking about the exact same program.

7 ATTORNEY ZEILBERGER: Objection to form.

8 A. So you're not talking about two instances of a
9 program, you're talking about a single instance of the
10 program replicating its screen across 13A and 13B?

11 Is that your question?

12 Q. Well, my -- let's use that example. Does
13 Ogawa exclude that?

14 ATTORNEY ZEILBERGER: Objection to form.

15 A. So if you read the sentence around -- it's the
16 middle of paragraph 33, which starts: Therefore, even
17 if a program different from the program being processed
18 on the first screen 13A is executed, the first screen
19 13A is not affected.

20 So I would read that, because it's saying even
21 if a program different from the program being processed
22 on the first screen 13A is executed. And this is
23 talking about -- earlier on, it's talking about 13B.
24 And so at least -- at least based on that disclosure, I
25 don't see it saying it's limited to -- that you cannot

1 run the same program in 13A and 13B.

2 BY ATTORNEY YANG:

3 Q. I see.

4 Could you turn to page 6 of Ogawa.

5 A. Okay, I'm there.

6 Q. And on page 6 of Ogawa, do you see paragraph
7 58, which is titled Effect of The Invention?

8 A. Okay, I see it.

9 Q. And the full paragraph says: As described
10 above, the present invention can provide a display
11 device where the display surface can be split into a
12 plurality of screens (windows) and display processing
13 can be executed on each of the plurality of screens
14 according to independent programs.

15 Do you see that?

16 A. I do.

17 Q. What does Ogawa mean by independent programs?

18 A. So I think, like the portion I read to you
19 from paragraph 33, it's stating therefore, two different
20 programs, such as a calendar and a schedule, can be
21 executed independently using the first and second
22 editing areas 27A and 27B and can be displayed
23 independently on the two split screens.

24 Q. So is that just referring to the embodiment of
25 paragraph 33?

1 ATTORNEY ZEILBERGER: Objection to form.

2 A. Are you asking whether what I read from was
3 referring to that embodiment, or was your question with
4 regard -- with regards to what? With regards to page 6
5 or from what I read?

6 BY ATTORNEY YANG:

7 Q. My question was what you read.

8 Does what you read refer to the embodiment in
9 paragraph 33?

10 ATTORNEY ZEILBERGER: Objection to form.

11 A. I don't think the word "embodiment" appears in
12 paragraph 33. So to the extent I understood your
13 question, paragraph 33 is disclosing how Ogawa
14 functions. And then if you further go down to 35, it's
15 even stating: And each part can be displayed by
16 splitting the screen into parts using different software
17 processes.

18 (Exhibit No. 1006, previously marked, was
19 referenced and indexed.)

20 BY ATTORNEY YANG:

21 Q. I see. Thank you for that clarification.

22 Could you turn to Exhibit 1006, the Choi
23 reference.

24 A. Okay, I'm there.

25 Q. And do you personally know the inventor, Choi?

1 A. I don't believe so.

2 Q. Okay. And were you aware of the Choi patent,
3 the patent, not anything in the patent, prior to your
4 work in this IPR?

5 ATTORNEY ZEILBERGER: Objection to form.

6 A. So when you say "not anything in the patent,"
7 I assume you're talking about the teachings or the
8 disclosures of the patent.

9 BY ATTORNEY YANG:

10 Q. Right. I'm asking about the patent itself,
11 not its teachings or disclosures. Were you aware of the
12 patent itself prior to your work in this IPR?

13 A. I don't believe so.

14 Q. And did you review Choi to prepare for this
15 deposition?

16 A. I reviewed Choi not only to prepare for the
17 deposition but also to prepare my declaration and to
18 perform the analysis that's set forth in my declaration.

19 Q. And how long did you review Choi to prepare
20 for the deposition?

21 A. I don't remember off the top of my head.

22 Q. Okay. Could you turn to page 8 of Choi.

23 A. The page number's on the bottom left?

24 Q. Yes, the page number's on the bottom left. It
25 says page 8 out of 94.

1 A. Okay, I'm there.

2 Q. And page 8 shows Figure 6, and it's labeled A,
3 B, C, D, E, and F.

4 Do you see that?

5 A. I do.

6 Q. Are all of these embodiments of Choi's
7 terminal?

8 ATTORNEY ZEILBERGER: Object to form.

9 A. If you look at column 2, line 53, it states:
10 Figure 6 is an overview of mobile terminals each having
11 a dual TOLED according to an embodiment of the present
12 invention.

13 BY ATTORNEY YANG:

14 Q. Okay. Could you now turn to Choi, column 25.
15 And let me know when you get there.

16 A. Okay, I'm there.

17 Q. The first full paragraph on column 25 starting
18 with line 9, it says: In addition, the user can select
19 one image, e.g., image 335 of the images 331 displayed
20 on the screen for activating the photo album, see
21 Figure 39A, and drag or flick the selected image 335 any
22 direction from the TOLED 154 to the LCD 151. See
23 Figure 39B.

24 Do you see that?

25 A. I do.

1 Q. Is this saying that all the images are part of
2 the same photo album?

3 ATTORNEY ZEILBERGER: Objection to form.

4 A. I don't see where it's saying that it's all
5 part of -- all of the images are part of the same photo
6 album.

7 BY ATTORNEY YANG:

8 Q. Well, let me ask you this. How many photo
9 albums are disclosed in this paragraph?

10 A. So your question was with regards to just what
11 is in that paragraph in column 25 starting at line 9?

12 Q. Yes. My question is for this paragraph
13 starting on line 9, how many photo albums are disclosed
14 in this paragraph?

15 ATTORNEY ZEILBERGER: Objection to form.

16 A. I'm not sure what you mean by how many photo
17 albums are disclosed. It's simply stating that the user
18 can select one imagine, e.g., image 335 of the images
19 331 displayed on the screen for activating the photo
20 album, and then it continues on.

21 BY ATTORNEY YANG:

22 Q. So do you agree that because it says "the
23 photo album," there is one photo album in this
24 paragraph?

25 ATTORNEY ZEILBERGER: Objection to form.

1 A. It's just talking about activating the photo
2 album, it's not saying that there's only one set of
3 photos that are displayed.

4 BY ATTORNEY YANG:

5 Q. Can you point me to where this paragraph
6 discloses a second photo album?

7 A. Well, this portion is simply talking about
8 activating the photo album and I don't see that limited
9 to a single photo album. For example, there may be
10 multiple sets of pictures within that.

11 Q. Right.

12 But my question is can you point me to where
13 in this paragraph it discloses the images are in more
14 than one photo album?

15 ATTORNEY ZEILBERGER: Objection to form.

16 A. But that's my point, that it's talking about
17 activating the photo album. And if you look at other
18 portions of Choi, for example, column 23, line 64, it's
19 talking about a photo album function is executed. So
20 it's talking about a photo -- if you read column 25
21 where it's talking about activating the photo album,
22 it's talking about activating the function for the photo
23 album.

24 BY ATTORNEY YANG:

25 Q. And my question was where did that paragraph

1 disclose a second photo album?

2 ATTORNEY ZEILBERGER: Objection, form.

3 A. Are you asking about photo album, the
4 function, or photo album, the grouping of pictures?

5 What is your definition of photo album that
6 you're asking me about?

7 BY ATTORNEY YANG:

8 Q. Let me clarify. The photo album I'm asking
9 about is the grouping of pictures.

10 Where in column 25, line 9, that paragraph, is
11 there a second grouping of pictures?

12 ATTORNEY ZEILBERGER: Objection to form.

13 A. It seems like the term "photo album" appears
14 only, at least in that paragraph, starting on line 9 of
15 column 25, it appears once, and that's on line 11 of
16 column 25.

17 And if you read it correctly and carefully,
18 it's stating activating the photo album. And so if you
19 read the portion of column 23 that I pointed you to
20 earlier, it's talking about the photo album function is
21 executed.

22 BY ATTORNEY YANG:

23 Q. Doesn't it also say that image 335 is in the
24 photo album?

25 ATTORNEY ZEILBERGER: Objection to form.

1 A. Where are you reading this, that image 335 is
2 in the photo album? I don't see it.

3 BY ATTORNEY YANG:

4 Q. The first sentence: The user can select one
5 image, e.g., image 335 of the images 331 displayed on
6 the screen for activating the photo album.

7 Is it your opinion that image 335 is not in
8 the photo album?

9 ATTORNEY ZEILBERGER: Objection to form.

10 A. It's saying one image, e.g., image 335 of the
11 images 331.

12 BY ATTORNEY YANG:

13 Q. Is image 335 of the images 331 in the photo
14 album?

15 A. Which photo album?

16 Q. The photo album on line 11 of column 25.

17 A. Okay, I've explained to you that activating
18 the photo album is referring to the functionality, the
19 photo album function.

20 Q. So is it your opinion that there is no
21 collection -- photo album, as in a collection of images,
22 that contains image 335?

23 ATTORNEY ZEILBERGER: Objection to form.

24 A. When did I say that?

25 BY ATTORNEY YANG:

1 Q. I'm asking. If you didn't say it, then just
2 say you didn't say it. It was just me trying to
3 clarify.

4 ATTORNEY ZEILBERGER: Objection to form.

5 A. It's stating the user can select one image,
6 e.g., image 335 of the images 331 displayed on the
7 screen for activating the photo album, and then it
8 continues on.

9 BY ATTORNEY YANG:

10 Q. So there is no photo album in this paragraph
11 that contains image 335, photo album being a collection
12 of images.

13 Is that right?

14 ATTORNEY ZEILBERGER: Objection to form.

15 A. There are images 331, and one of the images is
16 image 335.

17 BY ATTORNEY YANG:

18 Q. But there's no photo album that collects these
19 images in this paragraph.

20 Is that right?

21 ATTORNEY ZEILBERGER: Objection to form.

22 A. Again, you're limiting it to this paragraph,
23 column 25, line 9 through 21. And I've told you it
24 seems to be talking about the photo album functionality.
25 And so within that, I think grouping of photos would be

1 considered a photo album, so I really don't know what
2 your question is. I've pointed you to disclosure that
3 explains what the photo album function is, and I've
4 pointed you to disclosure that's talking about that
5 image, one image, e.g., image 335 is of the images 331.
6 So again, I'm confused by your question.

7 ATTORNEY YANG: I actually think you answered
8 it. That was very helpful, and I have no further
9 questions, so thank you so much for your time.

10 ATTORNEY ZEILBERGER: Let's go on a quick
11 break.

12 (Recess taken.)

13 ATTORNEY ZEILBERGER: Thank you very much,
14 Dr. Chatterjee. We have no questions.

15 ATTORNEY YANG: Thank you very much for your
16 time in explaining everything. You were very patient
17 with me.

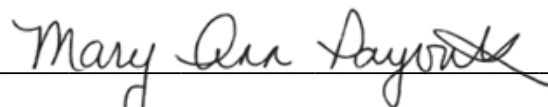
18 (Deposition adjourned at 4:05 p.m.)
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- REPORTER'S CERTIFICATE -

I, MARY ANN PAYONK, shorthand reporter and Notary Public, CA CSR No. 13431, do hereby certify that the witness whose deposition is hereinbefore set forth was sworn by agreement of all parties, that the proceedings were reported stenographically by me, and that this transcript is a true, correct, and full record of the testimony given.

I further certify that I am not related to any of the parties to this action by blood or by marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 9th day of August, 2025.



MARY ANN PAYONK, CSR #13431

Virginia Notary Registration No. 219251

My Commission expires 8/21/2026

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CASE CAPTION: Motorola vs. Multifold
DEPOSITION DATE: August 1, 2025

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1 I,

2 DR. SANDEEP CHATTERJEE,

3 state that I have read the foregoing deposition and
4 declare under penalty of perjury:

5 That the foregoing is my deposition under
6 oath;

7 That I have read same and have made the
8 necessary corrections, additions or changes to my
9 answers that I deem necessary;

10 That my answers as indicated are true and
11 correct.

12 Executed at _____ this
13 _____ day of _____, 2025.

14
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16 DR. SANDEEP CHATTERJEE
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