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

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

Petitioners,

vs.

No. IPR2025-01308

MAXELL, LTD.,

Patent Owner.

_____ /

VIDEO-RECORDED DEPOSITION OF RADOSTIN PACHAMANOV, PH.D.
Remote Zoom Proceedings
Boston, Massachusetts
Thursday, June 11, 2026

REPORTED BY:

LESLIE ROCKWOOD ROSAS, RPR, CSR 3462

Pages 1 - 169

Job No. 8249960

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT AND TRIAL APPEAL BOARD
3
4

5 SAMSUNG ELECTRONICS CO.,
6 LTD., AND SAMSUNG ELECTRONICS
7 AMERICA, INC.,

8 Petitioners,

9 vs.

No. IPR2025-01308

10 MAXELL, LTD.,

Patent Owner.

_____/

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12
13 Video-recorded deposition of RADOSTIN

14 PACHAMANOV, PH.D., taken on behalf of Petitioners, Remote
15 Zoom Proceedings from Boston, Massachusetts, beginning at
16 10:01 a.m. Eastern Daylight Time and ending at 3:40 p.m.
17 Eastern Daylight Time, on Thursday, June 11, 2026, before
18 Leslie Rockwood Rosas, RPR, Certified Shorthand Reporter
19 No. 3462.
20
21
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23
24
25

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Page 3

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Page 4

I N D E X

Thursday, June 11, 2026

WITNESS

EXAMINATION

RADOSTIN PACHAMANOV, PH.D.

BY MR. WOLFE

9

BY MR. GODO

160

BY MR. WOLFE

164

QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:

(None)

DEPOSITION EXHIBITS

RADOSTIN PACHAMANOV, PH.D.

NUMBER	DESCRIPTION	IDENTIFIED
Exhibit 2014	Declaration of Radostin Pachamanov, Ph.D., Concerning Patentability of U.S. Patent 11,277,650, 04/09/26	10

PREVIOUSLY MARKED EXHIBITS REFERRED TO HEREIN:

NUMBER	DESCRIPTION	IDENTIFIED
Exhibit 1001	United States Patent No. 11,277,650 B2, 03/15/22	17
Exhibit 1003	Determination of Patent Term Adjustment Under 35 U.S.C. 154(b)	110
Exhibit 1004	World Intellectual Property Organization International Bureau, WO 2005/094080 A1	126

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Boston, Massachusetts; Thursday, June 11, 2026

10:01 a.m. Eastern Daylight Time

PROCEEDINGS

--oOo--

10:01:33

THE VIDEOGRAPHER: Good morning. We are on the record at 10:01 a.m. on June 11th, 2026.

Please note that this deposition is being conducted virtually. Quality of the recording depends on the quality of camera and internet connection of participants.

10:01:54

What is seen from the witness and heard on screen is what will be recorded. Audio and video recording will continue to take place unless all parties agree to go off the record.

10:02:08

This is Media Number 1 of the recorded deposition of Dr. Radostin Pachamanov in the matter of Samsung Electronics Company, LTD, and Samsung Electronics America, Inc., versus Maxell, LTD, filed in the United States Patent and Trademark Office Before the Patent Trial and Appeal Board, Inter Partes Review Number IPR2025-01308 and US Patent 11,277,650.

10:02:29

This deposition is being conducted remotely using virtual technology.

My name is JoAnn Yager, representing Veritext

10:02:52

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1 Legal Solutions, and I am the videographer. I am not
2 related to any party in this action nor am I financially
3 interested in the outcome.

4 If there are any objections to proceeding,
5 please state them at the time of your appearance. 10:03:04

6 Counsel and all present will now state their
7 appearances and affiliations for the record, beginning
8 with the noticing attorney.

9 MR. WOLFE: My name is Joseph Wolfe. I
10 represent petitioner Samsung. 10:03:16

11 MR. GODO: My name is Seke Godo, representing
12 patent owner Maxell, LTD.

13 THE VIDEOGRAPHER: Will the court reporter
14 please introduce yourself and administer the oath to the
15 witness, and then counsel may begin. 10:03:32

16 THE REPORTER: Good morning. This is Leslie
17 Rosas, CSR 3462, RPR.

18 Good morning, Doctor. Would you raise your
19 right hand, please, and I'll swear you in.

20 Thank you, sir.

21 You do solemnly state and affirm that you will
22 tell the truth, the whole truth, and nothing but the
23 truth?

24 THE WITNESS: I do.

25 THE REPORTER: Thank you, sir. 10:03:52

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1 You may proceed, Counsel.

2

3 EXAMINATION

4 BY MR. WOLFE:

5 Q. Good morning, Dr. Pachamanov. Did I get that 10:03:55
6 correct?

7 A. Yes. Very correct. Very good.

8 Q. Awesome.

9 Will you please state your full legal name for
10 the record. 10:04:08

11 A. So my full legal name is Radostin Angelov
12 Pachamanov.

13 Q. Thank you.

14 And where are you today?

15 A. I'm in my home office in Boston, Massachusetts. 10:04:15

16 Q. Is there anyone in the room with you?

17 A. No.

18 Q. Did you bring anything with you to today's
19 proceeding?

20 A. No. The only thing I have is a printed version 10:04:27
21 of the '650 patent (indicating).

22 Q. And are there any -- oh, sorry.

23 And are there any notes written on the patent?

24 A. No, no. It's a clean version. I just printed
25 it before this morning. 10:04:42

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1 Q. You understand that you're having your
2 deposition taken today in connection with a declaration
3 you provided in IPR2025-01308?

4 A. I understand, yes.

5 Q. And this proceeding concerns US Patent Number 10:04:57
6 11,277,650.

7 Does that sound right?

8 A. That sounds right, yes.

9 Q. If I refer to the patent as the '650 patent,
10 will you understand what I'm referring to? 10:05:13

11 A. Yes.

12 MR. WOLFE: I'm going to share with you through
13 the chat Exhibit 2014 in this proceeding, which is your
14 declaration.

15 (Exhibit 2014, Declaration of Radostin 10:05:20
16 Pachamanov, Ph.D., Concerning Patentability of
17 U.S. Patent 11,277,650, 04/09/26, was marked for
18 identification by counsel electronically.)

19 MR. WOLFE: At least I'm trying to.

20 Do you mind going off the record for a quick 10:06:37
21 second?

22 MR. GODO: No problem.

23 THE VIDEOGRAPHER: Going off the record. The
24 time is 10:06 a.m.

25 (Discussion off the record.) 10:08:17

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1 THE VIDEOGRAPHER: Back on the record. The time
2 is 10:17 a.m.

3 Q. BY MR. WOLFE: Dr. Pachamanov, I just shared
4 with you Exhibit 2014 in this proceeding, which is your
5 declaration. 10:17:25

6 Is that your signature on the cover page?

7 A. Yes, that's my signature.

8 Q. Did you review your declaration in preparing for
9 this deposition?

10 A. I did, yes. 10:17:44

11 Q. And in your review, did you come across any
12 errors in your declaration?

13 A. I did. Like there's some typos here and there,
14 of course. And one thing I noticed also is -- just
15 check, find the exact page so I can tell you. 10:18:03

16 So on page 31, which is the summary of
17 Section 7, Summary of Petitioner Proposed Grounds, I
18 stated that the petition raises four grounds, where there
19 are three grounds. Then I listed three grounds. But,
20 yeah, it's just -- it's a little thing. And again, here 10:18:26
21 and there, I just found typos, but nothing major.

22 Q. Understood.

23 Are there any opinions in your declaration that
24 you would like to change or clarify before we get
25 started? 10:18:42

Page 11

1 A. No. I stand behind everything I cited or is
2 written here.

3 Q. Do you understand that you are under oath today?

4 A. I do.

5 Q. And you understand that you're here to give 10:18:53
6 complete and accurate testimony?

7 A. Yes, I do.

8 Q. Is there any reason why you can't give complete
9 and accurate testimony today?

10 A. Not that I know of. 10:19:04

11 Q. You've been retained by patent owner Maxell in
12 this proceeding; is that correct?

13 A. I was retained by counsel for Maxell, yes.

14 Q. You are being compensated at your usual
15 consulting rate of 550 per hour; is that correct? 10:19:21

16 A. That's correct, yes.

17 Q. Is your compensation dependent on the outcome of
18 this proceeding?

19 A. No, it is not, as I clearly stated in the
20 declaration. 10:19:34

21 Q. Have you been deposed before?

22 A. I have, yes.

23 Q. Approximately how many times have you been
24 deposed?

25 A. Four times in total. 10:19:43

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1 Q. So I know that you've been deposed, but I just
2 want to go over a few ground rules.

3 Everything you say today will be written down by
4 the court reporter so please try to give verbal answers
5 so that the transcript is clear. 10:19:59

6 Is that fair?

7 A. Understood, yes.

8 Q. If you don't understand any part of the
9 question, will you let me know so that I can clarify?

10 A. Yes, of course. 10:20:08

11 Q. And if you answer my question, I'm going to
12 assume that you understood it.

13 Is that fair?

14 A. That's fair, yes.

15 Q. From time to time, your counsel may object to 10:20:18
16 questions, but do you understand that you still need to
17 answer the question unless your counsel instructs you not
18 to?

19 A. I understand.

20 Q. I expect to take breaks every hour or so, but if 10:20:28
21 you need a break at a different time, just let me know.
22 I would just ask that you answer any pending questions
23 before we take a break.

24 Is that fair?

25 A. Yeah, that's fair. Thank you. 10:20:40

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1 Q. What did you do to prepare for your deposition
2 today?

3 A. So I reviewed my declaration. I reviewed the
4 prior art. The patent, of course, the petition, and I
5 met with counsel for Maxell and discussed everything and 10:20:55
6 what to expect from the deposition.

7 Q. So you mentioned you met with counsel. Did you
8 meet with anyone else?

9 A. No.

10 Q. Approximately how long did you spend meeting 10:21:08
11 with counsel in preparation for your deposition?

12 A. It was several hours spread over a couple days.
13 So Monday for a couple of hours, maybe, and then
14 yesterday for a few more hours. I'd say around two,
15 three, four hours, around. Three hours. 10:21:28

16 Q. And approximately how many -- how much time did
17 you spend reviewing documents in preparation for your
18 deposition?

19 A. So this was, again, spread over the last three
20 days. So in total, I would say like 10 to 15 hours, 10:21:42
21 maybe, something like.

22 Q. Did you review the petition in this proceeding?

23 A. I did not review it as part of my preparation.
24 Now I reviewed it when I was working on the declaration.
25 So like two months ago. 10:22:00

1 Q. Did you review Dr. Paradiso's declaration in
2 preparing for your deposition?

3 A. Yes, I looked at it.

4 Q. Did you review any documents other than those
5 cited in your declaration? 10:22:13

6 A. No, these are the ones that I reviewed.

7 Q. So turning to Exhibit 2014, which is your
8 declaration, did you draft the declaration by yourself?

9 A. Yes, I did.

10 Q. Did you draft the entire initial version or did 10:22:31
11 you have assistance?

12 A. You know how it works. The way it works is
13 usually I get like the template in terms of like the
14 organization and the structure of the document. Then I
15 add something onto this. And then counsel reviews what I 10:22:46
16 put there, fixes some language. I'm not a native speaker
17 so I do these mistakes from time to time.

18 Then it is an iterative process. So it was --
19 it was back and forth, but everything which is there is
20 something which I have provided as an opinion, and I 10:23:05
21 stand by it.

22 Q. Understood.

23 Approximately how much time did you spend
24 preparing your declaration?

25 A. It was approximately, I would say, between 50 10:23:22

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1 and 60 hours.

2 Q. If you could turn to paragraph 45 of your
3 declaration, please. This is Exhibit 2014.

4 A. Yes.

5 Q. You list the materials you considered. 10:23:48

6 Do you see that?

7 A. Yes, I see it.

8 Q. Does that list include all materials you
9 reviewed in forming your opinions?

10 A. Yes. 10:24:00

11 Q. Did you review any materials that are not cited
12 in this section so that is Section 4, "Materials
13 Considered"?

14 A. Not really. You mean -- I mean, the way it
15 works -- you know how it is -- like when -- when 10:24:15

16 somebody's analyzing something, you may need to check
17 something or things like that, but nothing material, I
18 would say. These are the -- the -- the most important
19 documents that I reflected and reviewed while preparing
20 the declaration. 10:24:29

21 Q. Now let's turn to paragraph 67 of Exhibit 2014.

22 A. Yes.

23 Q. You offered a claim construction opinion in your
24 declaration; correct?

25 A. I did not really offer a claim construction 10:24:55

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1 opinion. Here is more or less reflecting on what I heard
2 about the claim construction dispute. I was informed
3 about it, and this is -- I listed here what -- what I
4 understand about it.

5 The thing is I treated all the claims and every 10:25:10
6 claim term as their plain and ordinary meaning.

7 (Reporter clarification.)

8 THE WITNESS: With their plain and ordinary
9 meaning, yes.

10 Q. BY MR. WOLFE: So in paragraph 67, do you see 10:25:24
11 where you state that for any terms not specifically --
12 specifically construed, you applied the plain and
13 ordinary meaning that the terms would have had to a
14 person of ordinary skill in the art at the time of the
15 invention? 10:25:42

16 A. That's correct that that's what I said. For any
17 terms not specifically construed, I have applied the
18 plain and ordinary meaning that the terms would have had
19 to a person of ordinary skill in the art, yeah. Yes.

20 Q. Let's turn to Exhibit 1001, which is the '650 10:25:55
21 patent. Please let me know when you have that up.

22 A. Yes.

23 Q. Let's look at limitation 1e. This is column 15,
24 line 17 through 18.

25 Do you see that? 10:26:28

Page 17

1 A. Yes.

2 Q. In this limitation recites: "A first controller
3 controlling transmission/reception with the subsidiary
4 terminals." Correct?

5 A. That's correct, yes. 10:26:42

6 Q. Do you see the slash between the word
7 "transmission" and the word "reception"?

8 A. I do see it, yes.

9 Q. What is the plain and ordinary meaning of
10 "transmission/reception"? 10:26:55

11 A. It's exactly what it is stated here. "A first
12 controller controlling transmission/reception with the
13 subsidiary terminals." It's written there clearly.

14 Q. Does that slash mean transmission or reception?

15 A. For a person of ordinary skill in the art in 10:27:16
16 reviewing the specification of the patent, they would
17 understand what this means. And I'm -- I'm -- my -- my
18 understanding is that this -- this is clearly stated
19 here, and a person of ordinary skill in the art reading
20 this would understand what the slash means. 10:27:37

21 I -- I -- right now, if I tell you that this is
22 one or the other or one and the other or things like
23 that, this would -- this would limit the scope. And what
24 I -- I -- what you're asking is clearly written here, and
25 a person of ordinary skill in the art reading this and 10:27:56

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1 knowing the specification be informed with the
2 specification would understand what this is.

3 Q. Understood.

4 But there isn't a conjunction between the word
5 "transmission" and the word "reception." Correct? 10:28:08

6 A. Can you paraphrase "conjunction"? What exactly
7 do you mean?

8 Q. So either an "and" or an "or."

9 A. So, again, I'm not -- I'm not here to -- to --
10 to opine on that, and I haven't opined on that. So to 10:28:29
11 me, this really is something which is clear and something
12 that a person of ordinary skill in the art reading it
13 wouldn't start thinking what -- what the slash means.
14 They would understand what the system is required to do
15 based on -- on this claim. 10:28:46

16 Q. I understand.

17 But as I'm sure you understand, the scope of
18 protection for a patent is defined in the claim language;
19 correct?

20 A. I agree with that, yes. 10:28:58

21 Q. So it is important to understand whether
22 limitation 1e requires the first controller to control
23 transmission or reception or control transmission and
24 reception; correct?

25 A. Let me -- let me just ask you something. Like 10:29:15

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1 this is not a term which was construed by any of the
2 parties; is that correct? Are you asking me now to more
3 or less provide a construction telling you that this
4 means and and or or? Because I cannot do that here right
5 now.

10:29:35

6 Q. What I'm asking is for elaboration on paragraph
7 67. What you state in paragraph 67 is that you have
8 applied the plain and ordinary meaning that the terms
9 would have had to a person of ordinary skill in the art
10 at the time of invention.

10:29:50

11 So what is the plain and ordinary meaning of
12 "controlling transmission/reception"?

13 MR. GODO: Objection. Form.

14 THE WITNESS: So the plain and ordinary meaning
15 is clearly stated here. The scope is clearly stated.
16 This is a first controller controlling
17 transmission/reception with the subsidiary terminals. I
18 don't want to give you -- not I don't want. Sorry. I --
19 I cannot provide you like an explanation of what this is
20 because this would mean that I would -- I would actually
21 construe the term right now in front of you.

10:30:05

10:30:23

22 My understanding is that this would inform to a
23 person of ordinary skill in the art what exactly is meant
24 by -- by it, and therefore, I -- I don't want to say
25 something right now which-- which would limit the scope

10:30:43

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1 just because my understanding of -- not my understanding,
2 but like here on the spot, I -- I say that this -- this
3 specific symbol there means a specific thing.

4 Q. BY MR. WOLFE: So you have no opinion as to
5 whether the slash connotes an "and" or an "or." Is that 10:31:00
6 correct?

7 MR. GODO: Objection.

8 THE WITNESS: I have an opinion -- sorry.

9 I have an opinion about it, and my opinion is
10 that this -- for a person of ordinary skill in the art 10:31:09
11 reading this claim limitation, they would clearly
12 understand what is meant by it.

13 Q. BY MR. WOLFE: So let's look at limitation 1c.
14 This is column 15, line 15.

15 Do you see that? 10:31:30

16 A. Right. I see it. 15 is between two, but...

17 Q. So this states: "A storage storing the
18 contents."

19 A. Yes, I see it. Yes.

20 Q. What is the plain and ordinary meaning of 10:31:45
21 "contents"?

22 A. So we're going to have the same dispute here, I
23 guess. You are asking me on the spot to -- to give you a
24 definition of "contents," which just because I haven't
25 really written it in my declaration so I haven't 10:32:01

Page 21

1 carefully thought about formulating the term.

2 You ask me to do this on the spot, and the
3 reality is that in my opinion, Claim 1 in its whole
4 actually explains everything which is needed, starting by
5 a contents reproducing system comprising main terminal, a 10:32:25
6 plurality of subsidiary terminals, the main terminal
7 comprises a storage storing the contents.

8 So, again, a person of ordinary skill in the art
9 reading this would understand what "contents" is. And
10 the reality is that if you ask me right now to -- to tell 10:32:41
11 you this is a content, I may say something which -- or I
12 may exclude something just because I -- I am again -- I
13 have to do it quickly and everything.

14 So I don't want to provide a definition of
15 "contents" because of that. Otherwise, in my opinion, 10:33:01
16 "contents" is a well-understood term.

17 Q. But you can't elaborate on what that
18 well-understood term means?

19 A. One thing I can do is I can go to my declaration
20 and I can see if I'm saying something there, which would 10:33:15
21 be a safe thing to tell you about this. Just because,
22 again, I don't want to say something which -- which would
23 limit the scope of the claim right now.

24 So let me just look quickly. I'm going back to
25 my declaration. 10:33:32

Page 22

1 So if you just need me to -- to provide
2 examples, I can provide examples. And give me one
3 second.

4 Okay. So what I said in my declaration -- this
5 is paragraph 52 -- is: "The '650 patent discloses, as an 10:34:19
6 exemplary embodiment, that the subsidiary contents
7 included in main content receiving display unit 100 may
8 be, for example, multilanguage audio data, an electronic
9 program guide, an electronic content table" --

10 (Reporter clarification.) 10:34:47

11 THE WITNESS: Okay. "An electronic content
12 table or Electronic Contents Guide, subtitle data,
13 commercial information, HD (High Definition), or
14 SD (Standard Definition) resolution information," so on.

15 So these are examples, and that's the reason I 10:35:03
16 don't want to right now tell you what in my understanding
17 is contents just because I may say a few of those and I
18 may exclude others which are also important.

19 Therefore, when -- when I was looking at the
20 claim, to me the meaning of "contents" would be similar 10:35:20
21 to somebody who is familiar with the specification and
22 the patent.

23 Q. So let's look at subsection A of Section 6 of
24 your expert report, Exhibit 2014.

25 A. Sorry, can you point me to the page? 10:35:45

1 Q. Page 28.

2 A. Okay.

3 Q. And here in paragraph 69 through 72, you opine
4 on the plain and ordinary meaning that petitioner
5 proposes for the term "a, brackets, second/third display 10:36:11
6 displaying the content." Correct?

7 A. That's correct, yes.

8 Q. That term appears in Claims 1 and 4; correct?

9 A. Let me look at Claims 1 and 4. Claim 1, we just
10 read it. The term -- I'm sorry, it's correct. It 10:36:41
11 appears in Claims 1 and 4. That's what my declaration
12 states as well.

13 Q. And just jumping up to the table on pages 25
14 through 27 --

15 A. Uh-huh. 10:37:03

16 Q. -- of your expert report, the term "second
17 display displaying the content" appears in limitation 1j;
18 correct?

19 A. The term "second display displaying the
20 content," yes, is part of 1j. 10:37:23

21 Q. And the term "second display displaying the
22 content" is limitation 4k in Claim 4; correct?

23 A. Claim 4k is "wherein the first subsidiary
24 terminal comprises a second display displaying the
25 content." Yes. 10:37:45

Page 24

1 Q. And in limitation 4m, the term "a third display
2 displaying the content" is there; correct?

3 A. Yes. Claim 4m is "wherein the second subsidiary
4 terminal comprises a third display displaying the
5 content." Yes. 10:38:03

6 Q. Now let's just back to paragraph 69.

7 A. Yes.

8 Q. You state, "To be clear, I agree that 'the
9 content' is 'one of the contents'; however, I disagree
10 that 'the content' includes 'the content.'" 10:38:22

11 A. "The contents."

12 Q. My bad.

13 "However, I disagree that 'the content' includes
14 'the contents.'"

15 Now did I read that correctly? 10:38:35

16 A. Yes. It's an important distinction. That's why
17 I highlighted it.

18 Q. So it is your opinion that the content in
19 limitation 1j refers back to one of the contents in
20 limitation 1i, and not to the contents in limitation 1b 10:38:51
21 as a whole; is that correct?

22 MR. GODO: Objection to form.

23 THE WITNESS: So to answer to your question,
24 let's go back to -- to the claim itself. And I -- I
25 don't want to answer directly with yes, no, maybe, or 10:39:12

Page 25

1 things like that. Let's carefully read the -- the claim,
2 and there you can understand my opinion, which is written
3 clearly in my opinion. It's clearly in paragraph 69 and
4 70 of my declaration.

5 So Claim 1 is a contents reproducing system 10:39:34
6 comprising. So here we have contents reproducing system.
7 A main terminal and a variety of subsidiary terminals
8 wherein the main terminal comprises storage storing the
9 contents.

10 So there are multiple contents; correct? 10:39:54

11 Then a first display displaying the contents.

12 Again, the same, the contents.

13 Then a first controller controlling transmission
14 reception with the subsidiary terminals wherein the first
15 controller is configured to store a plurality of 10:40:13
16 device-specific identification. We can skip that.

17 Store a plurality of content information for
18 identifying each of the contents. So this is, again,
19 related to the contents that we're discussing.

20 Store association information for transmitting 10:40:35
21 one of the contents to one of the subsidiary terminals
22 and -- yeah.

23 So -- so here we more or less clearly traced
24 that it starts with contents and then -- which are
25 displayed on the main terminal, which is in line -- let 10:40:55

Page 26

1 me just go back to the question because it's more clearly
2 marked there which claim limitation it is.

3 So we have the contents, a reproducing system in
4 the preamble. Then we see that we are storing those
5 contents in Claim 1c. And then there were -- we are 10:41:18
6 seeing in Claim 1d that the first display displays the
7 contents.

8 And then as we -- as I just pointed, we have 1i,
9 which talks about the association information that
10 defines that one of the contents is associated with one 10:41:42
11 of the devices.

12 And then we have in 1j wherein the plurality of
13 subsidiary terminals comprise a second display displaying
14 the content.

15 So that's -- that's what I analyzed and 10:41:59
16 reviewed, and that's how I came with -- with this
17 conclusion which is then disclosed in paragraph 69 of my
18 declaration, which -- which clearly states that I agree
19 that "the content" is "one of the contents," because
20 that's what we see in the claim, but I disagree that "the 10:42:23
21 content" includes "the contents."

22 Q. BY MR. WOLFE: Okay. So turning to paragraph
23 70, you state that: "'Displaying the content' as
24 appearing in Claims 1 and 4 would be understood by a
25 POSITA as displaying the same 'one of the contents' on 10:42:42

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1 the main terminal, not 'the contents.'" Correct?

2 A. I state clearly that in my opinion, the term
3 "displaying the content" as appearing in Claim 1 and 4
4 would be understood by a POSITA as displaying the same
5 "one of the contents" on the main terminal, not "the
6 contents."

10:43:03

7 Yes, that's what I said.

8 Q. I just want to make sure I understand that
9 sentence and what you just said.

10 When you say "displaying the same 'one of the
11 contents' on the main terminal," you mean the same
12 content that is displayed on the main terminal's first
13 display; is that right?

10:43:12

14 A. What I mean is, again -- actually, I could have
15 read this -- this section here, which is -- which I did
16 actually on the spot before that. You see again this is
17 like an excerpt from the claim language. You have
18 contents reproducing system, you have main terminal,
19 plurality of subsidiary terminals, and then the main
20 terminal, a storage storing the contents and displaying
21 the contents. So all those are displayed there.

10:43:30

10:43:48

22 And then one of the contents is displayed on the
23 on the secondary display. And this is the same --

24 (Reporter clarification.)

25 THE WITNESS: On the second display.

10:44:05

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1 And -- and therefore, my opinion is that the
2 term "displaying the content" should be -- would be
3 understood by a POSITA as displaying the same one of the
4 contents on the main terminal, but not all the contents.
5 Not the contents. 10:44:27

6 Q. BY MR. WOLFE: And in paragraph 111 --
7 A. Okay.

8 Q. -- you state, quote: "'The content' displayed
9 on the 'second display' is the same as what is displayed
10 on the first display." Correct? 10:44:45

11 A. Let me just find it.

12 Q. It is the last sentence.

13 A. Yes, it is the last sentence, but instead of
14 just reading the last sentence, why don't we read the
15 rest, because the last sentence just starts with 10:45:07
16 "therefore."

17 Q. I understand. I'm just asking you about the
18 last sentence. That is what your declaration says;
19 correct? That: "'The content' displayed on the 'second
20 display' is the same as what is displayed on the first 10:45:19
21 display. Correct?

22 A. I cannot answer the -- so if you ask me if this
23 is what is written here, that sentence is, "Therefore,
24 'the content' displayed on the 'second display' is the
25 same as what is displayed on the first display." And 10:45:35

1 this "therefore" relates to everything which is stated up
2 there.

3 So if your understanding is very specific about
4 this -- and you can ask me about this if you want -- but
5 then I can explain what I meant by this particular 10:45:47
6 sentence so we can avoid any like big misunderstanding of
7 what exactly I meant here.

8 The reason -- the reason -- sorry, just to
9 finish my -- okay. Go ahead.

10 Q. Excuse me. 10:46:02

11 I asked the question. That's all I wanted to
12 know, whether it says exactly what I read to you and what
13 you just confirmed that it says in the record.

14 So in paragraph --

15 A. May I correct then -- sorry, I want to correct 10:46:15
16 my statement, then.

17 Q. I'm sorry. I'm sorry. Can I ask a follow-up
18 question then?

19 So is it not correct, then, that in the last
20 sentence of paragraph 111, it says, quote, another quote: 10:46:26
21 "'The content' displayed on the 'second display' is the
22 same as what is displayed on the first display"? Is that
23 not correct? Is that sentence not in paragraph 111?

24 A. This sentence is taken --

25 MR. GODO: Objection. Form. 10:46:44

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1 THE WITNESS: Sorry.

2 This sentence is taken out of context.

3 Q. BY MR. WOLFE: But that question -- my question
4 was: Is your position that the sentence: "Therefore,
5 'the content' displayed on the 'second display' is the 10:46:58
6 same as what is displayed on the first display" not in
7 paragraph 111?

8 A. It's interesting that you are pushing hard to
9 get a response on this particular question. And I will
10 answer to you. I'm willing to answer. 10:47:13

11 So "Therefore, 'the content' displayed on the
12 'second display'" -- this is one of the contents that we
13 just discussed -- "is also displayed on the first
14 display." And that's what the preceding part of this
15 paragraph actually is explaining. 10:47:25

16 So that's why I'm saying this sentence is taken
17 out of context, and that's the sentence. But here I'm
18 explaining everything which is up there, and that thing
19 up there is more or less explaining that whatever is on
20 the second display is also displaying on the first one. 10:47:40
21 This is one of the contents. Whereas the first display
22 displays other contents.

23 Q. So one last time, "yes" or "no," paragraph 111
24 of your declaration states, quote, "'The content'
25 displayed on the 'second display' is the same as what is 10:47:57

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1 displayed on the first display"?

2 A. And I'll provide the same answer. This is --
3 it's not a "yes" or "no" question.

4 So the answer here is the sentence that you are
5 citing is a part of a paragraph which concludes what is 10:48:16
6 said above. So this sentence says "therefore." So it's
7 not the content. It doesn't start with "the content."

8 "Therefore, 'the content'" -- this particular
9 content which we are discussing -- "displayed on the
10 'second display' is displayed also on the first display." 10:48:34
11 And if you read the previous part of the paragraph,
12 you'll see that this is explained there.

13 The fact that you're focusing on the word
14 "same," it is the same content which is displayed on the
15 first display, but the first display displays other 10:48:50
16 contents. All the other contents as Claim 1 clearly
17 explains.

18 Q. Turning to paragraph 158 of your declaration,
19 you say, quote: "The antecedent basis simply requires
20 that the second display of the subsidiary terminals 10:49:10
21 displays the content that is displayed on the main
22 terminal. Correct?

23 A. Let me find it first.

24 So this is paragraph 158, and it's a long
25 paragraph. Can you just point me to the page, 10:49:32

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1 approximately where it is? Otherwise, I can read it and
2 I can find it. It's up to you.

3 Q. So it's paragraph 158, starting second line of
4 page 77.

5 To repeat the question: In paragraph 158, you 10:50:04
6 state: "The antecedent basis simply requires that the
7 second display of the subsidiary terminals displays the
8 content that is displayed on the main terminal."
9 Correct?

10 A. And this is more or less very similar to the 10:50:25
11 previous discussion we just had, and that's why it's very
12 similar to the previous discussion we had because that's
13 the same thing that I'm explaining here.

14 Because of the fact that the claim -- and let
15 me -- let me go back to the claim so actually we can -- 10:50:39
16 we can again trace it clearly.

17 We have a contents reproducing system which has
18 a first display displaying the content, and then we have
19 what you are asking me for, the second display -- let me
20 just find it -- right -- wherein the plurality of 10:50:59
21 subsidiary terminals comprise a second display displaying
22 the content.

23 So, again, you have multiple contents on -- in
24 the -- on the main device. Then one of these contents is
25 routed to the secondary device, and then that secondary 10:51:36

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1 device displays that content which was routed to it.

2 It's the same which was routed. Let's put it this way,
3 to answer to your question.

4 Q. Dr. Pachamanov, I would greatly appreciate it if
5 you answered the questions that I asked. 10:51:55

6 A. Uh-huh.

7 Q. What I simply asked was whether that quote
8 exists in your declaration. Can you confirm that that
9 quote exists in your declaration? If you cannot, please
10 say "no." 10:52:08

11 MR. GODO: Objection. Form. Asked and
12 answered.

13 MR. WOLFE: He did not answer that question. In
14 fact, he hasn't answered the last three questions.

15 THE WITNESS: And my answer is, as I already 10:52:18
16 did, the sentence is: "Therefore, 'the content'
17 displayed on the 'second display' is the same as what is
18 displayed on the first display."

19 "Therefore" is an important part of the
20 sentence, and you are asking me to confirm the last part, 10:52:34
21 just because this -- this would mean something that you
22 want me to admit.

23 And I am explaining just because I'm trying
24 to -- to be helpful here, I'm trying to explain what I
25 meant by this. And this is what is -- everything -- 10:52:48

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1 everything which is -- which this sentence refers to is
2 stated earlier than that.

3 Q. BY MR. WOLFE: I understood that you're trying
4 to be helpful. And if I have a question relating to what
5 you meant by a particular sentence, I will ask that 10:53:02
6 question.

7 A. Okay. Then just let me -- let me ask this,
8 then: Like if you see it written here, what -- why is it
9 helpful for you to -- to read it for you. Like it's
10 written here. 10:53:18

11 So I stand behind what I have written here, but
12 I stand behind the entirety of my declaration, and the
13 entirety of my declaration explains this particular
14 sentence.

15 Q. So your construction requires that whatever 10:53:28
16 appears on the subsidiary terminal second display must be
17 displayed on the main terminal's first display; is that
18 correct?

19 MR. GODO: Objection. Form.

20 THE WITNESS: I do not want to paraphrase what 10:53:45
21 my construction says. That's why I have my -- my
22 declaration here, and if you want, I can read exactly
23 what I said about this. And what you just said is
24 paraphrasing of what I said. Therefore, I cannot just
25 say agree or disagree. I need to -- I can tell you what 10:54:05

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1 exactly I have written here, and I stand behind what I
2 have written here.

3 If you want me to do that, I can definitely read
4 what I said about the content.

5 Q. BY MR. WOLFE: Let me reask the question. 10:54:17

6 Your position is that what is displayed on the
7 second terminal, which is the content, that must be the
8 same thing that's displayed on the main terminal's first
9 display.

10 MR. GODO: Objection. Form. 10:54:36

11 (Jim Heintz enters deposition.)

12 THE WITNESS: And my answer to this is again, I
13 do want to misstate something. Therefore, I'll refer --
14 return to my declaration. I'll find the quote that you
15 are looking for, and I'll -- I'll read it to you so you 10:54:48
16 can understand what -- what my conclusion about this is.

17 Q. BY MR. WOLFE: Well, how about this: Let's jump
18 back to paragraph 111.

19 A. 111.

20 Q. Again, let me know when you're there. 10:55:03

21 A. Yes, I'm there. Yes, I'm there.

22 Q. So I'm going to read back to you the question
23 that I previously asked.

24 "Your position is that what is displayed on the
25 second terminal" -- strike that. 10:55:35

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1      Let -- the previous question was: "So your
2      construction requires that whatever appears on the
3      subsidiary terminal second display must be the same thing
4      that appears on the main terminal's first display?"
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5 And I direct you to the last sentence of 10:56:02
6 paragraph 111 when answering this response or this
7 question.

8 MR. GODO: Objection. Form.

9 THE WITNESS: We discussed it, and we went
10 through the claim language and we discussed it. There 10:56:17
11 are requirements in the claim. The scope of the claim is
12 clear, and there it talks about things go there.

13 I'll read it to you again. We're on the same
14 page.

15 So -- so the reason I guess you're asking this 10:56:35
16 question is because I saw and noticed in Dr. Paradiso's
17 declaration that the argument that he makes is that it --
18 sorry, this -- this term, the claim term "a second
19 display displaying the content," that it could refer to
20 both one of the contents and the contents. 10:57:04

21 And I clearly explain here that in my opinion,
22 this is incorrect. And then I'm explaining that "the
23 content" is "one of the contents."

```
24         So you receive multiple contents.  The content
25         is one of the contents.                                     10:57:22
```

1 But then "the content" doesn't include all the
2 contents. And I think we're on the same page for this;
3 right? The second display doesn't display all the
4 contents.

5 And then "the content" refers back to "the 10:57:36
6 contents." So it's one of them. And -- okay, and then
7 going forward, at least I'm reading now in Claim 70 --
8 sorry, in paragraph 70, I'm stating, "The claim language
9 clearly indicates that 'second display displaying the
10 content' refers back to one of the multiple contents 10:57:58
11 stored and displayed on the main terminal."

12 So that one of the contents is displayed on the
13 second terminal.

14 But then going back to Claim 1, and Claim 1 is
15 "a first display displaying the contents," my view is the 10:58:18
16 first display displays the contents, and then the second
17 display displays one of the contents simultaneously.

18 Q. BY MR. WOLFE: So let me break that down.

19 So you just said that the first display displays
20 the contents. 10:58:40

21 A. Correct.

22 Q. And then you just said that the second display
23 displays one of the contents simultaneously; correct?

24 A. That's what I said, and what I meant was it
25 displays one of the contents on the second display, yes, 10:58:58

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1 while the contents is present on the first display.

2 Q. So while the contents is present -- while the
3 content -- excuse me -- is present on the first display?

4 A. Correct.

5 Q. So what would be an example of "contents"? A 10:59:12
6 movie?

7 MR. GODO: Objection. Form.

8 THE WITNESS: You're asking me a hypothetical
9 question. It clearly depends what the system is used
10 for. 10:59:30

11 Q. BY MR. WOLFE: So in the '650 patent, what's an
12 example of "contents"?

13 A. I -- we went through that, and we discussed
14 what -- what the examples of "contents" are, but these
15 are examples of contents. This is the embodiment of 10:59:43
16 the -- embodiment of the specification.

17 The claim, though, is the important part. And
18 the claim in particular claims a specific system. So if
19 you are asking me if a movie could be a content here in
20 that particular system, and if that same movie is on the 10:59:59
21 secondary display, it really depends what -- what the
22 system is about.

23 And the system -- like if you think about it,
24 the claim -- sorry, the claim is clear that you have a
25 main device displaying the content, the contents, and 11:00:16

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1 then you have one of the contents routed, sent to the
2 second device, and then the second device displaying that
3 content.

4 And overall, the whole idea of the patent and
5 the whole idea of this claim is that you need to use the 11:00:31
6 secondary devices to -- to look at some of the contents
7 which are useful for you as a user.

8 And -- and from that perspective, you can
9 present -- you present all of them on one of the
10 displays, the main display, and then you have it -- one 11:00:48
11 of them presented on the second display.

12 Q. That's great. But my question again was:
13 What's an example of "contents" in the context of the
14 '650 patent?

15 A. Okay. So let's -- let's try -- and again, this 11:01:07
16 is like -- this is hypothetical. I just want to
17 highlight this. Like it -- in my opinion, this is
18 something that could be done this way.

19 You may have content which is, as you said, a
20 movie. And then you can have another content which is 11:01:24
21 subtitles. And then you can have third content which is
22 different, something different. I don't know.

23 So what happens -- and this is why I'm telling
24 you that I do not want to provide like specific examples,
25 because while providing this example, I actually am 11:01:45

1 reading the claim again, I realize that it is possible
2 that something -- just because the example like audio.
3 Audio is something that cannot be displayed. And audio
4 is a content as one of the examples in the -- in the
5 embodiments; right? 11:02:05

6 So since the claim is clear that you need to
7 display the content, you cannot display an audio. And
8 that's the reason I don't want to -- to give you an
9 example for this. Just because I started -- I tried to
10 give you an example, then this example doesn't work just 11:02:18
11 while I was giving you this example.

12 Q. Okay. So let me -- let me refine the question,
13 then.

14 So let's look at limitation 1c.

15 A. Okay. 11:02:26

16 Q. Let me know when you're there. Again, you can
17 always refer to your claim table.

18 A. Yeah. I'll do that. It's easier.

19 Q. Yeah, it's pages 25 through 27 of your report.

20 A. Yeah. Claim C, yes. 11:02:51

21 Q. So that says "a storage storing the contents."

22 A. Correct.

23 Q. So in the context of Claim 1 of the '650 patent,
24 specifically limitation 1c, what are examples of
25 "contents"? 11:03:11

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1 MR. GODD: Objection. Form.

2 THE WITNESS: You're asking me again about
3 examples. And again, this is something that it's
4 hypothetical, and if I provide examples, those may not be
5 entirely correct. 11:03:24

6 But if we focus on the term "contents," and
7 "contents" as some kind of data. So whatever contents
8 are received, they can be stored. That's what the claim
9 requires.

10 Q. BY MR. WOLFE: So let's go to the '650 patent, 11:03:47
11 Exhibit 1001. At column 5, lines 51 to 56.

12 A. Okay.

13 Q. And you see that it says -- it's the line that
14 starts "a stream which is received."

15 A. I'm sorry, lines 50 -- column 5, lines 55, you 11:04:34
16 said?

17 Q. 51.

18 A. 51.

19 Q. Uh-huh.

20 A. Which says, "Receiving control unit 309"? 11:04:49

21 Q. Yes. The paragraph starts, "as described
22 above."

23 A. Right. I found it.

24 Q. Okay. So in this paragraph describes main
25 content and subsidiary content; correct? 11:05:06

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1 A. This paragraph of the '650 patent describes a
2 specific embodiment which is here -- and, yeah, this
3 specific embodiment describes what you said.

4 Q. Okay. So an example of content in the claims
5 could be moving picture content, as recited in line 54 of 11:05:40
6 column 5; correct?

7 MR. GODO: Objection. Form.

8 THE WITNESS: Again, you are -- in my opinion,
9 we are mixing up here that embodiments of the -- in the
10 specification and the claim. 11:05:58

11 So my understanding -- and correct me if I'm
12 wrong, but my understanding is that the specification is
13 there to more or less inform the person of ordinary skill
14 in the art what the claim is about, what the claim
15 requires, I mean how the system's going to operate. 11:06:12

16 So this provides different examples which may or
17 may not be relevant to that particular claim. That's why
18 patents give multiple claims, see what's wrong.

19 So here the examples are video. And I agree
20 with that, that's what it says here. But this is a 11:06:30
21 specific embodiment.

22 Then when you turn to the claim itself, the
23 claim talks just about contents. So the kind of the
24 system which is claimed in Claim 1 would like work with
25 contents which are not necessarily something which is 11:06:48

1 written in any of these embodiments. It could be
2 something which is in a different embodiment.

3 So are these contents video? Well, from the
4 perspective of Claim 1, it really depends. This is --
5 but considering that Claim 1 requires contents, a person 11:07:06
6 of ordinary skill in the art would understand that the
7 contents could be all this kind of data that is received,
8 and it has to store these contents. It has to display
9 the contents.

10 You're asking about specific embodiments. So if 11:07:21
11 you ask me to confirm, yes, I confirm, this specific
12 embodiment talks about video, as you're asking.

13 Q. BY MR. WOLFE: I'm just asking in the context of
14 the '650 patent, specifically limitation 1c, can a video
15 be an example of a content that is stored in the storage? 11:07:42

16 MR. GODD: Objection. Form.

17 THE WITNESS: And this is a hypothetical thing,
18 and the reason -- the reason you are asking me is -- not
19 the reason. Sorry. The -- the -- the reason I'm
20 answering the way I'm answering is because there are 11:08:00
21 specific requirements in the claim, and these specific
22 requirements are the contents which are received and then
23 those contents are stored.

24 If the system is built in a way that these
25 contents are videos, then okay. But -- but again, like 11:08:17

1 this depends. Like we have to carefully review all the
2 claims and see that each specific type of content can be
3 stored, displayed on the first display, then displayed on
4 the second display, and things like that. In some cases,
5 these just might not work. 11:08:40

6 Q. BY MR. WOLFE: So in a non-limiting -- a movie
7 in the context of Claim 1 can be content?

8 MR. GODO: Objection. Form.

9 THE WITNESS: So the answer to this is movie
10 could be a content. Movie is content. Any kind of data 11:09:16
11 could be content. The reality, though, is again one
12 person has to carefully review the claim and see that
13 what's written there actually allows the content to be of
14 certain type.

15 And the example that I gave you, which is the 11:09:38
16 opposite, which is an audio. Can you display an audio?
17 No. So obviously, like if you're displaying the content
18 and the content is -- is audio a content? It --
19 generally, it is a content. But audio is not a content
20 which is -- which is something that Claim 1 talks about. 11:09:54

21 So you're saying non-limiting. In non-limiting
22 example, where like nothing limits this, movie is a
23 content. In the context of Claim 1, that's analysis that
24 we have to do. Can it be displayed, can it be stored,
25 and all these things. 11:10:15

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1 Q. BY MR. WOLFE: So let's go to Exhibit 1001, the
2 '650 patent.
3 A. Uh-huh.
4 Q. You're familiar with the specification of the
5 '650 patent? 11:10:38
6 A. Yes, I am.
7 Q. At column 2, lines 3 through 7, can you please
8 turn to that.
9 A. Yes.
10 Q. Let me know when you're there. 11:10:59
11 A. You said 3 to 7?
12 Q. Yes, column 2, lines 3 through 7.
13 A. Yes.
14 Q. This states: "For this reason, the present
15 invention provides a technology that is suitable for 11:11:20
16 personalizing subsidiary content, which is transmitted
17 together with main content."
18 Do you see that?
19 A. I see that, yes.
20 Q. Do you agree with that statement? 11:11:35
21 A. What do you mean if I agree or not?
22 MR. GODO: Objection. Form.
23 THE WITNESS: It's written here, and it's part
24 of the specification. If I agree or not is not relevant.
25 But the thing is, this is summary of the invention, and 11:11:48

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1 this more or less provides a view of -- of the inventors
2 about what their system could -- could help with. And
3 again, as I told you, that's why you have multiple
4 claims, and what we need to look at is the claim itself
5 and the language itself. 11:12:11

6 So, generally, they were trying to solve an
7 issue, and that's what they are referring to in column 2,
8 3 to 7. There was an issue that they see it, and they
9 started thinking how we can solve the problem.

10 Then they developed the -- they would have 11:12:27
11 thought about it, and they describe all the different
12 embodiments, et cetera, and then they came up with
13 specific claims. And these specific claims are the ones
14 which more or less tell us what the system is about, what
15 the invention is about. 11:12:42

16 This here is a wishful thinking. That could be
17 a first step or could be in a different claim or a full
18 patent. I don't know. But, yes, this is what this says.

19 So do I agree with this? I agree it's written
20 here, yes. 11:12:57

21 Q. BY MR. WOLFE: So going back to limitation 1c
22 and just the context of Claim 1.

23 A. Uh-huh.

24 Q. Can you let me know when you're at Claim 1.

25 A. Yes. 11:13:11

1 Q. Is there any reason why moving picture content
2 cannot be content as recited in Claim 1?

3 MR. GODO: Objection. Form.

4 THE WITNESS: Again, this is hypothetical. You
5 are asking me about very specific example which I haven't 11:13:28
6 analyzed. I mean, can -- can something be content? This
7 is content. Can something be content in -- in view of
8 Claim 1 is an analysis that I have to do. And this would
9 take time.

10 I mean, I don't -- I -- I I'm on the spot here. 11:13:47
11 If I say something that well. This is content or it's
12 not content, it can actually put me in a position that
13 I'm limiting the scope of the claim. I don't want to do
14 that.

15 So that's why I'm answering this way. Can this 11:14:00
16 be an example? Well, this is an analysis I have to do.
17 Like can you do -- move the association information in
18 this way, can you display it both on the first and second
19 display, all these things which are in the -- in the
20 claim. 11:14:17

21 Q. BY MR. WOLFE: So you have no opinion as to
22 whether a content recited in claim language could be
23 moving picture content?

24 MR. GODO: Objection. Form.

25 THE WITNESS: My opinion is that a content is 11:14:39

1 clearly -- contents are clearly described -- the types of
2 content that the system can work with are described based
3 on the functionality of the systems in Claim 1.

4 And the answer to your question is: Without
5 further analysis, like just going through carefully 11:15:00
6 reviewing these things, I don't want to say if moving
7 picture, a video by that, could be a content or not.

8 Q. BY MR. WOLFE: So if I refer to main content in
9 the context of the '650 patent, do you understand what
10 that describes? 11:15:40

11 A. You -- meaning in the context of the
12 specification of the '650 patent or the claimed
13 invention?

14 Q. The '650 patent.

15 A. In my understanding, these are a little bit 11:15:53
16 different things, and that's why I'm -- I'm asking for
17 this clarification. So as you -- as you see, Claim 1
18 doesn't talk about main content, does it?

19 Q. So in the specification, do you understand what
20 "main content" is? 11:16:10

21 A. The specification does talk about main content,
22 yes, but this now doesn't mean that this is in Claim 1 or
23 Claim 4. But, yes, I -- I understand what the
24 specification means by "main content," yes.

25 Q. And can you turn to column 3, lines 11 to 24. 11:16:25

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1 A. 11 through 24, yes.

2 Q. It starts "incidentally." Do you see that
3 paragraph?

4 A. Yes, I saw it. Yes.

5 Q. Got it. 11:16:47

6 And this states that: "Main content is, for
7 example, moving picture content such as a television
8 program." Correct?

9 A. I see that, yes. And I want to highlight that
10 it clearly says, "In this embodiment, the main content 11:17:00
11 is, for example, moving picture."

12 So, yes, in this embodiment here in column 3,
13 described in column 3, it could be a moving picture.

14 Q. Got it.

15 And does Claim 1 exclude this embodiment? 11:17:16

16 MR. GODO: Objection. Form.

17 THE WITNESS: Claim 1 clearly states what the
18 invention is about. So it doesn't exclude -- exclude it.

19 A person of ordinary skill in the art reading the
20 specification should understand what the claim is about, 11:17:29
21 what the claimed invention is about. So it doesn't
22 exclude something specifically.

23 The specification, my understanding is the
24 specification is there to inform the person of ordinary
25 skill in the art what the claimed invention is. 11:17:45

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1 So, again, we have seen this in many different
2 patents. You have one specification then 20 claims,
3 independent claims. And these 20 independent claims may
4 actually focus on different disclosures of the
5 specification. 11:18:01

6 A person of ordinary skill in the art reading
7 this may -- may understand that this -- this is not
8 relevant to Claim 1. This -- not this, but something's
9 not relevant to Claim 1 in particular, but something else
10 is. 11:18:17

11 So the specification as a whole has to inform a
12 person of ordinary skill in the art what the claim is
13 about.

14 And you are asking me is the moving picture.
15 Yes, moving picture could be a content. Is -- is it -- 11:18:27
16 in this particular embodiment that they -- they have
17 here, they talk about main content, which is not present
18 in Claim 1, that term. So that's why I'm saying we have
19 to be careful. It says "in this embodiment."

20 Q. BY MR. WOLFE: And are you familiar with the 11:18:45
21 rule that claims should not be excluded or should not be
22 construed to exclude disclosed embodiments?

23 MR. GODO: Objection. Form.

24 THE WITNESS: I'm not a lawyer so I -- I
25 don't -- I cannot -- I cannot opine on the rule or not. 11:19:01

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1 But from a technical perspective -- and I'm providing
2 technical opinions here -- the claim more or less
3 describes specifically what -- what the invention does.

4 So the claim is clearly explaining that you have
5 contents reproducing system with many contents, and you 11:19:23
6 store these contents, again, all these things.

7 So I'm not saying it excludes something. I'm
8 saying that this particular claim has this particular
9 invention in mind, where the embodiment more or less
10 describes some specific thing which can help a person of 11:19:43
11 ordinary skill in the art understand what the claim is
12 about.

13 I'm not saying it's excluding. I'm just saying
14 that this informs a person of ordinary skill in the art.

15 Q. BY MR. WOLFE: At column 3, lines 17 through 24 11:20:05
16 of Exhibit 1001, the specification provides examples of
17 subsidiary content; correct?

18 A. This particular part of the specification says,
19 "On the other hand, each of the subsidiary content
20 control receivers, which are subsidiary receiving 11:20:31
21 terminal units, is devised to receive desired subsidiary
22 content."

23 So I -- I don't know if I am going to go through
24 that describing what those are, but it says something
25 about it, yes. 11:20:44

1 Q. So in paragraph -- sorry. In column 3, lines 11
2 through 16, the '650 patent describes main content. And
3 in column 3, lines 17 through 24, the system describes
4 subsidiary content; correct?

5 MR. GODO: Objection. Form. 11:21:14

6 THE WITNESS: In column 3, this particular
7 embodiment which column 3 deals with, talks about main
8 content being, for example, moving picture content such
9 as television program. And also on lines 17 through 24
10 talks about that each of the subsidiary content control 11:21:36
11 receivers, which are terminal units, receive the desired
12 subsidiary content from the main content receiving
13 display unit.

14 So that's what the specification says. That's
15 what that particular embodiment, that's what it says, 11:21:52
16 yes.

17 Q. BY MR. WOLFE: So throughout the specification,
18 the patent distinguishes between main content and
19 subsidiary content as two separate categories?

20 MR. GODO: Objection. Form. 11:22:10

21 THE WITNESS: Not necessarily. The -- my -- my
22 read of the specification is that you may have main
23 content and subsidiary content. You may have it. But
24 then, again, to understand what the claim -- what the
25 invention -- claimed invention is, I -- I refer to the 11:22:28

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1 claim language.

2 And the claim language says, "A contents
3 reproducing system, main terminal" -- so the terminal is
4 definitely a main terminal -- subsidiary terminals, which
5 are not the main terminal. But then it talks about 11:22:45
6 contents. One of the content, things like that.

7 So is it the same like what we just discussed
8 in -- for example, about the main content and subsidiary
9 contents? Is it the same in Claim 1? Well, I don't
10 think so. 11:23:04

11 Like in Claim 1 is specific that these terms,
12 these specific terms, main content and subsidiary
13 content, are missing from claim, Claim 1.

14 So, again, Claim 1 talks about contents, whereas
15 this is a specific example in the -- in the specification 11:23:19
16 which -- which talks about main content and subsidiary
17 contents.

18 Q. BY MR. WOLFE: Okay. So my question was in the
19 specification.

20 A. Uh-huh. 11:23:29

21 Q. In the specification, specifically the detailed
22 description, the '650 patent distinguishes between main
23 content and subsidiary content; correct?

24 MR. GODO: Objection. Form.

25 THE WITNESS: In specific embodiments, yes, it 11:23:46

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1 does distinguish between main content and subsidiary
2 content.

3 Q. BY MR. WOLFE: Is there any embodiment in the
4 detailed description that does not distinguish between
5 main content and subsidiary content?

11:23:57

6 MR. GODO: Objection. Form.

7 THE WITNESS: To answer to your question, I --
8 the -- the -- the specification talks about contents. So
9 a specific thing is the main content and subsidiary
10 contents, and that's how it starts. And then it goes
11 further, explaining what -- what things could be done
12 with contents.

11:24:11

13 So is -- is there a specific embodiment which
14 doesn't talk about main content and subsidiary content?

15 I cannot tell you on the spot. I -- if you want, I can
16 review it and I can -- I can tell you specifically.

11:24:25

17 My understanding is that starting with the main
18 content and subsidiary content, this is like the start.
19 That's -- that's what one thing could -- could the system
20 be used for. Not the system. That's what could -- our
21 invention is trying to solve.

11:24:37

22 Then you can do this and that and this, and then
23 what we really claim is Claim 1 and 4. So Claim 1 and 4
24 are -- are something which -- they are the specific
25 invention, and therefore, the main content, like is there

11:24:55

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1 anything in the -- in the specification which doesn't
2 talk about the main content? If you want, I can review
3 the specification now and tell you.

4 My impression is that this is to inform a person
5 of ordinary skill in the art that there -- there could be 11:25:11
6 main content, there could be subsidiary content, and you
7 can do all these things with the content.

8 Q. BY MR. WOLFE: I'd greatly appreciate if you can
9 find for me an embodiment in which there isn't a -- isn't
10 a distinguishment between main content and subsidiary 11:25:25
11 content. So if you can do that, go ahead.

12 MR. GODO: Objection. Form.

13 THE WITNESS: I'll do my best.

14 Going through this -- and like I can continue
15 doing this, but... 11:31:33

16 So to go back to your question, the patent --
17 the patent talks about -- the example it provides is
18 talks about main content and subsidiary content. For the
19 purposes of that, that's what it is useful to have. This
20 system can solve this problem. 11:31:50

21 I mean, I don't want to -- to waste time of
22 everyone here just going through the specification trying
23 to find specific things that can say something different.
24 But I -- I do agree that that's the example which is
25 provided there. Main content, multiplexed together with 11:32:07

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1 the subsidiary content. That's in the patent
2 specification.

3 Q. Okay.

4 MR. GODO: Counsel, it's a bit more than an
5 hour. Can we take a break? 11:32:20

6 MR. WOLFE: Yeah, that works perfectly.

7 MR. GODO: Ten minutes.

8 THE VIDEOGRAPHER: Going off the record. The
9 time is 11:32 a.m.

10 (Recess.) 11:32:29

11 THE VIDEOGRAPHER: Back on the record. The time
12 is 11:43 a.m.

13 Q. BY MR. WOLFE: Dr. Pachamanov, let's go to your
14 declaration, Exhibit 2014.

15 A. Okay. 11:43:41

16 Q. And let's go to paragraph 71.

17 A. Okay.

18 Q. In the second sentence starting with "for
19 example"?

20 A. Uh-huh. Yes. 11:44:06

21 Q. You provide that the '650 patent discloses, for
22 example, that "contents" includes main content that is,
23 for example, moving picture content such as television
24 programs displayed on the main content receiving display
25 unit 100. Correct? 11:44:25

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1 A. That's correct.

2 Q. And then the next sentence, you state,

3 "Additional examples of 'contents' include 'subsidiary

4 content from the main content display unit display

5 receiving unit 100,' being selected from among streams 11:44:42

6 received by the main content display receiving unit 100."

7 Correct?

8 A. That's exactly what I meant before when I

9 mentioned to you that "contents" could be any of these

10 things. Main content, I provide examples from the 11:44:56

11 specification which could be those. And additional

12 examples of contents include, for example, the thing

13 which is in the specification, which is subsidiary

14 content from the main content display, et cetera.

15 So that's what I said here, and yes, that's why 11:45:14

16 before when we discussing this, I was telling you that

17 "contents" could be any kind of data that is suitable

18 to -- to the invention claimed in Claim 1 and 4.

19 Q. Yeah. So contents is, in your opinion, in the

20 context of the '650 patent, a broad term which can 11:45:38

21 include main content and subsidiary content?

22 A. It is a term which read carefully in the prism

23 Claim 1 would explain to a person of ordinary skill what

24 the content could be. Like if you read it, if you read

25 Claim 1 and 4 carefully, and you see all the requirements 11:46:03

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1 there, you would understand that the content could be,
2 for example -- could include, for example, the main
3 content, and again, for example, the subsidiary content
4 which were disclosed in -- in an embodiment of the
5 specification. 11:46:21

6 Q. Got it.

7 And one example of "main content" that you
8 provide in paragraph 71 is moving picture content.

9 A. That's an example that -- that is in the
10 specification, and therefore, I -- I provided it here so 11:46:37
11 that I can explain what the specification informs the
12 person of ordinary skill in the art about the meaning of
13 the term "content."

14 Q. Okay. And what example of subsidiary content as
15 you recite in paragraph 71 is an electric program guide? 11:46:57

16 A. That's an example for content or a content, yes.

17 Q. And another example that you provide in
18 paragraph 71 -- this is at the top of page 31 now -- is
19 subtitle data.

20 A. That's again something which is in an embodiment 11:47:20
21 of the specification, and I've listed it here as
22 something that -- that would inform what the contents
23 could be to a person of ordinary skill in the art.

24 Q. Okay. So let's see if moving picture content
25 sort of works in the context of Claim 1. So let's go to 11:47:49

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1 Claim 1 of the '650 patent.

2 A. Okay.

3 Q. So limitation 1c.

4 A. Uh-huh.

5 Q. "Wherein the main terminal comprises; a storage 11:48:06
6 storing the contents."

7 And in this example, the context could include
8 moving picture content.

9 A. This is hypothetical --

10 MR. GODO: Objection. Form. 11:48:24

11 Q. BY MR. WOLFE: Yes.

12 A. This is hypothetical. So I'm answering as like
13 something hypothetical, again, without performing the
14 analysis carefully. But this -- it doesn't preclude that
15 the -- the claim language here doesn't seem to say 11:48:38
16 anything which -- which would preclude getting motion
17 pictures as content.

18 Q. And along the same vein, there is nothing here
19 that would preclude an electronic program guide as being
20 one of the contents stored in storage in limitation 1c? 11:48:59

21 MR. GODO: Objection. Form.

22 THE WITNESS: From -- from the perspective of
23 the claim -- again, this is hypothetical. If it is -- if
24 it is a content which would work with everything here in
25 the claim, so just looking at, for example, the storage, 11:49:16

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1 yes, you can have an EPG and you can store it, yes. That
2 could be a content.

3 Q. BY MR. WOLFE: And the same question:

4 Hypothetically, could subtitle data be one of the
5 contents stored in storage in limitation 1c?

11:49:36

6 MR. GODO: Objection. Form.

7 THE WITNESS: This is where I disagree with you,
8 and that's the reason I don't want to do exercise -- this
9 exercise. Because you are trying to more or less ask me
10 for every single type of content that could exist, and
11 you want me to tell you a hypothetical if this could be a
12 content or not, if this could be in the system of
13 Claim 1.

11:49:50

14 And the answer is --

15 (Reporter clarification.)

11:50:00

16 THE WITNESS: I switched the language -- the --
17 the sentence. That's why there is a --

18 So the -- you asked me this thing. And
19 subtitles in particular is not a good example here. Why
20 it's not a good example here because I don't know. It
21 could be -- it could not be displayed, let's say,
22 simultaneously on all the -- all the displays, we'll
23 start with that.

11:50:21

24 So, again, it's an exercise which you want me to
25 do, but I -- I do not want to do for the simple reason

11:50:35

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1 that this is something that hypothetically may or may not
2 work, and I don't want to do this analysis now.

3 Q. BY MR. WOLFE: But, I'm sorry, did you say that
4 subtitle data is outside the scope of Claim 1?

5 A. No, I -- I said that -- 11:50:52

6 MR. GODD: Objection. Form.

7 THE WITNESS: I said that when we reach like to
8 the third or fourth of these examples, I just -- I'm just
9 telling you that I -- I would prefer not to do this for
10 the simple reason that you are putting words in my mouth, 11:51:07
11 like can this be something, "yes" or "no." Can that be
12 something, "yes" or "no."

13 And the answer is I answered to you previously
14 that the claim is clear. These are contents.
15 Contents -- some contents may or may not work for this 11:51:27
16 kind of claimed invention. And I don't want to do the
17 analysis now which content would work or would not work.

18 So when -- when you read me for the third one,
19 you asked me for a third one in a row, I don't want to go
20 through all these and just tell you something which I may 11:51:42
21 be wrong about just because I cannot do the analysis
22 right now.

23 Q. BY MR. WOLFE: So this is an example, subtitles,
24 that is, is an example in the patent, and I'm entitled to
25 get your understanding of this claim. So I'm going to 11:51:54

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1 ask again.

2 Is, hypothetically speaking, subtitles a type of
3 content that can be stored in storage as recited in
4 limitation 1c?

5 MR. GODO: Objection. Form. 11:52:14

6 THE WITNESS: And the answer, which I already
7 provided, is Claim 1c talks about storing the contents.
8 Whatever the contents are can be stored. That's the
9 requirement.

10 So the contents -- the contents can be stored. 11:52:29
11 Then that will -- that will be fine. This particular
12 example is something that I don't want to provide an
13 opinion on right now.

14 Q. BY MR. WOLFE: But you were okay with providing
15 an opinion on the electronic programming guide? 11:52:42

16 A. Obviously, I wasn't okay because I was -- I was
17 trying to avoid doing that. And in the end, like you
18 asked this question multiple times, and in the end, I
19 thought, okay, let's see. We can try to do it.

20 But the -- the reality is that I disagree that I 11:52:57
21 should explain and provide examples for all the kinds of
22 contents or even claim that certain kind of content is
23 actually can be content as -- as the one that is required
24 in Claim 1.

25 So I wasn't okay before that as well, to answer 11:53:17

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1 to your question.

2 Q. I'll give you another example. I mean, I'm just
3 focusing on subtitles since that was one of the examples
4 you provided in your expert declaration. So let's break
5 this down a little more. 11:53:33

6 Is subtitle data something that can be stored in
7 storage in limitation 1c?

8 MR. GODO: Objection. Form.

9 THE WITNESS: So the answer to your question, I
10 would break it into two parts. Can subtitles be stored? 11:53:52
11 Yes. Can they be stored in view of Claim 1? That's
12 something I don't want to say "yes" or "no" before doing
13 a specific analysis that this would work with everything
14 else.

15 And the reality is, again, I don't want -- 11:54:10
16 Claim 1c is one limitation. There are other things that
17 are required from this claim as well. So I cannot just
18 look at Claim 1c in isolation. I cannot just look at it
19 and say, okay, can -- I don't know. Can audio be stored?
20 Yes, it could be stored. Does it work with -- can -- can 11:54:28
21 audio be part of the -- an example for content in -- in
22 the system of Claim 1? And the answer is I don't know.
23 I have to check the other limitations.

24 So from that perspective, I can -- if I break
25 the -- the answer to two, I agree that subtitles is a 11:54:48

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1 type of content, and subtitles can be stored, yes. But
2 if we go to Claim 1, it's a different story. Either it
3 can or cannot be done.

4 Q. BY MR. WOLFE: Okay. Can subtitles be
5 displayed?

11:55:05

6 A. In general? If your question is in general,
7 yes, in general, subtitles can be displayed, yes.

8 Q. In the context of limitation 1e -- or sorry.

9 In the context of limitation 1d, it says "A
10 first display displaying the contents." Correct?

11:55:25

11 A. Uh-huh.

12 Well -- well, let me -- well, confirm because I
13 said "yes," but what I mean is yes, Claim 1c says what
14 you just said, yes.

15 Q. And we just said that subtitles can be
16 displayed.

11:55:40

17 MR. GODO: Objection. Form.

18 THE WITNESS: That's right. But we're talking
19 about hypothetical. So -- and I can -- I can tell you
20 directly.

11:55:52

21 So Claim 1 requires contents that are displayed
22 on the main display, sending one of the contents to the
23 subsidiary display, one of the subsidiary displays, and
24 then presenting both of the things on the first and the
25 second display. Right? That's what it says.

11:56:09

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1 So from that perspective, can subtitles be
2 displayed? Yes, they can be displayed on the first
3 display. They can be displayed on the second display.
4 That's true.

5 Do they -- are they displayed in the way that 11:56:25
6 Claim 1 requires? Can they be displayed in this? Maybe
7 it won't make sense if you have subtitles which are
8 different languages on them, let's say, for example, on
9 the first and on the second display.

10 So the answer to your question again is: The 11:56:37
11 fact that a subtitle is a type of content that can be
12 displayed reads the -- the Claim 1 in isolation. Yes,
13 they can be displayed. Can they be a content -- as a
14 content that's in the system of Claim -- Claim 1 can
15 tolerate and work with? I don't know. That's something 11:56:55
16 that has to be analyzed.

17 Q. BY MR. WOLFE: All right. Let's keep going with
18 Claim 1 and see if it works.

19 A. Okay.

20 Q. So in limitation 1j, that recites a second 11:57:13
21 display displaying the content. Correct?

22 MR. GODO: Objection. Form.

23 THE WITNESS: Claim 1j recites: "Wherein a
24 plurality of subsidiary terminals comprise; a second
25 display displaying the content." 11:57:43

1 Q. BY MR. WOLFE: Okay. And again, you said
2 earlier subtitles are content that can be displayed.

3 MR. GODO: Objection. Form.

4 THE WITNESS: And as I said earlier, this is
5 isolated claim limitation. I'm reading the claim as a 11:57:59
6 whole.

7 Q. BY MR. WOLFE: And we're going through it as a
8 whole.

9 A. Uh-huh.

10 Q. So we started with the limitation 1c, "a storage 11:58:07
11 storing the contents." Then we went to limitation 1d, "a
12 first display displaying the contents." And then we
13 jumped down to limitation 1j, "a second display
14 displaying the content."

15 And in each of these limitations, we said that 11:58:26
16 the subtitle data could be an example of content.

17 MR. GODO: Objection. Form.

18 THE WITNESS: This is an analysis that you did,
19 not -- not that I did. So I'm telling you again that
20 subtitles could be content. It is content. Is it 11:58:48
21 content under the requirements of Claim 1 is something
22 that I don't want to do right now. I -- I'm sorry, but
23 really you're asking me right now to do an analysis of
24 the claim, and certain things would -- would actually
25 infringe the claim or something like that. I don't want 11:59:10

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1 to do that.

2 And the reason I don't want to do that is not
3 because I don't want to be cooperative. But the thing is
4 I may miss something. I don't want to do it on the spot.

5 So, again, EPG could be a content or subtitles 11:59:22
6 could be a content. There could be other contents. And
7 the reality is that you have -- this combination of
8 contents, it may or may not work for some reason.

9 And again, Claim 1 is what Claim 1 is. Claim 1
10 requires certain things. So it's a different analysis 11:59:40
11 that has to be done if certain kind of content actually
12 can be -- can meet the requirements of Claim 1. That's
13 not my -- my task. That wasn't my task right now, right
14 now in general.

15 Q. BY MR. WOLFE: So what analysis would be needed 11:59:59
16 to determine if subtitles works for content in Claim 1?

17 MR. GODO: Objection. Form. Speculation.

18 THE WITNESS: So, again, this is speculative
19 just because I don't want respond to this. I don't
20 consider it, like I haven't thought about what kind of 12:00:18
21 analysis has to be done, but I can try to outline it for
22 you just to try to make it work.

23 And the analysis would be you should consider
24 the system as a whole, like the claim system as a whole,
25 what the system -- what are the different requirements, 12:00:32

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1 how things should work together, what kind of contents
2 you have.

3 Because it's a contents reproducing system.
4 It's not a single content that can go one-by-one and just
5 look at it this way. 12:00:44

6 And then you could have five types of content,
7 20 types of content, different devices. What are the
8 subsidiary devices? Can they display the content in a
9 way that has to be displayed? Things like that. Can
10 these be associated in a way that the content is routed 12:00:58
11 to the right places? Then I can -- I can tell you if --
12 if certain kinds of content can work together and can --
13 can be contents that are -- that could be in the system
14 of Claim 1 or 4.

15 Q. BY MR. WOLFE: But earlier you said in reference 12:01:16
16 to your expert declaration that subtitle data is an
17 example of subsidiary content.

18 A. Let me just check again if I said if it is an
19 example of subsidiary data or it's an example of content.
20 Can you remind me which was -- was that 70? 12:01:43

21 Q. It is the top line of 31. It is paragraph 71,
22 the last sentence, wherein it goes into 31.

23 A. Right.

24 So I just said additional examples of contents
25 include subsidiary content from the...(reading). 12:02:06

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1 (Reporter clarification.)

2 THE WITNESS: So what I said is: "Additional
3 example of 'contents' include 'subsidiary content from
4 the main content display receiving unit 100' being
5 selected from among streams received by the main content 12:02:22
6 display receiving unit. Moreover, 'subsidiary content'
7 includes, for example, multilanguage audio data, an
8 electronic program guide, an electronic content table,
9 and additional information (including subtitle data and
10 commercial information)." Correct. 12:02:43

11 So those are examples for content. And those
12 are examples for content. And again, I'm talking here
13 this section in particular is about a term, which is
14 displaying -- displaying the content. So that's the
15 explanation I -- I -- I found reasonable disclosed in the 12:03:12
16 specification, and therefore, I wrote it in my
17 declaration.

18 These are examples for this particular thing
19 which you asked, can these be stored? Yes, they can be
20 stored. 12:03:31

21 Q. Okay. Let's go to Exhibit 1001, column 12,
22 lines 40 to 52.

23 A. Uh-huh.

24 Q. Can you please just read for me column 12 to
25 yourself, lines 40 to 52, and explain what it discloses. 12:04:30

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1 A. Yes, I've read it.

2 Q. Okay. What does that portion of the '650 patent
3 disclose?

4 A. I can read it to you. Why do you want me to
5 paraphrase what's there? Like reading could be actually 12:05:26
6 much better instead of me telling you how -- how
7 different things are related to what exactly. It is
8 clearly written here.

9 Q. So let me ask a question.

10 A. Yeah. 12:05:40

11 Q. So does the '650 patent at column 12, lines 40
12 to 52, disclose the extraction of subtitle data from
13 main -- from the video data, and then transmission of the
14 extracted subtitle data to a subsidiary content control
15 receiver B 101? 12:06:12

16 MR. GODO: Objection. Form.

17 THE WITNESS: That's the reason -- you see,
18 that's the reason I didn't want to do it myself. You
19 were struggling with paraphrasing and summarizing these
20 things together. 12:06:22

21 So this specific paragraph of this specific
22 embodiment -- so I wouldn't say the '650 patent. The
23 specification of the '650 patent, or this particular
24 embodiment, describes what is written here. And it's --
25 it's an embodiment which describes how -- how things, as 12:06:39

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1 you see, like subsidiary content control receiver B
2 transmits an acquisition request, requires subtitle data,
3 accompanying the movie content, and ID information to the
4 main content receiving display.

5 So, yes, there is an acquisition request in this 12:06:59
6 particular embodiment in this particular paragraph here.

7 And then the main content receiving display unit
8 analyzes the received data, judges that the received data
9 includes the acquisition request, et cetera. And then it
10 sends it, I guess. 12:07:17

11 So it's clear. Whatever it says, it says it. I
12 cannot argue with this. And this is -- this is something
13 which is clearly in the specific embodiment of the
14 specification.

15 Q. BY MR. WOLFE: Video content 504, is that 12:07:33
16 content that can be stored?

17 MR. GODO: Objection. Form.

18 THE WITNESS: Are you asking me in general if
19 that is a content that could be stored or from the
20 perspective of the system of Claim 1 or 4? 12:07:48

21 Q. BY MR. WOLFE: Generally, is video content a
22 type of content that can be stored in storage?

23 MR. GODO: Objection. Form.

24 THE WITNESS: Generally speaking, you can store
25 any data on any storage. 12:08:05

1 Q. BY MR. WOLFE: So "yes"?

2 A. The answer, I gave it to you.

3 Q. Okay. And subtitle data, is that data that
4 could be stored on a storage?

5 MR. GODO: Objection. Form. 12:08:23

6 THE WITNESS: It can store any data. I -- I
7 answered already. And again, I don't see a reason to go
8 through this. Okay, I can answer to you again. No
9 problem.

10 You can store, in general, generally speaking, 12:08:34
11 data can be stored on a storage. That's the reason you
12 have the device called storage because you can store
13 data.

14 Q. BY MR. WOLFE: So, yes, subtitle data can be
15 stored. 12:08:47

16 Can video content be displayed on a display?

17 MR. GODO: Objection. Form.

18 THE WITNESS: Same question, hypothetically
19 unrelated to -- to Claim 1 because this is a different
20 analysis that I have to do. 12:09:05

21 Anything which can -- people -- people -- people
22 can perceive with their eyes, which is kind of content
23 that can be seen, can be displayed, and people can see
24 it.

25 Q. BY MR. WOLFE: Can subtitle data be displayed on 12:09:21

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1 a display?

2 A. That's one of the things that could be done with
3 it. There are other things as well, like you can store
4 it, yes. It's data. You can do all these things with
5 data, generally speaking. 12:09:35

6 Q. Okay. Can subtitle data be transmitted between
7 devices?

8 MR. GODO: Objection. Form.

9 THE WITNESS: Maybe if you --if you try to tie
10 this question more specifically to something that's -- 12:10:01
11 that is in my declaration or something that's related to
12 that. Right now, you're asking me very generic
13 questions, which are can this kind of data be
14 transmitted, can this data be stored. And the answer to
15 all these things, unrelated to -- to what we like -- we 12:10:19
16 discuss in general is the scope of Claim 1.

17 The answer to all this is if they can be
18 qualified as content, in the specification marks them as
19 content and describes them as content, in general, they
20 can be stored, transmitted, et cetera. 12:10:39

21 Q. BY MR. WOLFE: So now let's turn to Claim 1.

22 A. Okay.

23 Q. Is there anything about video content or
24 subtitle data that excludes them as being content in
25 limitation 1c that's stored in storage? 12:11:04

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1 MR. GODO: Objection. Form.

2 THE WITNESS: I think we already discussed this
3 thing. This is an analysis that I have to make right
4 now, and it is not something that I would like to do
5 right now just because, in my opinion, Claim 1 clearly 12:11:20
6 talks about contents. A person of ordinary skill in the
7 art would know what the contents are.

8 Specific examples for this are not necessary, in
9 my opinion. Therefore, like talking about video or
10 subtitles or anything else specifically here isn't 12:11:44
11 necessary. Contents are contents. That's what is
12 written here. And contents which can -- the system can
13 do all with these thing with these contents are contents
14 of the system.

15 Q. BY MR. WOLFE: So I just want to clarify 12:12:04
16 something that you just said. You said a person of
17 ordinary skill in the art would know what the contents
18 are.

19 A. That's correct.

20 Q. Do you consider yourself to be a person of 12:12:28
21 ordinary skill in the art, as you define it in Section C
22 of your expert declaration?

23 A. In my humble opinion, I exceed this, but yes, I
24 consider myself at least a person of ordinary skill in
25 the art. 12:12:50

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1 Q. Then shouldn't you be able to assess whether
2 video data or subtitle data constitutes contents in the
3 context of Claim 1?

4 A. I am able to, and I would have done it if this
5 was part of my task. My task is writing this 12:13:05
6 declaration, was more or less to review what Dr. Paradiso
7 has concluded about specific prior art references and
8 provide my opinion about these things.

9 So I wasn't tasked with construing the term
10 "contents" and explaining what "contents" could be or 12:13:25
11 what kind of contents would be suitable for this system.

12 What I did is I reviewed the claim, I reviewed
13 the -- the arguments of Dr. Paradiso, and I concluded
14 that those arguments and those references do not disclose
15 the invention of Claim 1 and 4. 12:13:42

16 So am I a person of ordinary skill in the art?
17 I hope I am. I am. And can I do the analysis? Yes, I
18 can. Was I asked to do the analysis? No, I have not
19 been asked to do that.

20 Q. Okay. Let's do the analysis with video content 12:13:58
21 and subtitle content.

22 MR. GODO: Objection. Form.

23 Q. BY MR. WOLFE: So if we go
24 limitation-by-limitation.

25 "A contents reproducing system comprising a main 12:14:07

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1 terminal, a plurality of subsidiary terminals, wherein
2 the main terminal comprises a storage storing the
3 contents.

4 So "storage storing the contents," we just said
5 earlier that video data can be stored and subtitle data 12:14:31
6 can be stored.

7 Is there anything in Claim 1 that is excluding
8 video data and subtitle data from being stored in
9 storage?

10 MR. GODO: Objection. Form. This is a 12:14:51
11 hypothetical.

12 THE WITNESS: The claim is what the claim is,
13 and the claim requires these things. And somebody is
14 doing the analysis, which, again, I don't think this is
15 the right time to do it, and I am not prepared to do it 12:15:01
16 today.

17 If somebody's doing this analysis, they would be
18 able to tell you if video content or any other kind of
19 content is content that can be received, stored,
20 displayed, transmitted, et cetera. But I'm not prepared 12:15:18
21 to do this analysis today, and my -- my task was not to
22 do the analysis; therefore, I do not think it's
23 reasonable to do the analysis right now.

24 Q. BY MR. WOLFE: But you offered your opinion as
25 to what Claim 1 means; correct? 12:15:40

1 A. I offered my opinion on what -- I have my
2 opinion on what Claim 1 is. And I offered an opinion if
3 any of the prior art references identified there by
4 Dr. Paradiso actually disclose this, teach these
5 limitations of Claim 1. That's -- that's the opinion I 12:16:00
6 provided.

7 I didn't provide my opinion on Claim 1 in
8 particular. I didn't do the analysis. Otherwise, I
9 would be involved in claim construction and other
10 variables. 12:16:14

11 Q. And you understand that the claims are to be
12 construed in view of the specification; correct?

13 A. I understand that, yes.

14 Q. Did you consider whether any of your
15 constructions are contrary to the embodiments of the 12:16:33
16 patent?

17 MR. GODO: Objection. Form.

18 THE WITNESS: I -- I did -- I consider if some
19 specific kinds of content, as I've cited in 71, I did
20 consider the specification as a whole when I was 12:16:55
21 providing opinion on this particular claim limitation.

22 Therefore, yes, I considered the -- the
23 specification. And when I provided my opinion about the
24 claim construction, I have considered everything which is
25 there, and I -- I -- I do think that these kinds of 12:17:11

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1 content which are listed there are kinds of contents that
2 can be stored and in particular.

3 Q. BY MR. WOLFE: Got it.

4 Are any of your constructions consistent with
5 the construction of Claim 1? 12:17:28

6 A. My constructions is just that particular
7 construction, and that's Claim 1 -- specific claim
8 limitation in Claim 1.

9 So what exactly is your question? Sorry, can
10 you rephrase it so I can understand it better? 12:17:45

11 Q. Yes.

12 Are -- did you consider -- sorry, strike that.

13 Are any of your constructions inconsistent with
14 any of the embodiments disclosed in the specification?

15 MR. GODO: Objection. Form. 12:18:06

16 THE WITNESS: The way -- the way I did that was
17 reading the whole specification without focusing on
18 specific embodiments, looking at the claim from the
19 perspective of a person of ordinary skill in the art who
20 has seen the specification, read the specification, and 12:18:21
21 that's how I came up with my conclusions for the meaning
22 of the terms and which of them would require some -- some
23 kind of clarifications and which -- which of them should
24 have plain and ordinary meaning.

25 And as I stated in the declaration, they -- 12:18:42

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they, to my -- in my opinion, in view of the specification, all the claim limitations and claim terms can have plain and ordinary meaning without the need of additional limitations to any of that.

Without limitations. I mean, specific limitation was for the one -- the additional limitations that the petitioner has tried to add, actually, to the claim.

Q. BY MR. WOLFE: So you never analyzed whether any
of your constructions were inconsistent with the
disclosed embodiments?

MR. GODO: Objection. Form.

THE WITNESS: I didn't -- I didn't do a specific analysis going one-by-one with the embodiments. Again, I -- I was looking at the specification as a whole and everything which is there to inform a person of ordinary skill in the art, and that's how I came up with the conclusions.

I haven't done the analysis specifically going line-by-line or row-by-row or column-by-column seeing this. But, again, I do think they are consistent with the -- with everything which is in the specification.

Q. BY MR. WOLFE: Did you look at any one embodiment?

MR. GODO: Objection. Form. 12:20:00

1 THE WITNESS: Again, the way I do the analysis
2 is, again, I looked at all the embodiments, and I
3 considered them all together from the perspective of what
4 does the specification teach, what are the different
5 embodiments. 12:20:14

6 And the reason I do that is because then the
7 claim has a very specific meaning, and the claim is what
8 the invention -- the claimed invention is.

9 So from that perspective, it is possible that
10 sometimes something -- the claim is what it is. That's 12:20:27
11 it. That's why -- that's why it's solved.

12 So I read the specification as a whole, I looked
13 at the claim, I -- I -- I have my opinion about the
14 claim, what exactly the claim requires, and then that's
15 the analysis I did. 12:20:45

16 Q. BY MR. WOLFE: So you just said I do think that
17 they are consistent with everything which is in the
18 specification.

19 Can you identify what embodiments you are
20 referencing that are consistent with your construction? 12:21:00

21 MR. GODO: Objection. Form.

22 THE WITNESS: My construction is consistent with
23 the claim. The language there explains how things work.
24 The claim is what it is, and my construction follows
25 specific things that are required by the claim. 12:21:19

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1 The specification was to inform me what -- what
2 are the -- what the ideas of the inventors were about
3 certain things, how they perceive the problem, what was,
4 in their opinion, in the prior art, what they tried to
5 fix. 12:21:34

6 How they fixed it and what they did in
7 particular are Claims 1 and 4 that I analyzed.

8 Q. BY MR. WOLFE: But again, the claim is read in
9 light of the specification; correct?

10 A. The specification -- the disclosures of the 12:21:48
11 specification in general have to support what the claim
12 is, what the claim has. But, yes. So when you read the
13 claim, you need to -- you need to come -- you need to be
14 able to understand what the claim is because of the
15 disclosures of the specification. 12:22:09

16 Q. So you say that the content must be displayed
17 concurrently with the content on the display.

18 A. Let's go back to the declaration and see what
19 exactly I said, and then I don't want to have words put
20 in my mouth. 12:22:29

21 So can you point me to the specific place that I
22 say it?

23 Q. Let me find it.

24 A. I mean, the reason I asked is like the word
25 "must" -- the word "must" is a strong word, and I just 12:23:13

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1 wanted to confirm what exactly I said or something.

2 Q. Turn to 106 of your declaration, please.

3 A. Okay. Okay.

4 Q. Actually, let's turn to 91 paragraph 91 first.

5 A. Okay. 12:23:58

6 Q. This is the second sentence. Can you please
7 read that out loud?

8 A. Just give me one second. Paragraph 91, which
9 part of the declaration is -- okay.

10 Q. "The '650 patent addresses." 12:24:16

11 A. Okay. So this in paragraph 91. "The '650
12 patent addresses the pertinent particular problem of
13 delivering content to specific users on individual
14 subsidiary terminals based on association information
15 managed by main terminal, while the main terminal 12:24:40
16 concurrently displays the content."

17 Q. What did you rely on to come to that
18 determination?

19 A. The claim language.

20 Q. Where in the claim language is there a 12:24:59
21 requirement for concurrent display?

22 A. I think we did that. Let's -- let's do it
23 again.

24 So Claim 1 talks about -- starts with: "A
25 contents reproducing system comprising a main terminal 12:25:11

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1 and a plurality of subsidiary terminals, wherein the main
2 terminal comprises storage storing the contents." So
3 these are the contents from the contents reproducing
4 system. "A first display displaying the contents." So
5 the first display displays the contents. 12:25:31

6 "First controller controlling transmission
7 reception with the subsidiary terminals, wherein the
8 first controller is configured to store a plurality of
9 device specific identification ID information of the
10 subsidiary terminals, store a plurality of content 12:25:50
11 information for identifying each of the contents, and
12 store association information for transmitting one of the
13 contents to one of the subsidiary terminals, wherein the
14 association information defines that one of the contents
15 identified by the content information is associated with 12:26:09
16 one of the device-specific ID information."

17 Then: "Wherein the plurality of subsidiary
18 terminals comprise a second display displaying the
19 content."

20 So this refers, I guess, back to -- not I guess. 12:26:25
21 This refers back to the content that was just transmitted
22 which is displayed on the main display.

23 "And a second controller" -- and going forward.

24 So that's how I based my -- that's how I came up
25 with this conclusion. The claim requires it. The claim 12:26:43

1 is stating it there.

2 Q. Where does Claim 1 say that the second display
3 displays the content concurrently?

4 MR. GODO: Objection. Form. Asked and
5 answered.

12:26:56

6 THE WITNESS: I can read it again to you. Like
7 we did this.

8 So we go through Claim 1, and Claim 1 requires:

9 "A contents reproducing system which comprises a main
10 terminal." I'll skip that for purposes of saving time.

12:27:09

11 "And a first display" -- "a first display displaying the
12 contents."

13 So what does this mean to you? To me, it means
14 that it displays the contents. The first display
15 displays the contents.

12:27:25

16 And then there is another -- then we're going to
17 the second display after one of the contents was sent to
18 the second display. And the second device displays on
19 the second display one of the contents.

20 So we have first display displaying the
21 contents, and we have one of the contents sent to the
22 second display and displayed there.

12:27:42

23 Q. What word in Claim 1 means concurrently?

24 A. So this is -- this is something which -- which a
25 person of ordinary skill in the art -- I'm acting here as

12:28:00

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1 a person of ordinary skill in the art. Reading this, to
2 me, it is you have one display, first display, which
3 displays the contents, and you have second display, which
4 displays one of the content.

5 So to me, this -- this means that things are 12:28:15
6 displayed on the one display, anything that is displayed
7 on the main display, where the second display displays
8 one of these things.

9 If this is considered like concurrently was a --
10 was a -- something that -- my read is that a person of 12:28:33
11 ordinary skill in the art would understand it this way.
12 In other words, I'm interpreting the claim. I'm -- I'm
13 providing my understanding of the claim.

14 The word "concurrently" in particular is
15 something that is more or less assumed from -- from the 12:28:57
16 disclosure of Claim 1, the specific words in Claim 1.

17 Q. Why can't the second display display the content
18 after it is displayed on the first display?

19 A. This is hypothetical, why many things can and
20 cannot happen. The idea is that that's what the claim 12:29:20
21 clearly says. The claim -- the claim -- the claim says
22 "the first display displaying the contents." So it's not
23 saying first display is displaying any content or
24 displaying at the same time any contents. It says it
25 displays "the contents." 12:29:43

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1 And then you have the additional things which
2 happened, and you send the second content, like other
3 content to -- to the second display, and the second
4 display has to display that one as well.

5 So why certain things can happen or cannot 12:29:55
6 happen, in general, because that's what the claim
7 requires. That's my answer to this.

8 Q. Where does the claim clearly say that content is
9 displayed on the first display and the second display at
10 the same time? 12:30:12

11 MR. GODO: Objection. Form.

12 THE WITNESS: I think I already provided my
13 opinion on this. I'll repeat myself again: To me, this
14 claim talking about contents reproducing system requires
15 that you have a first display displaying the contents, 12:30:28
16 then sending one of the contents because it was requested
17 by someone to the secondary device and subsidiary
18 terminal, and then display that particular content which
19 was requested to them.

20 So where does it say, you ask me? I provided my 12:30:51
21 opinion about this. This is what it says.

22 Q. BY MR. WOLFE: What if the first display
23 displays the content at 1 p.m. and the second display
24 displays the content at 3 p.m.? Why does that not
25 satisfy Claim 1, in your opinion? 12:31:15

1 MR. GODO: Objection. Form.

2 THE WITNESS: Because Claim -- Claim 1 should be
3 in some way, as we went lengthy before that, should be
4 informed by what is in the specification; right? And
5 you -- you were very persistent. You wanted me to tell 12:31:26
6 you each specific thing, like each specific content that
7 has to be -- that could be a content according to this
8 system.

9 So let's go back to your hypothetical. Let's
10 have subtitles data, main content and video content and 12:31:46
11 then subtitles data. If those are the contents which are
12 fine for Claim 1, then what happens if somebody sees the
13 subtitles five hours later? How would that work?

14 So back to your question. The question is --
15 this is hypothetical, and the question -- the answer to 12:32:04
16 this is: The reason I read it this way, Claim 1, is
17 because I'm informed by the disclosure of the
18 specification. The disclosure of the specification
19 provides specific examples of types of contents which --
20 which are suitable to -- to be support -- distributed to 12:32:21
21 or reproduced by this kind of system.

22 And therefore, my read for this particular claim
23 limitation is that you have a first display that displays
24 the content, then you have second display that displays
25 one of the additional contents, and both of them are on 12:32:40

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1 the one -- on the same page simultaneously. Whatever is
2 on the main display is also on the secondary display in
3 terms of one of the contents.

4 Q. BY MR. WOLFE: So then, in your -- in your
5 opinion, any delayed display of content on the second 12:32:55
6 terminal is outside of the scope of Claim 1?

7 MR. GODO: Objection. Form.

8 THE WITNESS: That's not -- that's not what I
9 said. I said it clearly that I don't want to -- to -- to
10 say what is out of the scope. I'm saying what is in the 12:33:12
11 scope. And in the scope is what is -- what Claim 1
12 requires: A first display displaying the contents, a
13 second display displaying one of the contents.

14 Q. BY MR. WOLFE: Well, if you just said Claim 1
15 requires simultaneous display, then wouldn't delayed 12:33:26
16 display be outside of the scope?

17 MR. GODO: Objection. Form.

18 THE WITNESS: That's an -- that's an analysis
19 that I do not want to do now. So I'm telling you what in
20 my opinion is in the scope. I don't want -- I do not 12:33:42
21 want to say what is out of scope just because if I say
22 something, I'm telling what is in the scope. Out of
23 scope, there could be many things which are out of scope.
24 And I do not want to -- to get this started because it's
25 an analysis that I have to do. 12:33:56

1 It's not that I cannot do it. The reason is
2 that I do not want to -- to say something which limits
3 the scope in some way or says, well, this is out of scope
4 and then this is in scope just because I haven't analyzed
5 it. That's the reason I'm not telling you direct. 12:34:10

6 Q. BY MR. WOLFE: But in paragraph 91, you did do
7 an analysis, and you stated that the main terminal
8 concurrently displays the content that is shown on the
9 subsidiary terminal.

10 A. That's the analysis what is in the scope; 12:34:22
11 correct?

12 Q. So if you know what's in the scope, shouldn't
13 you know what's outside the scope?

14 A. I leave it to -- to others to decide. My
15 statement is here. I can read it if you want in 12:34:34
16 paragraph 91.

17 And, yes, paragraph 91 says what is in scope.
18 What is out of scope, I'm not saying I cannot do the
19 analysis, but the -- the -- the thing is I do not want --
20 I do not want to go through hypotheticals what could be 12:34:49
21 out of scope right now as you asked me in answer to this
22 question, the reason being that this is something that
23 you asked me to do on the spot, and I haven't done it.

24 Can I do it? Yes. Can I make a mistake? In
25 some cases, maybe I can make a mistake. Therefore, I 12:35:06

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1 don't want to do it on the spot.

2 Q. But you did do so in not just paragraph 91, but
3 several times throughout your declaration.

4 A. Everything I said -- I stand by everything which
5 I said in my declaration. So anything which is in my 12:35:23
6 declaration, you can ask me about this particular thing.

7 As I said here, I said what is in the scope, and that's
8 the analysis I did. That's what I think is in scope. I
9 did analysis not necessarily what is out of scope.

10 Specific examples for what is out of scope right now, I'm 12:35:39
11 not prepared to -- to provide.

12 Q. Got it.

13 So let's turn to -- let's turn to paragraph or
14 page 53 of your expert report.

15 A. Okay. 12:36:15

16 Yes. Yes.

17 Q. So your opinion regarding Shindo is that it's
18 outside of the claim scope because there is no concurrent
19 display of content.

20 A. That's not the only opinion I have, and as you 12:36:40
21 see, like I have multiple opinions about Shindo, in
22 particular, and why it is out the scope and why -- why --
23 why it is not meeting the requirements of Claim 1.

24 Q. Sure. I'm just asking about this particular
25 opinion. 12:36:54

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1 So for this particular opinion, you said that
2 Shindo is out of scope because there is not concurrent
3 display of program.

4 A. Well, this -- here on page 53, which is part of
5 paragraph 106, clearly states, "For example, mobile 12:37:09
6 information terminal A or B do not receive one of the
7 program contents; instead, it receives rearranged after
8 the fact" -- after the fact -- "partial program content
9 or reconstructed program content."

10 Which is not one -- for example, replace of 12:37:29
11 highlights being portions from one program content, which
12 is not one concurrently displayed program content being
13 the claimed one of the contents.

14 So in addition to what you just said about
15 concurrently displayed, there is another problem which in 12:37:47
16 the same sentence, instead of focusing only on the
17 concurrently displayed. The fact that Shindo talks about
18 reconstructing something from the content, in other
19 words, creating new content and then sending this to the
20 device. 12:38:05

21 So, yes, as I read it, I say that these are the
22 problems in this particular paragraph that I talk about.
23 First of all, reconstructing the program content, and on
24 top of that, does not display this reconstructed content
25 simultaneous. 12:38:20

1 (Reporter clarification.)

2 THE WITNESS: Concurrently. It doesn't -- it
3 does not display concurrently the reconstructed content
4 on the "one of the contents" on the secondary display.

5 Q. BY MR. WOLFE: So then again, one of the reasons 12:38:50
6 that you found that Shindo is outside the claim scope is
7 because of the lack of concurrent display?

8 A. As I said, there are many reasons. And as I
9 said here, that content that you sent -- that partial
10 reconstructed program content which is sent to the -- to 12:39:12
11 the mobile terminal in Shindo is also not concurrently
12 displayed; therefore, it's not being "one of the
13 contents."

14 Q. So if Shindo displayed the entire content on the
15 subsidiary display but just at a later time, Shindo would 12:39:32
16 still be outside of the scope of Claim 1?

17 MR. GODO: Objection. Form.

18 THE WITNESS: Can you -- well, Shindo --
19 Shindo -- maybe -- maybe -- is this related to something
20 in particular that I said here? Like or you are just 12:39:52
21 asking me again hypothetical: Does Shindo display the
22 same thing on both displays?

23 Q. BY MR. WOLFE: No. So -- so you said -- in the
24 context of your opinion, you said --

25 A. Uh-huh. 12:40:06

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1 Q. -- one is that the content that Shindo says is
2 rearranged, and two, it's not concurrently displayed.

3 A. Right.

4 Q. So it would mean that the content in Shindo
5 isn't rearranged, and it is the same exact content. If 12:40:20
6 Shindo displayed the entire same exact content on the
7 subsidiary display, but just at a later time, would
8 Shindo be outside of the scope of Claim 1?

9 MR. GODO: Objection. Form.

10 THE WITNESS: So this is again hypothetical; 12:40:39
11 right? We discussed all these things. I can -- I can
12 discuss things that I have in the declaration, as I have
13 done in the declaration. So if something is outside of
14 the scope, if hypothetically Shindo does specific things,
15 they may or may not be out of the scope, but this would 12:40:55
16 not be Shindo.

17 The scope of Shindo, in the way I read it and
18 understood it and the way I described it in the
19 declaration, is that it receives this content, and then
20 it stores it on the main -- main device, and then 12:41:12
21 reconstructs that and sends it somewhere after that.

22 One of the problems is that this is a
23 reconstruction of the content. Hypothetically, if
24 something was presented or not presented, they need the
25 same content goes here or there, that's hypothetical, and 12:41:32

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1 it's not really relevant in this case. Shindo is clear
2 what exactly it discloses.

3 Q. BY MR. WOLFE: So let's go to Sasaki.

4 A. Okay.

5 Q. Paragraph 146 starting. 12:41:55

6 So in Sasaki, if the subsidiary terminal
7 eventually looks at all of the lines of a newspaper or
8 all of the stories of a newspaper one-by-one, does that
9 satisfy Claim 1?

10 MR. GODO: Objection. Form. 12:42:28

11 THE WITNESS: Another hypothetical. If
12 something could satisfy if it's not really disclosed or
13 not like what -- it's -- the analysis of Sasaki is in my
14 declaration. The analysis of Sasaki -- let me just find
15 it and I can read it so this would answer your question, 12:42:45
16 and we can direct the question more specifically to the
17 analysis of what exactly Sasaki does and discloses.

18 So let's see. Give me a second to find the
19 right thing.

20 I think easiest thing would be to -- to go to 12:43:07
21 like an overall video analysis of Sasaki, which is
22 actually in paragraph 78 and 79.

23 So Sasaki is generally directed to a system that
24 divides content into portions according to the free
25 memory capacity of the content area of a personal digital 12:43:29

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1 assistant, PDA. The agreement, I guess.

2 "Sasaki discloses that PDA 2 does not have the
3 same memory capacity as PC home server device; therefore,
4 the segment portions of the content is transmitted to
5 PDA 2 with delimiter information. The PC home server 12:43:49
6 device 1 transmits the segment of content after it
7 verifies the display and memory capacity of PDA 2. The
8 segment of content is, for example, paragraph, chapter,
9 article, or one to several lines of an electronic
10 newspaper." 12:44:07

11 And to go further with that, so if PDA -- the
12 PDA goes line-by-line, it will keep receiving portions of
13 the content line-by-line. These are portions of the
14 content. And it will be the content which is there on --
15 on the main device. That was a specific term that Sasaki 12:44:27
16 uses.

17 (Reporter clarification.)

18 THE WITNESS: I'm mumbling. Just give me a
19 second to find the specific term that Sasaki uses here.

20 Data communication device -- controlling device. 12:44:44

21 So in Sasaki, the main device, correspondence,
22 let's say, could be the -- the -- the data communicating
23 controlling device which stores the content. But then
24 Sasaki teaches dividing this content in portions and
25 sending only portions. 12:45:02

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1 Q. BY MR. WOLFE: Okay. So if Sasaki only gets one
2 paragraph at a time and eventually gets the entire
3 article while that article displayed on the main
4 terminal, how does that not satisfy or be within the
5 scope of Claim 1? 12:45:25

6 MR. GODO: Objection. Form.

7 THE WITNESS: You're asking me about
8 hypothetical thing. But the answer to your question
9 directly is because Sasaki deals with a very specific
10 types of terminals, which are PDAs, one of the reasons 12:45:37
11 for the existence of Sasaki is the fact that these
12 terminals do not have storage. They just have limited
13 capacity, and they cannot really have more than
14 whatever -- whatever is sent to them, the portion. And
15 this portion is being deleted and the new portion is 12:45:52
16 requested and provided.

17 So to answer to your question hypothetically, if
18 they weren't PDAs, but they were devices which had a lot
19 of memory, this wouldn't be Sasaki.

20 So hypothetically, I cannot answer to your 12:46:05
21 question if this is going to -- to meet the claim
22 limitation just because this is something which is not
23 relevant to Sasaki. Sasaki uses a very specific problem.

24 Q. BY MR. WOLFE: Got it.

25 So -- so let's assume the article is three 12:46:21

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1 paragraphs, and that's the entire article that is on the
2 main display in Sasaki, and the main terminal in Sasaki
3 sends the PDA in Sasaki the article, but one paragraph at
4 a time so that the first paragraph is displayed, the
5 second paragraph is transmitted then displayed, and the 12:46:41
6 third paragraph is then transmitted and displayed.

7 Why doesn't -- why isn't that Sasaki displaying
8 the content on the second -- on the second device or the
9 PDA?

10 MR. GODD: Objection. Form. 12:46:57

11 THE WITNESS: You just -- you just described it,
12 and you just answered to -- to your question in your --
13 in your question. The answer was there.

14 It says portions of the content. So it says,
15 portions of the content, one-by-one, each at a time, and 12:47:10
16 the secondary device in Sasaki displays that. These are
17 portions of the content.

18 So Claim 1 -- if you go back to Claim 1 --
19 requires sending one of the contents. Sending one of the
20 contents. And the read of "one of the contents" is that 12:47:30
21 the content has to be sent there. In Sasaki, clearly,
22 these are portions, reconstructed portions of the
23 content.

24 Q. BY MR. WOLFE: But isn't that just the way
25 video, for example, is transmitted, in frames at a time? 12:47:48

1 MR. GODO: Objection. Form.

2 Q. BY MR. WOLFE: That's a very interesting
3 question. And the answer to this is that it really
4 depends on the level of obstruction.

5 So should we talk about bits, how bits are 12:48:01
6 transmitted? Should we talk about really radio waves and
7 how signal is received and things like that?

8 The whole thing is to look at this -- these
9 references, this alleged references from the perspective
10 of Claim 1. 12:48:20

11 And Claim 1 is clear. It doesn't go to physical
12 layer, how things are transmitted or received or if
13 anything is done, let's say, bit-by-bit or something like
14 that. Claim 1 clearly requires that you have contents.
15 You have one content -- these contents are displayed on 12:48:36
16 the first display, and one of these contents is routed
17 to -- to a secondary device because it was requested.

18 So it talks about contents. It doesn't -- you
19 asked me isn't that how video works or how other things
20 work? Well, that's -- it depends on the level of 12:48:59
21 obstruction you're -- you're thinking. This -- this is
22 not what Claim 1 requires.

23 Claim 1 doesn't really specify that you have to
24 consider the video is transmitted bit-by-bit. You have
25 content. One content is received; that content is 12:49:15

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1 transmitted.

2 Q. But for a movie, is an entire movie displayed on
3 the display at the same time?

4 MR. GODO: Objection. Form.

5 THE WITNESS: This is the obstruction level. So 12:49:25
6 again, if you just try to look at on an isolated
7 perspective, let's say isolated perspective, what is
8 content then? Going back to this interesting discussion
9 we had before and the reason I didn't want to answer to
10 that. 12:49:44

11 So what -- what exactly is content? Like if
12 video could be content. And if you look at the entirety
13 of the video, you store that content. Could a frame from
14 the video be content? Yes, it could be content. Just
15 because it's data. Like it's a kind of data. 12:50:00

16 So this is hypothetical again. Like we just
17 discussing these things right now. The way Claim 1 is
18 written is you have contents received at some point, and
19 one of them or many of them routed to the secondary
20 subsidiary terminals. 12:50:24

21 So one of the contents -- many contents are
22 received. One of them is routed.

23 MR. GODO: Counsel, I'm sorry. It's been an
24 hour. Can we take a break?

25 MR. WOLFE: Can we go maybe two more questions? 12:50:41

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1 MR. GODO: Okay.

2 Q. BY MR. WOLFE: So I -- I just want to do this
3 because -- because we -- you brought it up before talking
4 about how video is transmitted. So let's jump into the
5 analysis. 12:50:58

6 Can you explain to me how video is streamed to a
7 device?

8 MR. GODO: Objection. Form.

9 THE WITNESS: I can. The question is why is
10 this part of this discussion? But now like my -- my task 12:51:16
11 here is not to explain how certain things work. So
12 transmitting video is a -- is a specific thing, and it
13 has a lot of elements, and we can, I guess, discuss it
14 offline if you're interested how it works.

15 For the purposes of -- of Claim 1, I don't see 12:51:36
16 how this is relevant. Claim 1 doesn't require
17 transmission of video. Claim 1 requires presence of
18 contents, receiving of contents.

19 So next you may ask me how is CPG transmitted,
20 how is subtitles transmitted, how are they transmitted. 12:51:55
21 They can be burnt into the video. Many other things
22 could happen. The thing is: We need to look at these
23 things from the perspective of Claim 1.

24 So the transmission of video and the way it is
25 transmitted, in my opinion, is not really relevant to -- 12:52:07

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1 to -- to the discussion.

2 Q. BY MR. WOLFE: I understand. And the test today
3 is to answer the questions that I pose. It's -- you
4 don't get to decide what is relevant and irrelevant.

5 So going back to my question: Can you explain 12:52:30
6 to me how video would be streamed to a device?

7 MR. GODO: Objection. Form. This is
8 speculative.

9 THE WITNESS: So just to answer to -- to -- to
10 your statement, I'm here today because I want to explain 12:52:52
11 what I have written in my declaration. And my
12 understanding is that this is the purpose of this
13 meeting.

14 I am willing to explain to you other things as
15 well, which -- which could be in the scope of my 12:53:08
16 assignment. If you can point me to the specific thing
17 which I explain how video is transmitted and things are
18 happening there, I would be willing to go further and try
19 to explain it to you, and then we can -- we can take it
20 from there. 12:53:26

21 Now this is to -- so demanding an answer and me
22 saying that I -- I just don't think that this is
23 something that is in the scope of this discussion, the
24 way that you demand answer, the way -- I -- I have the
25 right to say that in my opinion, this is not really 12:53:43

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1 relevant.

2 In any case, video transmission is a specific
3 thing. So that's why I said talking about video
4 transmission is something which is very specific, and
5 explanation about how video is transmitted to me doesn't 12:54:01
6 seem in the scope of the -- the discussion we have today
7 for the reason that Claim 1 doesn't talk about video
8 specifically. Claim 1 talks about contents. And there
9 are many different contents, and those contents are maybe
10 transmitted in a different way. 12:54:24

11 MR. WOLFE: It would be fantastic if you could
12 answer my question.

13 MR. GODO: Objection. Form. Asked and
14 answered.

15 MR. WOLFE: He did not answer the question. In 12:54:32
16 fact, he hasn't answered multiple questions.

17 MR. GODO: Asked and answered. Objection.
18 Form. Asked and answered.

19 THE WITNESS: Let's look at the obstruction
20 level. So what obstruction level do you want me to -- to 12:54:47
21 cover?

22 Q. BY MR. WOLFE: I am just asking very simply:
23 How is video streamed to a device? And I'll even specify
24 the device. How is video streamed to a TV, for example?

25 MR. GODO: Objection. Form. This is 12:55:02

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1 irrelevant.

2 THE WITNESS: Does -- does the TV have storage?

3 The reason I'm asking is the way -- from the perspective

4 of a user, video is transmitted -- transmitted -- like

5 the user doesn't know how it is transmitted. So from the 12:55:20

6 perspective of a user, I click on a button or I click on

7 an icon, and I get the video.

8 So that's why I said what is a -- what is the --

9 the threshold level that you want me to cover? I'm

10 answering to your question. You click on a -- on a -- on 12:55:36

11 an icon, and then you get -- you get the video. The

12 video is received.

13 Or you may use radio waves. So then you get the

14 video, and the video is transported to a different --

15 into bits and bytes. Those are in some way modulated. 12:55:55

16 Then they are transmitted over antenna. Then those are

17 received. Those are demodulated. There is multiplexion

18 with other signal. There are many things.

19 So from that perspective, again, sending --

20 receiving a video is something which, in general, like 12:56:18

21 just talking hypothetically, it depends really on the

22 obstruction level that we booked.

23 Could be -- from someone's perspective, it could

24 just be a matter of a click. So you click and get the

25 content; from someone else's perspective, it could be 12:56:38

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1 completely different.

2 And again, we're not here to discuss this.

3 We're here to discuss, in my opinion, Claim 1, which is a
4 contents reproducing system that receives content.

5 Q. BY MR. WOLFE: We are here to discuss Claim 1. 12:56:51

6 And I say that --

7 A. Right.

8 Q. -- because the '650 patent describes ad nauseam
9 streaming data.

10 MR. GODD: Objection. Form. What is the 12:57:05
11 question?

12 Q. BY MR. WOLFE: So can you explain again in the
13 context of the '650 patent how video is streamed from
14 content delivery unit 103 to main content receiving
15 display unit 100? 12:57:26

16 MR. GODD: Objection. Form. How is that
17 relevant to his declaration?

18 MR. WOLFE: Did he provide an opinion on the
19 '650 patent?

20 THE WITNESS: I did provide an opinion on '650 12:57:40
21 patent, and so I agree with you. Like as we discussed
22 initially, TV streaming is one of the things which is
23 described in the specification. So do you want me to tie
24 TV stream specifically to Claim 1?

25 I told you when we went through that that this 12:58:02

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1 is an analysis that I haven't performed. This content
2 fits well into this -- if TV content here fits well into
3 Claim 1. And doing it on the spot just doesn't make
4 sense.

5 Video streaming, again, from the perspective of 12:58:17
6 somebody, it's a -- it's content, but it has different
7 level -- levels of obstruction. Could be a bit, could be
8 a frame, could be the whole movie or sound.

9 So how is this done? It depends. It depends.
10 I tried to explain to you how it is transmitted, and you 12:58:41
11 disagree. And what I'm saying is that -- okay, it's
12 content. I click on the video, and I get it as a
13 content. That's how it is transmitted.

14 Does this answer the question?

15 Q. BY MR. WOLFE: No. 12:58:55

16 How is streaming performed in a device that has
17 a receive buffer?

18 MR. GODO: Objection. Form. This is
19 irrelevant.

20 THE WITNESS: Is it -- is your question related 12:59:04
21 to Claim 1?

22 Q. BY MR. WOLFE: Let's assume that the buffer can
23 hold a hundred frames of data and the movie has 10,000
24 frames. In this context, how is streaming performed in a
25 device that has a receive buffer? 12:59:18

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1 MR. GODO: Objection. Form. This is a
2 hypothetical.

3 MR. WOLFE: There are no speaking objections.

4 THE WITNESS: So hypothetically, receiving
5 stream of data is physically there are -- there are 12:59:34
6 restrictions of the device, obviously. You just said
7 there is a buffer. So you -- you have this buffer filled
8 in with data, and that data is the content that
9 hypothetically at this -- at this obstruction level, this
10 is the content that you get. 12:59:55

11 So hypothetically, you get this, let's say,
12 buffer, which -- which isn't buffered really enough for
13 let's say a frame, and this is the content that you get
14 in the moment.

15 Then you get the next one, then you get the next 13:00:12
16 one, and going forward. So that's how it is received,
17 obviously. Like I'm not -- I'm not trying to say that --
18 you're trying to -- to ask me -- you're asking me
19 something which is obvious, and of course, that's how it
20 is done. That's how it is done. Video transmission is 13:00:30
21 like that. This is -- this is the implementation of
22 video transmission.

23 And the question is: What is the content then?
24 Is the content one frame? Is the content one picture?
25 Is the content the video and -- and everything else. 13:00:44

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1 So how is video transmission done? This is how
2 it is done. Physically, that's how it is done. As you
3 said, there is a buffer. That buffer is filled in with
4 data. That data is then like analyzed, and you get
5 from -- from the bits and bytes, you get to -- to the 13:01:01
6 picture.

7 Q. BY MR. WOLFE: So is the content then one frame,
8 one picture, the entire movie, or whatever is streamed?
9 What is it?

10 A. The content could be. 13:01:19

11 MR. GODO: Objection. Form.

12 THE WITNESS: The content, it depends on the
13 obstruction level that you have to -- to apply there.
14 And obstruction -- content could be any of these things,
15 but in general, just because data could be content. 13:01:32
16 That's what I said. Content -- data is content.

17 The question is: How does fit -- this fit into
18 the requirements of Claim 1, the limitations of Claim 1,
19 and all the other things in addition to the fact that you
20 have the content, like storing it and then displaying it, 13:01:49
21 then sending the same thing to someone else, then
22 reading -- displaying it there as well? So what exactly
23 is content, then?

24 To answer your question, well, it could be any
25 of these things in general. Specifically, it depends. 13:02:04

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1 Q. BY MR. WOLFE: Got it.

2 So it sounds like the Sasaki reference. You're
3 sending bits or lines or paragraphs from the main
4 terminal to the subsidiary terminal.

5 MR. GODO: Objection. Form. 13:02:24

6 THE WITNESS: To me, it doesn't sound like
7 Sasaki reference at all. And the reason is what I just
8 read to you.

9 So in Sasaki, in particular, it talks about the
10 newspaper; correct? So Sasaki, in particular, defines 13:02:36
11 actually what the content is. That's the difference, in
12 my opinion.

13 So Sasaki is a very specific disclosure. You
14 have a newspaper, let's say, and with that newspaper, it
15 is received. It stays on the -- on the device. And then 13:02:54
16 Sasaki starts breaking it up. And the content, which is
17 the newspaper, is not transmitted as a whole. The
18 content is something you just get something from the
19 content. You more or less come up with something new,
20 which is a different kind of content now, from another 13:03:14
21 perspective or another obstruction level. And -- and you
22 send the other content to -- to the secondary device. So
23 that's why it's not the same.

24 MR. WOLFE: Okay. I think now's a good time to
25 break for lunch. 13:03:33

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1 THE WITNESS: Okay.

2 THE VIDEOGRAPHER: Going off the record. The
3 time is 1:03 p.m.

4 (Recess.)

5 THE VIDEOGRAPHER: Back on the record. The time 13:50:52
6 is 1:51 p.m.

7 Q. BY MR. WOLFE: Dr. Pachamanov, let's turn to
8 paragraph 45 of your expert report.

9 A. 45, you said?

10 Q. Yes. 13:52:14

11 A. Yes, I'm there.

12 Q. Okay. And this is your list of materials
13 considered; correct?

14 A. Yeah, that's correct.

15 Q. And one of the items that you reviewed was the 13:52:28
16 prosecution history, which is Exhibit 1003?

17 A. That's correct. I looked at it, yes.

18 Q. Let's turn to Exhibit 1003, specifically PDF
19 page 111.

20 A. One second. Which page? Sorry. 13:52:55

21 Q. PDF page 111.

22 A. I'm sorry, you -- you broke up. Sorry about
23 that. Like which page again? I just couldn't hear it.
24 It just breaks up, the page.

25 Q. 111. 13:53:09

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1 A. 111. Okay. Thank you. PDF 111.

2 It's funny. It breaks at the moment you say the

3 page number, in particular.

4 Okay. Just to make sure I'm on the same page,

5 it starts with Claim 2. It says Claim 2. 13:53:34

6 Q. Yes. Yes, that's correct.

7 A. Okay.

8 Q. If we could just start a couple pages earlier,

9 102 to 103.

10 A. Okay. 13:54:01

11 Q. Do you see an amendment to Claim 2 that was

12 made?

13 A. Yes, I see it on page 102 and 103.

14 Q. And that amendment has some language underlined

15 and some language struck through; correct? 13:54:18

16 A. Correct. I see that, yes.

17 Q. And some of the language that is underlined

18 starts, "Wherein the first controller is configured to"?

19 A. Right. This is on page 102; right?

20 Q. Yes. 13:54:45

21 A. Yes.

22 Q. And so do you understand that this amendment was

23 in response to an Office Action mailed April 7th, 2021?

24 A. I'm not sure if it's regarding the same Office

25 Action. I take your word for this, but yes, usually when 13:55:08

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1 you see amendments like this, they are in response to an
2 Office Action.

3 Q. Okay. Now let's go back to page 111.

4 A. Okay. Yes.

5 Q. So the second paragraph describes, "In the 13:55:34
6 presently claimed invention, by using the association
7 information, for example, it is possible to realize using
8 different contents for each respective device, such as
9 using EPG1 on a PC and EPG2 on a TV." Correct?

10 A. Yeah. I see that, yes. 13:56:08

11 Q. So as the applicant of this application argued
12 on page 111 of the file history, EPG1 is an example of
13 content under the plain and ordinary meaning of the term
14 in Claim 1; correct?

15 A. That's what this states, yes. It states that an 13:56:39
16 example provided such as using EPG1 on a PC and EPG2 on a
17 TV. So yes.

18 Q. Okay. And earlier you testified that the claim
19 requires that the content that is displayed on the second
20 display in limitation 1j must be displayed simultaneously 13:57:10
21 with the content displayed on the first displayed in
22 limitation 1d.

23 A. Yes, that's what I said because that's what's in
24 the claim, yes.

25 Q. So in the example that the applicant provided, 13:57:30

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1 EPG1 that would be sent to the subsidiary device and
2 displayed would also needed to be -- be displayed at the
3 same time on the main display, based off of your
4 interpretation of the claim?

5 MR. GODO: Objection. Form. 13:57:57

6 THE WITNESS: The claim requires that the
7 content is received, all the contents are received,
8 presented on the -- displayed on the main display, and
9 one of them -- in this case, being EPG1 -- should be
10 presented on one of the secondary displays, yes, while 13:58:14
11 this is also displayed on the first display, on the main
12 display.

13 Q. BY MR. WOLFE: And in this paragraph, the
14 applicant states that different content, so EPG1 versus
15 EPG2, can be sent to two different subsidiary displays? 13:58:35

16 A. That's correct. That's what it says, yes.

17 Q. So in that case, would both EPG1 and EPG2 must
18 be displayed on the main display at the same time as EPG1
19 on the PC and EPG2 on the TV?

20 MR. GODO: Objection. Form. 13:59:10

21 THE WITNESS: According to the claim, that
22 should be the case. Because the claim requires that the
23 first display displays the content, and then the second
24 display displays one of the contents. Displays the
25 contents, and then the other one is one of the contents. 13:59:30

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1 And it could be that -- so this is in particular
2 for Claim 1, yes, okay. So but, yes, this is still in
3 line with what -- what my read of the claim is.

4 Q. BY MR. WOLFE: Okay. So let's say there's a
5 third subsidiary display, and there is EPG3. In that 13:59:51
6 case, under your interpretation, the main terminal must
7 display EPG1, EPG2, and EPG3?

8 MR. GODO: Objection. Form.

9 THE WITNESS: My interpretation of the claim is
10 based on what the claim says, which is a plurality -- 14:00:10
11 sorry. The first display displaying the contents. So it
12 displays the contents.

13 If there are some situation in which you have
14 multiple subsidiary devices, which is actually not really
15 part of Claim 1 in this particular case, I think, in 14:00:32
16 particular. But anyway, that's what the claim requires.

17 So, yes, under my interpretation, that's what
18 the claim requires.

19 Q. BY MR. WOLFE: And they all -- EPG1, EPG2, and
20 EPG3 -- must be displayed on the main display at the same 14:00:51
21 time?

22 A. That's what the --

23 MR. GODO: Objection. Form.

24 THE WITNESS: -- claim requires.

25 Q. BY MR. WOLFE: Now let's look at Exhibit 1001. 14:01:09

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1 A. Okay.

2 Q. And I'm going to direct you to column 1, lines
3 38 to -- sorry -- 37 to 41. It starts "at this time."

4 A. Yes.

5 Q. So doesn't the '650 contemplate as a problem it 14:01:59
6 is trying to solve, that being of the display area of a
7 main display becoming narrow as a result of displaying
8 main content and subsidiary content?

9 A. It is said, the inventors here, the authors,
10 review the background, what is present in the field, and 14:02:32
11 they said that this -- this is one of the problems, yes.
12 This could be a problem.

13 Q. Wouldn't displaying three different EPGs on the
14 main display run directly counter to the alleged
15 improvement of the invention? 14:02:56

16 MR. GODO: Objection. Form.

17 THE WITNESS: That's -- that's something that in
18 general goes back to the discussion about the content in
19 the specific system. So the specific system of Claim 1
20 requires getting contents and then displaying. Those 14:03:13
21 contents on the main display, then displaying -- routing
22 some of the contents to specific secondary displays, and
23 this claim goes there, while also represented on the
24 first one.

25 So this particular part of the specification is 14:03:29

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1 something that the authors had recognized as an issue in
2 the past. This doesn't preclude that the invention they
3 have wouldn't do something similar, but having additional
4 of different things there.

5 So it is -- it is -- obviously, they -- they 14:03:48
6 consider it as -- it could be an issue. But this doesn't
7 mean that the Claim 1 incorporates this in particular.
8 Because Claim 1, again, like the literal read of -- of --
9 of the claim language is that it displays -- main display
10 displays one contents, and then one of the contents is 14:04:12
11 displayed on the second display.

12 Q. BY MR. WOLFE: So in the context of replacing
13 different EPGs with different subtitles, if, for example,
14 subsidiary device one wants Italian subtitles, subsidiary
15 device two wants Japanese subtitles, subsidiary device 14:04:51
16 three wants German subtitles, all of those subtitles must
17 be displayed concurrently on the main display.

18 MR. GODO: Objection. Form.

19 THE WITNESS: I'm not here to -- to provide an
20 opinion on if this invention is going to work and if it's 14:05:12
21 works fine and that this is something which -- which
22 actually won't create any problems. I'm just reading
23 literally the -- the claim language.

24 And reading literally the claim language is that
25 you have main display -- 14:05:26

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1 (Reporter clarification.)

2 THE WITNESS: Main. First display displaying
3 the content, and then you have secondary display
4 displaying one of the contents.

5 So I'm not opining on if this is -- if this is 14:05:42
6 like something which is going to create problems with
7 certain type of content or -- or anything like that. I'm
8 just reading the claim, interpreting the claim.

9 Q. BY MR. WOLFE: Understood.

10 And the reason why I ask is because earlier I 14:05:56
11 kept asking about what the plain and ordinary meaning of
12 "content" is. So I'm trying to figure out sort of the
13 outer bounds of how you are defining "content" in the
14 context of this claim.

15 We just saw an example in the prosecution 14:06:14
16 history where the applicant was very clear that EPG
17 constitutes content for the context of the claim.

18 A. Uh-huh.

19 Q. And we discussed earlier, EPG data is an example
20 of subsidiary content, which you opined in your expert 14:06:32
21 declaration is content.

22 MR. GODO: Objection. Form.

23 Q. BY MR. WOLFE: One of the other examples of
24 subsidiary content that you point to is subtitle data;
25 correct? 14:06:57

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1 A. I -- I said that this is an example of content
2 in general, yes.

3 Q. So when we turn to the claim language, is
4 subtitle data within the plain and ordinary meaning of
5 content, as you understand it? 14:07:19

6 MR. GODO: Objection. Form.

7 THE WITNESS: If we turn to -- to the claim
8 language, I guess the reason you are asking me is would
9 it -- would that be like a system which -- which is --
10 which makes sense to present multiple -- multiple 14:07:33
11 subtitles on the same stream.

12 And the answer is I'm not -- I haven't analyzed
13 that.

14 The reality is that there is a claim which
15 claims a specific invention. Yes, the inventors in the 14:07:49
16 file history explain that EPG1 and EPG2 could be examples
17 of secondary contents. That's true. Would there be a
18 specific situation in which it makes sense to present
19 EPG1 and EPG2 both together with the main content, the
20 content on the screen, on the main screen? There could 14:08:14
21 be a situation like this.

22 Obviously, the inventors had something in mind
23 when they claimed this invention, and they outlined the
24 invention in the claim.

25 So from that perspective, I'm -- I'm still 14:08:24

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1 focusing on the claim language in particular. Would
2 something make sense? In my opinion, is not necessarily
3 something that I can -- I can opine on right now. It may
4 not make sense. It may make sense. But the reality is
5 that there is a specific claim and that requires specific 14:08:45
6 thing.

7 So from that perspective, there may be a
8 situation which you have the main content, and then in
9 one corner of the screen, you have EPG1, the other corner
10 you have EPG2, then you send this to one or the other 14:09:00
11 devices. It may be like that. But that's like
12 hypothetical, and it's a specific implementation, a
13 specific situation.

14 So, again, I just interpret the language in the
15 claim. 14:09:13

16 Q. BY MR. WOLFE: Understood.

17 But my question wasn't if -- if it makes sense,
18 if it made sense.

19 MR. GODD: Objection -- I'm sorry. I apologize.
20 Go ahead. 14:09:23

21 Q. BY MR. WOLFE: My question is whether the plain
22 and ordinary meaning of "contents" includes subtitle
23 data.

24 A. So can we go back to -- to my declaration. I
25 will go back to my declaration just to see where I'm 14:09:43

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1 talking about subtitles.

2 The reason I talk about it when I discuss the
3 patent and the disclosure of the patent -- so, I'm sorry,
4 I may not be finding it quickly enough, but the thing is
5 what I -- what I see here is that I'm talking about 14:10:20
6 subtitle data as an example when I'm explaining what the
7 '650 patent specification is about.

8 So in particular for subtitles, I -- I cannot
9 provide an opinion right now largely because I haven't
10 thought about it, I haven't analyzed it. 14:10:38

11 With the EPG, if the inventors say directly that
12 the EPG is an example of something that can work, then I
13 cannot argue with that. Not well. But EPG could be a
14 content that -- that is -- that the person of ordinary
15 skill in the art would understand the type of content 14:10:54
16 that the person of ordinary skill in the art would
17 understand, then I cannot disagree with that.

18 In terms of subtitle data, that's not something
19 that I have opined on, if subtitle data in particular,
20 unless I cannot find it. But I think I didn't mention it 14:11:08
21 in my analysis.

22 Or if I had, can you please point me to that?
23 The idea is in general, I cannot do it right now unless I
24 can see it in my declaration.

25 Q. One second. 14:11:27

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1 A. Okay.

2 Q. Okay. Let's go to paragraph 71 of your
3 declaration.

4 A. Okay. Yeah, I just found it when you were
5 actually started, yes. 14:12:09

6 Q. And here you say, "For example, the '650 patent
7 discloses, for example, that 'contents' -- in quotes --
8 includes" -- in quotes -- 'main content that is, for
9 example, moving picture content such as television
10 program.'" 14:12:43

11 A. Uh-huh. Yeah, yes.

12 Q. And then to -- or the next line, "Additional
13 examples of" -- in quotes -- "'contents' include" -- in
14 quotes again -- "'subsidiary content from the main
15 content display receiving unit 100' being selected from 14:13:06
16 among streams received by the main content display
17 receiving unit 100."

18 A. Correct. I say this, yes.

19 Q. So your position is that "contents," which is a
20 quote -- which is in quotes in your declaration, includes 14:13:25
21 or can include main content and can include subsidiary
22 content?

23 A. It includes -- yeah, different kinds of
24 contents, yes, which can be by the device managed
25 subsidiary, but in general, are contents. 14:13:44

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1 Q. And then two lines from the bottom of page 30 in
2 paragraph 71 that starts "moreover," you quote the patent
3 and say that: "Subsidiary content includes, for
4 example," and then you provide examples.

5 Isn't one of those examples subtitle data? 14:14:09

6 A. One of the examples listed here is indeed
7 subtitle data, and the reason it is listed here is that
8 content in general may -- may be any kind of content,
9 presumably. And the inventors have provided these -- all
10 these examples as what content could be. 14:14:28

11 And then going back to the claim, even if
12 subtitles is kind of data, a kind of content, sorry,
13 there is still the strict requirement that this has to be
14 presented on the main display and then on the subsidiary
15 displays. 14:14:50

16 What I'm saying is that these are different
17 examples, like the specific situation in which you have
18 25 different kinds of, let's say, subtitles, is a
19 different story. And this is reasonable, and this is
20 something that a person of ordinary skill in the art 14:15:02
21 would think to implement in the -- as a system of the --
22 of Claim 1 or Claim 4.

23 In other words, having contents, examples of
24 contents, would not change what Claim 1 requires with --
25 with this -- the specific limitations that the first 14:15:28

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1 display displays the content and then the second display
2 displays a content from, one of the contents.

3 Q. And in paragraph or in Exhibit 1001, turning
4 back to column 12, lines 40 to 52 that we discussed
5 earlier, this is an example where subtitle data is 14:15:57
6 extracted from the video content and provided to the
7 subsidiary content for display.

8 MR. GODO: Objection. Form.

9 THE WITNESS: This is within the -- the
10 specification, and yes, it is an example. So it's one 14:16:25
11 example of a certain kind of content that could be
12 extracted.

13 Q. BY MR. WOLFE: So again going back to your
14 interpretation of the concurrent nature of display in
15 Claim 1, when subtitle data is requested as content by 14:16:41
16 one of the subsidiary devices, in order for it to be
17 displayed on the subsidiary device, it must be displayed
18 concurrently on the main device.

19 MR. GODO: Objection. Form.

20 THE WITNESS: Yes, and this is based on my read 14:17:13
21 of the claim, and I can hypothetically provide you an
22 example for this. I have problems with my eyes, and I
23 want to see it on the subsidiary terminal as well.

24 Q. BY MR. WOLFE: So now let's say that there is a
25 second person in the room with you that wants subtitles 14:17:29

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1 but in a different language, and they request subtitle
2 data from the main terminal and receive it.

3 So does that mean that the subtitle data that
4 they are receiving and displaying on their subsidiary
5 device must also be displayed on the main terminal's 14:17:59
6 display?

7 MR. GODO: Objection. Form.

8 THE WITNESS: The answer to this question is
9 that Claim 1 is mostly of the type of the -- the content
10 which is there. So Claim 1 requires displaying 14:18:16
11 everything on the first display and then displaying one
12 of them on the second display, maybe the same thing on
13 the third display, fourth thing, I don't know, on the
14 fourth display.

15 The question here is -- that's why I answered 14:18:30
16 the first time -- it may not work for specific things in
17 term of -- in terms of it's not logical to -- to do that,
18 but the claim requires that.

19 So as I said, it could be a situation in which
20 like elderly people need to see the subtitles. There's 14:18:51
21 only one subtitle subsidiary data, so just one subtitle
22 kind of data. So that one is transmitted to one device.

23 Then there's a secondary person who also sees
24 the -- like he has a secondary device. And they also
25 look at the same subtitle data. They don't look at -- 14:19:09

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1 there is just no third subtitle -- subtitle data. Or
2 there is no different language, for example.

3 So there are situations in which if you just
4 say, well, there will be 25 different types of secondary
5 subtitle in different -- subtitles in different 14:19:25
6 languages, well, then, the claim just requires that they
7 are displayed simultaneously. So maybe you shouldn't
8 have 25 subtitle contents, secondary contents, subsidiary
9 contents.

10 So from that perspective, can subtitles be 14:19:46
11 content? Presumably. If -- if it is there, yes. But
12 again, going back to the claim and the requirements of
13 the claim, it's very clear. They -- first display
14 display the contents, and then second display and third
15 display and fourth display displaying one of the 14:20:08
16 contents.

17 I'm not saying that this is -- again, I'm not
18 doing an analysis if this is feasible, if there is a
19 specific situation in which it doesn't make sense to have
20 it like that. Just this is the claimed invention. 14:20:20

21 Q. Okay. Let's go to the limitation 1c of
22 Exhibit 1001.

23 A. Yes.

24 Q. 1c recites: "A storage storing the contents."

25 Do you see that? 14:21:02

1 A. Yeah. Main terminal comprises a storage storing
2 the contents, yes.

3 Q. And limitation 1d recites: "A first display
4 displaying the contents." Correct?

5 A. Correct. 14:21:17

6 Q. So the contents in limitation 1c and the
7 contents in limitation 1d, those refer to the same
8 contents?

9 A. I'm reading it. It refers to the contents. So
10 it has to be the same. 14:21:32

11 Q. So does that mean that the first display must
12 display every content that it stores?

13 A. That's what the claim says.

14 Q. Okay. Let's go to Shindo, which is
15 Exhibit 1004. 14:22:16

16 A. Okay.

17 Q. And let's go to paragraph 88 of your expert
18 declaration.

19 A. 88, you said?

20 Q. Uh-huh. 14:22:51

21 A. Okay. Yes.

22 Q. So one of the distinctions that you allege
23 between Shindo's system and Claim 1 involves what you
24 refer to as blind transmission.

25 A. That sounds familiar, but can you point me to 14:23:22

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1 the specific place that I say -- I say it some -- I do
2 remember using this word. Let me just see.

3 Q. Yes.

4 A. I say it in paragraph 88, I say, "In contrast,
5 Shindo discloses a fundamentally different system that is 14:23:36
6 not based on content-to-device mapping architecture --

7 (Reporter clarification.)

8 THE WITNESS: Sorry.

9 "Content-to-device mapping architecture
10 (one-to-one mapping). Instead, it is centered around a 14:23:46
11 trigger information-to-mode for blindly transmitting
12 portion content to multiple mobile terminals, which
13 requested a certain mode."

14 Q. What do you mean by "blind transmission" in this
15 context? 14:24:04

16 A. Well, the -- referring back to Claim 1, you need
17 to have -- Claim 1 requires that you have this specific
18 association information that is used to identify -- let
19 me read it so that I can better phrase it.

20 But -- so Claim 1 requires that the main device 14:24:27
21 should store a plurality of content information for
22 identifying each of the contents and store association
23 information for transmitting one of the contents to one
24 of the subsidiary terminals.

25 And then the actual transmission, the actual how 14:24:43

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1 is this implemented, that runs through -- the association
2 information defines that one of the contents identified
3 by the content information is associated with one of the
4 device-specific ID informations.

5 So from that perspective, you need to have this 14:25:03
6 association information present so that you can -- more
7 or less you can query, ask the device, and I should -- I
8 should do this, check which content is associated with --
9 which specific content ID is associated with specific
10 device ID, and then route this content to that device. 14:25:25

11 Using the term "blindly" here is that there is
12 no association between the content and -- and the device.
13 Devices can request a certain mode. So the devices can
14 request a replay, let's say.

15 So the trigger -- the trigger information says 14:25:52
16 this is a replay time, and that replay is generated as a
17 content and sent widely to everybody who requested it.

18 So it's not that particular content. It's not
19 like one-to-one -- no, sorry. It's not that particular.
20 It's that exert from the content at a certain point of 14:26:13
21 time is generated and blindly sent to 15 different
22 devices, which -- which said I want replay.

23 So from that perspective, it's blindly. This
24 content has to go there. It's replay event has to be
25 provided to these ten devices. That's why I'm saying 14:26:34

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1 blindly. It doesn't -- it doesn't really map, it doesn't
2 check, okay, I need to send this. Because this
3 particular replay which is here has to be sent to that
4 particular device there. There's no association between
5 specific content and specific device. 14:26:52

6 Q. Maybe I'm not understanding the distinction.

7 A. Uh-huh.

8 Q. So the -- please correct me if I characterize
9 this incorrectly.

10 So your distinction appears to be that blindly 14:27:15
11 transmitting is transmitting content -- actually, I don't
12 understand what that distinction is.

13 Do you mind maybe giving me an example of what
14 is a blind transmission versus what isn't a blind
15 transmission? 14:27:45

16 MR. GODO: Objection. Form.

17 THE WITNESS: Okay. This goes again a little
18 bit into a hypothetical part, what exactly is blind
19 interpretation. But okay.

20 What I meant here is that blind is you get 14:27:54
21 something, you send it to everyone. That's blind. You
22 don't check something. You don't -- you don't really
23 have an association to map this -- this particular
24 content has to be sent there.

25 In Shindo, this is the trigger. The trigger is 14:28:10

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1 something. So more or less the trigger triggers this --
2 the generation of the replay, let's say, and then checks
3 if anyone has requested it. So it would -- it would
4 generate it, and it would send it to those people.

5 But it's -- it's not that the -- the -- the 14:28:36
6 devices can request it, that particular replay. They
7 just requested a mode. They just requested a replay.

8 So "blindly" is not like aware of what is being
9 sent where. "Blindly" is just a term which I use here,
10 is to get something and send it to everyone who just put 14:28:57
11 a flag that "I want a replay" in general.

12 Q. BY MR. WOLFE: So is it more like a broadcast?

13 A. It's more like that, yes. Broadcast will
14 certain limited number of devices which selected this
15 mode. 14:29:13

16 Q. Got it.

17 Can we turn to paragraph 49 of Shindo.

18 A. Okay.

19 Q. This is page 15 of Exhibit 1004.

20 A. Yes. Let me just read it. Or maybe ask the 14:29:32
21 question and I can read it.

22 Q. Feel free to read it first, and let me know when
23 you're done.

24 A. I'm done.

25 Q. What does that paragraph describe? 14:30:42

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1 A. The specific situation and -- and the specific
2 description of Shindo, like an example of how things
3 could have -- could be done.

4 Q. So is it accurate to state that this paragraph
5 says that before transmitting the rearranged program 14:31:01
6 content -- contents, quote, "The accumulation video
7 processing unit inquires of the mobile information
8 terminal management unit 106 about the information of the
9 mobile information terminal A and processes the stream
10 according to the mobile information terminal"? 14:31:30

11 MR. GODO: Objection. Form.

12 THE WITNESS: I kind of want to go back to the
13 declaration. Because this specific thing --

14 Q. BY MR. WOLFE: I understand, but we're focusing
15 on this for right now. 14:31:44

16 Is that what it says here?

17 A. So one thing that I -- I -- I don't really like
18 is that like you're paraphrasing what is -- what is said
19 there. We can read it and it can be on the record.

20 So it sounds like it. I just want to make sure 14:32:00
21 that we're saying it correct and I'm not -- I'm not
22 missing something.

23 So should I read it and -- I can read it, and
24 then when I read it, obviously it's stated here, and it
25 is like that. 14:32:10

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1 Q. Let me just rephrase it, and if you disagree
2 with my description, please let me know and specifically
3 what you disagree on.

4 This paragraph says that before sending the
5 requested content, whether it's replays or highlights, 14:32:26
6 the system determines information associated with the
7 requesting unit such as its display size, resolution, and
8 encoding scheme. It processes the program contents in
9 accordance with that information and then sends it to
10 that device. 14:32:55

11 A. So this --

12 MR. GODO: Objection. Form.

13 THE WITNESS: This more or less says -- and I --
14 I can confirm that it says the accumulation video
15 processing unit 104 receives -- 14:33:14

16 (Reporter clarification.)

17 THE WITNESS: "The accumulation video processing
18 input 104 receives input from the metadata interpretation
19 unit 103 and first rearranges the program contents." So
20 that's correct. 14:33:24

21 Then: "The accumulation video processing unit
22 inquires of the mobile information terminal management
23 unit 106 about the information of the mobile information
24 terminal A." That's what you said.

25 "And processes the stream according to the 14:33:41

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1 mobile information terminal."

2 So that's -- that's what it says.

3 And, yes, the rest is like the terminal -- a
4 specific display or stopping this could -- this could be
5 implemented so that replays are sent in a specific 14:33:58
6 format.

7 Q. BY MR. WOLFE: What does "process the stream
8 according to the mobile information terminal" mean?

9 MR. GODO: Objection. Form.

10 THE WITNESS: That's something which -- which 14:34:12
11 here is explained to be that takes information -- okay.
12 Wait a second. I'm still formulating my -- my response.

13 So it could mean, for example, that this
14 management unit 106 has information about the mobile
15 terminals, what -- what exactly -- what they are. That's 14:34:47
16 what it says. And this information could be there, and
17 based on that, these -- these contents prepare to -- to
18 match whatever the device -- device can support.

19 Q. BY MR. WOLFE: Got it.

20 So if terminal B has a different display size, 14:35:09
21 it processes the information differently.

22 MR. GODO: Objection. Form.

23 THE WITNESS: It depends what you mean by
24 processing the information differently. Which
25 information? Like the one which is being sent to -- to 14:35:30

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1 the device?

2 Q. BY MR. WOLFE: Yeah, that's fair. Let me back
3 up.

4 So if terminal A and terminal B both requested
5 the playback mode of highlights, and terminal A has a 14:35:41
6 display size of 2.5, and terminal B has a display size of
7 5, doesn't that mean that Shindo's system processes the
8 highlight data differently depending on the display size
9 of each requesting device?

10 MR. GODO: Objection. Form. 14:36:18

11 THE WITNESS: In my -- so this is my
12 interpretation. It is something that I just understand
13 right now, but -- but what I understand is that it
14 doesn't process the highlight in a specific way. The
15 highlight is what the highlight is. This -- this is 14:36:36
16 actually processed in a way that you receive the trigger
17 information, and you have all the information there about
18 the index information, everything. This is processing of
19 the highlight.

20 Then what this thing here says is that the 14:36:49
21 accumulation data processing unit inquires information
22 about the terminal and from the -- sorry. So the
23 information data processing unit inquires of the mobile
24 information terminal management unit information of the
25 mobile information terminal A -- sorry, too many words. 14:37:09

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1 So it inquires this and prepares changes again
2 in some way. The -- the piece of -- piece of regenerated
3 content to send it to -- to the device.

4 (Reporter clarification.)

5 THE WITNESS: Piece of regenerated content. 14:37:36
6 Actually, generated content, not regenerated content, and
7 send it to the device.

8 Q. BY MR. WOLFE: Okay. So if terminal A and
9 terminal B request the same type of content and they have
10 different display sizes and resolutions, they are sent a 14:37:57
11 different stream?

12 MR. GODO: Objection. Form. It's a
13 hypothetical.

14 THE WITNESS: I wouldn't -- first of all, I
15 wouldn't say different stream just because like this is 14:38:16
16 again like a specific thing that's not related to the
17 discussion. But if -- if this is -- this is in reference
18 to when I said "blindly" in my declaration, or are you
19 just asking me a hypothetical how this could be done.

20 Q. BY MR. WOLFE: No. I'm focusing on what the 14:38:39
21 plain text of paragraph 49 says.

22 What paragraph 49 says is that the mobile
23 information -- or sorry -- the accumulation video
24 processing unit 104 inquires of mobile information
25 terminal management unit 106 about the information of the 14:38:57

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1 mobile information terminal A and processes the stream
2 according to the mobile information terminal.

3 And the example that it provides is the stream
4 is processed according to display size equals 2.5,
5 resolution equals 345 by 456, and encode equals MPEG4. 14:39:19

6 So what does that mean?

7 MR. GODO: Objection. Form.

8 THE WITNESS: And this is not something that I
9 have analyzed in my -- and presented in my declaration;
10 is that correct? 14:39:40

11 Q. BY MR. WOLFE: Well, you say that Shindo blindly
12 sends the content to the devices, and earlier you said
13 that that is similar to a broadcast. And what we have
14 here is a customization of the content in accordance with
15 the mobile terminal management information. 14:40:07

16 MR. GODO: Objection. Form.

17 Q. BY MR. WOLFE: Correct?

18 A. So I can go back to the declaration? And I can
19 explain "blindly," but --

20 Q. I'm asking first what this says. Let's focus 14:40:19
21 first on what Shindo says.

22 Does Shindo not say what I just said it does?

23 A. I cannot say that it doesn't say what you said
24 because that's what it says. The question here is how
25 this relates to my use of the word "blindly." And 's 14:40:38

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1 what I want to discuss.

2 Q. I understand, but I'm asking the question.

3 A. Okay. Understood.

4 Okay. So you're reading it, and you're reading
5 it correct. I agree that what you read is written here. 14:40:46
6 This, in my opinion, is not relevant to my use of the
7 word "blindly" just because sending something and
8 modifying it for some reason at some point is not
9 relevant.

10 I was talking about blindly about the fact how 14:41:03
11 this content is now extracted and then forwarded. The
12 fact that like some device in the end does something with
13 it or -- this is irrelevant, in my opinion.

14 So that's why I want to clarify this.
15 Otherwise, yes, you read it correctly, and that's what 14:41:20
16 Shindo says.

17 Q. Got it.

18 So does this paragraph say that if mobile
19 information terminal B has a different display size, a
20 different resolution, or a different encode, that it 14:41:32
21 receives the same stream that was processed in accordance
22 with the display size, resolution, and code of mobile
23 information terminal A?

24 MR. GODO: Objection. Form.

25 THE WITNESS: That paragraph says that you -- 14:41:46

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1 you get the stream, process it, process the stream
2 according to the mobile information, and then you send
3 it.

4 Q. BY MR. WOLFE: Okay.

5 A. But that's the stream. We're talking here about 14:42:00
6 the stream, which is actually after the -- everything has
7 happened. Like this is the final step of something which
8 is irrelevant to the disclosure of Claim 1 or Claim 4.

9 And that's why I used "blindly" -- the word
10 "blindly" there. So that this stream, the original 14:42:18
11 stream is not something that was requested or something
12 like that. Anyway.

13 Q. I am not focused on the actual content. I am
14 focused on what you refer to as a blind transmission.

15 A. Right. And let me go back and explain what I 14:42:32
16 mean by blind transmission.

17 Q. We will go there. Please bear with me, okay?

18 A. Okay, okay.

19 Q. So if we go to paragraph 89 of your declaration.

20 A. Okay. 14:43:16

21 Q. You state that Shindo's system is, quote,
22 "Centered around a trigger information-to-mode for
23 blindly transmitting" -- "transmitting portion content to
24 multiple mobile terminals which requested a certain
25 mode." 14:43:31

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1 MR. GODO: Objection. Form.

2 THE WITNESS: Are you asking for 89 or 88?

3 Q. BY MR. WOLFE: I'm sorry, 88. It is the second
4 sentence.

5 A. Right. And yes. 14:44:03

6 So what I meant by saying "blindly" here is
7 exactly what I tried to explain before, and I will try to
8 repeat it now.

9 So you don't have in Shindo -- and the reason I
10 think this Shindo does not disclose the limitations of 14:44:19
11 Claim 1 or 4, is that in Shindo, there is nothing that
12 associates specific content with specific device.
13 Nothing does it. Shindo is centered around the trigger
14 information-to-mode.

15 So different devices can request a different 14:44:41
16 mode. So two devices request it using seeing highlights.
17 Other devices request it seeing something completely
18 different, replays.

19 So what happens is that the broadcast -- the
20 broadcaster decides that it's time for broadcasting. 14:44:59
21 Just -- not broadcasting, but just it's time for replay.
22 There is a pause or something in the game so people can
23 watch replay.

24 It sends this trigger information. That trigger
25 information is taken from -- received at the device, main 14:45:14

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1 device in Shindo. The main device in Shindo analyzes,
2 okay, has anyone requested replay? Yes, okay. Let me
3 generate the replay. That's all the content. That's all
4 the content that -- that is being received and displayed.
5 It's a replay. 14:45:34

6 And then, okay, these terminals can request a
7 replay. So I'm sending all -- all the same replay to all
8 these terminals that requested it.

9 Then the paragraph that you read is the next
10 step. That's what I meant by "blindly." It just gets 14:45:51
11 the content, regenerates -- generates the content based
12 on the content which is received, generates a new piece
13 of content which hasn't been present up until now, but is
14 generated based on the information that is in the trigger
15 information. 14:46:07

16 And having this replay stream says, okay, these
17 25 devices have to receive it. And then the next step is
18 what -- what -- what you said. Okay. Then the system
19 further are changes the parameters of -- of the stream
20 which is generated to match the stream. Okay. 14:46:25

21 But what I meant here by "blindly" is that it's
22 not -- it's not that the content is meant for this
23 particular device. There is no relation between these
24 two. It's the trigger that just triggers the generation
25 of content, and then that content is blindly sent to 14:46:46

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1 everyone who said I want it. Then the next modifications
2 are something which -- which I didn't cover with this.

3 Q. That's where you lose me is you keep saying "is
4 then blindly transmitted." Because "blindly" is
5 modifying "transmitted" here, and what you just said is 14:47:04
6 after that content is identified and selected, it gets
7 blindly transmitted to every device that requested it.

8 MR. GODO: Objection. Form.

9 Q. BY MR. WOLFE: Is that what you said?

10 A. I'll try to explain. Because this is another 14:47:25
11 example of how we are seeing the things at different
12 levels.

13 So to me, transmit -- for you, transmission is
14 the last step. This is more or less the transmission
15 which is from whatever transmits physically the things 14:47:38
16 from -- from the device, generating device, to main
17 device to -- to the mobile device.

18 What I meant here by "transmission" is because
19 transmission has multiple steps. One of the steps is
20 internal in -- in the system. And in the system, what 14:47:57
21 happens is that you have one module which does something,
22 then it takes what it's done and says this has to be sent
23 to all these devices. Has to be sent, okay. So its
24 intent for transmission.

25 It goes to a different module, and that module 14:48:14

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1 does the actual transmission and the modification that
2 you said so.

3 Again, going back from my perspective saying
4 "blindly" is that it doesn't take into account that
5 specific content is requested by a specific device. It 14:48:29
6 doesn't take into account this. That system doesn't do
7 it. Shindo doesn't do it. That's the "blindly" part.

8 What you are saying is that the system transmits
9 based on the -- on the -- on the device. Yes, Shindo
10 talks about this, but this is a different thing. 14:48:44

11 So for me, "blindly" is he doesn't take into
12 consideration what content was requested.

13 In your case -- not your case. What you are
14 stating, and at least what I understand you are pointing
15 out to, is that the system takes into consideration -- 14:48:58
16 when it finally transmits the final thing, it takes into
17 consideration the device's -- the device's specifics and
18 characteristics.

19 But the word "blindly," again what I mean here
20 is that the system does not take into consideration any 14:49:16
21 mapping between content and device. All these devices
22 requested, then I have to generate it. I'll send it.

23 Q. So to clarify, "blindly transmitting" does not
24 refer to the actual -- let's call it sub-step of sending
25 the finished data package from the main terminal to the 14:49:56

1 subsidiary terminal?

2 MR. GODO: Objection. Form.

3 THE WITNESS: So if we go back to -- to the
4 figure in Shindo -- what is the figure in Shindo that
5 describes this?

14:50:17

6 Not going to specifics, but like in Shindo,
7 which is Exhibit 1004 -- let me just look at the figure.

8 So, for example, you have Figure 10, for
9 example. I'm not sure if this is the same embodiment or
10 anything like that.

14:50:46

11 You do see that here you have multiple elements
12 of the main device. So what happens is that what you are
13 focused on is -- in my understanding, is 1011 on this
14 figure. What I'm focused on is something which happens
15 before 1011, which is inside, which is something that
16 gets generated, goes to -- to -- let's say 1006 and --
17 and that's the blind transmission. That's the one that
18 I'm just saying -- maybe the word "transmission" that
19 they used there is not entirely -- it is accurate, in my
20 opinion, but -- it is accurate. It's my opinion that
21 maybe you -- you do not understand the way I understand
22 it.

14:51:11

14:51:33

23 But in my understanding, again, is that you have
24 this content, then you decide that this -- this
25 particular excerpt from the content needs to be sent to

14:51:46

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1 all these devices.

2 So that's the blind part. You don't think of
3 which device needs to receive it. Then the -- the actual
4 transmission that you were discussing and focused on is
5 later on. 14:52:05

6 So that's what I meant. But I hope this answers
7 your question. If it doesn't, like you just said, why I
8 don't understand the steps and things like that, that's
9 what I mean. Transmission could be logical transmission.
10 In this particular case, that's what I meant. 14:52:20

11 Q. BY MR. WOLFE: Just one clarification. What did
12 you mean by I am focusing on 1011 in Figure 10?

13 A. I was pointing to 1011.

14 Q. Yes. But what does that mean? What did -- why
15 do you think I'm focusing on 1011? 14:52:37

16 A. Well, that's my understanding of what you were
17 asking for in terms of the final step of the
18 transmission. So this was 10 -- 1011. This is the
19 connection, in other words.

20 Q. Correct. 14:52:50

21 A. So it's wrong. Maybe that's one of the reasons
22 I was saying that the analysis on the spot is not a great
23 thing because I may be wrong about this. Let me look.

24 Okay. So, yeah, this is -- this is wrong, yes.

25 This is wrong in this particular case just because this 14:53:03

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1 is more as the initial request that is sent. So it's not
2 1011. So forget about this.

3 I was just talking about the final step which is
4 really literally transmitting something from -- from
5 the -- from the device as a general to the terminal. 14:53:16

6 (Reporter clarification.)

7 THE WITNESS: To the terminal.

8 Q. BY MR. WOLFE: Got it.

9 And if we focus on figure -- I'm trying to do
10 this -- Figure 10 and paragraph 49 at the same time, it 14:53:28
11 says, "The accumulation video processing unit 104" --
12 that's actually not a good example. We should go to
13 Figure 1.

14 Figure 1. Are you there?

15 A. I'm sorry? 14:54:15

16 Q. Are you at Figure 1?

17 A. I'm at figure -- sorry. I was at Figure 10.

18 Let me just go to Figure 1. Yes, let me just turn it.

19 Yes, I'm at Figure 1. Yes.

20 Q. Okay. So looking at 49, the accumulation video 14:54:39
21 processing unit 104 inquires of the mobile information
22 terminal management unit 106.

23 If we look at Figure 1 --

24 A. Uh-huh.

25 Q. -- 104 is in standalone display device 1; 14:54:58

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1 correct?

2 MR. GODO: Objection. Form.

3 THE WITNESS: Well, I guess it is just because
4 like this is -- 104 is the whole device. I'm looking at

5 the figure. Sorry, 104 is an accumulation video 14:55:18
6 processing unit, according to the figure; is it not?

7 Q. BY MR. WOLFE: Yep.

8 A. Okay.

9 Q. Uh-huh.

10 A. Okay. So what was the question? 14:55:31

11 Q. And that is a component of standalone display
12 device 1?

13 A. Let me just see if this whole thing is
14 standalone device 1. And if it is, okay. Obviously,
15 this is -- in Shindo, this is like a component of the 14:55:50
16 whole device, yes.

17 Q. Backing up, Figure 1 shows what? What are the
18 two devices shown communicating in Figure 1?

19 A. So going back to -- to my declaration, I
20 didn't -- 14:56:16

21 Q. I don't mean to interrupt you. I'm just asking
22 you this question: What two devices are shown
23 communicating in Figure 1?

24 A. What two devices? Let's go in Shindo's -- let
25 me go in Shindo. 14:56:29

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1 So in the figure, obviously you have one big
2 device which is -- which has multiple sub-devices there.
3 And there is another one which clearly stated. So
4 standalone display device 1 is presumably the large one,
5 and then there is a second one, which is mobile 14:56:45
6 information terminal A. These are -- these are the two
7 devices presented on Figure 1.

8 Q. And accumulation video processing unit 104 is
9 part of which device?

10 A. Clearly, it is presented as part of the larger 14:57:09
11 device there then the one which has multiple elements.
12 So Figure 1 presents standalone display device 1, which
13 has multiple elements, such as broadcast reception unit,
14 metadata interpretation unit, video processing unit,
15 mobile information management terminal unit, display 14:57:37
16 unit, and the one you asked for, accumulation video
17 processing unit. Hopefully, this -- this covers all the
18 units within the standalone display device on Figure 1.

19 Q. So those components that are in Figure 1 are
20 described in paragraph 49 as doing the inquiring about 14:58:06
21 the information of mobile information terminal A;
22 correct?

23 MR. GODO: Objection. Form.

24 THE WITNESS: Let me look again at 49.

25 Assuming that 49 talks about processing unit 104 14:58:31

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1 which are depicted in the same way on Figure 1, I would
2 assume that, yes, those are -- paragraph 49 discusses
3 specific implementation which is presented on Figure 1 of
4 Shindo.

5 Q. BY MR. WOLFE: Okay. And the distinction you 14:58:54
6 make about the blind transmission appears to be about the
7 selection of content for transmission.

8 A. The distinction I made is written clearly in my
9 declaration. And let's go a little bit further because
10 you are -- you are -- focused on the use of the word 14:59:23
11 "blindly" in paragraph 88, which is more or less the
12 beginning of the -- the analysis.

13 And then I'm -- I'm saying -- and I explain what
14 I mean by "blindly" -- that, "For example, Shindo
15 discloses a main display device that displays a live 14:59:44
16 broadcast program content and one or more one mobile
17 information terminals for playing replays or highlights.
18 The main display device receives a broadcasted program
19 content and 'trigger' information that relates to a
20 specific (sic) playback of the program content on the 15:00:03
21 mobile information terminals. The program content
22 includes index information regarding the broadcasted
23 program being played, and the trigger information
24 includes mode information for the special playback
25 (highlights or replays) of the program content. Using 15:00:16

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1 the combination of index information and trigger
2 information, the main display device distributes in a
3 wholesale fashion a specific highlight (reconstructed
4 extracted partial program content) of the content to all
5 mobile information terminals." 15:00:37

6 So that's what I mean by this. It's -- it's a
7 wholesale fashion. That's what I meant by "blindly."

8 Q. Got it.

9 So what is a "wholesale fashion for replays" in
10 Shindo? 15:00:55

11 MR. GODO: Objection. Form.

12 THE WITNESS: This is hypothetical what exactly
13 it is, but what I understand with it is that you get the
14 replay. So this is the replay. This is -- this is
15 something which -- which is generated based on the 15:01:13
16 content which is received.

17 So "wholesale fashion" means that that replay is
18 what was requested. Not requested. That's what I need
19 to extract and create out because I have to send it
20 further. That's the wholesale fashion. It just -- it's 15:01:33
21 not this content has to be sent to that -- that
22 particular device.

23 Q. BY MR. WOLFE: Doesn't paragraph 49 say
24 something different?

25 MR. GODO: Objection. Form. 15:01:50

1 THE WITNESS: Paragraph 49, going back -- back
2 to this and like focusing on that particular disclosure
3 there, in fact focuses on the actual transmission in the
4 end, which happens in the end. The adaptation of the
5 content which -- which is already generated for some 15:02:10
6 reason. But -- but this is not -- this is not what I'm
7 discussing here in paragraph 88.

8 MR. GODO: Counsel, can we -- can we take a
9 break? It's been more than an hour.

10 MR. WOLFE: Sure. One more question. 15:02:26

11 Q. But if I have two devices in Shindo that have
12 different display resolution and sizes, the ultimate
13 content that is provided to both of them is different;
14 correct?

15 MR. GODO: Objection. Form. 15:02:47

16 THE WITNESS: The ultimate content that is
17 provided to both of them is, in general, a different
18 content from the one which is transmitted, received by
19 the main device --

20 Q. BY MR. WOLFE: That was not my -- 15:03:05

21 A. And so the content itself -- this goes back to
22 the discussions about content and what -- what exactly is
23 content.

24 So one of the -- one of the -- they have
25 different displays. So the -- the -- the data which is 15:03:21

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1 transmitted to them, to the two devices, and they have
2 different requirements, is the same -- it's -- it's a
3 modified -- modified way -- modified content just because
4 it has to be compressed or something like that.

5 Q. That's different. 15:03:49

6 MR. GODO: Objection. Form.

7 THE WITNESS: I cannot say it's different. What
8 is the content in this case? Do they see -- do they see
9 the same replay?

10 Q. BY MR. WOLFE: I'm not sitting for a deposition. 15:04:03

11 A. I'm responding to your question.

12 So are they going to see the same replay? I'm
13 not asking you a question. I'm just saying both devices
14 are going to see the same replay. So from that
15 perspective, it is the same content that they receive. 15:04:19

16 Q. And because they receive the same content, it is
17 not a blind transmission?

18 MR. GODO: Objection. Form.

19 THE WITNESS: I haven't said that.

20 Q. BY MR. WOLFE: What is a "blind transmission"? 15:04:37

21 A. A blind transition is that the device, the main
22 device in Shindo does not really -- is not really
23 interested which -- which devices want to receive certain
24 content. That's -- that's the blind transition. The --
25 the -- the device in Shindo, the system in Shindo 15:04:57

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1 identifies that there is a specific trigger, specific
2 mode pointed out in the trigger, and that's what it does.

3 Like that's how the -- that's how replay is
4 sent. It doesn't care that specific device has requested
5 this. It cares that that specific mode is being 15:05:13
6 requested.

7 So it's not -- it's not the content. It doesn't
8 ask -- it doesn't map the content which is being received
9 and displayed on the main display to -- to something
10 which is requested by -- by the mobile terminals. 15:05:30
11 Instead, it just blindly sees that there is a trigger
12 event, generates the replay, and sends the replay there.

13 MR. WOLFE: We can take a break.

14 MR. GODO: Thank you.

15 THE VIDEOGRAPHER: Going off the record. The 15:05:51
16 time is 3:05 p.m.

17 (Recess.)

18 THE VIDEOGRAPHER: Back on the record the time
19 is 3:16 p.m.

20 Q. BY MR. WOLFE: Dr. Pachamanov, can you please go 15:16:43
21 to the claims of the '650 patent.

22 Limitation 4k. That is column 16 -- sorry, line
23 24, 25. It starts, "Wherein the first subsidiary
24 terminal comprises: A second display displaying the
25 content"? 15:17:49

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1 A. Yes, I see it.

2 Q. And limitation 4m as in Mary, that is column 16,
3 lines around 32 to 33, that states: "Wherein the second
4 subsidiary terminal comprises: A third display playing
5 the content." 15:18:27

6 A. I see it, yes.

7 Q. So the contents that is displayed on the third
8 display in 4m is the same as the content displayed on the
9 second display in 4k?

10 A. Not necessarily. And we are reading the claims 15:18:52
11 in isolation. So we -- that's why we have other things
12 which are part of the same claim which talk about
13 associating one of the contents to the second device,
14 another content to the third device, and then displaying
15 this. 15:19:13

16 So the first "the content," which is referenced
17 in there, in the claim.

18 Q. Are you familiar with what "antecedent basis"
19 is?

20 A. I've used it, so yes. 15:19:30

21 Q. And you've referred to it a couple times in your
22 expert declaration; correct?

23 A. That's correct, yes.

24 Q. What does Claim 4 describe as the content that
25 is to be transmitted to the first subsidiary terminal? 15:20:01

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1 A. That can easily be answered by referring to the
2 claim language.

3 So Claim 4 requires a contents reproducing
4 system that comprises: Main terminal, first subsidiary
5 terminal, and second subsidiary terminal, wherein the 15:20:21
6 main terminal comprises a storage storing the contents.
7 First display displaying the contents.

8 Then I'm just trying to go directly to the
9 content so we can save time.

10 So wherein the first controller is configured to 15:20:42
11 store first device-specific identification information of
12 the first subsidiary terminal and second device-specific
13 ID information of the second subsidiary terminal. Store
14 first content information for identifying first
15 content -- first content -- among the contents, and 15:21:02
16 second content information for identifying second content
17 among the contents. And store association information
18 for translating one of the first content or the second
19 content.

20 So this is what it points out to, one for the 15:21:17
21 second -- one or the other, to one of the first
22 subsidiary terminal or the second subsidiary terminal.

23 And then going to the question that you asked me
24 about the content, it refers to these -- these contents,
25 in my understanding, now the first or the second. 15:21:41

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1 Q. Does Claim 4 ever state that the second display
2 displays, quote, the first content?

3 A. It says later on, like further in the claim, it
4 explains how the content is routed.

5 Q. Uh-huh. 15:22:08

6 A. And in my opinion, that would explain what
7 exactly is displayed. If you route something, you need
8 to display it, in general.

9 So, again, I'm not reading the claims in
10 isolation. So, yes, they refer to "the content," but the 15:22:22
11 claim as a whole explains that there is a first content
12 and a second content, and those can be sent to the first
13 or the second device.

14 And then the claim is very specific about the
15 fact that if the first content is meant to be sent to the 15:22:36
16 first device, that's what you do. And therefore, the
17 display will be on that particular content. You cannot
18 display something that is not sent to it.

19 Q. I'm going to ask the question again.

20 A. Sure. 15:22:50

21 Q. Does Claim 4 recite that the second display
22 displaying, quote, the first contents?

23 MR. GODO: Objection. Form. Asked and
24 answered.

25 MR. WOLFE: He did not answer the question. 15:23:06

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1 THE WITNESS: I think I did answer the question,
2 but let me try to -- to change my answer so you
3 understand what I meant.

4 Q. BY MR. WOLFE: Let me -- let me refine the
5 question, then. 15:23:18

6 I'm looking for the exact language of whether
7 the first content -- quote: "The first content is
8 displayed on the second display."

9 MR. GODO: Objection. Form. Asked and
10 answered. 15:23:40

11 THE WITNESS: My answer to this -- no, I'm going
12 to answer. The answer to this is that you are asking me
13 if something is clearly said, a very vague term, in the
14 claim. You can see it by yourself. I don't need to --
15 to tell you "yes" or "no." You can read the claim. 15:23:55

16 You're asking me about -- about my
17 understanding, and I explained it to you. So that's my
18 answer.

19 If you asked me is that word over there, and I
20 don't need to answer to this from the perspective that 15:24:05
21 this is something that is clear. The claim is in front
22 of us. I can read it, and if you don't hear from me that
23 I say this, this means that it's not said there. Or if
24 you hear it, it's there.

25 But, again, to me this sounds like something 15:24:20

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1 which you are -- you are asking me a question which
2 obviously the answer is in the claim language itself.

3 Q. BY MR. WOLFE: I didn't ask for your opinion of
4 the claim. I didn't ask for your interpretation of the
5 claim. I will ask one more time. 15:24:36

6 A. Okay.

7 Q. Does Claim 4 recite a second display displaying,
8 quote, the first content?

9 MR. GODO: Objection. Form. Asked and
10 answered. 15:24:59

11 THE WITNESS: The claim explicitly requires that
12 the second display display the content, where the content
13 could be the first content or the second content, based
14 on the -- on the -- on the different limitations
15 disclosed in Claim 4, listed in Claim 4. 15:25:18

16 Q. BY MR. WOLFE: Does Claim 4 recite the word
17 "purple"?

18 MR. GODO: Objection. Form.

19 THE WITNESS: We can read it, and we can see if
20 it does. 15:25:32

21 Q. BY MR. WOLFE: Go for it. Tell me "yes" or
22 "no."

23 A. You mean the word "purple" as the color?

24 Q. Yep.

25 A. Well, I can easily answer this. Oh, it does. 15:25:44

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1 Because now none of the claims talks at all about colors
2 or anything which would suggest that purple could be one
3 of the colors that could be displayed in general.

4 So, no. The answer to your question is purple
5 is not explicitly mentioned in the claim. 15:26:04

6 Q. Is it explicitly mentioned in the claim that the
7 second display displays the first content?

8 MR. GODO: Objection. Form.

9 THE WITNESS: It is implicitly claimed.

10 Q. BY MR. WOLFE: That wasn't my question. 15:26:20

11 Is it explicitly explained that the second
12 display displays, quote, the first content?

13 MR. GODO: Objection. Form. Asked and
14 answered.

15 MR. WOLFE: He hasn't -- I understand. He 15:26:33
16 hasn't answered the question. His last response to the
17 question was, quote: "It is implicitly." My question
18 was if it is explicitly recited.

19 Q. So I will ask again: Does Claim 4 explicitly
20 recite a second display displaying, quote, the first 15:26:54
21 content?

22 A. Based on my understanding and the thing that we
23 were discussing about the antecedent basis and
24 everything, it is there. Just because it talks about the
25 content, and this "the content" refers to first content 15:27:10

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1 or second content.

2 Verbatim the word -- the word -- the word that
3 you're looking for is not in this -- in this particular
4 claim limitation that you pointed out to. But the fact
5 that he talks about the content, secondary display 15:27:31
6 displaying the content, means that "the content" refers
7 to the first content or the second content.

8 Q. BY MR. WOLFE: I was not asking about your
9 interpretation of the claim.

10 A. Okay. So the answer to your -- okay. I don't 15:27:47
11 want to be arguing about this. I'm explaining what I
12 mean by this, and your direct answer to your question is:
13 Claim limitation talks about "the content." It doesn't
14 talk about "the first content" or "the second content."

15 Q. Similarly, for a third display, does Claim 4 15:28:08
16 recite a third display displaying, quote, the first
17 content?

18 MR. GODO: Objection. Form.

19 THE WITNESS: Similarly to what we just
20 discussed, it requires that the content is displayed, and 15:28:27
21 based on the other limitations, the first -- the content
22 could be the first content or the second content.

23 So it's not my interpretation of the claim, but
24 it says a third content displaying -- a third display --
25 sorry -- displaying the content. So that could be the 15:28:44

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1 first or the second content.

2 Literally, the word "first" or "second" is not
3 in this particular claim limitation that you are asking
4 about.

5 MR. WOLFE: I have no further questions. Pass 15:29:07
6 the witness.

7 MR. GODD: Okay. Do you want to take a break,
8 Rado, or do you or do you want to continue?

9 THE WITNESS: I'm fine. We can continue.
10 15:29:24

11 EXAMINATION

12 BY MR. GODD:

13 Q. Okay. So Dr. Pachamanov, do you recall counsel
14 asking you questions about paragraph 49 in Shindo?

15 A. I do. 15:29:34

16 Q. Okay. Isn't it true that Shindo's replays are
17 not the claimed "the content." Correct?

18 A. That's correct, and that's what I explain in my
19 declaration.

20 Q. And similarly, Shindo's highlights are not the 15:29:48
21 claimed "the content." Correct?

22 MR. WOLFE: Objection. Form.

23 THE WITNESS: That's correct. As I discussed
24 with counsel, that's my understanding, and it is true
25 that this is not "the content." The replays and the rest 15:30:09

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1 is not "the content" as required by the '650 patent.

2 Q. BY MR. GODO: And further to counsel's questions

3 regarding screen resolution in paragraph 49 of Shindo,

4 the fact that the main terminal -- actually, sorry, let

5 me -- the fact that standalone display device 1 in Shindo 15:30:39

6 has a different resolution than the mobile information

7 terminal A, that fact does not change the fact that the

8 content -- the content shown on the standalone display

9 device 1 is the same one of the content displayed on

10 mobile information terminal A; correct? 15:31:06

11 A. That's -- that's exactly what we were

12 discussing, mainly, the content which is displayed on the

13 mobile terminals is not the content which is on the main

14 display.

15 So the whole discussion about the resolution and 15:31:23

16 everything, in my opinion, was irrelevant to -- to the --

17 to the -- because of the fact that we are talking about

18 completely different content that is being sent on the

19 mobile terminals.

20 Q. And Dr. Pachamanov, you do stand by every -- the 15:31:37

21 entirety of your declaration as you stand today; correct?

22 A. Yeah, that's correct. I stand by the entirety

23 of my declaration and all the -- everything I said there

24 is what my opinion and opinions are about this, this

25 dispute and this -- this prior art. 15:31:59

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1 Q. And your opinion has not changed from your
2 declaration; correct?

3 A. No. My opinion --

4 MR. WOLFE: Objection.

5 THE WITNESS: -- remains the same as I state 15:32:10
6 anything in the declaration.

7 Q. BY MR. GODD: And going back to do you recall
8 counsel asking you questions about Claim 4?

9 A. Yes.

10 Q. And do you recall them focusing on -- focusing 15:32:30
11 in on claim element 4k, which is --

12 A. Yes.

13 Q. -- that wherein the first subsidiary terminal
14 comprises a second display displaying the content.

15 Do you recall that? 15:32:54

16 A. I recall that, yes.

17 Q. So in your opinion, what is "the content" for
18 that claim element? What is it referring to?

19 A. The content refers to any of the first or the
20 second content which are discussed in previous claim 15:33:12
21 limitations, namely for 4h, 4i and 4g. So "the content"
22 refers to either first or second content.

23 Q. And going to claim element 4m, which states:
24 "Wherein the second subsidiary terminal comprises a third
25 display displaying the content," similarly for that claim 15:33:43

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1 element, "the content," what is that "the content"
2 referring to?

3 MR. WOLFE: Objection.

4 THE WITNESS: Similar to what we just discussed
5 about claim limitation 4k and the second display, the 15:33:59
6 third display displays "the content," and "the content"
7 is either the first or the second content which are
8 previously discussed in -- in the -- in the claim -- in
9 the same claim, Claim 4.

10 Q. BY MR. GODO: And do you recall counsel asking 15:34:17
11 you questions on Section 6 of your declaration?

12 A. Hold on. Yes. Let me just --

13 Q. Which is on page 28 of your declaration.

14 A. Sorry. Page 6?

15 Q. 28. 15:34:41

16 A. 28. Sorry.

17 Yes. Can you repeat the question? Sorry. I
18 feel like I found it.

19 Q. Sure. No problem.

20 So you confirmed that you provided your 15:34:55
21 interpretation of the term "a second/third display
22 displaying the content" from Claims 1 and 4 in your
23 report at paragraphs 69 through 72; correct?

24 A. That's correct. I provide my interpretation of
25 this particular term within paragraph 69 and 70, yes. 15:35:15

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1 Q. And according to paragraph 67, you've applied
2 plain and ordinary meaning to the remaining terms in
3 Claims 1, 2, 3, and 4; correct?

4 A. That's correct. I applied plain and ordinary
5 meaning for any other terms which are not discussed here 15:35:38
6 in this section of my declaration.

7 MR. GODO: Okay. That's it. I'm done.

8 Counsel, do you want to do a redirect or?

9 MR. WOLFE: I'm just looking.

10 EXAMINATION 15:35:57

11 BY MR. WOLFE:

12 Q. Dr. Pachamanov, do you recall an earlier
13 question by Mr. Godo relating to screen resolution in
14 paragraph 49 of Shindo and the fact that the main
15 terminal or the standalone display device in Shindo has a 15:37:03
16 different resolution than the mobile information terminal
17 A does not change your opinion that the content shown on
18 the standalone device is the same one of the content
19 displayed on the mobile information terminal A?

20 A. I recall asking -- I recall him asking this 15:37:26
21 question. I'm not sure if this is exactly the same
22 question. You have it in front of you, but it's hard to
23 say if it was exactly the same.

24 So, yes, I recall that he asked this question, a
25 question. 15:37:42

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1 Q. And why, in your opinion, is the content
2 displayed on the mobile information terminal A in Shindo
3 not the same as the content that is shown on the
4 standalone display device?

5 A. Because it's something which is generated post 15:38:06
6 factum. Something which after the content -- post
7 factum. Something which happens after something else.
8 The content is the live stream; right? In Shindo. That
9 one or -- yeah, that's the game, football game, let's
10 say, which is being streamed. That's received. That's 15:38:31
11 stored.

12 At some point, the broadcaster sends a trigger
13 event together with the stream. That trigger event is
14 interpreted, and then from there, an excerpt from the
15 content -- so it's not "the content" but something which 15:38:47
16 is generated at that particular time -- is generated by
17 the main device in Shindo, and that one is then sent
18 to -- to the devices which required replay.

19 So the replay is not the football game.
20 That's -- that's why I'm saying this is a different 15:39:07
21 content. This is not "the content."

22 Q. So is it because what is displayed on the mobile
23 information terminal A is a derivative of what is
24 displayed on the standalone display device?

25 A. It is because it is not "the content." 15:39:27

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1 (Reporter clarification.)

2 THE WITNESS: Because it is not "the content."

3 "The content" is the thing, not -- not the same thing
4 which is displayed. The thing which is the main content.

5 That's the -- that's "the content." 15:39:43

6 Then you have derivative of it. Okay? You said
7 derivative of it. Is this "the content"? It is a
8 derivative of something. So it is -- it's not only the
9 fact that it's not the same thing which is displayed, but
10 also it's not the same content. It's not "the content." 15:40:00

11 MR. WOLFE: All right. I don't have any further
12 questions.

13 MR. GODO: No further questions.

14 THE REPORTER: Before we go off the record,
15 counsel, Mr. Godo, do you need a rough transcript? 15:40:19

16 MR. GODO: Yes.

17 THE REPORTER: Thank you.

18 THE VIDEOGRAPHER: Counsel, would you like to go
19 off the record?

20 MR. GODO: Yes. 15:40:25

21 THE VIDEOGRAPHER: Okay. This completes today's
22 deposition. We are going off the record. The time is
23 3:40 p.m.

24 (Time noted: 3:40 p.m. Eastern Daylight Time.)

25 --oOo--

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1 STATE OF CALIFORNIA) ss:
2 COUNTY OF MARIN)
3

4 I, LESLIE ROCKWOOD ROSAS, RPR, CSR NO. 3452, do
5 hereby certify:

6 That the foregoing deposition testimony was
7 taken before me at the time and place therein set forth
8 and at which time the witness was administered the oath;

9 That testimony of the witness and all objections
10 made by counsel at the time of the examination were
11 recorded stenographically by me, and were thereafter
12 transcribed under my direction and supervision, and that
13 the foregoing pages contain a full, true and accurate
14 record of all proceedings and testimony to the best of my
15 skill and ability.

16 I further certify that I am neither counsel for
17 any party to said action, nor am I related to any party
18 to said action, nor am I in any way interested in the
19 outcome thereof.

20 IN WITNESS WHEREOF, I have subscribed my name
21 this 15th day of June, 2026.
22

23 

24 LESLIE ROCKWOOD ROSAS, RPR, CSR NO. 3462
25

1 Joseph Wolfe, Esq.

2 joseph.wolfe@dlapiper.com

3 June 15, 2026

4 RE: Samsung Electronics Co., LTD. v. Maxell, LTD.

5 6/11/2026, Radostin Pachamanov , Ph.D., (#8249960).

6 The above-referenced transcript has been

7 completed by Veritext Legal Solutions and

8 review of the transcript is being handled as follows:

9 ___ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
10 to schedule a time to review the original transcript at
11 a Veritext office.

12 ___ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
13 Transcript - The witness should review the transcript and
14 make any necessary corrections on the errata pages included
15 below, notating the page and line number of the corrections.
16 The witness should then sign and date the errata and penalty
17 of perjury pages and return the completed pages to all
18 appearing counsel within the period of time determined at
19 the deposition or provided by the Code of Civil Procedure.
20 Contact Veritext when the sealed original is required.

21 ___ Waiving the CA Code of Civil Procedure per Stipulation of
22 Counsel - Original transcript to be released for signature
23 as determined at the deposition.

24 ___ Signature Waived - Reading & Signature was waived at the
25 time of the deposition.

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1 ___ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF
2 Transcript - The witness should review the transcript and
3 make any necessary corrections on the errata pages included
4 below, notating the page and line number of the corrections.
5 The witness should then sign and date the errata and penalty
6 of perjury pages and return the completed pages to all
7 appearing counsel within the period of time determined at
8 the deposition or provided by the Federal Rules.
9 xx Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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