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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOUGHBUILT INDUSTRIES, INC.,

Petitioner

v.

MERIDIAN INTERNATIONAL CO., LTD.,

Patent Owner

Case IPR2025-01461

U.S. Patent No. 11,986,946

DEPOSITION OF GLENN E. VALLEE, PH.D.

THURSDAY, JULY 16, 2026

9:00 A.M.

Job No.: 641337

Pages 1 - 205

Reported by: Adrienne Mignano, RPR

1 Deposition of GLENN E. VALLEE, PH.D., held
2 via Zoom videoconferencing, pursuant to Notice, before
3 Adrienne M. Mignano, a Registered Professional
4 Stenographic Reporter and Notary Public in and for the
5 State of New York.

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A P P E A R A N C E S

ON BEHALF OF PETITIONER

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ALSO PRESENT:

Caroline Walls - Summer Associate

1	EXAMINATION OF GLENN E. VALLEE, PH.D.	PAGE
2	By Mr. Tang	5
3	By Ms. Halsey	193

5 E X H I B I T S

6 (Attached to the transcript)

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9	notations	

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1 Whereupon,

2 GLENN E. VALLEE, Ph.D.,
3 being first duly sworn or affirmed to testify to
4 the truth, the whole truth, and nothing but the
5 truth, was examined and testified as follows:

6 EXAMINATION BY COUNSEL FOR THE PETITIONER
7 BY MR. TANG:

8 Q Hello, Dr. Vallee. How are you?

9 A I'm fine. Good to meet you.

10 Q Nice to meet you.

11 Can you please start by stating your
12 full name for the record.

13 A My name is Glenn Vallee.

14 Q All right. And just so we're on the
15 same page before diving in here, I'm just going
16 to go over some, I guess, common guidelines that
17 I would like to follow, too, in this deposition.

18 First, when I ask a question, can you
19 make sure to answer verbally so that the court
20 reporter can record your answer?

21 A I will.

22 Q All right. And so that also means no

1 nodding or head shaking. Do you understand
2 that?

3 A Understood.

4 Q Okay. And counsel may object.
5 Unless they instruct you not to answer a
6 question, you understand that you must answer
7 the question; is that right?

8 A Understood.

9 Q All right. And typically I like to
10 take a break about every hour or so. Does that
11 sound reasonable to you?

12 A That's fine.

13 Q And if you need a break before that
14 point, you can let your attorneys know and we'll
15 do our best to find a convenient stopping point.
16 Is that fair?

17 A That's fair.

18 Q All right. And the only thing I ask
19 is that if there is a pending question, that you
20 provide an answer to that question before we go
21 on the break. Does that work?

22 A Understood.

1 Q Okay. Also, if you don't understand
2 a question, please let me know. If you answer a
3 question, I'll assume that you understood it.
4 Is that fair?

5 A Yes, it is.

6 Q Okay. You understand that there is a
7 transcript being made of this deposition; is
8 that right?

9 A I do, yes.

10 Q All right. Is there any reason you
11 cannot provide truthful testimony today?

12 A No reason.

13 Q Okay. Any other reason you feel that
14 we could not proceed today?

15 A No.

16 Q Okay. And so since this is a remote
17 deposition, can you please state where you're
18 located right now.

19 A I'm in Atlanta, Georgia.

20 Q Okay. And who are you with?

21 A I am with counsel from Eversheds
22 Sutherland.

1 Q Okay. Do you have any materials with
2 you?

3 A I do.

4 Q And what are those materials?

5 A My declaration with all of the
6 related exhibits, I have my CV and I have the
7 '946 patent.

8 Q Okay.

9 MS. HALSEY: Counsel, we also have
10 clean, unmarked copies of all of the exhibits to
11 the petition and the petition, et cetera, as
12 well. Everything is clean and unmarked.

13 MR. TANG: Okay, great. Thank you.

14 BY MR. TANG:

15 Q Do you have any notes with you by any
16 chance?

17 A I do not.

18 Q Okay. And you don't have any
19 computer in front of you; is that accurate?

20 A Correct.

21 Q Okay.

22 All right. How many times have you

1 been deposed before?

2 A In total, oh, between 30 and 40,
3 something like that.

4 Q Okay. Do you recall how many of
5 those roughly have been in the past four years?

6 A I can refer to my CV. My CV has a
7 comprehensive list of my testimony within the
8 last four years. So the question was
9 depositions?

10 Q That's right.

11 A Okay. Let's see. Well, I would have
12 to go through and count them.

13 MS. HALSEY: And while he's counting,
14 he is looking at Exhibit 2013.

15 THE WITNESS: My CV, yes.

16 A So in the civil ITC cases, it's nine
17 times. I'm going to say approximately nine
18 because in some of these I was deposed twice,
19 but it is about nine times. Then IPR/PGR, that
20 would be about seven. And that's from page 3 of
21 my CV. And then there are products liability
22 cases, if you would like me to count those too.

1 That would be about two over the last five
2 years.

3 Q Okay. So is that about 15 or so,
4 then?

5 A Since about, yeah, that's -- is it?
6 9 -- it's like 18 or something.

7 Q Okay. And you mentioned -- sorry,
8 and you mentioned that was ITC, IPR, PGR and
9 products liability?

10 A Correct. And that's since about --
11 about the last five years. I give the totals of
12 my consulting career in the CV --

13 Q Understood.

14 A -- going beyond that.

15 Q So given your deposition experience,
16 you're familiar with the deposition process
17 then; is that fair?

18 A Yes, it is.

19 Q So Dr. Vallee, you understand that
20 you are here today to testify regarding the
21 declaration that you submitted for inter partes
22 review proceeding IPR2025-01461 regarding U.S.

1 patent number 11,986,946; is that right?

2 A That's correct.

3 Q And for ease of discussion, would it
4 be okay if I just refer to that patent as the
5 '946 patent?

6 A Please do.

7 Q So before diving into the content of
8 your declaration, can you tell me what you did
9 to prepare for this deposition.

10 A I reviewed my declaration, the
11 exhibits related to it with support documents.
12 And then I had meetings with counsel yesterday
13 to review my declaration, and here I sit today.

14 Q So about how long do you estimate in
15 total you spent preparing for this deposition?

16 A Oh, I'd have to consult my time
17 sheet. It was probably, oh, I don't know, maybe
18 10 or 15 hours, something like that. But to be
19 sure I would have to consult my records. As I
20 go along, I keep a record of how much time I
21 spend.

22 Q Okay. And we mentioned, I think,

1 Exhibit 2012, which is your declaration, and
2 we'll get to that as well.

3 How much time did you spend preparing
4 that declaration?

5 A Oh, again, I'd have to look at the
6 time sheet, but it was more than 10 or 15 hours.
7 I don't remember exactly because it is an
8 ongoing process where I write some, I review
9 some, I review more documents. And I'd have to
10 look at the time sheet, too, to give you an
11 accurate number.

12 Q Okay. Did you personally draft the
13 declaration then?

14 A This is my declaration, yes. I had
15 assistance from the firm in assembling, you
16 know, annotations and citations, collecting
17 that, doing kind of the grunt work, if you will,
18 and providing me with the legal basis for --
19 that's included in sections -- throughout
20 sections of my report.

21 Q Okay. So you're saying counsel
22 drafted the legal sections of your report.

1 A Correct.

2 Q Okay. Do you recall which sections
3 you drafted?

4 A Well, every other section, I was --
5 it's my declaration so nothing goes in it unless
6 it is my opinion and I approve it. So I -- my
7 input is throughout the balance of it. So I
8 drafted basically the rest of it. Again, I
9 have -- since it is from the firm as far as
10 formatting and things like that, but it is my
11 declaration. Nothing goes in unless I approve
12 it.

13 Q Okay. So in preparing your
14 declaration, then, did you speak to anyone other
15 than your attorneys?

16 A No.

17 Q All right. Okay. So let's, I guess,
18 turn to the exhibits. So first I would like you
19 to pull out Exhibit 2012, which I think is
20 accessible to you; is that right?

21 A That's correct. And so you're aware,
22 everything is collected here so counsel can

1 quickly and efficiently hand me these documents
2 and take them back so I don't lose them all.

3 Q Okay.

4 A So that's how -- so if you see hands
5 going back and forth, that's all it is.

6 So 2012, I have that in front of me.

7 Q Okay. And this is the declaration
8 that contains your true and correct opinions as
9 it pertains to the '946 patent; is that right?

10 A Correct.

11 Q And I think you mentioned there are
12 no markings other than just it being a clean
13 copy of your declaration. Is that accurate?

14 A Correct. It is a clean copy.

15 Q Okay. And sitting here today, are
16 you aware of any errors or corrections that need
17 to be made to this declaration?

18 A Not that I'm aware of, no.

19 Q Okay. And so I'd like to just make
20 sure you have access to a few other documents,
21 the first one being Exhibit 1001, which should
22 be the '946 patent. Do you have access to that?

1 A I have that, yes.

2 Q Okay. The next one is Exhibit 1007,
3 which is the Li patent publication. Do you have
4 that?

5 A I do.

6 Q Okay. The next one is Exhibit 1012,
7 which is the Baruch reference. Do you have that
8 one?

9 A I do.

10 Q Okay. And then for now I'd also like
11 to hand you the petition, which is paper 2.

12 A I have that.

13 Q Okay. So just to make sure you have
14 these documents and they are accurate, I guess
15 we'll start with the '946 patent that you have.
16 Is this the '946 patent that you analyzed in
17 your declaration?

18 A Yes, it is.

19 Q Okay. And then looking at the Li
20 reference, is that the Li reference that you
21 analyzed in your declaration?

22 A Yes, it is.

1 Q Okay. And then turning to the Baruch
2 reference, is that the Baruch reference that you
3 analyzed in your declaration?

4 A Yes, it is.

5 Q And then finally, the petition, is
6 that the petition that you analyzed in your
7 declaration?

8 A Yes, it is.

9 Q All right. I'd like to turn to your
10 declaration now and, specifically, paragraph 30.

11 A I'm there.

12 Q Okay. So in paragraph 30 you define
13 a person of ordinary skill in the art. Is that
14 accurate?

15 A Correct.

16 Q Okay. Can you explain to me what are
17 the requirements of being a person of ordinary
18 skill in the art based on what you've laid out
19 here.

20 MS. HALSEY: Object to form.

21 A So a person of ordinary skill in the
22 art -- I'll call him a POSA moving forward, if

1 that's okay -- should have at least an
2 equivalent of an undergrad degree in mechanical
3 or closely -- in mechanical engineering or a
4 closely related field, two years of industry or
5 academic experience with connecting technologies
6 or similar mechanisms, or a combination of
7 education and experience I cited above. And if
8 they are deficient in that, then additional
9 relevant industry experience, again, in
10 connecting technologies, may compensate for the
11 lack of formal education.

12 So it reads just as paragraph 30
13 reads.

14 Q Okay. Can you now also turn to
15 page 9 of the petition.

16 A The petition, okay.

17 Okay, I am there.

18 Q Okay. Do you see that the petition
19 also defines a POSA?

20 A I see that.

21 Q Is the definition of a POSA that you
22 provided in your declaration the same or

1 different from the one provided in the petition?

2 A Slightly different.

3 Q Okay. What is the difference?

4 A Well, I'm -- in my declaration, I
5 believe a POSA should have a "degree in
6 mechanical engineering or a closely related
7 field." In the petition it says, "or industrial
8 design," which, in my view, is not a closely
9 related field because industrial design has more
10 to do with aesthetics than it does to
11 calculating the mechanics of a mechanism.

12 Then the petition says, "two years of
13 industry or academic experience with connecting
14 technologies," and that portion is the same.
15 And I say, "connecting technologies or similar
16 mechanisms." That's slightly different. And I
17 add "an equivalent combination of education and
18 experience." So if you have a little more
19 industrial experience with connecting
20 technologies and a little less education, you
21 can still be considered a POSA, so long as you
22 have the experience in connecting technologies.

1 And then I add that "Additional
2 relevant experience may compensate for lack of
3 formal education or vice versa." So that
4 stresses the importance of having hands-on
5 experience with designing connecting
6 technologies.

7 Q I think you said also "vice versa,"
8 correct?

9 A With respect to -- I don't recall
10 exactly what I said "vice versa" to. I believe
11 it must have been the experience or the degree.

12 Q Right. I'm reading the last sentence
13 of paragraph 30. It says, "Additional relevant
14 industry experience may compensate for lack of
15 formal education or vice versa."

16 Do you see that?

17 A Correct. I do.

18 Q Okay. So this is saying that formal
19 education can compensate for a lack of industry
20 experience; is that right?

21 A Well, what it says really is -- I'm
22 just reading it once more.

1 Yeah, the relevant exp- -- the
2 industrial experience compensates for formal
3 education or vice versa. It's assumed the
4 formal education would involve connecting
5 technologies. That's what the "vice versa" is.

6 Q Okay.

7 A So if I simply had -- I'm sorry, if I
8 simply had a mechanical engineering degree and
9 my area of specialization were thermal science
10 or robotics or something like that but I had --
11 I never taught connecting technologies and that
12 really wasn't academically what my background
13 and what my teaching was, then what this says is
14 that wouldn't apply.

15 What it says is if you taught
16 mechanical design, for example, where you taught
17 connecting technologies and you did student
18 projects yet you did not work in the industry in
19 that field, then that would be okay, with the
20 emphasis on having some experience with
21 connecting technologies, whether in academia or
22 in industry.

1 Q Right. So when you say "formal
2 education" in this sentence, are you referring
3 to teaching experience or education in terms of
4 being a student?

5 A Formal education in being a student
6 as well, that is true, because as formal
7 education as a student, not every curriculum in
8 mechanical engineering covers connecting
9 technologies. So you can have a mechanical
10 engineering degree. Depending on where you
11 went, you may or may not have that experience.

12 Q Okay. So going back to the
13 differences, can you remind me, what is the
14 difference, if any, between your definition of a
15 POSA and the petition's definition of a POSA?

16 A Sure, we can just go through it
17 again. So the petition says, "a BS degree in
18 mechanical or industrial design." I say, "an
19 undergraduate degree in mechanical or a closely
20 related field." I don't consider industrial
21 design necessarily a closely related field.

22 And the petition says, "two years of

1 industry or academic experience with connecting
2 technologies." And I say, "two years of
3 industrial or academic experience with
4 connecting technologies or similar mechanisms,"
5 meaning mechanisms that, you know, join things
6 together, for example.

7 Then I add "or an equivalent
8 combination of education and experience," so
9 that's different.

10 And then I add that the relevant
11 industrial experience can compensate for the
12 lack of formal education, or formal education
13 related directly to connecting technologies can
14 compensate for a lack of industrial experience.

15 Q Okay. Does the difference that you
16 identified, would that have impacted your
17 analysis that you performed in your declaration?

18 MS. HALSEY: Object to form.

19 A Sorry, could you repeat. I'm not
20 sure I understand that question.

21 Q Sure. So you identified two
22 different standards for a POSA; is that

1 accurate?

2 MS. HALSEY: Object to form.

3 A I identified the one in the petition
4 and I identified mine, that is correct.

5 Q And so which standard did you apply
6 when outlining your declaration?

7 A I used my definition of person of
8 ordinary skill in the art.

9 Q So you didn't apply the petition's
10 definition of a person of ordinary skill in the
11 art when preparing your declaration?

12 A Well, again, the two are very
13 similar, but I base my declaration on my
14 opinion, which is in my declaration, of what a
15 POSA is.

16 Q Okay. So if the board were to adopt
17 the petition's definition of a person of
18 ordinary skill in the art, would that impact
19 your analysis?

20 A Well, it was a pretty in-depth
21 analysis. I would have to take every point of
22 my analysis and then redo the declaration

1 through the lens of the other definition, which
2 I haven't done. I'd have to go through my
3 declaration and then see if anything would
4 change. Again, my focus was on the -- my
5 definition of a POSA is what I used, and my
6 declaration is based on that.

7 Q Okay. Exclusively on your definition
8 of a POSA?

9 A Well, again, there is a lot of
10 overlap, but my report was based on my
11 definition of a POSA.

12 Q Okay. If the definition of a POSA,
13 as used in the petition were applied, would that
14 impact the conclusions that you reached in your
15 declaration?

16 MS. HALSEY: Object as to form.

17 A Again, I would have to go through my
18 entire declaration and put on the hat of a
19 different POSA and go through the whole thing
20 again before I could answer that question.

21 Q Right. So you don't think you'd
22 reach the same conclusions. You think you'd

1 reach different conclusions.

2 MS. HALSEY: Object to form.

3 A No, that's not what I said. What I
4 said was, sitting here, my declaration was based
5 on my definition of a POSA. I have not taken
6 the petitioner's definition of a POSA and
7 drafted another declaration to see if it is
8 different.

9 I don't know is the answer to the
10 question. I'm just saying that my declaration
11 was based on my definition of a POSA, and I
12 would have to go through the whole process of
13 drafting the declaration again using a different
14 definition of a POSA to answer your question.

15 Q So if the board adopts the petition's
16 definition of a POSA, the conclusions you reach
17 in your declaration might not be relevant, then;
18 is that fair?

19 A I don't know, but, again, I would
20 have to go through that whole process again to
21 rewrite the declaration using a completely
22 different -- well, a different definition of a

1 POSA to answer your question.

2 Q Okay. So in -- I think one of the
3 aspects that you said overlapped between the two
4 was this idea of two years of industry or
5 academic experience. Is that right?

6 A Related to connecting technologies, I
7 believe is what I said.

8 Q Okay. So that definition says that
9 two years of industry experience is not required
10 to be a POSA. Is that accurate?

11 A The first part of -- and we're
12 talking about my definition, correct?

13 Q Sure.

14 A In my declaration, right?

15 You need a degree in ME and two
16 years' industry or academic experience with the
17 technology of connecting mechanisms. So you
18 have to have the degree plus, as I stated
19 earlier, the experience in connecting
20 technologies either through academic pursuits or
21 through industrial pursuits.

22 Q Right. So two years --

1 A But you have to have -- I'm sorry,
2 that was my fault. I paused.

3 Q I'm good. Go ahead.

4 A Okay. So, yeah, the key here is a
5 POSA needs to know how to design connecting
6 technologies and they need to have been taught
7 the fundamentals of how to design such things.
8 That's why I say in the last sentence that
9 additional industry may compensate for maybe
10 you're weak with the undergrad, but if you have
11 a super amount of industrial experience, that
12 will compensate. Or maybe you're weak in the
13 industry but you were taught by the best on how
14 to design theoretical -- or design -- I
15 shouldn't say theoretical, just how to design
16 such a thing even if you haven't in industry
17 done it.

18 The important part of a POSA is
19 understanding the applications and how to design
20 the technology -- the connecting technologies.

21 Q Right. So industry experience is not
22 explicitly required.

1 A Well, if you have -- again, it starts
2 with the degree, which you need experience with
3 connecting technologies, okay. So you can have
4 the degree and either industry or academic, but
5 it's got to be with connecting technologies, so
6 long as you have either academic experience
7 designing connecting technologies or industrial
8 experience designing connecting technologies.
9 You need one of those.

10 Q Okay. Does a POSA need to have
11 created a consumer product to qualify as a POSA?

12 A Well, the connecting technologies
13 that are involved in the '946 patent is related
14 to a consumer product. So if you've got no
15 experience in designing a consumer product with
16 a tech- -- either academically or industrially,
17 if you don't have that experience with a
18 consumer product, you can't qualify as a POSA
19 because that experience exposes you to the
20 applications, the design, considering strength
21 and environmental factors, like durability, what
22 environment is it used in, material selection.

1 These are all things that if you have never
2 designed a product and you've only been in a
3 purely theoretical world, that would prevent you
4 from, I think, thoroughly understanding the
5 purpose of the '946 patent.

6 Q But in your definition in
7 paragraph 30, you don't mention consumer
8 products; is that fair?

9 MS. HALSEY: Object to form.

10 A So in my definition in paragraph 30,
11 the connecting technologies -- I mean, the whole
12 IPR is based on in, you know, this one, the '946
13 patent, which is -- it's understood it is a
14 connecting technology in a product like storage
15 containers, which is a consumer product. I
16 could go to Home Depot, probably, and buy a
17 similar storage container that's stackable. So
18 it's implied that, well, yes, it's got to be
19 connecting technologies of course related to the
20 '946 patent.

21 Q Are you saying that the claims of the
22 '946 patent are limited to consumer products?

1 A I'm saying the '946 patent is
2 directed toward consumer products. I'm sure it
3 could be used in other applications, but the
4 patent deals with consumer/industrial product.
5 But when you go to Home Depot and buy a nail
6 gun, that's a consumer product because anyone
7 can buy it. It's also an industrial product
8 because industries use it, right?

9 So it is aimed at the consumer
10 product arena, but it could be used for other
11 things. I've never done an analysis to see what
12 else the invention of the '946 patent could be
13 used at. But the point is consumer product
14 background, I think, is critical to
15 understanding a consumer product.

16 Q Okay. So you mentioned that a
17 consumer product background is critical. So
18 then should we modify paragraph 30 to mention
19 consumer products?

20 A Again, but it is already inherent in
21 the related field. There is no need to do that
22 because the related field is stackable storage

1 containers that just happen to be consumer
2 products.

3 Q So does one need to have experience
4 in stackable storage containers to be considered
5 a POSA?

6 A Well, a stackable storage container
7 is a consumer product, but, you know, it is
8 connecting technologies that can be used in a
9 stackable storage container.

10 Q Are the claims directed to a
11 stackable storage container?

12 A I'm going to go to the patent,
13 actually, which is Exhibit -- we probably need
14 to read -- have we read this into the record
15 yet? If not, we can read it into the record.
16 This is Exhibit 1001. So we have the patent.

17 (Witness reviewing document.)

18 All right, well, I'll -- I understand
19 we're going to get to the claims in a second,
20 but the whole Background of the Invention -- I'm
21 in column 1, oh, around line 28. "In order to
22 facilitate the user in the case of carrying

1 multiple storage boxes (such as toolboxes) to
2 facilitate overall movement and use," et cetera,
3 et cetera, et cetera, that are "usually stacked
4 together, each storage box is usually locked
5 together by interlocking," et cetera.

6 So before I even get to the
7 specification of the claims, then it tells me,
8 we're about to study a patent that has to do
9 with stackable, locked storage containers. So
10 that's where we will begin.

11 And then, when we go to the claim, it
12 tells me -- I'm in column 15, line 5. The first
13 part of the first claim says, "A storage box."
14 So now I know what the storage box is, okay. So
15 I understand what the field of the invention is,
16 and then I move forward and analyze the claims
17 or the specification, et cetera.

18 So it tells me it is a storage box.
19 And if I read further, you know, the definition
20 of a toolbox and things like that, it's a
21 consumer product -- consumer/industrial product.

22 Q So does someone need to have

1 experience designing consumer products in order
2 to qualify as a POSA?

3 A They have to have either academic or
4 industrial experience with consumer products in
5 this arena, including the connecting
6 technologies that go into the consumer products.

7 Q And you said that's inherent in the
8 definition you provided in paragraph 30?

9 A Yes, because when I say "mechanical
10 engineering and closely related field, two years
11 in industry experience with connecting
12 technologies or similar mechanism," right? So
13 we're dealing with the connecting technologies,
14 you know, similar to what's in the '946 patent,
15 not exactly the same, but connecting
16 technologies and consumer products. That's what
17 the field is, more specifically, to a stackable
18 storage boxes.

19 Q Okay. So if someone had two years of
20 industry experience with connecting technologies
21 for airplanes, they would not qualify as a POSA?

22 MS. HALSEY: Object to form.

1 A Well, you would have to give me some
2 examples of which connecting technologies, maybe
3 there are storage boxes on airplanes. I don't
4 know. You know, you would have to give me --
5 I'd have to take them example by example to see
6 if they fit in the same -- you know, in the same
7 arena as the '946 patent.

8 I think it is too broad just to say
9 airplanes. There are so many different kinds of
10 connections in an airplane, thousands from --
11 well, there are just too many to count.

12 Q Okay. I'm just trying to understand
13 because you wrote, "experience with connecting
14 technologies or similar mechanisms," and I would
15 like to know what that means and what the bounds
16 of that are.

17 A And I understand, and I think I
18 explained it, you know. Someone with connecting
19 technologies that are involved in industrial
20 consumer products, which is why industry
21 experience is in there. But, again, academic
22 experience, if you design such things, I think

1 is completely applicable.

2 I myself teach a course where I teach
3 students how to design consumer products and
4 different things. In fact, in that course, I'm
5 sure you are aware that I actually designed a
6 stackable storage container that was latched
7 together. But to be a POSA, you need the
8 understanding of what goes into the use of these
9 products, and they are consumer products. And,
10 again, I'll use consumer industrial. This is
11 one of those that kind of fits in both
12 categories.

13 Q So you mentioned that you taught
14 students how to design a stackable box; is that
15 right?

16 A Correct.

17 Q When was that?

18 A Oh, it was before COVID. I would
19 have to go back to see if I could find it. It
20 was probably 2015-ish or something like that,
21 2019. I forget what year it was. Because the
22 course runs every year and there are so many

1 products we develop.

2 Q Do you have documentation or a
3 website that describes that?

4 A I personally don't. It generally was
5 kept. There was a university website that we
6 keep this thing, but I'm not sure it is even
7 still there. They changed systems and, you
8 know, generally, they don't keep things over a
9 certain number of years. I don't have it. I
10 don't even know if it's -- the university even
11 still has it.

12 Q Well, I think we'd like your counsel
13 to try to produce that if possible. So if you
14 could coordinate with them and provide that to
15 them so that they can send it to us, that would
16 be helpful.

17 MS. HALSEY: Tim, we're not in
18 discovery.

19 MR. TANG: I mean, this is discovery.
20 This cross examination is discovery.

21 MS. HALSEY: No, this was a permitted
22 deposition. Discovery is a completely different

1 process, and it's not -- we're not in a
2 discovery process right now other than the
3 deposition.

4 MR. TANG: I mean, this is
5 petitioner's discovery phase of the proceeding.

6 MS. HALSEY: You are not permitted to
7 randomly request documents. You have to ask
8 permission from the PTAB to seek discovery of
9 something like this, particularly which is not
10 directly relevant to the proceedings, and would
11 be quite burdensome.

12 MR. TANG: Well, Dr. Vallee did
13 mention it, so I think we disagree. And we
14 would like a copy to see the evidence that he
15 has for what he has just stated.

16 MS. HALSEY: He's stated his history
17 and experience.

18 MR. TANG: Right. As it relates to
19 stackable boxes --

20 MS. HALSEY: Under oath.

21 MR. TANG: -- in this course that he
22 has taught.

1 MS. HALSEY: Okay. Well, I think
2 that you are way outside the bounds of what is
3 permitted. Please feel free to request it in
4 writing and we'll respond in due course.

5 MR. TANG: We will do that. Thank
6 you.

7 BY MR. TANG:

8 Q Okay. I guess, Dr. Vallee, going
9 back to your definition of a POSA, does it
10 require that someone has designed a latching
11 device to qualify as a POSA?

12 A Well, again, we'll go back to
13 paragraph 30. So I'm requiring the degree and
14 the two years' experience in either academic or
15 industry with connecting technologies or similar
16 mechanisms. So the connecting technology, I
17 mean, has to be with latching or similar
18 mechanisms. I mean, using Scotch tape to
19 connect two things technically might be
20 considered connecting technology, but no one
21 would argue that that would be -- that it is so
22 broad that it encompasses that. It has got to

1 be connecting technologies, you know, related to
2 or of similar type as in the '946 patent. It's
3 got to be -- you know, like the '946 talks about
4 latches repeatedly. So, obviously, experience
5 with latching is one of the -- is the key
6 connecting technology.

7 It can't be so broad that, you know,
8 that you could use my example of just I've
9 designed things that are Scotch taped together
10 or duct taped together. It has got to be
11 similar connecting technology to what's in the
12 patent, and, specifically, it was -- I mean,
13 latches are basically what the patent is about.

14 That's why I don't think it is
15 necessary to drill down and be hyper specific in
16 my definition of a POSA. It's obvious that
17 someone, you know, who is a POSA would have
18 experience with connecting technologies that are
19 similar or close to what's in the patent.

20 Q Okay. And then the petition's
21 definition also uses that same language, right?

22 A Well, not the exact same language.

1 Again, I say ME or close field, two years of
2 industry or academic with connecting. And the
3 petition says an BSME or industrial design,
4 which I disagree with, two years' industry or
5 academic experience with connecting technologies
6 or similar mechanisms, okay?

7 So the connecting technologies,
8 right, or similar mechanisms, I mean, it has --
9 my understanding, what the petitioner's
10 definition of a POSA is, you know, should also
11 include similar technology. But I didn't write
12 the definition of a POSA in the petition, so I
13 don't really know if that's exactly what they
14 had in mind, but I know exactly what I have in
15 mind when I define a POSA, right?

16 So for me to comment on what the
17 petitioner was thinking when they wrote the
18 definition of a POSA I don't think is
19 appropriate, okay? The wording may be similar
20 as mine, but I know what my definition of a POSA
21 was.

22 Q And did you intend it to be different

1 than the petition?

2 A Well, again, I -- my definition of a
3 POSA is what I thought was necessary. It is
4 different because I felt that the last sentence,
5 "Additional relevant industry experience may
6 compensate for lack of formal education or vice
7 versa," was appropriate. But I didn't -- I
8 mean, I came up with, you know, what I believed
9 was the proper definition of a POSA. They came
10 up with theirs. I came up with mine. And by
11 "they," I mean the petitioner, obviously.

12 Q Okay. And so in your definition,
13 does someone need to have designed a latching
14 device previously to qualify as a POSA?

15 A Well, as I said before, even industry
16 and academia, they needed to have had that
17 experience with connecting technologies. And,
18 obviously, experience with it would be designed,
19 application, things like that, all right? Just
20 looking at one doesn't give you experience with
21 it, okay? So someone should have design -- have
22 experience designing, developing those kinds of

1 devices.

2 Q Okay. So under your definition,
3 someone must have previously designed a latching
4 device to qualify as a POSA?

5 A Someone must have designed some kind
6 of technology close to a latching device so they
7 understand, you know, how latches are used, how
8 they've developed and what the requirements for
9 latches are.

10 Q And someone who hasn't done that is
11 not capable of analyzing the '946 patent?

12 MS. HALSEY: Object to form.

13 A In my opinion, to adequately examine
14 the '946 patent, you need to be what we've just
15 been discussing for quite a while now, what I
16 define in paragraph 30. You have to have the
17 undergrad ME degree or closely related field,
18 with two years in industrial or academic
19 experience with connecting technologies. We've
20 also discussed what the scope of the
21 technologies -- connecting technologies are,
22 okay, or the combination of education and

1 experience.

2 Q Okay. All right. Well, I think I am
3 done asking about a person of ordinary skill in
4 the art, then. Why don't we turn over to the
5 '946 patent.

6 A Okay.

7 Okay, I have the patent.

8 Q All right. So I want to look at
9 Figure 7, and if you have the petition handy,
10 that might be also helpful. Looking at
11 Figure 7, there are a bunch of components that
12 are annotated in the petition if you would like
13 to use that as a reference.

14 THE WITNESS: Could I have the
15 petition back again, please --

16 MS. HALSEY: Oh, yes.

17 THE WITNESS: -- just to -- I gave it
18 away too soon.

19 A What page is this on, if you could
20 guide me, in the petition?

21 Q In the petition, page 5.

22 A Okay. So that has some of the items

1 annotated. So, okay, I'll keep that too. Thank
2 you.

3 Q All right. And I guess if you would
4 like to refresh yourself, it is columns 6 and 7
5 of the '946 patent that describe this figure and
6 everything, but I guess we can get to that
7 point.

8 A Okay.

9 Q All right. So looking at Figure 7 of
10 the '946 patent, there are various components
11 depicted. Is that fair?

12 A That's true.

13 Q Okay. And then in Figure 7 there is
14 a depiction of something called locking part 12;
15 is that right?

16 A That is correct.

17 Q All right. And there is also
18 something called stopping part 3. Do you see
19 that as well?

20 A I do.

21 Q All right. So I'd like to turn to
22 the '946 patent, the bottom of column 7, if you

1 want to jump to that.

2 A Okay.

3 Q All right. Starting at about line 66
4 there, with "The stopping part 3 includes," feel
5 free to read that and then on to the -- the rest
6 of the paragraph if you'd like.

7 A Okay, thank you.

8 (Witness reviewing document.)

9 Okay. So then you said just read
10 around column 8, line 9 -- 8, the end of the
11 paragraph, correct?

12 Q That's right, yeah. I guess did you
13 get a chance to review that?

14 A Okay, I did, yes. Thank you for
15 that.

16 Q Okay. All right. And so in this
17 passage that you just looked at, it says that
18 card block 32 and second resilient member 33 are
19 parts of stopping part 3; is that right?

20 A That's correct.

21 Q Okay. And so when assembled, these
22 are components that are part of locking part 12;

1 is that right?

2 MS. HALSEY: Object to form.

3 A I think it is probably more accurate
4 to say that they are inserted into -- housed in
5 locking part 12. They will move with the
6 locking part. It's -- the wording in column 7,
7 line 59, the stopping part is provided on it.
8 So they are two separate entities. It moves --
9 when the whole thing is assembled, it moves with
10 the stopping part. But it is provided on. It's
11 not -- I would say "provided on" is the right
12 word as opposed to "part of." Provided on.

13 Q Okay. Why don't we turn to -- moving
14 up that same column -- line 3. If you can read
15 from about lines 3 to 7.

16 A Column 7?

17 Q Column 7, yep.

18 A Okay.

19 (Witness reviewing document.)

20 Okay, I'm with you.

21 Q Okay. And so this part says the
22 locking part 12 includes locking body 121 and

1 locking buckle 122; is that right?

2 A That's correct.

3 Q Okay. And so here, this is saying
4 that locking buckle 122 is part of locking part
5 12; is that right?

6 MS. HALSEY: Object to form.

7 A It says that locking part 12 includes
8 the body and the buckle. That's what it says,
9 yes.

10 Q Okay. And so, right, there is not a
11 one-to-one correspondence between the term
12 "locking part" and the term "locking body." Is
13 that accurate?

14 MS. HALSEY: Object to form.

15 A I'm sorry, could you repeat that one
16 more time?

17 Q Sure. There is not a one-to-one
18 correspondence between the term "locking part"
19 and "locking body"; is that accurate?

20 A Well, I'm not sure what you mean.
21 The locking body includes -- I'm sorry, the
22 locking part includes the locking body and the

1 buckle. I'm not sure what you mean by

2 "one-to-one."

3 Q Yeah, so I guess -- I think this is
4 all going to become clear, but there are three
5 things recited in the passage we looked at,
6 right? There is locking part, locking body and
7 locking buckle; is that accurate?

8 A That is true.

9 Q Right. And so the term "locking
10 part" is not synonymous with "locking body,"
11 right?

12 A Well, the locking part is the body
13 and the buckle, at least the body and the
14 buckle. So when you say "locking body," you
15 know you are a part of the locking part. And it
16 says locking buckle. So I'm not sure I
17 understand the question.

18 Q Okay. Is a locking body different
19 than a locking buckle?

20 A Well, they are called two different
21 things in the figure so they are not the exact
22 same thing. It is just they are related in the

1 way I described, that the body and buckle are
2 part of the locking part.

3 Q Right.

4 A And so you've got a locking part, and
5 then you say, okay, we'll call this portion of
6 it the buckle and this portion of it the body.

7 Q Right. And so the locking part is
8 the entirety that includes both the body and the
9 buckle, correct?

10 A Well, I mean, it is really -- I mean,
11 the body is the body of the buckle, right,
12 because it is one component in the figure. So
13 the locking part has a buckle which includes a
14 body. Maybe that's the easiest way to say it.
15 Because they move together. They are a single
16 piece of the assembly. They are just called out
17 in two different portions of it.

18 Q Yeah, and this might be clearer if we
19 looked at Figure 7 maybe. Do you have that
20 handy?

21 A Sure do.

22 Q Okay. So I see locking part 12 in

1 Figure 7. Do you see that?

2 A Correct. I do.

3 Q And so what does locking part 12
4 refer to in this figure?

5 MS. HALSEY: Object to form.

6 A It refers to exactly what it is
7 pointing to. It points to that -- I don't know
8 how to describe it, that -- you know, that piece
9 that has the tapered front, which is the buckle,
10 and the rest of that structure, which is the
11 body of the buckle, and it has the slot with the
12 31 in it. That is what 12 is. It is exactly
13 what it points to.

14 Q Okay. And locking buckle 122 that's
15 pointing to the slots that you referred to; is
16 that right?

17 A Slots, no. It's the tapered portion
18 that intersects -- that engages the grooves on
19 the top storage container.

20 Q Sorry, my mistake.

21 A It contains them.

22 Q Sorry, just to say it again, so

1 locking buckle 122 is the tapered portion of
2 locking part 12.

3 A It is the portion that engages with
4 the upper container, upper storage box. And the
5 body -- you know, it's one -- what's confusing,
6 I understand, is it's one component, really,
7 right? We're going to call it a locking part,
8 but the body always moves with the buckle. So
9 it is fair to say that, you know, if that buckle
10 has a body behind it, we're going to call these
11 two things the locking part, right? They always
12 move together. It is one unit that moves
13 together.

14 So if it is a single part and the --
15 you know, that's used to latch, let's say, and
16 the author of the patent is calling it, you
17 know, the buckle is the front part of it and the
18 body is what supports it.

19 Q Sorry, the locking buckle is the
20 front part of the locking part; is that right?

21 MS. HALSEY: Object to form.

22 A The locking buckle is just what it

1 points to. So you have the one part and then
2 you have this body that supports the locking
3 buckle. I'm not sure how else to explain it.
4 When I think the figure does it best, it is the
5 locking part as -- you know, it could even be
6 called a buckle if you wanted to because it has
7 a body of it behind it. I think the author just
8 chose to call those -- you know, that part with
9 those two features locking part and delineate
10 the buckle from the body, but it is one part.
11 It is really one part.

12 Q Okay. So --

13 A Component may be a better word. I'm
14 sorry, component may be a better word.

15 Q Sorry, how do you use the word
16 "component" to describe the locking buckle?

17 A If I were going to manufacture this,
18 I would probably -- that would probably be a
19 heavy-duty plastic part, maybe ABS, and I would
20 mold it as a single piece, and that's what it
21 would be. So that's -- you can call it a part,
22 a component, I don't really think it makes a

1 difference. It is a component.

2 Q The locking buckle is a component of
3 the locking part?

4 A No. I'm sorry, I think you
5 misunderstood. We have one component here that
6 slides back and forth, and the patent doesn't
7 describe it as different components. All I'm
8 saying is that the buckle is the front of it,
9 and the body of it is the locking body. It is
10 one -- it is really one item with two separate
11 portions defined.

12 Q Okay. So I guess moving on, then,
13 I'm looking at Figure 7. We also have first
14 resilient member 13. Do you see that?

15 A I do.

16 Q What is first resilient member 13?

17 A That is a -- typically a coil spring,
18 compression spring -- coil spring.

19 Q Okay. Is it limited to just that
20 type of spring?

21 A Well, if you look at the claims, for
22 example -- if you can just bear with me for a

1 second.

2 Okay. I'm in column 15. We're
3 talking about claim 1. And I'm starting at, oh,
4 about line 9 where the claim talks about this.
5 So "Wherein the first connection part comprises
6 a mounting body, a locking buckle movable with
7 respect to said mounting body" -- and the
8 mounting body is -- in the figure, that would
9 be -- the mounting body would be 112 -- "a first
10 resilient member located between that mounting
11 body and the buckle," and et cetera, et cetera.

12 So we go down to the next part.
13 Let's see. Okay, I'm sorry I'm on line 18 of
14 claim 1, "Wherein the locking buckle is
15 configured to slide inward with respect to the
16 mounting part."

17 So the claim -- just what I read so
18 far in the claim tells us it is a sliding
19 component, and the spring is located between the
20 mounting body and the buckle, basically. And it
21 says in the specification, in fact, to clarify,
22 that's even a coil spring. So that would be a

1 linear coil spring, to move something that
2 slides in a linear fashion.

3 Q Okay. Does the first resilient
4 member touch the locking body?

5 A We're in Figure 7, for example --
6 that may even be a better figure. I guess
7 Figure 7 is the best. Yeah, we just discussed
8 how it defines the locking body of the buckle.
9 So it touches the buckle in the body section and
10 it touches the mounting body 112. So it's in
11 between the buckle and the mounting body.

12 Q Right. So to make sure I heard that
13 correctly you're saying the first resilient
14 member touches the mounting body and then
15 touches the locking body part of the locking
16 part, right?

17 A I said it was the -- it touches the
18 buckle through -- it touches the locking buckle
19 through the locking body. It is one component.
20 It would be, if I were to make anything move, so
21 that's where it touches it.

22 Q Okay. So then the first resilient

1 member 13 doesn't directly contact locking
2 buckle 122; is that right?

3 MS. HALSEY: Object to form.

4 A Well, as I just explained, it is the
5 body of the buckle. They move together. They
6 are one unit. So it is touching the body of the
7 buckle. The buckle doesn't move unless it
8 touches the body of the buckle, right? It is in
9 between the two and it is used to move the
10 buckle forward.

11 Q Right, but like you said, locking
12 body 121 is a different portion of locking part
13 than locking buckle 122, right?

14 A It is a portion of the locking part,
15 but it is the body of that buckle that moves
16 back and forth. You can't have one without the
17 other, right? It is one component. That spring
18 pushes the buckle forward and then -- and we're
19 saying the resilient member pushes it forward.
20 So it has to touch that body part of the buckle
21 so you can move it.

22 THE WITNESS: And just to -- when

1 you're done with this line of questioning, it's
2 been over an hour, I think. Whenever a good
3 time for a break for you would be, that would be
4 good.

5 MR. TANG: Great. Yeah, I guess I
6 have just a couple more questions here.

7 You know what, actually maybe now
8 would be a good time to take a break. Why don't
9 we take -- how much time would you like, five,
10 ten?

11 THE WITNESS: Maybe 15 -- yeah, maybe
12 10, that's fine.

13 MR. TANG: All right. Ten-minute
14 break then.

15 THE WITNESS: Okay, thanks.

16 MR. TANG: Off the record.

17 (A recess was taken.)

18 BY MR. TANG:

19 Q Dr. Vallee, during the break, did you
20 have any conversations with counsel?

21 A Nothing regarding my testimony, no.

22 Q All right. And so before we went on

1 break, we were talking about the first resilient
2 member 13. Do you remember that?

3 A I do.

4 Q Okay. And we said that the first
5 resilient member 13 contacts locking body 121,
6 right?

7 A Well, the body of the buckle is how I
8 said it.

9 Q Okay.

10 A It does kind of --

11 Q Sorry, go ahead.

12 MS. HALSEY: Object to form.

13 A It contacts the -- let's see, yeah,
14 the body 121 of the buckle.

15 Q Okay. So I'd like to turn to
16 Figure 4 of the '946 patent, and it might just
17 be helpful to look at it in the petition on
18 page 3.

19 A Page 3. Okay.

20 Q So are you looking at Figure 4 of the
21 '946 patent?

22 A Yes, I am.

1 Q And so does Figure 4 show locking
2 part 12 fully assembled and attached to the
3 container lid?

4 A It shows the locking part 12 on the
5 container lid, that is true.

6 Q Okay. And where is first resilient
7 member 13 in this figure?

8 A Well, 13 isn't called out in
9 Figure 4.

10 Q Right. In the '946 patent, where
11 would one place first resilient member 13 in
12 this figure?

13 A It would be as it is called out in
14 Figure 7. So it would be -- if you're looking
15 at Figure 4, it would be to the right of item 1.
16 It's not visible in Figure 4.

17 Q Okay. And so it's not visible
18 because it's enclosed within locking part 12; is
19 that right?

20 MS. HALSEY: Object to form.

21 A No, the spring is not enclosed in
22 locking part 12. The spring is pushing against

1 the body, which is part of 12. The spring is
2 between the mounting body 112 and the body of
3 the buckle, which we said was 121.

4 If you could repeat your question.
5 Maybe I misunderstood it, but your question was
6 again?

7 Q Yeah. So I'm looking at Figure 4
8 when everything is assembled, and I just want to
9 know, where is the first resilient member in
10 that figure?

11 A Again, it's hidden. You can't see
12 it. You have to go to Figure 7 to understand it
13 is between the locking buckle and the mounting
14 body 12 -- 112, sorry. You can't see it. That
15 figure doesn't show you where it is.

16 Q Right. But looking at Figure 4 and
17 Figure 7, Figure 4 is demonstrating locking part
18 12 assembled on the container; is that accurate?

19 MS. HALSEY: Object to form.

20 A Figure 4 shows a number of things,
21 including the locking part as installed on the
22 bottom container.

1 Q So when you look at Figure 4, you
2 would recognize where the first resilient member
3 13 is, even if it is not labeled; is that fair?

4 A Well --

5 MS. HALSEY: Object to form.

6 A -- just looking at Figure 4, I can't
7 tell that. That figure doesn't tell me anything
8 about where it is located. You can't see it.

9 Q Okay. So you don't know, looking at
10 Figure 4, where the first resilient member 13 is
11 located?

12 MS. HALSEY: Object to form.

13 A All I know is it's to the right of
14 the mounting body. And I only know that because
15 of the claims in Figure 7. Figure 4 does not
16 tell me anything about the location of the
17 resilient member.

18 Q Okay. So in Figure 4 is the locking
19 part 12 covering the first resilient member 13?

20 MS. HALSEY: Object to form.

21 A It doesn't -- there is not enough
22 detail in the figure to tell you that. It is --

1 you can't see it. That figure doesn't give me
2 enough information to answer your question. All
3 I know is it is behind 1. It is in there
4 someplace.

5 Q Okay. So maybe let's --

6 A But you have to --

7 Q I'm sorry.

8 A I'm sorry, my fault. Again I paused.

9 No, that -- Figure 4 doesn't tell you
10 where the resilient member is. It doesn't tell
11 you anything about it. You have to go to a
12 figure like 7 to understand where it is because
13 it doesn't show it. I get no information about
14 resilient member from Figure 4.

15 Q Okay. So let's go back to Figure 7,
16 then. In Figure 7 would you, looking at
17 Figure 7, know how to assemble locking part 12?

18 A Between Figure 7 and the
19 specification, yes.

20 Q Okay. And so when assembled, that
21 results in the configuration in Figure 4; is
22 that accurate?

1 MS. HALSEY: Object to form.

2 A Figure 7 is an exploded view and
3 Figure 4 is -- in fact, it is discussed -- bear
4 with me for a second.

5 Okay. So it is simply a schematic
6 diagram of the partially exploded structure.
7 I'm sorry, I'm in column 4, line 64, where it
8 defines what Figure 4 is. It's simply the
9 "schematic diagram of the partially exploded
10 structure of Figure 3." So Figure 3 is an
11 exploded view of what you're looking at in
12 Figure 4.

13 Q Sorry, Figure 7 is an exploded view;
14 is that right?

15 A I'm sorry. Thank you, you're right.
16 Figure 7. I read Figure 3. We have to look at
17 Figure 3.

18 Okay. I'll read what I read.
19 "Figure 4 is a schematic diagram of the
20 partially exploded structure of Figure 3."

21 Well, that's what it says.

22 Well, that's what it says.

1 Q Okay. So would you agree or disagree
2 that Figure 4 depicts locking part 12 assembled
3 on the storage container?

4 A Yes, I think that's correct. It is
5 the locking part. It points to it. It is on
6 the storage container. It shows the mounting
7 body and the bolts that hold it in. So that's a
8 schematic of what it might look like if it were
9 assembled.

10 Q Okay. And even if you can't see
11 first resilient member 13 in Figure 4, based on
12 your review of the '946 patent, would you
13 understand that there would be a first resilient
14 member 13 in that configuration?

15 A And you said, again, what you can't
16 see in Figure 4, or do you mean Figure 7?

17 Q Figure 4.

18 A 4. Figure 4. And you can't see it
19 in either configuration. You can't see the
20 resilient member in Figure 4 or Figure -- yeah,
21 you can't see it in Figure 4.

22 Q Right. My question was even if you

1 can't see it, based on your review of the '946
2 patent, would you understand there to be a first
3 resilient member in that configuration?

4 A I understand that from the
5 specification and the claim. I don't understand
6 it from the figure. I guess that's my only
7 point. That figure doesn't tell me anything
8 about it.

9 Q Okay. I guess let me ask it this
10 way. Out of all the figures in the '946 patent,
11 which one accurately shows what we see in
12 Figure 7 assembled?

13 MS. HALSEY: Object to form.

14 A Well, I would say that Figure 4,
15 Figure 5, Figure 3, there are a number of
16 figures that try to depict -- and Figure 6 --
17 different views of the component service. I
18 don't know -- to say how accurately, I mean, I'm
19 an engineer. I don't think any of them are
20 super accurate, the schematics. My definition
21 of schematic isn't going to be really accurate.

22 In other words, it wouldn't be to

1 scale. Figure 4 wouldn't be to scale
2 necessarily. I think it just tries to depict,
3 you know, how it looks in service. These aren't
4 engineering drawings. These are really -- these
5 are sketches or schematics. I think "sketch"
6 may be a little weak, but it's a schematic.
7 There is no scaling. There is no dimension.
8 There is no anything.

9 Q Okay. So you said Figures 3, 4, 5
10 and 6 depict what is shown in Figure 7 but
11 assembled; is that accurate?

12 A Well, I believe what I said was
13 figures 3, 4, 5 -- what's the other one -- 6,
14 try to depict what it might look like in
15 service.

16 I'd have to -- I mean, I don't think
17 this is to scale. What I'm saying is if I had
18 Figure 7 mentioned in a solid model and I put
19 the solid model back together again to see what
20 it looks like assembled, that I don't know if
21 Figure 4 is that accurate. I think it attempts
22 to show it, but to say this is exactly how it

1 looks when it is assembled, I can't really take
2 that jump just based on a schematic.

3 Q Okay. Looking at Figure 7, would you
4 know how to assemble all of those components
5 together?

6 A I believe I answered that question.
7 Yeah, looking at Figure 7, I would know how they
8 would fit together. It may not dictate a
9 step-by-step process for how to assemble them,
10 but the exploded view gives me the information
11 about what's in the assembly, unlike Figure 4,
12 which does not.

13 Q Okay. So when -- based on your
14 understanding of how these components would be
15 assembled, would the locking part 12 cover first
16 resilient member 13?

17 MS. HALSEY: Object to form.

18 A Resilient member 13, as the claim
19 says, would be pressed up against the buckle
20 through the body. So it would be pushing
21 against it.

22 Does that answer your question? I

1 think that's what you asked.

2 Q Yeah, I don't think it did.

3 So when you assemble all of the
4 components in Figure 7, would locking part 12
5 cover first resilient member 13?

6 A Well, you can't see first resilient
7 member 13, okay. It pushes up against it. But
8 it's -- I mean, when you say "cover," I'm not
9 sure -- do you mean cover from view or -- you
10 know? Because the resilient member is between
11 12 -- the locking body and the mounting body.
12 It is between them. Whether there is a portion
13 of the locking body that goes over it, it's
14 being -- it doesn't matter.

15 When you're talking about a spring,
16 you're talking about the contact surfaces, so
17 the spring is located between the two.

18 In fact, as I look at Figure 7 and I
19 look at the locking body geometry, it seems to
20 be that the resilient members are pushed outward
21 to -- close to the extents of the width of the
22 locking body. So, yeah, it is simply between

1 the two components.

2 I mean, just because if I had two
3 surfaces compressing a coil spring, I have a
4 right side and a left side, and I look from the
5 right, I can't see the spring. That doesn't
6 mean the body on the right covers it. It just
7 means you can't see it. This covering implies
8 to me, you know, surrounded by and -- you know,
9 it is simply not. It is the resilient members
10 just between the two parts. Nothing is covered.
11 It is just really between them.

12 There is no information in Figure 4
13 that is given to me. It is in -- yeah, it is
14 just between them.

15 Q Okay. Let me ask it this way. So I
16 look at Figure 7, and if I were to put all of
17 those pieces together, I think I would get
18 something like Figure 6. Is that fair?

19 A Well, I think it describes exactly
20 what Figure 6 is.

21 So Figure 6 -- I'm on column 5 in the
22 patent, line 1. "Figure 6 is a

1 three-dimensional view of a storage box in
2 Figure 4." So Figure 6 is an image of the
3 storage box in Figure 4. It doesn't explicitly
4 state that it is what the assembly in Figure 7
5 would look like exactly. It simply says that
6 that is the exterior view that you see in
7 Figure 4, three-dimensional view of the storage
8 box.

9 Q Okay. So you're saying when I
10 assemble all of the components in Figure 7, it's
11 not going to look like Figure 6?

12 A What I'm saying is when you assemble
13 it, it should look something like it but not
14 exactly like it. It doesn't tell you, for
15 example, in Figure 4 or 6 where those springs
16 are. I believe it doesn't tell you where the
17 second resilient member is, looking at Figure 6
18 or 4. You can't tell. It is just a schematic
19 to give you an impression about what it would
20 look like. It is not an engineering drawing.
21 It doesn't tell you where the springs are.

22 Q So you're saying that a person of

1 ordinary skill in the art looking at Figure 6
2 wouldn't know where the springs are?

3 A What I'm saying is they wouldn't know
4 exactly where the springs are, how far outboard
5 they are, exactly where they contact the buckle,
6 those kinds of things. These are schematic
7 drawings.

8 Q Okay. So there is a deficiency in
9 the teachings of the '946 patent, then?

10 MS. HALSEY: Object to form.

11 A Not at all. Just because it doesn't
12 show -- the patent is not a design drawing, all
13 right. The patent does a good job at explaining
14 how it works, what the components are involved,
15 and, I'd say, maybe approximate location. But I
16 can't take this patent and convert it
17 immediately to an engineering drawing. There
18 are fits, there are tolerances, there are
19 material choices. You have to know what the
20 taper angle on the buckle is so it effectively
21 interfaces with the top. There's a lot of
22 things to do.

1 The patent is -- or any patent, to my
2 knowledge, really isn't intended to serve as a
3 blueprint that you can just directly hand it to
4 a manufacturing company to make. There's a lot
5 more that goes into it. But it does do a good
6 job in explaining to me how this works and what
7 the key components are and how they work.

8 My point is that I cannot look at
9 that -- these Figures 6 and 4 and tell you
10 exactly where the spring is. That is not the
11 intent of the patent or any patent I've worked
12 with. Unless they are claiming certain
13 positions or dimensions. Sometimes I see that.

14 Q Okay. So looking at Figure 6, you
15 don't know if there is a first resilient member
16 under locking part 12. Is that what you're
17 saying?

18 MS. HALSEY: Objection to form.

19 A What I'm saying is exactly what I
20 said. Looking at Figure 6, I don't know exactly
21 where the resilient member is. Like, when I
22 look at the top view -- let's go to Figure 4,

1 for example, okay. Figure 4, all right,
2 shows -- you know, basically it points to the
3 one with the mounting body, okay, and that's the
4 first -- I think it's the first connection part.

5 You can see the mounting body 112.
6 And you can see the two bolts and where they go.
7 And you can see what looks to be a portion of
8 the locking part, right? You can see a portion
9 of 12, but you don't know where those springs
10 are. To me, it looks like the springs are
11 outboard. In other words, they would be closer
12 to the bolts than to what you see in item 12.

13 So you don't know where they are. So
14 I think the resilient members are outboard. So
15 nothing covers it. It is -- you know, it is to
16 the sides. And that would be for a very good
17 reason because when you're designing a
18 spring-loaded slide, you'd like -- if you're
19 going to use two springs, you want them outboard
20 to resist twisting.

21 Q Sorry, you said you believe that the
22 springs are outboard? Did I hear that

1 correctly?

2 A Meaning that they are closer -- if
3 you look at Figure 4, to me, looking at Figure 7
4 and 4, they look like they are more toward those
5 bolts, toward the -- I call that outboard --
6 toward the bolts than they are toward the center
7 of locking part 12.

8 Q Which direction are the springs
9 pointing then?

10 MS. HALSEY: Object to form.

11 A They go from the mounting body to the
12 buckle, so either left to right -- in Figure 7
13 you can say right to left, how they go -- they
14 are horizontal in -- or nearly horizontal in
15 Figure 7, just as they are depicted.

16 Q Right, but I think you were talking
17 about Figure 4 as well, right?

18 A In Figure 4, well, it goes from
19 either the left to the right or the right to the
20 left. It is kind of an isometric view. You
21 really can't say left or right with any
22 certainty.

1 Q Sure. But they point toward the
2 center of the box. Is that fair, then?

3 MS. HALSEY: Object to form.

4 A What points toward the center of the
5 box?

6 Q Do the first resilient members point
7 toward the center of the box?

8 A You would have to tell me which
9 direction. It would be the plus direction or
10 minus. Do you see what I mean? What direction
11 does a spring -- you never define the direction
12 a spring points. You simply say what direction
13 the force is. I don't mean to be super
14 technical, but to say what direction a spring
15 points is kind of a -- you have to be a little
16 more specific --

17 Q Yeah, and I --

18 A -- to understand the --

19 Q Yeah, and that's why I wanted to
20 understand what you meant by "outboard." Does
21 that refer to the direction that the spring is
22 pointing?

1 A Oh, I see. I'm sorry. Yeah, let me
2 clarify.

3 If I can find a good view, it would
4 be helpful. Let's say we call a center of the
5 locking part, which is the center of the locking
6 buckle and body, let's say that's the slot 31.
7 Let's just say that's center -- a center, right,
8 meaning in a list of direction.

9 So if you go from -- if you look at
10 the locking body, I'll call them two lugs,
11 maybe, that extend back and front. Do you
12 understand what I mean? It is difficult on a
13 Zoom thing without being able to draw it, but
14 you see item 12 in Figure 7 has two bosses, one
15 to the -- that's lower left, and the one that
16 goes up on the right is partially hidden.

17 Do you understand what I mean?

18 Q You're looking at Figure 7, locking
19 part 12, and you're talking about the outside
20 edges of locking part 12; is that correct?

21 A One that goes to one of the mounting
22 slot and one that goes to the other. So they go

1 across it in the width direction. So the
2 locking part is wider than it is long, let's
3 say, and on the wide ends you have those two
4 bosses, I'll call it, okay? So they are
5 outboard of the center of that slot 31. That's
6 what I mean. Does that clear it up?

7 Q I think so. Maybe it will be
8 helpful, like you mentioned, to draw it.

9 MR. TANG: I guess, Anna, is it
10 possible to give Dr. Vallee, like, a copy of
11 Figure 7 that he can annotate?

12 MS. HALSEY: Do you want to call this
13 something specific, give it an exhibit number of
14 some sort?

15 MR. TANG: Let's just call it
16 Exhibit A to the deposition then.

17 THE WITNESS: Thank you.

18 Okay. I think this will clear it up.
19 Now, how do we get this on camera?

20 MR. TANG: I'm not really sure.
21 Bring it close to the camera, if you could.

22 MS. HALSEY: That's going to focus on

1 it.

2 MR. TANG: I think it's tracking.

3 THE WITNESS: Back it up a little
4 more.

5 BY MR. TANG:

6 Q Okay. I see two arrows --

7 A Yes.

8 Q -- towards, I'll say, the top right
9 of the page and the bottom left of the page. Is
10 that accurate?

11 A Correct. They are parallel with the
12 sides of the storage box, so that's what I'm
13 calling the outboard directions.

14 Q Okay. And I think you wrote some
15 text, and that's a bit fuzzy. Could you tell me
16 what the text is?

17 A It just says, "Outboard direction."

18 Q Okay. On the top right it says
19 "Outboard direction" and the bottom left it says
20 "Outboard direction"?

21 A You got it.

22 MR. TANG: Okay, thank you.

1 And I guess we'll scan a copy for
2 Planet Depos, if that works.

3 MS. HALSEY: I can scan a copy, and
4 if you'd like, I can also take a picture and
5 e-mail it to you now so you have it in front of
6 you.

7 MR. TANG: That would be helpful,
8 thanks.

9 And I guess, Planet Depos, if you
10 would mark that and admit that as Vallee
11 Deposition Exhibit A.

12 (Vallee Deposition Exhibit A marked
13 for identification and attached to the
14 transcript.)

15 BY MR. TANG:

16 Q Okay. So going back then, you're
17 saying that first resilient member 13, there
18 would be two of them, and they would both be on
19 the outboard direction; is that right?

20 A That's the way I interpret Figure 7.

21 Q Okay. And so, when assembled, it
22 would still be in that orientation; is that

1 right?

2 A When assembled, the springs would be
3 aligned the way they are in Figure 7, that is
4 correct.

5 Q Okay. And then, when assembled,
6 those springs would not be visible anymore; is
7 that right?

8 A Correct. From the outside of the
9 unit, you could not see the springs.

10 Q Right. Like from the top down,
11 locking part 12 would cover the springs.

12 A Well, portions of the mounting body
13 would also probably cover the -- actually, I
14 don't think any part of the part 12 would cover
15 the springs. I think it would be part 112,
16 which is the mounting body line.

17 Q From the top -- go ahead.

18 A I'm sorry. From the top view, okay,
19 you wouldn't be able to -- the -- I wouldn't say
20 they cover it. They obstruct the view of the
21 springs, and I think it is the mounting body
22 112, in my opinion, that would prevent you from

1 seeing it, because once -- actually, I'm sorry,
2 I stand corrected.

3 If I do look at Figure 4, right, and
4 it is inboard of the bolt, the first obstruction
5 to your view would be the top surface of the
6 first container adjacent to the bolt head you
7 see in Figure 4. So that obstructs your view of
8 the spring, the resilient member. And then it
9 looks like a portion of 112 would also obstruct
10 it. Do you see what I mean? I don't think any
11 part of the buckle does.

12 Q Okay. So you're saying that mounting
13 body 112 is the component that obstructs the
14 view of first resilient member 13; is that
15 right?

16 A Well, as I -- I'm sorry, as I look at
17 Figure 4, I think Figure 4, that top surface of
18 the container, the box, adjacent to the bolt, if
19 you're looking from the outside, that's what
20 obstructs your view. That's why you can't see
21 the springs. And even if you cut that out, I
22 suspect that the springs -- there is an

1 obstruction because of the mounting body.

2 Again, these aren't engineering
3 drawings so I can't tell you for sure. I don't
4 know about the mounting body, the obstruction.
5 I'm more -- if, when you assemble Figure 7 and
6 it looks like Figure 4, it looks like the top
7 surface of the box obstructs your view of it.

8 Q Okay. So if I assemble mounting body
9 112 and first resilient member 13 on the box and
10 I don't include locking part 12, would I be able
11 to see the springs?

12 A I believe, as I just said, the
13 adjacent part of the top surface of the box is
14 probably what obstructs your view.

15 Q So when I don't include locking part
16 12, you're saying I would not be able to see the
17 spring still?

18 MS. HALSEY: Object to form.

19 A If you look from straight down.
20 Again, there is so little detail. There are no
21 dimensions here. So it is hard for -- you know,
22 it is very difficult to say. I can only go by

1 if I look at Figure 4, it appears that if you
2 removed the locking part, you may not be able to
3 see the springs still. Without engineering
4 drawings, we just see sketches. It's really
5 hard to interpret.

6 Q Okay. So your interpretation of
7 Figure 4 is that there would be a first
8 resilient member 13 in that figure?

9 MS. HALSEY: Object to form.

10 A My interpretation of Figure 4 is
11 that -- well, again, it gave me the description
12 right in the patent. Figure 4 is -- column 4,
13 line 64, "Figure 4 is a schematic diagram of the
14 partially exploded structure of Figure 3."
15 That's what it says. When I look at Figure 3,
16 Figure 3 has the locking part pulled out, and if
17 one assumes that Figure 4 is similar to, in
18 appearances, Figure 7, we'll look at the way it
19 is assembled. And, again, if Figure 4 depicts a
20 functioning unit, then I would have to believe
21 the resilient members are in there, but you
22 can't see where they are or how they are

1 oriented from Figure 4. It gives you no
2 information about the resilient members.

3 Q Okay. So let's go back to Figure 7,
4 then. I'd like to talk about mounting
5 portion 11. Do you see that in Figure 7?

6 A I do.

7 Q All right. And if you would like to
8 refresh the description on this, you can go to
9 column 6, line 53.

10 A Okay. I'll do that.

11 (Witness reviewing document.)

12 Okay, I'm good.

13 Q All right. And so you see here that
14 mounting body 112 is an element of mounting
15 portion 11; is that accurate?

16 MS. HALSEY: Object to form.

17 A Well, I mean, the mounting body is
18 part of the mounting portion. The mounting body
19 is 112 in the slot. And they define those as
20 111 and 112. So the locking part 112 is a
21 sliding latch that moves horizontally relative
22 to the mounting portion. I mean, 112 and 111

1 are part of the mounting portion.

2 Q Okay --

3 A Okay.

4 Q -- right. And so mounting body 112
5 is an element of the mounting portion 11, right?

6 A It is part -- 112 and 111 are part of
7 the mounting portion 11.

8 Q Okay. And so is the mounting body
9 112 attached to the lid of the storage container
10 or the body of the storage container?

11 A Well, 11 is mounted in. I mean,
12 that's -- that, I believe, is the part 52, which
13 is -- 52 is the hinged lid. So -- and I'm at
14 column 6, line 16.

15 And if you look at Figure 8 of this
16 em- -- well, not Figure 8. Yeah, so it's in the
17 hinged lid 52.

18 Q Right. So mounting body 112 is
19 attached to the hinged lid, correct?

20 MS. HALSEY: Object to form.

21 A I'm sorry, you said the locking --
22 mounting body or locking body?

1 Q Mounting body 112 is attached to the
2 lid of the storage container, right?

3 A Yes, the hinged lid.

4 Q Right. It is not attached to the
5 body of the storage container.

6 MS. HALSEY: Object to form.

7 A Bear with me just one second, please.

8 I'm just looking for the section
9 where they define exactly what body it is.

10 (Witness reviewing document.)

11 I'm on column 6 here, around line 25,
12 where it talks about the connection structure
13 module provided on a storage box.

14 And, I mean, now we're down at
15 column 6, 54 or 53. "As shown in Figure 7, in
16 this embodiment, the mounting portion 11 is
17 fixedly connected to the box lid ... and a
18 mounting body 112 in the slot 111, which can be
19 bolted into the mounting slot 111."

20 So it's in the lid.

21 Q Okay. And, yeah, I guess, just to
22 help out here maybe, looking at column 6,

1 lines 49 through 52, right, there is a
2 discussion of a box body as well.

3 Do you see that?

4 A Uh-huh.

5 Q Sorry, did you say yes?

6 A Yes, I see it. I'm sorry. I know,
7 I'm sorry, I apologize for mumbling. That's in
8 other embodiments.

9 Well, yeah, the projections are on
10 the box body. That's the piece that fits in
11 there. But anyway, to answer your original
12 question, the mounting portion is on the lid.

13 Q Right.

14 A And if we define the body as the
15 underside of the -- I mean, if the body is the
16 remainder of the container, then it is on the
17 lid, not the body.

18 Q Okay, gotcha. Okay. I guess let's
19 go back to column 6. We're looking at lines 53
20 to 60. I think that's the one you just pointed
21 to.

22 A Yep.

1 Q All right. And I'm looking at this
2 paragraph. Does it say that the mounting body
3 can have multiple different configurations?

4 MS. HALSEY: Object to form.

5 A The mounting portion 11 includes a
6 top and a lid and the mounting body. And it
7 says, in other embodiments, it can be integrally
8 formed or fixedly connected such as a snap-on.

9 But your question was does it say --
10 what was that again, I'm sorry, if you can
11 repeat it.

12 Q Yeah. So based on that description,
13 can the mounting body have different
14 configurations?

15 A Well, that paragraph doesn't tell me,
16 but if we look at the claims, it could have some
17 requirements on the mounting body, like if we go
18 to column 15 -- I'm on line 9 -- "said first
19 connecting part comprises a mounting body, a
20 lockable buckle movable with respect to said
21 mounting body, and a first resilient member
22 located in between." So it says that resilient

1 member between the mounting body and the locking
2 buckle. Then it gives a little more detail.

3 Let's go to line 18. "The locking
4 buckle is configured to slide inward with
5 respect to the mounting part." So that tells me
6 that the mounting body -- and I could go on even
7 in the claim, but essentially what that claim
8 tells me is that the mounting buckle moves
9 inward and the spring has to be in the middle.
10 It has to be oriented that way so the spring
11 pushes in.

12 So the mounting body needs to be
13 oriented the way it is in Figure 7. And the
14 mounting buckle has to be oriented the way it is
15 in Figure 7. And the spring has to be between
16 the two so that it exerts a force -- the
17 reaction forces on the mounting body, and the
18 force of motion, if you will, pushes against the
19 buckle to snap it back so it grabs the top
20 container.

21 Q Okay. So you mentioned the claims.
22 When you read the term "mounting body" in the

1 claim, does that encompass all of the
2 embodiments in column 6, lines 53 through 60?

3 A Column 6.

4 (Witness reviewing document.)

5 So that's column 6 and starting at
6 line 53. "As shown in Figure 7, mounting
7 portion 11 is fixedly connected to the lid." We
8 went through that. "The mounting portion 11
9 includes a mounting slot 111 in the lid and the
10 body 112" -- it says that -- "can be bolted ...
11 or can be fixedly connected, such as snap-on."

12 So there is nothing in that paragraph
13 that violates claim 1, if that's what you're
14 asking.

15 Q Right. So when you read the term
16 "mounting body" in claim 1, all of these
17 embodiments can serve as examples of the
18 mounting body of claim 1, right?

19 A Well, Figure 7 happens to be one
20 embodiment. So, you know, it's referring to
21 Figure 7. When it says "other embodiments," it
22 is referring to Figure 7, that and -- so I think

1 what it is saying is that you have the
2 embodiment shown in Figure 7. By simply
3 changing the mounting slot to be formed or
4 integrally connected, you can come up with
5 another embodiment. But if that is the only
6 change in the other embodiment, then it is
7 still -- it's claim 1.

8 Q Right. So I guess I'll ask it this
9 way, right? Like you said, there is a phrase
10 here that's "The mounting body can be integrally
11 formed with mounting slot 111."

12 That type of mounting body is within
13 the scope of claim 1; is that fair?

14 A Yeah, if that slot in the same
15 configuration doing the same job as the mounting
16 body in Figure 7, if that can be molded or
17 made -- I guess they say if it's integrally
18 formed -- in other words, you take -- it's in
19 Figure 7, and you simply mold that feature into
20 the lid. That's what that means.

21 So if you mold it into the lid, but
22 it still behaves like the stopping part where

1 the -- it's -- I'll say it's toward the outside
2 of the lid, it acts as a stationary support for
3 the resilient members to be located. It allows
4 a sliding -- a locking buckle to slide linearly
5 within it under the force of resilient members
6 13, and it's integrated such that you can still
7 get the top container in and snap it in. That's
8 what that means.

9 So if all that is still present, then
10 it does not violate the claims.

11 Q Right. It falls within the scope of
12 the claims, right?

13 A Yes. It has to do the same thing in
14 the same way that the mounting buckle in the
15 figure does -- I'm sorry, the mounting body
16 does.

17 Q Okay. And then there is a remaining
18 portion on 59 through 60 that says, "The
19 mounting body 112 ... can be fixedly connected
20 by means such as snap-on." Do you see that?

21 A I do.

22 Q Okay. And that is also encompassed

1 within claim 1; is that fair?

2 A Well, again, it can't violate
3 claim 1. So if it's -- for example, it is
4 fixedly connected in the same way so that you
5 have the function shown in Figure 7, then it
6 doesn't violate the claim. So you can take that
7 part instead of a bolt, for example, and if you
8 put two -- if you put another latch on the
9 inside and a release on the lid, you could snap
10 that component axially into the lid and have the
11 same configuration.

12 It's just you have to -- you have to
13 configure that mounting body -- whether it is
14 molded integral or it's snap fit or however you
15 do it, it has got to be the same orientation
16 doing the same thing that it does in Figure 7.
17 Then it will satisfy the claim.

18 Q Okay. So I think you also used the
19 term "violate the claim." What does that mean?

20 A Well, I mean doesn't satisfy the
21 claim, is what I should have said. Not being a
22 patent attorney, I don't want to use terms that

1 may have a legal connotation. I just mean it
2 doesn't satisfy the claim.

3 Q Right. I guess maybe to make sure I
4 understand it correctly, you're saying, again,
5 claim 1 encompasses all of the mounting body
6 configurations that we just talked about because
7 they don't violate the claims; is that right?

8 MS. HALSEY: Object to form.

9 A Claim 1 -- I'll go backwards. If the
10 mounting body is positioned and installed, has
11 the same use, and is -- acts as one, and for the
12 resilient member, two, the resilient member has
13 got to be between that mounting body, whether it
14 is molded, snap-in, whatever, and the mounting
15 buckle. And it has to -- everything we talked
16 about. If it is aligned like that as a mounting
17 body, if it still operates like a mounting body
18 does as described in the claims, then the claims
19 are satisfied. But it has to be done the way
20 the patent and the claims describe it has to be.

21 Q Okay. What does it mean to be
22 integrally formed within mounting slot 111?

1 A I think, as I said earlier, if it is
2 integrally formed, then you probably find a way
3 to mold -- assuming that the lid is a polymer,
4 you would mold or fabricate it as part of the
5 same tooling and you would create the rest of
6 the lid.

7 Q Can the portion of the lid itself be
8 considered a mounting body?

9 MS. HALSEY: Object to form.

10 A The area of -- if you were to
11 integrally -- I'll say molding as an example of
12 integrally forming, okay, if you molded the
13 mounting body, which is a separate structure,
14 it's just fabricated at the same time you make
15 the lid. But it still -- if it does what the
16 claims say it has to do, then that portion of
17 the lid is the mounting body. But it has to do
18 what the claims say it has to do.

19 The mounting body must be on one end
20 of the resilient member and allow the mounting
21 buckle to slide axially within it. And the only
22 thing between the mounting buckle and the

1 mounting body has to be the resilient member.
2 The resilient member has to be between those
3 two, is what I should say.

4 Q Sorry, you're correct in saying you
5 don't need there to only be a resilient member
6 between those two things?

7 MS. HALSEY: Object to form.

8 A No. What I'm saying is you have the
9 mounting body, then the spring, then the
10 buckle -- or the body of the buckle in this
11 case. That's how it is going to be oriented.

12 Q Okay. And so the lid itself could be
13 a mounting body?

14 A No. The mounting body could be
15 injection molded to be integral with the lid.
16 The mounting body in that case would be the
17 portion of the lid where one end of the spring
18 contacts, and the spring has -- and it allows
19 the spring to be located between the locking
20 buckle and the mounting body.

21 In other words, it would look very
22 similar. It would just be, like, injection

1 molding that part into it. That's what that
2 passage in the specification means.

3 Q Right. So you're saying you would
4 create a mold of a lid that would already have
5 the mounting body as part of that. Is that what
6 injection molding means?

7 MS. HALSEY: Object to form.

8 A The tooling would allow you to mold
9 the mounting body at the same time you mold the
10 lid and they would be one unit. That's commonly
11 done to eliminate manufacturing steps, right, so
12 you don't have to have a different part and use
13 a fastener. You can actually lower costs by
14 doing it in one, but, again, it has to satisfy
15 the claim language.

16 Q Okay. So in that example, you would
17 have the lid with this particular molding and
18 you would have the spring and then you would
19 have the locking part; is that fair?

20 MS. HALSEY: Object to form.

21 A Well, what you would have is
22 something that looks very similar to how

1 Figure 7 would look if you simply took the
2 mounting body and glued it in for example.
3 Or -- you know, it would look very similar to
4 that except you wouldn't have a glue line. But
5 the mounting body has to be outboard so that the
6 resilient spring can contact it and the other
7 end of the spring can contact the locking
8 body -- through the locking body. That's what
9 I'm saying.

10 Q Okay. So in that example what we're
11 saying is the manufacturing would have a mold
12 that includes the lid and the mounting body as
13 just one single piece; is that right?

14 A They would be, right, molded
15 together. That is correct.

16 Q Okay. So then, right, like you said,
17 the portion of the lid, that portion could be in
18 the mounting body?

19 A Right. Well, that would be the
20 mounting portion and the mounting body would
21 be -- look similar to what's in Figure 7 for the
22 mounting body. It would just be molded

1 together. It wouldn't have a separate part.

2 Q Okay. So then moving on to the next
3 part of that sentence, "fixedly connected by
4 means such as snap-on," what does that mean?

5 A I think I went through that before.
6 You could simply take that mounting body that's
7 shown in Figure 7 -- so you have 112, and it is
8 clear that it goes into the mounting slot 111,
9 and it would slide in through the slot because
10 it wouldn't go from the top. It would -- it
11 wouldn't go from the top. It has to come from
12 the left side in Figure 7 because there is a
13 surface to constrain the bolt head, right?
14 You're going to bolt it in, right? There is a
15 bolt hole there.

16 So that would slide in from the
17 slide, and one way you could snap it in is you
18 could have a resilient -- I'll call it a latch,
19 like in a battery compartment. If you're
20 familiar with walkie-talkies or any toys, if you
21 have kids, you know, with the removable
22 batteries, and you push down, and the little

1 latch depresses, and you can slide the battery
2 compartment out or you can slide it in. And the
3 action of sliding in depresses the latch and
4 resets it. You could put one of those on each
5 side of that -- of the mounting body 112, and
6 have a recess in the sides of the groove 111 and
7 snap it in. That eliminates the need for the
8 bolt.

9 Q Right. So you're saying in the
10 snap-in example, you wouldn't use the bolts
11 anymore.

12 MS. HALSEY: Object to form.

13 A If you had a snap-in, you could use
14 the bolts if you wanted an extremely rigid
15 connection. Or you wouldn't have to.

16 Q All right. I think I'd like to turn
17 to claim 1 now.

18 A Okay.

19 Q And it might be helpful if you have
20 your declaration available, and I'm simply
21 looking at the Table of Contents of your
22 declaration.

1 A Okay. Let me get there, please.

2 All right.

3 Q Okay. So in looking at the Table of
4 Contents, I believe in your declaration you
5 raise some objections related to the Li
6 reference and the Baruch reference. Is that
7 fair?

8 A Well, I discuss how I feel that the
9 Li and the Baruch reference make things obvious
10 or make things anticipated. I do that. So I
11 have objections to the petition where it would
12 say that it is obvious or anticipated, but yet I
13 see that's page 21 -- well, it goes on from
14 there. I first discuss the references on 21.
15 And then in the body of the petition, I talk
16 about the details. So that is correct.

17 Q Okay. So just to understand your
18 objection, I'd like to go through claim 1 and
19 talk about how you've analyzed them in view of
20 Li and Baruch.

21 A Okay. I'll get there in the report.

22 Okay.

1 Q Yeah, I'm really just going to step
2 through claim 1 at this point.

3 A Okay. And I believe I start that on
4 page 26, I believe. Well, technically the
5 bottom of 25, but 26, okay, I'm with you.

6 Q Okay. So I'm looking at claim 1,
7 which starts, "A storage box comprising."

8 Do you see that in claim 1?

9 A I do.

10 Q You don't dispute that Li and Baruch
11 teach a storage box, correct?

12 A No, it's how the storage box is
13 configured that I disagree with.

14 Q Right, okay. And so then moving on
15 to the next portion, it says, "A first
16 connection part disposed on one area of said
17 storage box connectable to a second connection
18 part of another storage box."

19 Do you see that?

20 A I do.

21 Q And you don't dispute that Li and
22 Baruch teach this first connection part, right?

1 A Well, there are different connection
2 parts, but in my declaration I don't take issue
3 with that element.

4 Q Okay, right. And Li and Baruch, you
5 don't dispute that they teach the second
6 connection part?

7 A Well, now we're talking about Li and
8 Baruch. Can we take them one at a time?

9 Q Sure, we can take them one at a time.
10 Sure. In your declaration you don't dispute Li
11 teaches the second connection part; is that
12 fair?

13 A Well, it has a first connection part,
14 but it is not the first connection -- I don't
15 disagree it has a first connection part, but it
16 is not the first connection part with all the
17 other details that it says in the claim. But it
18 has a connection part, so I don't disagree it
19 has a connection part. It is not the same
20 connection part as spelled out in the patent, if
21 we go down to the other elements of the claim.

22 Q Sure. All right. Yeah, why don't we

1 move on, then, to that part.

2 So the next part of the claim says,
3 "Wherein, said first connection part comprises a
4 mounting body, a locking buckle movable with
5 respect to said mounting body, and a first
6 resilient member located between said mounting
7 body and said locking buckle."

8 Do you see that?

9 A I see that.

10 Q In your declaration, you believe Li
11 does not teach this element; is that fair?

12 A Correct.

13 MS. HALSEY: Object to form.

14 A I do not believe that Li teaches a
15 mounting body, a locking buckle, et cetera, what
16 you read. That is correct.

17 Q Okay. And for that same element you
18 also believe that Baruch does not teach that; is
19 that fair?

20 A Let's see. It would be page 33.

21 All right. So that is correct.

22 Q Okay. Moving on in that same clause,

1 it says, "Wherein said first resilient member
2 keeping said locking buckle automatically in a
3 locked state." Do you see that?

4 A Well, "Wherein said" -- in the same
5 claim element, "Wherein said first resilient
6 member keeping said locking buckle automatically
7 in a locked state," that is correct.

8 Q Okay. And you don't have in your
9 declaration any dispute related to Li teaching
10 that claim element; is that fair?

11 A Well, it's the -- let's see.

12 (Witness reviewing document.)

13 I'm sorry, which part of that claim
14 are you reciting again? I was looking in here
15 and I lost it.

16 Q So it is the "first resilient member
17 keeping said locking buckle automatically in a
18 locked state."

19 A Well, my problem is with the first
20 resilient member, and because it is a -- it is
21 not the resilient member defined among the
22 claims between the mounting body and the locking

1 buckle. That's the issue that I have.

2 Q Right. And so you don't have any
3 specific issue, in the declaration at least,
4 specific to keeping the locking buckle
5 automatically in a locked state. Is that fair?

6 MS. HALSEY: Object to form.

7 A The issue I have is it is not the
8 same locking buckle. If you define the locking
9 buckle in Li versus the '946, they are not the
10 same. If you define how the resilient member
11 is -- operates, it's not the same.

12 So I discuss those issues in the
13 declaration here. I don't have a section that
14 specifically says, you know, first resilient
15 member, like I do in other parts of my
16 declaration. That doesn't mean, oh, that part
17 is okay. No, no, no, no, no. I have a problem
18 with resilient member and the locking buckle as
19 it's defined by Li.

20 Q Okay. And your declaration doesn't
21 have any section related to Baruch teaching this
22 claim element; is that fair?

1 A Well, let's take a look.

2 (Witness reviewing document.)

3 The section on Baruch starts at 33.

4 And, again, they're talking about "first
5 resilient member keeping said locking buckle
6 automatically in a locked state," as I recall,
7 right? That's what we're discussing now with
8 respect to Baruch?

9 Q That's correct.

10 A I don't have a separate section on
11 it, but, similarly, I have a problem with the
12 resilient member, which is a torsion spring, I
13 believe, and its orientation to the locking
14 buckle. So, yeah, within my declaration I talk
15 about those things I just don't have a separate
16 section specifically on that.

17 Q Okay. So I guess moving on to the
18 next part, the next part of the claim says, "a
19 second connection part of the other storage box
20 comprises a mating part interlockable with the
21 locking buckle."

22 Do you so that?

1 A And which line are we on?

2 Q We are on line 15.

3 A I'm sorry, did you say 15?

4 Q 15, yes.

5 A Okay. So we're -- okay. Okay, I see
6 it.

7 Q Okay. So you don't dispute that Li
8 teaches the second connection part, right?

9 A Well, I don't say Li teaches the same
10 connection, but what I'm saying is that I don't
11 dispute that there is a second connection part,
12 with a mating part interlockable with the
13 locking buckle. But it is not the same locking
14 buckle, right? So, in a sense, I dispute that
15 because I dispute the definition of the locking
16 buckle. But I don't have a separate section of
17 the report that specifically delineates that
18 particular claim element.

19 So when I discuss the problems I have
20 with the claim above that section in the
21 previous section we just discussed, which is,
22 like, on page 26, there are so many differences

1 between the connection parts. I think if you're
2 picking out -- you're picking it apart, the
3 claim. We have to read the claim in its
4 entirety.

5 So I -- you know, what I discussed in
6 my declaration is how I feel it does not satisfy
7 the claim language, okay. So maybe it may --
8 there may be a sentence in there that may not be
9 applicable, but you have to read the claim as a
10 whole. And when I read that claim as a whole, I
11 have problems with everything I have in my
12 report.

13 In fact, I mean, it's "A storage box
14 comprising." Well, clearly, it's not -- it
15 doesn't comprise what the '946 patent says it
16 does, okay? So as I state in my report, I
17 detailed everything I feel that the Li patent
18 does not satisfy as far as claim 1 goes.

19 Q Okay. So your report also doesn't
20 include an argument that Baruch does not teach
21 the second connection part; is that fair?

22 A Baruch and the second connection

1 part?

2 (Witness reviewing document.)

3 The first connection part is the
4 latch, and the second connection part is --
5 yeah, I don't think I discuss the second
6 connection part. I don't discuss the -- I mean,
7 there is so much wrong with Baruch that, you
8 know, if the latch is completely different, it
9 is kind of irrelevant what the second connection
10 part is. But, no, I didn't -- I don't discuss
11 that in my report.

12 Q Okay. And then I'd like to jump down
13 to "stop part," which is at line 27.

14 A I see it.

15 Q Okay. And so in your declaration you
16 don't dispute that Li teaches a stop part,
17 correct?

18 A Li does not teach the stop part in
19 this claim.

20 Q Is that in your declaration?

21 A Well, let's see.

22 (Witness reviewing document.)

1 So let me put it this way. So the --
2 I don't have a separate section addressing "stop
3 part," okay, because the -- I mean, the -- I've
4 shown the locking buckle is very different than
5 anything that Li has. So discussing further the
6 stop part in particular, if it -- it really
7 doesn't matter if you don't even have the same
8 locking buckle.

9 But you are correct. I don't discuss
10 "stop part." But if you look at the Li
11 device -- and do I have a good one?

12 I'm going to look at the Li patent
13 for just a second if that's okay.

14 Q Sure.

15 A Can someone pass me the Li. I forget
16 what exhibit it is. I can point you to
17 Figure -- it's Figure 4 of Li, the patent -- the
18 '985 -- I guess it is an application for
19 publication -- publication, yes.

20 If you look at that figure, that
21 is -- it is not the same, for example, stop
22 part, because of the way it is already in here.

1 With respect to what he calls a locking buckle,
2 I don't agree with, but --

3 Q I'm sorry, what is the stop part in
4 Figure 4?

5 A Okay. In Figure 4 I think -- I don't
6 know if he calls -- he calls item 33, "elastic
7 boss."

8 Q So elastic boss 33 is the stop part?

9 A No. I'm just saying that the closest
10 thing to the stop part would probably be 33.
11 But since -- I guess my point is really that
12 it's not the same locking buckle, so I don't
13 discuss that -- the closest thing to a stop part
14 in the '946 patent. I believe he calls -- stop
15 piece 35 is something completely different,
16 right? Those are those two little feet that pop
17 out at the bottom of that assembly.

18 Q Right, but, yeah, we're talking about
19 stop part in the claim, right? Your declaration
20 doesn't have a section that says, Li doesn't
21 teach a stop part, fair?

22 A Yeah, I don't have a section related

1 to Li's stop part either way.

2 Q Right, okay. And then the same goes
3 for Baruch, right? There is not a section in
4 your declaration that says Baruch doesn't teach
5 a stop part. Is that fair?

6 A Yeah, for the same reason, Baruch
7 just teaches something that becomes an obstacle,
8 but there is so much else that's different. I
9 don't have a separate section just dedicated to
10 that.

11 Q Okay. So I'd like to turn to
12 paragraph 38 of your declaration.

13 A Paragraph 38. I am there.

14 Q All right. So in paragraph 38 you
15 reference the plain and ordinary meaning of the
16 term "stop part"; isn't that right?

17 A I'm sorry, I flipped to page 38,
18 meanwhile it's paragraph 38.

19 Q That's right.

20 A Okay. Yes, I do.

21 Q Okay. So is it your position that
22 the term "stop part" needs a construction or

1 does not need a construction?

2 A Well, stop part is explained in the
3 claim. I mean, stop part is the name of item --
4 let's see, 3, I guess, in Figure 7, right? So
5 stop part is defined in claim 1 as to what that
6 is. The claim tells me what stop part is.

7 Q Okay. So you're saying stop part
8 doesn't need a construction because claim 1 is
9 sufficient?

10 A Well, claim -- I mean, stop part, if
11 you take the plain and ordinary meaning and then
12 read the claim, you know what it is.

13 Q Yeah, I believe what I asked is it
14 looks like you provided a construction in
15 paragraph 38.

16 A Right. In paragraph 38, the "plain
17 and ordinary meaning," to someone such as myself
18 in the art "in the context" -- you always have
19 to be in the context of the claims, as I
20 explained -- "is 'a retractable part, which is
21 extended into the locking path of the locking
22 part when the connection parts are in an

1 unlocked state, and which is compressed out of
2 the locking path of the locking part when the
3 connection parts are in a locking state," which
4 is basically what the claim says.

5 Q Right. So you just copied elements
6 from the claim and put them into your
7 construction?

8 MS. HALSEY: Object to form.

9 A No. Again, I have to -- we do this
10 in the context of the claims. But, I mean, you
11 could have different stop parts, right, and
12 different things that stop other components.
13 But, you know, I understand, as a person in the
14 art in connecting technology, after reading this
15 patent, you know, what they mean by stop part.
16 They could have called it anything. So if I
17 look at some names and patents, I don't know
18 where they came from. But I just look at the
19 term "stop part," as one in the art, and it is
20 clear to me what it is.

21 Q Okay. So now I'd like to move on to
22 paragraph 39, and here in your declaration it

1 talks about the term "mounting body." Do you
2 see that?

3 A I do.

4 Q All right. And moving to
5 paragraph 40, you indicate that term "'mounting
6 part' ... is used interchangeably with the term
7 'mounting body.'" Is that right?

8 A I'm sorry, where are we again? What
9 paragraph?

10 Q Paragraph 40.

11 A Okay. And 40 says, "In the District
12 Court case, the parties agreed to the
13 construction of 'mounting part' as 'plain and
14 ordinary meaning.'"

15 Okay. Well, that was a District
16 Court case. I'm not familiar with the District
17 Court case, but yeah, that is true.

18 Q Right, that "mounting part" is used
19 interchangeably with "mounting body," right?

20 A Evidently in the District Court case
21 that's what they said, not in this case. I
22 don't think anyone has -- not in this case, to

1 my knowledge.

2 Q Do you disagree with the District
3 Court's position?

4 A I am not involved in that case, and I
5 don't know why -- I wasn't there when they made
6 the decision. I don't know what they are
7 thinking. I know what I'm thinking. And you
8 know, what I think is obviously in my
9 declaration. I'm just not aware of the details
10 of that District Court case. I'm not involved
11 in it.

12 Q You cited it in your declaration so
13 that's why I'm asking about it.

14 A That's true, because I was told that
15 they were used interchangeably. That's true.

16 Q Okay. But you're taking no position
17 on whether or not that's correct?

18 A Well, my position is really in
19 paragraph 41, okay, where I state -- so even if
20 a District Court did say a mounting part and
21 mounting body can be used interchangeable, I
22 write in paragraph 41, "It does not appear that

1 Petitioner has applied a 'plain and ordinary'
2 meaning to the term in the invalidity analysis"
3 and arguing that "'mounting body' comprises a
4 combination of multiple prior parts," like the
5 chute, et cetera.

6 Q Okay. If I could direct you to --

7 A I --

8 Q -- paragraph 44, that might help.

9 I'm sorry, did you have more?

10 A Yeah, just that, you know,
11 paragraph 40 says, "interchangeably," and
12 whether you talk to either one of them, it's
13 plain and ordinary meaning. That's in there
14 just to say, I'm looking at it with plain and
15 ordinary meaning. By the way, this District
16 Court case used plain and ordinary meaning,
17 okay. But it seemed to me in the petition they
18 were trying to argue something a little bit
19 different. That was my point.

20 Now you're directing me to
21 paragraph 44?

22 Q That's right.

1 A And we may be coming upon a break
2 time at some point? I don't know how long we've
3 been going.

4 Q Yep, just a couple more questions.

5 A Okay, so 44. Okay, I'm there.

6 Q Okay. And so is this where you
7 provide the plain and ordinary meaning of
8 mounting body?

9 A Yes. "The portion of the first
10 connecting part attached to the body of the
11 storage container relative to which the locking
12 buckle slides."

13 Q Okay. And that is the entirety of
14 the construction; is that fair?

15 MS. HALSEY: Object to form.

16 A Well, I say that's -- now, that's the
17 construction -- I mean, that's the plain and
18 ordinary meaning. I'm not sure there is,
19 really, technically a construction. You know,
20 you look at the patent and then you look at the
21 term, "mounting body," and that's the plain and
22 ordinary meaning, and I think that -- and that

1 is correct, what I put in paragraph 44.

2 Q Okay. And I'm looking at Figure 7,
3 which you have here again, and I think we
4 previously said in Figure 7 the mounting body
5 attaches to the lid of the storage container,
6 right?

7 A Yes, in that embodiment, through a
8 bolt.

9 Q Okay, right. And so does your
10 construction need to be modified to say that
11 instead?

12 MS. HALSEY: Object to form.

13 A Why would it?

14 Q So your construction currently says
15 "body of the storage container," correct?

16 A Right. But it's the storage
17 container where it slides. If you go to the
18 spec -- let's see.

19 Bear with me just for a second.

20 (Witness reviewing document.)

21 I'm sorry, I'm finding where that is
22 in the specification. It's taking a minute.

1 Q Sure. I can help. If you want to
2 look at column 6, line 53, it might be that
3 portion.

4 (Witness reviewing document.)

5 A Well, okay. So here the body of the
6 storage container is going to have -- you have
7 the lid. If you -- I mean, the idea behind, you
8 know, the definition of mounting body is it's
9 got to be connected to the body of the storage
10 container, right, because if it is not, and you
11 have something on top of it and you lift it up,
12 the lid just goes. It has got to be connected
13 to the storage container, right, so you can lift
14 the whole thing up, so you can stack them,
15 right?

16 The whole thing is connected
17 together. I am looking at Figure 7, okay. So
18 it is connected to the body of the storage
19 container through the lid, right? "The first
20 connection part to the body of the storage
21 container relative to which the locking buckle
22 slides." That's just telling you it has got to

1 be part of the -- it's got to be connected to
2 the body. Otherwise, you're just lifting the
3 lid off and then you have all your tools on the
4 ground.

5 Q Well, I think the lid is connected to
6 the body, right?

7 MS. HALSEY: Object to form.

8 A If the -- they are all -- like in any
9 assembly, you know, there is nothing in that --
10 in paragraph 44 that says it cannot be connected
11 to the -- if the lid is connected to the body,
12 then you're connected to the body, right?

13 Q No, I don't think that's right.
14 So --

15 A If I'm sitting --

16 Q Go ahead.

17 A If I'm sitting in my car, right,
18 I'm -- I'm in the -- the car has a cabin with
19 the air conditioning and the seats, and I'm
20 sitting in the cabin, I'm sitting in the car
21 because the cabin is connected to the car as a
22 whole. No, I think that construction is

1 correct. The whole idea of it, as one in the
2 art, the mounting body has got to be connected
3 to that storage container somehow, right.

4 The embodiments show it in detail,
5 the lid, but the lid is part of the higher -- it
6 is connected -- it is still connected to the
7 storage container.

8 Q So I think a storage container has a
9 body and it has a lid on top of the body, and
10 this piece mounts to the lid. Is that wrong?

11 A But the whole idea is it is attached
12 to the body, all right, so they are all
13 attached. I can't pull the mounting body out
14 and not drag the -- I can't pull the mounting
15 body out of this assembly and not drag the body
16 with it -- the body of the container with it,
17 right? Because they are all together, right,
18 according to "the first connection part attached
19 to the body of the storage container relative to
20 which the mounting buckle slides."

21 So it is connected to the storage
22 container -- to the body of it. It is connected

1 to the whole thing. As it's shown there, it's
2 positioned as one in the embodiment here, it is
3 positioned on the lid.

4 And looking at the claim -- let's
5 see. And claim 1 starts with you have a first
6 connection part. But let's go to mounting body.

7 Yeah, I mean, that's -- claim 1
8 doesn't say that it has to be on the lid or the
9 body. There is a second connection part, but it
10 has to be on the other container, and it says
11 that the locking buckle is movable with respect
12 to it.

13 Q Okay. So is it your position that
14 the lid is part of the storage container?

15 A The lid, the body are part of the
16 storage container.

17 Q The mounting body? What do you mean
18 by when you say "body"?

19 A I'm sorry. That's why we need to
20 take a break soon.

21 The lid and the body of the
22 container. That's the container, okay? And the

1 mounting body has to be connected to, as I say,
2 the body of the storage container. See, I could
3 also -- I could envision an embodiment where you
4 simply have a truncated lid and if we call it
5 the body comes up farther, we stick it in there.
6 We stick the mounting body in that portion.

7 It has got to be connected, and, you
8 know, that plain and ordinary meaning for
9 mounting body means it is connected to -- it's
10 got to be connected to the storage container.

11 MR. TANG: Okay. Why don't we go
12 ahead and take that break then. I guess it's
13 about noon here, did you want to take a longer
14 break?

15 THE WITNESS: I don't know, maybe 30
16 minutes, 35?

17 MS. HALSEY: Yeah, it's 11:55, so why
18 don't we go until 12:30.

19 MR. TANG: That works for me. that
20 works.

21 (A luncheon recess was taken.)
22

1 BY MR. TANG:

2 Q Dr. Vallee, during this break, did
3 you talk to counsel at all about the content of
4 your testimony?

5 A No.

6 Q Great. Okay. So I'd like to turn to
7 paragraph 47 of your declaration.

8 A Okay, 47.

9 Q Okay. And in this paragraph you
10 provide a construction for locking buckle. Is
11 that right?

12 A Correct.

13 Q And what is that construction?

14 A Well, I say, "A POSITA would
15 understand the 'locking buckle' to include the
16 entire locking or latch component that slides
17 relative to the mounting body."

18 Q And what does "the entire locking or
19 latch component" mean?

20 A It's everything that slides relative
21 to the mounting body. As we discussed earlier
22 the locking buckle and the locking body are in

1 one piece, basically. So it would be the entire
2 locking or latch component that slides, the
3 latching component being the -- you know, it is
4 indicated as 122 in Figure 7.

5 Q Okay. So is that different than
6 locking part 12?

7 A Well, locking part 12 -- I mean,
8 locking -- let's see. Locking part 12 is just
9 generally referring to overall locking --
10 components that lock. And as I testified
11 earlier, the -- you have the mounting body --
12 I'm sorry, you have the locking body and the
13 locking buckle that both move together. So the
14 buckle has a body that moves along with it.

15 Q Right. So is the construction
16 referring to locking part 12 then?

17 A No. No, it's part -- locking buckle
18 is 122. I'm just saying like how the body is
19 integral to that.

20 Q Okay. And that's still a portion of
21 locking part 12, correct?

22 MS. HALSEY: Object to form.

1 A Maybe the specification can help us
2 out here a little bit. I believe it is
3 column 6.

4 Q Yeah, I'll point you to column 7,
5 lines 3 to 7.

6 A Right. So "The locking part 12
7 includes the body 121 that can be accommodated
8 in the mounting body 112 and a locking buckle
9 122 located on the side." So that says what I
10 just said, the -- 12 includes the locking body
11 121 and locking buckle 122. And it has to be
12 accommodated in the mounting body. So you've
13 got to have both to be accommodated in the
14 locking body.

15 Q Okay. And turning to claim 1, you're
16 aware that claim 1 recites both a locking part
17 and a locking buckle, correct?

18 A That is my recollection. Let me turn
19 to claim 1.

20 It talks about, yeah, on column 15,
21 line 11, "a first resilient member located
22 between said mounting body and said locking

1 buckle." Then it goes down.

2 And then it talks about "manual
3 movement or the locking part," so I'm on
4 line 25. "Manual movement of the locking part
5 causes the locking buckle to move to an unlocked
6 state."

7 So, like I said, they are integral.
8 So when the part has a body and a buckle and --
9 but the body is integral to the buckle, so,
10 basically, it is saying that you have to push
11 the buckle into position so it can lock with the
12 upper storage container.

13 Q Okay. So in claim 1, claim 1 also
14 recites first resilient member, right?

15 A I'm sure it does. If you could
16 direct me to the line, or I could look.

17 Q Yes, looking at line 11.

18 A Thank you. Yeah, "a first resilient
19 member located between said mounting body and
20 the locking buckle." Okay, I see it.

21 Q Right. And so the locking buckle is
22 a portion of the locking part, right?

1 A As I said before, the locking part
2 has the locking buckle and the locking body as
3 part of it.

4 Q Right. And so does the first
5 resilient member need to be immediately adjacent
6 to the locking buckle?

7 A Well, excuse me, it has to be
8 certainly between, as the claim says. And --
9 but because it's -- because the locking body and
10 locking buckle are integrated together, if
11 you're touching the locking body, you're
12 touching the locking buckle.

13 But if you're moving the locking --
14 if I put force on the spring -- this is all
15 related to how the spring moves it -- the force
16 of the spring pushes on the locking body and,
17 therefore, pushes on the locking buckle. So the
18 force pushes on the locking buckle.

19 Q Okay. Can there be a component
20 between the first resilient member and the
21 locking buckle?

22 A What the claim says is the spring has

1 to be in contact -- I'm on line 11, so -- but I
2 keep -- you understand if I say "spring," I'm
3 really, in the context of our conversation,
4 talking about the first member --

5 Q Sure.

6 A -- because there is a second
7 resilient member.

8 So the first resilient member is
9 between the mounting body and the locking
10 buckle, okay. So we can push on a piece again.

11 And it doesn't specify -- it's got to
12 be between it. It has to touch -- it has to
13 exert the force on the mounting body and the
14 locking body.

15 Q Right. What --

16 A So it doesn't say anything about
17 the -- I'm sorry. It doesn't say anything about
18 putting components in between. It's very
19 straightforward. It says put the spring in
20 between these two things. It's not saying you
21 can or should put another object in between
22 that. It just says this spring goes between

1 those two things.

2 Q Right. So if, let's say, there are
3 intervening components on either side of that
4 spring, that spring would still be between the
5 mounting body and the locking buckle, right?

6 A But that's not how I read this claim.
7 This claim basically says that the spring -- I
8 mean, when you design a spring -- I used to
9 teach this in my class. When you design a
10 spring, you design the enclosure. In other
11 words, you design what it's between.

12 When someone in the art designing
13 springs and talking about springs is saying that
14 if a spring is between two things, those are the
15 two things that it contacts. One wouldn't
16 understand you could put another object in
17 between. And one in the art would look at a
18 spring and say it touches the mounting body and
19 it touches the buckle, and that's it.

20 Q Okay. So your interpretation of the
21 claim is that the mounting body has to touch one
22 end of the first resilient member and then the

1 locking buckle has to touch the other end of the
2 first resilient member? Is that what you're
3 saying?

4 MS. HALSEY: Object to form.

5 A No. When reading the claim, as one
6 in the art who has also designed many springs,
7 one end of the spring has to contact the
8 mounting body and one end has to touch the
9 locking buckle. And because the locking body
10 and buckle are integrated in the same part, it
11 is touching the locking buckle.

12 Q Yeah, I think that's what I asked,
13 but you disagreed with me, so I'll ask it again.
14 Okay, I'll read the question.

15 So your interpretation of the claim
16 is that the mounting body is touching one end of
17 the first resilient member and then the locking
18 buckle is touching the other end of the first
19 resilient member?

20 A Yeah, I thought that's what I said.
21 Am I mistaken?

22 Q I just wanted to clarify because you

1 disagreed with me, so I wanted to understand.

2 Okay. So what you're saying is your
3 position is there can be no intervening
4 components like adjacent to the spring -- or
5 between the spring and the locking buckle, for
6 example?

7 A Well, the way I read the claim is put
8 the spring in contact with those two other
9 bodies without putting different things in
10 between.

11 Q Okay. And so that is just based on
12 the word "between," correct?

13 MS. HALSEY: Object to form.

14 A My opinion is based on, you know, the
15 view of one in the art, one in the art who
16 designs assemblies and things with springs. So
17 when someone talks about a spring and where it
18 is placed, it is understood that what it
19 contacts is how it distributes the force.

20 Q Okay. So, right, if I had components
21 A, B and C, B would be between A and C, for
22 example?

1 MS. HALSEY: Object to form.

2 A Well, I mean, it depends on how you
3 lay out A, B and C.

4 Q Sure. If, I guess, A is touching B
5 on one side and then C is touching B on the
6 other side, B is between A and C, right?

7 A Okay. So your question is again?

8 Q Would B be between A and C?

9 A It would be a lot easier with a
10 sketch, but if A -- let's do it this way. If A
11 is the mounting body, B is the resilient member
12 and C is the locking buckle, then B must be
13 touching A and C.

14 Q Okay, right. And if there was, like,
15 another component X between A and C, B would no
16 longer be touching A and C.

17 A Correct, so understanding that the
18 locking body is the body of the latch. So if it
19 is touching the locking body, it is touching the
20 locking latch. I want to make that clear. They
21 are not two separate components. They are one
22 piece.

1 Q Locking latch, is that in the claim?

2 A I'm just explaining, you know, when
3 I -- because I said touching the latch, okay?
4 The mounting body, resilient member, locking
5 buckle. Sorry, you're right, I meant locking
6 buckle as opposed to latch. There is no latch.

7 Q Okay.

8 All right. I'd like to turn to
9 column 1 of the '946 patent and specifically
10 line 52.

11 A Line 52. Okay. So that would be the
12 start of the Summary?

13 Q That's correct.

14 A I'm there.

15 Q You can read that paragraph, if you
16 would like.

17 (Witness reviewing document.)

18 A Okay. Just that paragraph?

19 Q Yeah. So the '946 patent, what is
20 the purpose of its invention?

21 A The purpose is to allow a user to
22 basically automatically lock by placing an upper

1 storage container over a lower one and then to
2 allow the containers to be separated when you
3 disengage the latch such that when you lift the
4 top container off the bottom container, you're
5 not lifting the two of them. So it won't
6 automatically relatch when you are trying to
7 separate them. That's basically what the
8 purpose is.

9 Q So did the inventors seek to invent a
10 new storage box?

11 MS. HALSEY: Object to form.

12 A Well, as that paragraph says, they
13 wanted "to provide a connection structure of a
14 storage box" that does what I just described.
15 Now, if you want to call a box with this
16 invention a new box, I mean, I'm okay with that.
17 I think it would be if I -- you know, if I can
18 buy three different storage boxes, if one of
19 them has this, it's a new box. It's a different
20 box. So it's a -- you could call it an improved
21 storage box, a mechanism to improve a storage
22 box.

1 Q Okay.

2 A So in a way, I think they did.

3 Q Okay. Because I think you said two
4 things there, because there is a new storage box
5 and then a mechanism to improve a storage box.
6 Which one were the inventors directed towards?

7 MS. HALSEY: Object to form.

8 A Well, the paragraph didn't say new
9 storage box. I think I said "new."

10 They invented a device that improves
11 interconnecting two storage boxes. And, I mean,
12 when you put that device on the storage box, I
13 mean, you could interpret that as a new and
14 improved storage box. I mean, you could
15 interpret it a lot of ways.

16 Q But --

17 A The intent was to just -- I'm sorry.
18 The whole intent of the patent was to simply
19 come up with a mechanism that allows you to
20 automatically lock and improve how easy it is to
21 unlock it. And whether you call it a new box,
22 an old box, an improved box, I'm not sure that's

1 really relevant.

2 Q Right. You're saying that the
3 inventors were trying to create a new connection
4 structure for storage boxes.

5 A They were trying to do essentially
6 just what that paragraph says, right? Provide a
7 connection structure of a storage box that
8 solves a number of problems. That's what they
9 were trying to do.

10 Q Right. So the invention is directed
11 to that connection structure that's referenced
12 in that paragraph, right?

13 A Correct.

14 Q Okay. So now I'd like to turn to
15 paragraph 11 of your declaration.

16 A Okay, paragraph 11, I'm there.

17 Q Okay. And in paragraphs 11 and 12, I
18 think you lay out your understanding of claim
19 construction. Is that right?

20 A Just let me take a quick look.

21 (Witness reviewing document.)

22 Okay. I'm good.

1 Q Okay, right. And so this section
2 talks about your understanding of claim
3 construction, right?

4 A Yeah, it talks about my understanding
5 of claim construction. I don't think it's a
6 comprehensive paragraph on everything I know
7 about claim construction, but it does have to do
8 with my -- with claim construction.

9 Q Okay. And what is your understanding
10 of what it means to construe a claim?

11 A To determine -- I mean not being a
12 patent attorney, I'll put it in my own words,
13 but to give a more definite meaning to what a
14 claim term means.

15 Q Okay. Is it your understanding that
16 it is defining a boundary for that claim term?

17 MS. HALSEY: Object to form.

18 A I'm not sure. There is a legal
19 connotation there about boundary. I just know
20 if a court or some entity construes a claim,
21 that, you know, that would be the definition
22 of -- or term, you know -- that would be the

1 definition that's to be used moving forward.

2 Q Okay. So is it your understanding
3 that it is a minimum definition required to
4 satisfy the claim term?

5 MS. HALSEY: Object to form.

6 A No. My understanding is what I wrote
7 there, that, not being a patent attorney, how a
8 claim is constructed and understood is -- you
9 know, I basically -- I don't determine that,
10 right? Different terms in a claim and how they
11 are construed is generally given to me. If it
12 is not, it should be viewed through the lens of
13 a POSA, and that's how I proceed. I'm not sure
14 about all the details you're talking about.

15 Q Okay. So when you construed claim
16 terms, you were just trying to give them the
17 meaning that a person of ordinary skill in the
18 art would have attributed to those claim terms.
19 Is that fair?

20 A Plain and ordinary meaning of a POSA,
21 yes, that a POSA would understand in the context
22 of the patent.

1 Q Okay. And so is it your
2 understanding that identifying a component in
3 the prior art that meets a construction shows
4 that the prior art teaches that claim term?

5 MS. HALSEY: Object to form.

6 A If you could just give me that one
7 more time. I'm not sure I understand the
8 question.

9 Q Right. And so say you construed a
10 term, let's say, "storage box," to have some
11 meaning, right, and then I point to something in
12 the prior art that has a storage box, that is
13 how I demonstrate that term "storage box" was
14 taught in the art. Is that how you interpreted
15 and applied the constructions that you formed?

16 MS. HALSEY: Object to form.

17 A So when I look at prior art, I start
18 with how a POSA would construe a term, and then
19 I look at the other art in terms of that
20 definition. My analysis moves forward, whether
21 reviewing prior art and asserted patents,
22 whatever, through that lens.

1 Q Okay. And so you come up with a
2 construction based on just the '946 patent
3 itself, and you're saying at the start, before
4 looking at the art, this is what this term
5 means. Is that accurate?

6 A Well, again, I don't come up with the
7 constructions. If they are given to me, I have
8 to use those. But as one of a POSA, as one in
9 the art, I look at the plain and ordinary
10 meaning of all these terms in the claims, okay?
11 And I do it in view of the '946 patent, and I
12 applied that throughout my analysis, whether it
13 has anything to do with the other art or not.
14 Because this is the patent at issue here. So
15 that's how I proceed.

16 Q Right. So like you said, regardless
17 of what the prior art says, you can come up with
18 your own constructions based on the '946 patent,
19 right?

20 A Well, again, when you say my own
21 constructions, they are constructions of one in
22 the art. So anyone -- myself or anyone who fits

1 the definition of a POSA -- would understand the
2 same thing, right? It's -- it means it's anyone
3 who is one in the art. That's the beauty of
4 having plain and ordinary meaning is people in
5 this arena would all understand the same thing.

6 Like someone in the art of designing
7 springs, we went through before, would
8 understand how the spring is between two things,
9 how it exerts a force on two different
10 components. It's not like I'm coming up with
11 some unique construction that only fits this
12 patent. This is the patent at issue, and I'm
13 asked to say, how do you interpret this patent
14 as one in the art? And if I'm going to look at
15 prior art, I have to use the same guidelines. I
16 can't all of a sudden switch, right, because
17 it's just one in the art. If it weren't me, if
18 it were somebody else with my equivalent
19 experience, they should understand the claim
20 terms as plain and ordinary meaning the way I
21 do.

22 Q Okay. And so when a petitioner

1 identifies an element in the prior art, you
2 understand that the petitioner is not construing
3 the claim, right?

4 MS. HALSEY: Object to form.

5 A Can you just repeat the first part of
6 that question again -- or repeat the whole
7 thing, please.

8 Q Sure. So when a petitioner
9 identifies an element in the prior art, the
10 petitioner is not construing the claim when they
11 do that. You understand that, right?

12 A Well, I'm not sure what you mean by
13 when they analyze an element -- what do you mean
14 by "an element in the prior art"?

15 Q Okay, yeah, I'll give you an example,
16 right? So say I point to Li's storage box, and
17 I say, Li's storage box teaches the claimed
18 storage box. That does not impart a
19 construction on the term "storage box." Is that
20 your understanding?

21 A Well, unless construed by a Court,
22 then storage box would be in its plain and

1 ordinary meaning, which would apply to any of
2 the work in this area about, you know, covering
3 storage boxes.

4 Q Right. So, for example, you agree
5 that Li teaches a storage box, right?

6 A Well, Li teaches -- he teaches what
7 he says he teaches, a latch structure that
8 basically goes on a storage box. I don't think
9 he teaches a storage box. He teaches a latch
10 structure --

11 Q I mean, if you look --

12 A -- which is used with a storage box.
13 I'm done. Go ahead.

14 Q Sure. Like, if you look at Figure 1
15 from Li, that's a storage box, right?

16 A Yeah, that's a storage box. I'm
17 saying that the patent isn't aimed at developing
18 a storage box. It is aimed at, you know, a
19 latch -- some kind of structure to couple two
20 storage boxes. That's what it says right in the
21 abstract.

22 Q Sure. But you understand that a

1 piece of prior art teaches things and that is
2 what establishes the prior art, right? So the
3 fact that there is a storage box means that a
4 storage box existed in the prior art. You
5 understand that, right?

6 MS. HALSEY: Object to form.

7 A But Li teaches a modification to --
8 that is going to be applied -- a new structure
9 to a storage box. That's my understanding.

10 Q Okay. And so you would also agree
11 that Li teaches a storage box because it depicts
12 one, right?

13 A Well, he teaches a modification to a
14 storage box.

15 Q Are you saying Li does not disclose a
16 storage box?

17 A Well, I didn't say he doesn't
18 disclose a storage box. I mean -- again, not
19 being a patent attorney, when you say he teaches
20 something, he teaches a storage box, to me that
21 says is he teaching a new kind of storage box,
22 right? What he is teaching is a new -- maybe

1 the best way to do this is just to go to --
2 let's see. I'm on Li -- well, there are no
3 columns -- paragraph 3.

4 "When objects such as boxes, crates
5 or pallets that are stacked," et cetera,
6 et cetera, "can be joined together by a latch to
7 improve the stability of the stacked objects.
8 However, separating the stacked items -- when
9 separating the stacked items, the latch
10 structures known in the prior art are
11 inconvenient to unlatch. Usually, the uppermost
12 item must be unlatched from the adjacent item
13 immediately below it by two hands before it can
14 be released. This is often inconvenient."

15 So he is teaching a new latching
16 structure that can be applied to, what he says,
17 stabil -- stacked-up objects, boxes, crates,
18 pallets, things like that. So he is teaching
19 things that can be applied to a storage box,
20 right? And if you want to say it is part of it,
21 you could. I think we just had a discussion
22 about is the '946 patent teaching a new storage

1 box. It's really teaching your own mechanism to
2 go on one, and whether the layman calls it new
3 or not I don't think really matters.

4 Q Okay. Why don't we move to
5 paragraph 16.

6 A Okay. My declaration.

7 Q Your declaration.

8 A Okay, "Anticipation."

9 Q So what is your understanding of what
10 it means in a prior art reference to anticipate
11 a claim element?

12 A Well, I say right here in
13 paragraph 16, "A claim is anticipated only if
14 each and every element as set forth in the claim
15 is found, either expressly or inherently
16 described, in a single prior art reference."

17 So if one prior art reference, happy,
18 you know, discloses every element of the claim,
19 then it is anticipated by that single reference.

20 Q Right. And so, right, like I said,
21 claim 1 had the word "storage box." Li also has
22 a storage box, so Li anticipates a storage box,

1 right?

2 A Well, no. Again, you --

3 MS. HALSEY: Object to form.

4 A You can't pick a claim apart. It is
5 every element of the claim, right? You can't
6 just say the claim talks about a storage box, Li
7 does, so he anticipates it. No, that's not
8 true. He has to anticipate every single element
9 of the claim, right? If you don't disclose
10 every element of the claim, you don't anticipate
11 the claim. Just the fact that Li talks about a
12 storage box certainly doesn't mean that,
13 therefore, claim 1 is anticipated.

14 Q Yeah, I meant the claim term
15 specifically.

16 MS. HALSEY: Object to form.

17 A I've never heard of anticipating a
18 term. I thought -- I've only heard of
19 anticipating a claim. I didn't know you could
20 anticipate a term. If that's the case, then
21 half the words in every patent would be
22 anticipated by someone else. Again, I'm not a

1 patent attorney. I'm just saying I have never
2 heard of anticipating a term.

3 Q Okay. I understand your
4 interpretation then. Why don't we move to
5 "Obviousness" in paragraph 19.

6 A Okay. I'm there.

7 Q What is your understanding of
8 obviousness?

9 A I'll just read this quickly to
10 refresh my memory, if that's okay.

11 (Witness reviewing document.)

12 Well, it's all right here. So "To
13 render a claim obvious" -- I'm reading on
14 paragraph 19 -- "every claim element must be
15 taught in the prior art, and there must be a
16 motivation to use the cited art to solve the
17 problem at hand," okay.

18 And it goes on to say there must be
19 evidence indicating a person -- a POSA would
20 combine them and have a motivation to combine.
21 And it is insufficient to show that they could
22 be combined. There must be evidence to show

1 motivation that they would have been combined,
2 right? There must have been motivation to pick
3 out those references and combine them to arrive
4 at the claimed invention. Oh, let's see.
5 That's basically it.

6 So obviousness means it would have
7 been obvious to come up with, you know,
8 something that's claimed, and if it is not and
9 you pull prior art references, they would have
10 been motivated to put certain aspects of the
11 prior art reference together to arrive at the
12 claimed invention. That's my understanding.

13 Q And so what is your understanding of
14 the phrase "motivation to combine"?

15 A My understanding of that is what
16 would cause a person to seek a particular
17 reference and want to combine them? Why would
18 someone do that? You have to -- there has to be
19 a reason you do this. If something works just
20 fine there wouldn't be much motivation to change
21 it, right? So if someone seeks a deficiency and
22 tries to change it, they would have a motivation

1 to combine things, but you have to look at
2 every -- if you're combining prior art, you look
3 at every different prior art reference and
4 determine if there was a reason why would
5 someone want to combine these things.

6 That's my understanding.

7 Q Okay. So you're saying that there
8 needs to be a deficiency in the art to have a
9 motivation to combine?

10 A Well, there has to be -- if you're
11 going to combine things to get something new,
12 there has got to be something you want to
13 change, right? Deficiency might be there.
14 There may be something that needs improvement.
15 It could be a deficiency. It could be something
16 that needs to be improved. But there has to be
17 a reason why you would want to improve
18 something.

19 Q Okay. I don't think any of the case
20 law you cite here requires an improvement to
21 have a motivation to combine. Is that accurate?

22 A Well, again, not being a patent

1 attorney, my understanding is you should want --
2 why change something if you're not going to
3 either make it perform better, add a feature? A
4 new invention is geared toward, you know,
5 improving society really, right? That's why we
6 have patents.

7 So I'm not -- is it the case law?
8 I'm not familiar with the details of the case
9 law by any means. In my mind, if you're going
10 to change something that works, you have to have
11 a reason to. You have to have a motivation to.

12 Q Okay. So like you said, you didn't
13 personally find these cases, right?

14 MS. HALSEY: Object to form.

15 A I didn't -- which cases are you
16 talking about?

17 Q The ones in this Obviousness section.

18 A I know counsel, you know, provides
19 that information.

20 Q Okay. Did they draft this section of
21 the declaration too?

22 A Well, this section of the declaration

1 wouldn't be here if I didn't say it should be
2 here, right? So a situation like this is, you
3 know, when we're talking about -- it's early, so
4 this is when -- yeah, this is in the illegal --
5 sorry, it's in the legal principle section. So
6 this is generally provided by counsel. I'm not
7 a patent attorney so they give me relevant
8 standards and things like that so I can continue
9 with my analysis. So this -- I did not write
10 this. But I approve everything that goes in it.

11 Q Right. Because you didn't read the
12 cases listed in this section, right?

13 A No, I was not asked to go through
14 PersonalWebTechs, LLC versus Apple or InTouch
15 Techs. No, I wasn't asked to review that. This
16 is the case law that helps explain. And,
17 basically, they took these cases and then took
18 out quotes from them, for example, the Belden
19 Inc. and Berk-Tek LLC. To help explain what
20 this is, they pull out "Obviousness concerns
21 whether a skilled artisan not only could have
22 but would have been motivated to make the

1 combinations."

2 So no, I don't go through it. I
3 mean, the attorneys are familiar with the case
4 law, and I asked them to pull out things that
5 help just explain from a very high level what
6 it's about, why it contributes to obviousness.
7 That's all.

8 Q Okay. I would like to ask about a
9 couple of the statements in paragraph 21 in this
10 section.

11 A Okay.

12 Okay, I'm there.

13 Q Okay. And so in paragraph 21 there's
14 a couple cases here, one from 1988 and then one
15 from 2004. Do you see that?

16 A Okay, I do.

17 Q All right. And in the parenthetical
18 I think it says that there must be a suggestion
19 in the art for selecting a modification; is that
20 right?

21 A "There must be a reason or suggestion
22 in the art for selecting the [modification],

1 other than the knowledge learned from the
2 applicant's disclosure." Okay.

3 Q Okay. And that's the analysis you
4 provide -- you conducted when analyzing the
5 obviousness grounds in the petition, right?

6 MS. HALSEY: Object to form.

7 A Well, I looked for motivation. Would
8 they be motivated to take this feature out of
9 prior art and put it together with something --
10 another prior art reference to arrive at the
11 claims.

12 Q Does there need to be a reason or
13 suggestion in the art to provide that
14 motivation?

15 MS. HALSEY: Object to form.

16 A As it says right here, there must be
17 a reason for selecting it. In other words, if
18 you look at prior art, why am I looking at this?
19 Why would I select this aspect of prior art?
20 Again, there has to be a reason.

21 Q Right. So if the art doesn't
22 explicitly have a reason or suggestion, a person

1 of ordinary skill in the art would not have been
2 motivated to combine references; is that right?

3 MS. HALSEY: Object to form.

4 A Well, the reason -- a reason of the
5 suggestion in the art I don't interpret as the
6 art saying, hey, add this to your product
7 because it could make it better. I mean, you
8 pull out the reason by reading the disclosure,
9 right? What is the benefit? What is the
10 feature?

11 You look in the art and you read it,
12 and then you interpret if, you know, that gives
13 you a reason, a reason in the art, say, like the
14 improved feature, or whatever it is, if that is
15 a reason to adopt that and combine it with
16 something else.

17 The way I understand your question
18 is, you know, does the art have to say, put this
19 on your device because it will improve A, B and
20 C? No, not necessarily. I mean, you would have
21 to look at it and see if you're going to apply
22 it to your device, if there is a motivation, if

1 there is a reason to do that, if it will improve
2 your device.

3 Q Because, again, your position is that
4 an improvement is needed for there to be a
5 reason to combine references?

6 A Well, I mean, you'd want to make a
7 positive change. If you have a device and
8 you're going to change it, you're not going to
9 change it to make it worse. You're going to
10 change it to in some way improve it. Otherwise,
11 what's the purpose? It could be an improvement
12 in design, cost, performance, ease of
13 manufacture. It could be a number of things.

14 Q Well, could you swap two components
15 that are interchangeable?

16 MS. HALSEY: Object to form.

17 A Which two components, for example?
18 You would have to give me an example of that.

19 Q Well, you said a requirement for
20 motivation to combine is an improvement, but
21 what if you swapped two components -- and it's
22 not necessarily an improvement, it just operates

1 the same as it did?

2 A Well, then why would you do it?

3 Q Right. So you're saying there is no
4 motivation to combine provided in this scenario.

5 A Well, again, it's -- you would have
6 to give me more detail on this hypothetical.
7 Two things can perform the same, but maybe they
8 are less expensive. So, I mean, if you can give
9 me some detail -- it's too broad a statement
10 just to say, well, you could swap two things if
11 they are equivalent. You would have to give me
12 an example that I can analyze because every
13 patent, every device is different. So if you
14 can give me an example, maybe.

15 Q Yeah. I'm just trying to understand
16 your understanding of obviousness.

17 A Okay. So your question is?

18 Q Right. So if I swapped two
19 components that are interchangeable, would a
20 person of ordinary skill in the art have found
21 that obvious?

22 MS. HALSEY: Object to form.

1 A Well, swapped them in what device?
2 Can you give me -- it is just too broad a
3 statement, if you could just swap two things,
4 right? If they are two things, they are
5 different, right? So there would have to be
6 differences in the parts if you're swapping
7 them. So I need detail so I can make an
8 assessment. You see what I'm saying? I really
9 can't answer the question without more detail.

10 Q We can come back to that.

11 I guess I would like to move to
12 paragraph 19, still in this section, if you
13 would like to scroll up.

14 A You said scroll up?

15 Q Sorry. I'm scrolling. If you would
16 like to turn your page.

17 A Because these documents aren't on the
18 screen, I'm not sure if you're aware, because I
19 have them all in front of me anyway.

20 Okay. So paragraph 19?

21 Q That's right. Or --

22 A That's right. Okay, I am there.

1 Q Okay. And in, like, the fourth line,
2 there is a case called KSR International v.
3 Teleflex. Do you see that?

4 A I see it.

5 Q Okay. And you didn't read this case
6 either, right?

7 A No, I didn't go -- I was not asked to
8 go through these cases.

9 Q Okay. So you have no idea what the
10 holdings of that case are, correct?

11 A You said "the holdings"?

12 Q Right.

13 A No, I am not.

14 Q Okay. And so then you didn't apply
15 those holdings to your analysis of the art?

16 MS. HALSEY: I object to form.

17 A Yeah, I'm not sure what you mean by
18 "holdings" exactly. "The holdings of the case,"
19 that sounds like a legal term to me, because I
20 don't use the word "holdings" in my declaration.
21 So I'm not sure what you mean by "holdings."

22 Q Okay. So you are not familiar with

1 the term "holdings," fair?

2 A That is fair. With respect to patent
3 law, no, I am not.

4 Q Okay. And so how about the
5 conclusions from this KSR case? You're not
6 familiar with the conclusions that the Court
7 came to in that case?

8 A The conclusion that is in my
9 declaration is -- you know, one of the
10 conclusions, I think, is that -- it's in quotes
11 on line -- 1, 2, 3, 4, 5. "A patent composed of
12 several elements is not proved obvious merely by
13 demonstrating that each of its elements was,
14 independently, known in the prior art."

15 So, to me, that is -- that is a
16 pertinent conclusion, I would say, that came
17 from that case.

18 Q Okay. But you're not aware of any
19 other conclusions in that case?

20 A Again, I wasn't asked to review that
21 case.

22 Q Okay. So I'd like to turn to the

1 petition now, and if you would like to go to
2 page 30 of the petition.

3 A Let's see.

4 Page 30, got it.

5 Q So in the middle of this page, there
6 is a sentence that starts, "Li's first spring 34
7 additionally teaches the claimed first resilient
8 member."

9 Do you see that?

10 A I do. Just bear with me so I can get
11 a little context here.

12 Q Sure.

13 A It's somewhere in the 160-page
14 document. Let's see.

15 (Witness reviewing document.)

16 Okay, thank you for that. I'm with
17 you now. And now we're talking about the first
18 spring 34, which is on page 30, correct?

19 Q That's right. Okay. So is first
20 spring 34 an example of a resilient member?

21 A Yeah, a spring can be a resilient
22 member. It's not the resilient member in the

1 '946 patent, but it is a resilient member, it is
2 a spring.

3 Q Okay. So why isn't it the first
4 resilient member?

5 A Because the first resilient member
6 has to be positioned between the mounting body
7 and the locking buckle, and it is simply not in
8 Li.

9 Q Okay. So to make sure I understand
10 your position, is the issue that Li doesn't
11 teach the position of a spring in the right
12 spot, or is it that Li doesn't teach a spring?

13 A It is the fact that Li doesn't teach
14 a mounting buckle, as described in the '946
15 patent, nor does it teach a mounting body, nor
16 does it teach the proper position of the
17 resilient member in between the mounting body
18 and the locking body. It is all those things.

19 Q Right. But the first spring 34 is a
20 first resilient member because they are both
21 springs, right?

22 A It is not --

1 MS. HALSEY: Object to form.

2 A It is not the resilient member talked
3 about in the patent. It is a spring, but it is
4 not the spring talked about in the '946 patent
5 for the reasons I just explained.

6 Q And the reasons you explained are
7 based on the mounting body and the locking
8 buckle, correct?

9 MS. HALSEY: Object to form.

10 A How it interacts with the mounting
11 body and the locking buckle and the fact that Li
12 doesn't disclose the mounting body and locking
13 buckle that is in the '946 patent.

14 Q So, yeah, I guess I understand that
15 your position is that Li doesn't disclose the
16 mounting body or the locking buckle, but the
17 first spring 34 is still a spring, and the first
18 resilient member, an example of that is a
19 spring, right?

20 MS. HALSEY: Objection to form.

21 A The first resilient member has a
22 specific meaning in the '946 patent. It is a

1 spring that is designed to fit in between the
2 locking buckle of the '946 and the mounting body
3 of the '946. That's why that spring 34 -- they
4 both may be springs, but that spring wasn't
5 designed to fit between the locking buckle and
6 the mounting body of the '946 patent. That
7 spring evidently was -- is designed to be in
8 this device, which is a different device.

9 Q Okay. So you said the first
10 resilient member is a -- was designed to fit in
11 a particular way, correct?

12 A I mean, what I mean by that is that
13 this resilient member is intended to be put
14 between that stop piece and -- if we go to the
15 next page on Figure 4, we have Exhibit 1007 on
16 page 32. That shows it better.

17 This spring is intended to butt up
18 against that stop piece 35, which has to snap
19 into something else, and then the other end of
20 the spring has to go in a part of a pull latch
21 cover 32.

22 And my point is that, you know, that

1 stop piece 35 is not the mounting body, and the
2 back of that pull latch cover isn't the locking
3 buckle. So that spring was designed for this
4 figure, intended for this figure, if you will,
5 which is different than the '946 patent.

6 Q I guess my question is, is the claim
7 "first resilient member" a specialized spring?

8 A Again, in the claim, we can't pull
9 the claim into pieces. We have to read the
10 claim in its entirety. And it says -- I'm on
11 the '946 patent, column 15, line 9 -- "said
12 first connecting part comprises a mounting
13 body," which is different than me, "a locking
14 buckle movable with respect to said mounting
15 body," different than me, "and a first resilient
16 member located between the mounting body," which
17 I said is at least, "and the locking buckle,"
18 which is in there.

19 So this is a specific spring that has
20 to act in this way as defined in the claim, this
21 resilient member -- and I shouldn't even say
22 "spring" really. It is a resilient member. It

1 just happens to be a spring. The spring has to
2 fulfill this claim element.

3 But what you just read, to me,
4 doesn't characterize or limit what the qualities
5 of the spring are. I think it just says where
6 the spring needs to be positioned. Is that not
7 correct?

8 MS. HALSEY: Object to form.

9 A Well, it's not only the position, but
10 it's its function, "wherein said first resilient
11 member keeping said locking buckle automatically
12 in a locked state." So -- and that is just one
13 element of this claim. It tells you how it is
14 positioned in between the two and what it has
15 got to do. And then -- and that has to do with
16 the further elements below, "automatically
17 locking with the mating part of the other
18 storage box." So it also defines that.

19 Q So, again, you're saying the first
20 resilient member is like a specialized spring?

21 MS. HALSEY: Object to form.

22 A No, I'm saying the first resilient

1 member has to satisfy that claim element. There
2 could be many, many springs. In fact, I would
3 say probably a number of out-of-the-box, you
4 know -- off-the-shelf, I should say --
5 compression springs would fit that bill.

6 So it is not that it is a specialized
7 spring, right? The spring has to function as it
8 says in the claim. But I could -- well, again,
9 that's basically it. That spring has to satisfy
10 that claim element in the way that it is used.

11 Q Okay.

12 A And the spring in Li doesn't do that.

13 Q But the spring in Li is a compression
14 spring, right?

15 A It is.

16 Q Okay. All right. I'd like to turn
17 to page 28 of the petition.

18 THE COURT REPORTER: Could we take a
19 five-minute restroom break before we do that?

20 MR. TANG: Sure, that sounds good.

21 (A recess was taken.)

22

1 BY MR. TANG:

2 Q Dr. Vallee, during that break, did
3 you have any conversations with counsel about
4 the content of your testimony?

5 A No, I did not.

6 Q Okay. So we were turning to page 28
7 of the petition, and so let me know when you get
8 to that.

9 A Page 28.

10 Okay, I'm on page 28 of the petition.

11 Q Okay. And it is my understanding
12 that you disagree with the statement, "Li's pull
13 latch cover 32, which includes latch bar 321,
14 teaches the claim, locking buckle movable with
15 respect to said mounting body." Is that right?

16 A That is correct.

17 Q Okay. And I'd like to turn to
18 paragraph 79 of your declaration.

19 A Okay.

20 Q Just let me know when you get there.

21 A I'm there.

22 Q Okay. And so in paragraph 79 you

1 say, "The locking buckle would be comparable to
2 the entire latch 3 of Li, and not just the pull
3 latch cover 32." Do you see that?

4 A I do.

5 Q Okay. And so what did you mean by
6 that statement?

7 A Well, just what it says. I mean, the
8 buckle, as we discussed, has the integrated
9 body, and it is pushed from the rear with the
10 resilient member and now it is pretty
11 straightforward what it is.

12 Here, only a piece of what's in
13 Figure 3 on my page 31 is said to be the locking
14 buckle, which just doesn't make sense to me. I
15 see in paragraph 80, for example, of my report,
16 "Li is clear in Figure 3 that the latch bar
17 321" -- the image is up top -- "and the pull
18 latch cover 32 are only a portion of the pull
19 latch," okay?

20 And there is no explanation as to why
21 in the petition it is believed that the buckle
22 should only be considered to be that piece of

1 it. If there is anything close to it, I look at
2 the '946 patent and it's more of the entire
3 object that's in Figure 3 as opposed to just a
4 little piece of it. So it is not clear to me
5 why they just chose "piece."

6 That's what I mean by that.

7 Q Okay. And I think we've previously
8 discussed the locking buckle is a piece of the
9 locking part, right?

10 A Correct. The locking buckle is
11 integral with the locking body, which
12 constitutes the locking part.

13 Q Okay. I'd like to turn to paragraph
14 74 of your declaration.

15 A Okay. I'm there.

16 Q Okay. And here it says Li's chute 21
17 teaches the claimed mounting body; is that
18 right?

19 A Paragraph 74?

20 Q Paragraph 74.

21 A Okay. "In my opinion, a POSA would
22 understand the 'mounting body' of Li to be the

1 chute, but not the snap-in hole and stop
2 pieces." Okay, that's what it says.

3 Q Okay, right. And so there is a
4 figure on the same page, Figure 5 from Li above.
5 Do you see that?

6 A I do.

7 Q Okay. And do you see that snap-in
8 hole 211 is a portion of chute 21?

9 A Well, the snap-in hole goes through
10 21. It is not the chute. It is basically two
11 square or rectangular holes in chute 21.

12 Q Right. And so if chute 21 is a
13 mounting body, like you said there, then the
14 snap-in hole 211 is a portion of chute 21 and
15 snap-in hole 211 is also a portion of the
16 mounting body, right?

17 MS. HALSEY: Object to form.

18 A If you go to -- I have Li someplace.
19 Oh, there we go.

20 (Witness reviewing document.)

21 No, the holes are not part of the
22 chute. They may be molded into the chute, but

1 the holes are a separate structure that's put --
2 you know, that is put through the chute. I
3 wouldn't say that's part of the chute. And
4 that's why I say at paragraph 74, the mounting
5 body is closest to just the chute, not a hole or
6 a stop piece.

7 Look at the '946. I would say
8 Figure 7 probably, right? Mounting hole 11 in
9 Figure 7 of the '946, it is just, you know, an
10 opening, basically. The chute of Li is just an
11 opening. The square holes, I'll call it, or the
12 snap-in holes, are a different item.

13 Q Right. And you said the snap-in
14 holes were molded into chute 21?

15 A Well, I'm not actually sure, without
16 a product in front of me, what it is, but they
17 are placed somehow. They go through the bottom
18 surface of the chute. But it is a different --
19 if I did a negative and I put a boss on top,
20 okay, that would be a separate component I added
21 into the chute. It's not the chute. It is
22 something that goes on the chute. Those snap-in

1 holes are something that go through the chute.

2 So it is a different component.

3 Q Okay. I'd like to turn to page 103
4 of the petition.

5 A Petition, okay. Let me just get my
6 bearings here, just to get my context of where
7 we are.

8 (Witness reviewing document.)

9 And what page would you like to
10 discuss?

11 Q Yeah, I'm looking at 103.

12 A Okay. I am there. Thank you.

13 Q Okay. So on 103 you see figures 20
14 and 21 from Baruch; is that right? I'm sorry
15 figures 20 and 22 from Baruch.

16 A That's right, 20 and 22.

17 Q Okay. And in Figure 20 you see a
18 component labeled "latch mechanism 310"; is that
19 right?

20 A Correct. It is in the upper right.

21 Q And is this the latch mechanism that
22 you analyzed when preparing your declaration?

1 A Yes, it was. I believe I have
2 figures to that effect, actually, in my
3 declaration on page -- yeah, on page 38 of my
4 declaration, I actually have Figure 21. Okay.
5 Yes, that's the one.

6 Q Okay. And so this latch mechanism
7 310 includes latch 314 that includes the main
8 body 315 and a primary hook 316; is that right?

9 A Yep, that's what it says in
10 Figure 20. It lists those different features,
11 yes.

12 Q Okay. So I'd like to also turn to
13 Figure 23B of Baruch, and I think you reproduced
14 this on page 35 of your declaration.

15 A And could someone hand me Baruch?
16 Oh, is this it? I have it, thank you.

17 You said page 35, was it?

18 Q That's right, of your declaration.

19 A That's Figure 23B and 24B. Okay.

20 Okay, I am with you.

21 Q Okay. And if you have Baruch and you
22 would like to look at paragraph 55 from Baruch,

1 that might also be helpful.

2 A Okay.

3 (Witness reviewing document.)

4 Okay.

5 Q Okay. So paragraph 55 in Baruch is
6 describing installing latch mechanism 310 into
7 carveout 352; is that right?

8 A It basically says it can be disposed
9 in the carveout, that is correct.

10 Q Okay. And so to do that, someone
11 slides latch mechanism 310 downward into
12 carveout 352; is that right?

13 (Witness reviewing document.)

14 A Up in paragraph 55 he talks about,
15 "More specifically, slots 54 function as the
16 guides as the latch mechanism is positioned
17 within the carveout. Latch mechanism 310 is
18 slid downwardly within the carve-out with
19 laterally outward extending into the pin."
20 Okay, so it is slid down.

21 Q Right. So the slide latch mechanism
22 310 downward to position latch mechanism 310 in

1 carveout 352, right?

2 A That is correct. To install it,
3 yeah.

4 Q Okay. And during this installation
5 process, as it is sliding down, the pins 334
6 snap into hole 356, right?

7 A Yeah, it says, "Pins 34 are
8 compressed inwardly while sliding." So the pins
9 get compressed inwardly, and when it hits those
10 holes, then it would go back to its original
11 configuration.

12 Q Okay, right. So it snaps into the
13 holes and that's how the latch mechanism is
14 attached to the carveout, right?

15 A Yeah. It doesn't say anything about
16 how the spring is configured, but that's how
17 that body is installed.

18 Q Okay.

19 Okay. I guess I'd like to turn to
20 page 105 of the petition.

21 A Okay.

22 Q Okay. So do you see Figures 24A, 24B

1 and 24C from Baruch on this page?

2 A I do.

3 Q All right. What is your
4 understanding of what is happening in these
5 figures?

6 A These figures -- let's get to the
7 proper portion in Baruch. He talks about those
8 figures in paragraph 62. "The fourth embodiment
9 of the latch mechanism 310 also positively
10 couples the containers." And it goes through
11 24A, the first step is to position the body on
12 the lid. Then it goes on to say 24 -- what 24B
13 does.

14 So it is basically showing what
15 happens to Baruch's latch. When you push the
16 upper container down, it deflects the latch and
17 then the latch catches over the top container
18 and latches them together. That's my
19 understanding. And I say it in -- it's in the
20 petition, too.

21 Q Okay. And you said it deflects the
22 latch, the upper box pushing downward; is that

1 right?

2 A Yeah. The latch rotates outward. It
3 doesn't slide, but it rotates outward.

4 Q Okay. And then do you see primary
5 hook 316 in Figure 24A?

6 A I do.

7 Q Okay. And that is the component that
8 rotates outward; is that right?

9 A Well, the entire latch rotates, okay?
10 The part of the latch that is above the pivot
11 pin rotates outward, so the bottom of the latch
12 below the pin would have to rotate inward.

13 Q Okay. And that's what happens
14 between Figure 24A transitioning to Figure 24B;
15 is that right?

16 A Well, that's one of the things that
17 happens, yes.

18 Q Okay. And then, so transitioning
19 from Figure 24B to Figure 24C, we have primary
20 hook 316 rotating inward; is that right?

21 A If by "inward" you mean toward the
22 member it latches to, yes, that's correct. It

1 rotates back more towards its original position.

2 Q Okay. All right.

3 And I'd like now to turn to
4 paragraph 97 of your declaration.

5 A Okay.

6 Q Okay. And then I think in the second
7 sentence here it says, "The 'mounting body' of
8 Baruch is only the carveout 352." Is that
9 right?

10 A Correct.

11 Q Okay. Are holes 356 a component of
12 carveout 352?

13 A You know, I think I just -- yeah, I
14 think I just explained that they are a
15 separate -- in a separate component that's, you
16 know, put into the carveout. It's not like in
17 the '946 patent where, you know, it's simply a
18 slot, and you slide it in the slot. There are
19 no extra cutouts or things.

20 So that's what I say in paragraph 97,
21 in the mounting body of Baruch -- the closest
22 thing to it anyway -- the closest thing to

1 what's in the '946 patent is just the carveout
2 itself, right? Not the holes. Not the pin. It
3 is nothing like the '946. That's what I write
4 in paragraph 97.

5 Q Okay. I guess, do you have Baruch
6 handy still?

7 A Sure.

8 Q Okay. If we can go to paragraph 55.

9 A Okay, paragraph 55.

10 Q Okay. I'm looking at the third line
11 that starts, "carveout 352 may include one or
12 more slots 354 and holes 356." Do you see that?

13 A I do.

14 Q Okay. So this is saying holes 356
15 are a part of carveout 352, right?

16 MS. HALSEY: Object to form.

17 A It says what it says. The carveout
18 352 may include slots and holes. But there is
19 the slot -- I mean, there is the carveout, which
20 is one thing, and there's the slots, which is
21 another, and the holes, which is another. And
22 there aren't slots and holes in the '946. I

1 think that's my point when I wrote paragraph 97.

2 Q Okay. All right. I'd like to turn
3 to claim 13 of the '946 patent.

4 A Okay.

5 Q Okay. And you see here it says, "The
6 second resilient member is a torsion spring"; is
7 that right?

8 A That's what it says.

9 Q What is a torsion spring?

10 A A torsion spring is a spring, unlike
11 a compression spring, which uses the twisting of
12 a coil through the addition of two elongated
13 legs on either side of the torsion spring to
14 wind it up, as it were, to load it, and then the
15 spring reacts by unwinding and rotating about an
16 axis, as opposed to a compression spring, where
17 the spring is linearly compressed and reacts by
18 simply pushing outward. So the torsion spring
19 rotates. The compression spring is designed to
20 be compressed to load in one direction and then
21 it unloads in the other.

22 Q Okay. I'd like to turn back to

1 Figure 7 of the '946 patent.

2 A Figure 7. Okay.

3 Q All right. So in Figure 7 the
4 component labeled 33 is the second resilient
5 member, correct?

6 A Correct.

7 Q Oh, I'm sorry, did you answer?

8 A Oh, I did, yes, I said, "Correct."

9 Q Okay. And claim 13 says that the
10 second resilient member is a torsion spring,
11 correct?

12 A It says it can be a torsion spring.
13 Even if -- so that's like an -- a dependent
14 claim that says it can be a torsion spring,
15 correct.

16 Q In Figure 7, though, is what is
17 depicted as 33 a compression spring?

18 A In the figure it is.

19 Q Okay. So then is claim 13 swapping a
20 compression spring out with a torsion spring?

21 A Well, claim 13 only has to do with
22 the stopping part, right, which basically the

1 job is to, you know, once it's compressed, the
2 top storage container is locking, it has an
3 upward force so it can snap out and prevent the
4 locking buckle from re-engaging, okay?

5 That's a different component than the
6 resilient members number 1. That's why they are
7 two different things. It's not a simple swap
8 out. So all that claim 13 says is you can
9 implement in this particular instance the motion
10 of the stop part through a torsion spring, but
11 to do that, you need an axis of rotation,
12 basically, because it is a torsion spring.

13 You are going to need to redesign the
14 buckle and the stop so you can replace it.
15 "Swap out," I don't think, is the right term
16 because "swap out" means, oh, just take that
17 spring out and pop the other one in. No, no,
18 no, no, no. You need an axis. You need to
19 redesign it. You have to understand there is
20 going to be an increased cost. There are a lot
21 of things you need to do. It is not just a swap
22 out. You have to make changes to the design to

1 do that. But you can do that for that part.

2 Q Right. So the '946 patent doesn't
3 depict the second resilient member as a torsion
4 spring in any figure, right?

5 A Correct. And I believe that's
6 because it makes far more sense to use a
7 compression spring. Less expensive, more
8 reliable for the user of the design, but they do
9 give the option in the claim. They do claim
10 that you can also put that torsion spring there.

11 Q Right, but if a person of ordinary
12 skill in the art were attempting to implement
13 the torsion spring, would they have known how to
14 do that based on the figures in the '946 patent?

15 A It wouldn't be a simple design
16 change. I think they could figure it out, but
17 it would take some engineering, I think, to put
18 that in there because, again, you need to decide
19 what axis you're going to mount the torsion
20 spring on, will it be horizontal, will it be
21 vertical. There is a lot of do. It can be
22 done. But that's simply -- I mean, I think it

1 could be done. It wouldn't be easy.

2 Q Okay, right, yeah, not impossible.

3 That's what you're saying.

4 A Well, it wouldn't be easy. Actually,
5 I have not done it. I mean, even though the
6 invention claims it, I would have to go through
7 the exercise of actually designing it to
8 actually see how it can be done. I would be
9 premature if I said, well, it's claimed so
10 obviously someone would know how to design a
11 product doing that. I haven't done that yet.

12 I would have to think through the
13 whole process of how that would be done. It is
14 not a trivial exercise. I understand what the
15 claim says, but it is certainly not just
16 swapping out the spring, not even close. I
17 would have to go through the analysis and see
18 how, if any way, I could do that.

19 Q Okay. And there is another component
20 of this that says that there is a stop part that
21 rotates relative to the locking part. Do you
22 see that?

1 MS. HALSEY: Object to form.

2 A Where are we looking now? I'm sorry.

3 Q Still claim 13.

4 A Okay.

5 (Witness reviewing document.)

6 "Stop part rotates relative to the
7 locking part." Okay, I see that.

8 Q Okay. And how would a person of
9 ordinary skill in the art have implemented a
10 stop part that rotates relative to the locking
11 part?

12 A There are probably a number of ways
13 you can try to do it. Again, I would have to go
14 through a design and actually design it. But
15 you have to understand, to implement that, you
16 need to -- you basically have to reassess the
17 whole design because you're adding components
18 because you need a shaft. Again, that is not a
19 trivial task either, having a stop part that
20 rotates relative to the locking part.

21 I'd have to give that some thought
22 and I'd have to analyze it.

1 Q Okay. So looking at Figure 7, would
2 it require modifying card block 32?

3 A Again, it depends on how I design it.
4 I'm sure you have to modify the locking part.
5 Again, I haven't done that analysis. In order
6 to do that, there are quite a few steps you have
7 to go through to implement a design like that.
8 It is not trivial.

9 Q Okay. But a person of ordinary skill
10 in the art reading the '946 patent would know
11 how to do it; is that fair?

12 A Well, I think a person in the art
13 reading the patent would know what the claim
14 describes that it does. Like, the stop part
15 would somehow rotate. But, again, it's -- a
16 person in the art would have to design it and
17 actually perform a design, right? So one in the
18 art knows what it needs to do, but it is another
19 matter actually going through and designing such
20 a thing.

21 Q Okay. All right. So I'd like to
22 turn to paragraph 114 of your declaration.

1 A 114. Okay, I am there.

2 Q Give me one moment.

3 Sorry, that was my mistake. I wanted
4 to jump to 144.

5 A 144, okay. I'm with you.

6 Q All right. So there is a header
7 above this paragraph and there is a table above
8 this paragraph, but the header says, "There is
9 no motivation to combine Li and Davidian or
10 Baruch and Davidian"; is that right?

11 A Correct.

12 Q So just to confirm, the only argument
13 you present related to Davidian is related to a
14 motivation to combine; is that right?

15 A One second.

16 (Witness reviewing document.)

17 Okay. That's all I argue in that
18 paragraph.

19 Q Okay, right. You have no objections
20 to the content of Davidian teaching the claims
21 14 and 16, right?

22 MS. HALSEY: Object to form.

1 A They certainly don't -- if we look at
2 Davidian --

3 THE WITNESS: Could I have the
4 Davidian patent, please.

5 (Document handed to the witness.)

6 THE WITNESS: Thank you very much.

7 A So, again, I'm sorry, your question
8 exactly was?

9 Q Yeah, so you didn't include any
10 objections to Davidian's content and how it
11 teaches claims 14 and 16, right?

12 MS. HALSEY: Object to form.

13 A Well, that's because it doesn't teach
14 claims 14 and 16. I mean, I suppose I could
15 have put that in there, but, you know, it
16 doesn't teach elements of that claim so, you
17 know, since you can't even combine it and there
18 is no motivation to do so, I didn't include
19 that.

20 Oh, I have it right in front of me.
21 That's not it. Just handed it to me. Oh, okay,
22 I'm sorry, I have a lot of other documents here

1 in front of me.

2 Q Okay, I mean, feel free to keep
3 looking. I think you confirmed that it is not
4 included in there. That's all.

5 A I think I answered the question that,
6 I mean, I don't think it does. But since there
7 is no motivation to combine anyway, I didn't
8 include it there in the report.

9 Q Okay.

10 MR. TANG: All right. I think we're
11 getting close, so I would like to take a
12 ten-minute break if that's possible.

13 THE WITNESS: That would be great.

14 (A recess was taken.)

15 MR. TANG: Thank you, Dr. Vallee, I
16 have no further questions.

17 THE WITNESS: Okay.

18 MS. HALSEY: I just have a few
19 questions.

20 EXAMINATION BY COUNSEL FOR THE PATENT OWNER

21 BY MS. HALSEY:

22 Q Dr. Vallee, when you prepared your

1 declaration in this matter, Meridian had already
2 prepared and submitted a preliminary response,
3 correct?

4 A Correct.

5 Q And you had no role in preparing the
6 preliminary response, correct?

7 A That is also correct.

8 Q Did you review the preliminary
9 response?

10 A I didn't.

11 Q Are there portions of the preliminary
12 response that are incorporated into your
13 declaration?

14 A Yes, there were.

15 Q Let's look at your declaration, and
16 let's go to paragraph 30.

17 A Got it.

18 Q Let's look at the last sentence here.
19 It says, "Additional relevant industry
20 experience may compensate for lack of formal
21 education or vice versa." Do you see that?

22 A I do.

1 Q And that says, "it may compensate,"
2 correct?

3 A Correct.

4 Q Why did you use the word "may" there
5 instead of the word "can" or "will"?

6 A Because it depends on what that
7 relevant experience is.

8 Q So that there could be experience
9 that wouldn't be sufficient in order to render
10 someone a person of skill in the art?

11 A Exactly.

12 Q Could there be education that wasn't
13 sufficient to render someone?

14 A Also, yes, that is true.

15 Q In your definition of a person of
16 ordinary skill in the art, which is
17 paragraph 30, would an academic with two years
18 of connecting technology experience be expected
19 to also, as a result of that experience, have an
20 understanding of industry design needs and
21 requirements for the relevant industry?

22 A Can you ask that one more time?

1 Q Sure. In your definition of a person
2 of ordinary skill in the art, would it be
3 presumed that an academic with two years of
4 connecting technology experience would have an
5 understanding of industry design needs and
6 requirements for the relevant industry?

7 A If the academic was involved in an
8 industrial project or something like that, yes.

9 Q Would you assume that in order to
10 be -- to meet your standard of a person of
11 ordinary skill in the art, even an academic
12 would have to be able to take that into account
13 in relation to the patent?

14 A Yes.

15 Q Counsel asked you a few questions
16 about the positioning of the locking buckle
17 earlier in the deposition, correct?

18 A That's true.

19 Q If you look at the patent at
20 column 7, lines 3 through 7.

21 A 7, lines 3 to 7.

22 Q And it says, "The locking part 12

1 includes a locking body 121 that can be
2 accommodated in the mounting body 112 and a
3 locking buckle 122 located on the side of the
4 locking body 121 near the center of the storage
5 box."

6 Do you see that?

7 A I do.

8 Q Based on that clause, where do you
9 understand the locking buckle to be located on
10 the locking body?

11 A The locking buckle is inward so that
12 it can latch with the mating box. So it's
13 inward more toward the center of the box, as
14 opposed to outward, which would be away from it.

15 Q And do you understand that --

16 MS. HALSEY: Strike that.

17 Q And is the locking buckle on the side
18 of the locking body?

19 MR. TANG: Objection. Leading.

20 A I believe it says just what it says.
21 It says the locking buckle is located on the
22 side of the locking body.

1 Q Okay.

2 A So that's yes.

3 Q Is part of your job as an expert to
4 develop an understanding of the patents in the
5 proceeding?

6 A Of course.

7 Q As part of that process, would you
8 ever rely solely on the drawings of the patent
9 to understand what the patent is teaching?

10 A Not solely, no.

11 Q Are there other portions of the
12 patent you would need to study?

13 A Sure.

14 Q And what would those be?

15 A That would be the specification, the
16 claims, of course.

17 Q Okay. Look at column 6, lines 53
18 through 60.

19 A Of the '946?

20 Q Yes.

21 A Column 6, lines 53, you said, through
22 60?

1 Q Through 60. And that's the paragraph
2 that we talked a good bit about earlier
3 regarding where it says, "Mounting portion 11 is
4 fixedly connected to the box lid," and then
5 later it says, "In other embodiments, the
6 mounting body could be integrally formed or
7 fixedly connected by means such as a snap-on."

8 Do you see that?

9 A I do.

10 Q Do you understand those alternate
11 embodiments to change the configuration of the
12 mounting body in any way?

13 A No.

14 Q During your deposition earlier,
15 counsel asked you about what the inventors were
16 trying to do with the invention of the '946
17 patent. Do you recall that?

18 A I do.

19 Q Do you have any personal knowledge as
20 to what the inventors intended?

21 A I do not.

22 Q What do you base your understanding

1 of their intent on?

2 A The reading of the patent.

3 Q As you read the claims of the patent,
4 do the claims require an operable communication
5 between the spring and the mounting body and the
6 locking buckle?

7 MR. TANG: Object to form.

8 A So can you repeat that question just
9 one more time.

10 Q Do the claims of the '946 patent
11 require an operable communication between the
12 spring and the mounting body and the locking
13 buckle?

14 A Yes.

15 MR. TANG: Objection to form.

16 Q Dr. Vallee, are you an expert in
17 mechanical engineering?

18 A Yes.

19 Q Are you an expert in patent law?

20 A No.

21 Q Can you just turn to Figures 17 and
22 19 of the patent.

1 A 17 and 19, okay.

2 Q I guess probably 19 specifically.

3 A Okay.

4 Q Okay. Do these figures include
5 springs?

6 A They do.

7 MR. TANG: Objection. Scope.

8 Q What kind of springs are shown on
9 Figure 19?

10 MR. TANG: Objection. Scope.

11 A There is a linear compression
12 spring -- two of them, actually -- items 1013,
13 and then there is a torsion spring, item 1033.

14 Q And I'm just going to briefly turn to
15 the petition at page 30.

16 A I'm there.

17 Q And the petition says, "Specifically,
18 first spring 34 contacts top face 35 and front
19 face of pull latch cover 32 as depicted in
20 Figure 4." Do you see that?

21 A Not yet. Is that the top paragraph
22 of page 30, or the second paragraph?

1 Q Let me find it.

2 The second paragraph.

3 A Okay.

4 Q The second to last sentence.

5 A That begins with "Specifically."

6 Q "Specifically, first spring 34
7 contacts top face 35 and the front face of pull
8 latch cover 32 as depicted in Figure 4."

9 Do you see that?

10 A I see that.

11 Q Is contacting two parts the same as
12 being between two parts?

13 A No.

14 MS. HALSEY: Those are all the
15 questions I have for now.

16 MR. TANG: Okay. I have no further
17 questions.

18 (Time noted: 2:52 p.m.)

19

20

21

22

1 ACKNOWLEDGMENT OF DEPONENT

2
3 I, GLENN E. VALLEE, PH.D., do hereby
4 acknowledge that I have read and examined the
5 foregoing testimony, and the same is a true,
6 correct and complete transcription of the
7 testimony given by me and any corrections appear
8 on the attached Errata sheet signed by me.
9

10 _____

11 (Date)

(Signature)

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Adrienne Mignano, a Certified
3 Reporter and Notary Public within and for the
4 State of New York do hereby certify:

5 That Glenn E. Vallee, Ph.D., the
6 witness whose deposition is hereinbefore set
7 forth, was duly sworn by me before the
8 commencement of such deposition and that such
9 deposition was taken before me and is a true
10 record of the testimony given by such witness.

11 I further certify that the adverse
12 party was represented by counsel at the
13 deposition.

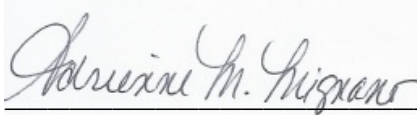
14 I further certify that the deposition
15 of Glenn E. Vallee, Ph.D. occurred via Zoom
16 videoconferencing on Thursday, July 16, 2026,
17 commencing at 9:00 a.m. until 2:52 p.m.

18 I further certify that I am not
19 related to any of the parties to this action by
20 blood or marriage, I am not employed by or an
21 attorney to any of the parties to this action,
22 and that I am in no way interested, financially

1 or otherwise, in the outcome of this matter.

2 IN WITNESS WHEREOF, I have hereunto
3 set my hand this 27th day of July, 2026.

4 My commission expires: June, 2028

5 
6 _____

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8 STATE OF NEW YORK

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