

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BECKMAN COULTER, INC.,

Plaintiff,

VS.

Case No. 1:24-CV-00945-CFC

CYTEK BIOSCIENCES, INC.,

Defendant.

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HIGHLY CONFIDENTIAL

OUTSIDE ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF

JAMES LEARY, PhD,

Palo Alto, California

Friday, February 20, 2026

9:22 a.m.

Job No. 620829

Pages 1 - 296

Stenographically reported by:

JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC

CSR No. 3969

CYTEK V. BECKMAN  
PGR2025-00088  
BECKMAN 2062

|    |                                                      |          |
|----|------------------------------------------------------|----------|
| 1  |                                                      | 10:51:36 |
| 2  |                                                      | 10:51:38 |
| 3  |                                                      | 10:51:39 |
| 4  |                                                      | 10:51:41 |
| 5  |                                                      | 10:51:43 |
| 6  |                                                      | 10:51:46 |
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| 14 |                                                      | 10:53:28 |
| 15 |                                                      | 10:53:30 |
| 16 | Q. Okay. So, in your opinion, "a POSA would          | 10:53:31 |
| 17 | understand that a wavelength division multiplexer,   | 10:53:33 |
| 18 | as recited in the claim, refers to an optical        | 10:53:37 |
| 19 | component that brings together rather than separates | 10:53:40 |
| 20 | different wavelengths of light."                     | 10:53:42 |
| 21 | Did I read that right?                               | 10:53:45 |
| 22 | A. Yes, you did.                                     | 10:53:45 |
| 23 | Q. And is that still your opinion, sitting           | 10:53:46 |
| 24 | here today?                                          | 10:53:49 |
| 25 | A. Yes. My opinion remains unchanged.                | 10:53:50 |

1 [REDACTED] 15:19:22  
2 [REDACTED] 15:19:25  
3 [REDACTED] 15:19:43  
4 [REDACTED] 15:19:44  
5 [REDACTED] 15:19:57  
6 Q. Okay. Here, you say: 15:19:58  
7 "In my opinion, based on the plain 15:20:00  
8 language of the claim, a POSA would 15:20:03  
9 understand that the fiber must receive 15:20:04  
10 light directly from the flow cell, and 15:20:06  
11 that light that has passed through (and 15:20:10  
12 is manipulated by) any intervening 15:20:14  
13 optical element, such as an objective 15:20:19  
14 lens in the case of the accused 15:20:22  
15 products is not considered 'light from 15:20:24  
16 the flow cell,' but rather 'light from 15:20:27  
17 the objective lens.'" 15:20:32  
18 "Do you see that? 15:20:33  
19 A. Yes. Yes, I wrote that. 15:20:35  
20 Q. Okay. So, in your view, a person of skill 15:20:39  
21 in the art would interpret an optical fiber 15:20:42  
22 configured to receive light from the flow cell to 15:20:47  
23 require the fiber to receive light directly from the 15:20:51  
24 flow cell; is that right? 15:20:54  
25 A. You can't just stick a fiber up next to a 15:21:04

1 flow cell; you have to have some intervening optics. 15:21:07

2 And Beckman Coulter and Cytex do it very 15:21:13

3 differently. But you can't just stick it up to -- 15:21:16

4 next to the flow cell and expect to get any kind of 15:21:18

5 a real signal. 15:21:22

6 Q. That wouldn't make any sense? 15:21:25

7 A. It wouldn't make any sense. It's, again, 15:21:26

8 poorly worded. 15:21:32

9 [REDACTED] 15:21:43

10 [REDACTED] 15:21:47

11 [REDACTED] 15:21:52

12 [REDACTED] 15:21:54

13 [REDACTED] 15:21:59

14 [REDACTED] 15:21:59

15 [REDACTED] 15:22:02

16 [REDACTED] 15:22:05

17 [REDACTED] 15:22:08

18 [REDACTED] 15:22:10

19 [REDACTED] 15:22:13

20 [REDACTED] 15:22:16

21 [REDACTED] 15:22:16

22 [REDACTED] 15:22:22

23 [REDACTED] 15:22:23

24 [REDACTED] 15:22:28

25 [REDACTED] 15:22:28

|    |                                                     |          |
|----|-----------------------------------------------------|----------|
| 1  |                                                     | 18:26:25 |
| 2  | You've interpreted the claimed flow cell to         | 18:26:25 |
| 3  | be limited to a flow cell with a concave mirror and | 18:26:29 |
| 4  | an aberration corrector plate in performing your    | 18:26:34 |
| 5  | noninfringement analysis; right?                    | 18:26:36 |
| 6  | A.    That's the only one described in the -- in    | 18:26:38 |
| 7  | the patent.                                         | 18:26:42 |
| 8  |                                                     | 18:26:53 |
| 9  |                                                     | 18:27:01 |
| 10 |                                                     | 18:27:02 |
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| 22 |                                                     | 18:27:59 |
| 23 |                                                     | 18:28:01 |
| 24 |                                                     | 18:28:14 |
| 25 |                                                     | 18:28:17 |