

**In The Matter Of:**

***ROY-G-BIV Corporation***

***vs.***

***ABB, Ltd., et al.***

---

***Marc McClung***

***March 14, 2014***

---

**MERRILL CORPORATION**

**LegalLink, Inc.**

311 South Wacker Drive  
Suite 300  
Chicago, IL 60606  
Phone: 312.386.2000  
Fax: 312.386.2275

ROY-G-BIV CORPORATION  
EXHIBIT 2021  
ABB v ROY-G-BIV  
TRIAL IPR2013-00062

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

- - - -

ROY-G-BIV CORPORATION, )  
)  
Plaintiff, )

vs. )

No. 6:11-cv-000622-LED

ABB LTD., ABB, INC., )  
MEADWESTVACO TEXAS, LP and )  
MEADWESTVACO CORPORATION, )  
)  
Defendants. )

\_\_\_\_\_)

- - - -

DEPOSITION OF MARC McCLUNG

Held at Verbatim Reporting Service  
141 Stony Circle, Suite 240, Santa Rosa, California  
Friday, March 14, 2014, 10:00 a.m.

- - - -

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES

For the Plaintiff:

Boies, Schiller & Flexner LLP  
Attorneys at Law  
5301 Wisconsin Avenue, NW  
Washington, DC 20015  
BY: RICHARD S. MEYER, ESQ.

For the Defendants:

Squire Sanders  
Attorneys at Law  
1200 19th Street NW  
Suite 300  
Washington, DC 20036  
BY: JEREMY W. DUTRA, ESQ.

ABB, Inc.  
Legal Department - 4U6  
29801 Euclid Avenue  
Wickliffe, Ohio 44092  
BY: ROBERT P. NUPP  
Senior Patent Attorney

Also present:

David Brown  
Eric Harnew, Videographer

Reported by:

Jennifer L. Furia, RPR, CSR  
License No. 8394

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

INDEX OF EXAMINATION

	Page
Examination by Mr. Dutra	7
Examination by Mr. Meyer	143
Further examination by Mr. Dutra	214

INDEX OF EXHIBITS

McClung

Exhibit No.	Description	Page
1	Compumotor Motion Toolbox User Guide, Bates stamped RGBINSP00017944 - RGBINSP00018056	37
2	Compumotor 6000 Series Software Reference Guide, Bates stamped RGBINSP00001703 - RGBINSP00001970	50
3	A Parker Compumotor Digiplan Memo to Bob Cook, Kevin Holloway, Joanne Botka, Marc McClung, John Stroup, Dave Brown - ROY-G-BIV, Jay Clark, ROY-G-BIV, CC Roy Glassett, DATE April 22, 1994, RE ROY-G-BIV Meeting Minutes, Bates stamped PARKER 0010 - PARKER 0016	83
4	Motion Control Component WOSA API/SPI Specification, Bates stamped RGB00055144 - RGB00055171	105
5	WOSA/XMC MCAPI and MCSPI Design Specification, Bates stamped RGB00055896 - RGB00055949	124
6	ROY-G-BIV Spec 2.0 Meeting Minutes, September 8, 1994 3:30 AM, Bates stamped PARKER 0045 - PARKER 0046	125

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

INDEX OF EXHIBITS (Continued):

McClung Exhibit No.	Description	Page
7	Email from Marc McClung, to Dave Brown, dated 9/19/94, RE: WOSA/XMC, Draft 2, Section 3.3, Bates stamped RGB00051658 - RGB00051659	130
8	Email from Marc McClung, to Dave Brown, dated 11/10/94, RE: WOSA/XMC, Draft 2, ITimer, Bates stamped RGB00051664	131
9	Email from Marc McClung, to Dave Brown, dated 11/11/94, RE: WOSA/XMC, Draft 2, Interrupts, Bates stamped RGB00051665	131
10	Email from Marc McClung, to Dave Brown, dated 11/11/94, RE: WOSA/XMC, Draft 2, ICounter, Bates stamped RGB00051666	132
11	RGBLOG.TXT, Bates stamped PARKER 0034 - PARKER 0038	132
12	Motion Control Component WOSA API/SPI Specification, Bates stamped RGB00120632 - RGB00120659	161
13	Reciprocal Non-Disclosure & Confidentiality Agreement, Bates stamped RGB00058740 - RGB00058742	166
14	Reciprocal Non-Disclosure & Confidentiality Agreement, Bates stamped RGB00057860 - RGB00057862	184
15	RGBLOB.TXT, Bates stamped PARKER 0019 - PARKER 0044	186
16	Parker Compumotor Digiplan Memo to Bob Cook, Kevin Holloway, Marc McClung, John Stroup, Bates stamped PARKER 0052	218

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.