SEL EXHIBIT NO. 2026

INNOLUX CORP. v. PATENT OF SEMICONDUCTOR ENERGY LABORATORY CO., LTD.

IPR2013-00066

Page 1 1 UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD 2 3 INNOLUX CORPORATION,)) Petitioner, 4)) 5 IPR2013-00068) vs. U.S. Pat. No.) 6 SEMICONDUCTOR ENERGY 8,066,204) LABORATORY CO., LTD.,) 7) Patent Owner.) 8 9 10 11 The videotaped deposition of MICHAEL J. 12 ESCUTI, Ph.D., called by the Petitioner for 13 examination, pursuant to Notice, and pursuant to 14 the applicable rules, taken before Sandra L. 15 Rocca, CSR, CRR, at 115 South LaSalle Street, 16 Chicago, Illinois, on the 6th day of September, 17 2013, at the hour of 9:49 a.m. 18 19 20 21 22 23 24 25

1				
1	APPEARANCES:	Page 2	1	Page 4 VIDEOGRAPHER: Okay. We're on record.
2				My name is Mary Ann Naas of Veritext. Today's
3	JEFFER MANGELS BUTLER & MITCHELL, LLP By: MR. STANLEY M. GIBSON			date is September 6th, 2013. The time is
	3 Park Plaza, Suite 1100		1	approximately 9:49.
4	Irvine, CA 92614 (949) 623-7200/Fax: (949) 623-7202		5	This deposition is being held in the
5	sgibson@jmbm.com			
6	appeared on behalf of the			office of Steptoe & Johnson located at 115 South
7	Petitioner;			LaSalle Street, Chicago, Illinois.
8			8	The caption of the case is Innolux Corp.
	STEPTOE & JOHNSON, LLP			versus Patent of Semiconductor Energy Lab, case
9	By: MR. STANLEY A. SCHLITTER 115 South LaSalle Street		10	number IPR 2013-00068, Patent No. 8,066,204, in
10	Chicago, IL 60603		11	the United States Patent and Trademark Office
11	(312) 577-1250/Fax: (312) 577-1370		12	before the Patent Trial and Appeal Board. The
11 12	sschlitter@steptoe.com -and-		13	name of the witness is Dr. Michael Escuti.
13	HUSCH BLACKWELL LLP		14	At this time will the attorneys please
14	By: MR. EDWARD D. MANZO 120 South Riverside Plaza		15	identify themselves and the parties they
14	Suite 2200			represent, after which our court reporter, Sandra
15	Chicago, IL 60606			Rocca of Veritext, will swear in the witness and
16	(312) 526-1535/Fax: (312) 655-1501 edward.manzo@huschblackwell.com			we can proceed.
10	appeared on behalf of the		19	MR. GIBSON: Stan Gibson on behalf of
	Patent Owner.			the Petitioner.
18 19			20	MR. SCHLITTER: Stan Schlitter of
20	Also Present:			
21	Ms. Mary Ann Naas, Videographer			Steptoe & Johnson and Edward Manzo from Husch
22 23				Blackwell on behalf of the patent owner.
24			24	
25			25	
		Page 3		Page 5
	INDEX /ITNESS PAGE		1	MICHAEL J. ESCUTI, Ph.D.,
2			2	having been first duly sworn, was examined and
м 3	IICHAEL J. ESCUTI, Ph.D.		3	testified as follows:
E7 4	XAMINED BY		4	EXAMINATION
	Mr. Gibson 5		5	BY MR. GIBSON:
5				
	Mr. Schlitter 177 Mr. Gibson (Eurther) 187		6	Q. Good morning. If you could once again
6	Mr. Schlitter 177 Mr. Gibson (Further) 187		6	Q. Good morning. If you could once again spell your last name and state your name for the
6 7	Mr. Gibson (Further) 187		6 7	spell your last name and state your name for the
7 8	Mr. Gibson (Further) 187 EXHIBITS		6 7 8	spell your last name and state your name for the record.
7 8	Mr. Gibson (Further) 187		6 7 8 9	spell your last name and state your name for the record.A. Good morning. My last name is spelled
7 8 9 De	Mr. Gibson (Further) 187 EXHIBITS		6 7 8 9 10	spell your last name and state your name for the record.A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James
7 8 9 10	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED		6 7 8 9 10 11	spell your last name and state your name for the record.A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti.
7 8 9 10 11	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit o. 1004 U.S. Pat. No. 5,504,601 144		6 7 8 9 10 11 12	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for
7 8 9 10 11	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit		6 7 8 9 10 11 12 13	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat
7 8 NI 9 De 10 No 11 No 12 No	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit 0. 1004 U.S. Pat. No. 5,504,601 144 0. 1005 U.S. Pat. No. 5,636,329 106 0. 1008 Late-News Paper: Polarization		6 7 8 9 10 11 12 13 14	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat those unless you would like me to do so.
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7 8 9 10 11 No 12 No 13 14	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit 0. 1004 U.S. Pat. No. 5,504,601 144 0. 1005 U.S. Pat. No. 5,636,329 106 0. 1008 Late-News Paper: Polarization Independent Liquid Crystal Microdisplays 53		6 7 8 9 10 11 12 13 14 15 16	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat those unless you would like me to do so. Would you like me to repeat those for you?
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7 8 9 10 10 11 12 13 14 15	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit o. 1004 U.S. Pat. No. 5,504,601 144 o. 1005 U.S. Pat. No. 5,636,329 106 o. 1008 Late-News Paper: Polarization Independent Liquid Crystal Microdisplays 53 o. 1009 Schematic of Fig. A, pg. 40 of Escuti '204 declaration 82 o. 1010 schematic of Fig. B, pg. 50		6 7 8 9 10 11 12 13 14 15 16 17 18	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat those unless you would like me to do so. Would you like me to repeat those for you? A. There's no need to do so. Q. And there's no reason your deposition
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7 8 NI 9 De 10 Nc 11 Nc 12 Nc 13 Nc 14 Nc 15 16 Nc 17 Nc 19 Nc 20 Nc	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit 0. 1004 U.S. Pat. No. 5,504,601 144 0. 1005 U.S. Pat. No. 5,636,329 106 0. 1008 Late-News Paper: Polarization Independent Liquid Crystal Microdisplays 53 0. 1009 Schematic of Fig. A, pg. 40 of Escuti '204 declaration 82 0. 1011 schematic of new modified Fig. 4 of Shiba 83		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat those unless you would like me to do so. Would you like me to repeat those for you? A. There's no need to do so. Q. And there's no reason your deposition can't proceed today? A. There's no reason. Q. All right. Let's we're now here
7 8 NI 9 De 10 No 11 No 12 No 13 14 No 13 16 No 17 No 17 No 19 No 20 No 21 No	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit o. 1004 U.S. Pat. No. 5,504,601 144 o. 1005 U.S. Pat. No. 5,636,329 106 o. 1008 Late-News Paper: Polarization Independent Liquid Crystal Microdisplays 53 o. 1009 Schematic of Fig. A, pg. 40 of Escuti '204 declaration 82 o. 1010 schematic of Fig. B, pg. 50 of Escuti '204 declaration 82 o. 1011 schematic of new modified Fig. 4 of Shiba 83 o. 1012 U.S. Pat. No. 8,068,204 9 o. 1013 U.S. Pat. No. 8,068,204 9		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat those unless you would like me to do so. Would you like me to repeat those for you? A. There's no need to do so. Q. And there's no reason your deposition can't proceed today? A. There's no reason. Q. All right. Let's we're now here dealing with the '204 patent and you also
7 8 NI 9 De 10 No 11 No 12 No 13 14 No 15 16 No 17 No 18 19 No 20 No	Mr. Gibson (Further) 187 EXHIBITS UMBER PRESENTED eposition Exhibit o. 1004 U.S. Pat. No. 5,504,601 144 o. 1005 U.S. Pat. No. 5,636,329 106 o. 1005 U.S. Pat. No. 5,636,329 106 o. 1008 Late-News Paper: Polarization Independent Liquid Crystal Microdisplays 53 o. 1009 Schematic of Fig. A, pg. 40 of Escuti '204 declaration 82 o. 1010 schematic of Fig. B, pg. 50 of Escuti '204 declaration 82 o. 1011 schematic of new modified Fig. 4 of Shiba 83 o. 1012 U.S. Pat. No. 8,068,204 9 o. 1013 U.S. Pat. No. 8,068,204 9 o. 1014 U.S. Pat. No. 8,068,204 9 o. 1015 U.S. Pat.		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 spell your last name and state your name for the record. A. Good morning. My last name is spelled E-s-c-u-t-i and my full name is Michael James Escuti. Q. And I went over the background rules for the deposition yesterday. I'm not going to repeat those unless you would like me to do so. Would you like me to repeat those for you? A. There's no need to do so. Q. And there's no reason your deposition can't proceed today? A. There's no reason. Q. All right. Let's we're now here

2 (Pages 2 - 5)

		1	
1	Page 6 (Document marked previously as Exhibit	1	Pag printing, but it does seem to be that there's two
2	Number 2011 was presented.)		copies of the same thing.
3	BY MR. GIBSON:	3	· •
4	Q. And I'm going to hand you a copy of that	1	attached to the original that way or if that was
5	and ask you to take a look at it and confirm that		something that was done in the copying either, bu
6	it's your declaration.		putting that aside, is it the same CV, albeit with
7	A. It does appear to be my declaration and	1	two copies of the one we went through yesterday
8	exhibit I'm sorry, declaration and appendices	8	
9	but not the exhibits.	9	
10	Q. And if you look at Appendix B to your	10	Q. If you'd look at paragraph 52 of your
	declaration		declaration
12	A. I see it.	12	
13	Q are those the materials that you	13	Q and if you have a moment, just to
	reviewed to prepare your declaration?		read that to yourself. Just let me know when
15	A. Yes.		you're done.
16	Q. And did you review anything else in	16	A. I've read it.
	preparing your declaration?	17	Q. And what are you trying to articulate
18	A. In forming the opinions that are		there?
	expressed here and in preparing the declaration	19	A. The statement says what it says and I
	itself, I didn't review anything else in addition		stand by it, that an ordinarily skilled artisan
	to this list.	1	understands that this terminal in the '204 patent
22	Q. So you didn't look at any other patents,		is fabricated generally from the bottom up,
	for example?		beginning with the foundation and substrate and
24	A. Not for the purpose of forming the		then the other layers. And that's required
	opinions and preparing the declaration, no. As I	1	because of the processing that's needed during the
	Page 7		Pag
1	did mention vesterday, there were other things I	1	-
	did mention yesterday, there were other things I looked at but decided not to spend any more time		fabrication.
2	looked at but decided not to spend any more time	2	fabrication. Q. And this figure's coming from the '204
2 3	looked at but decided not to spend any more time on, other than recognizing that I had seen them.	2 3	fabrication. Q. And this figure's coming from the '204 patent, is that correct?
2 3 4	looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked	2 3 4	fabrication.Q. And this figure's coming from the '204 patent, is that correct?A. Yes, I believe it's Fig. 4A.
2 3 4 5	looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider?	2 3 4 5	fabrication.Q. And this figure's coming from the '204 patent, is that correct?A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit
2 3 4 5 6	looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any	2 3 4 5 6	fabrication.Q. And this figure's coming from the '204 patent, is that correct?A. Yes, I believe it's Fig. 4A.(Document marked previously as Exhibit Number 1012 was presented.)
2 3 4 5 6 7	looked at but decided not to spend any more time on, other than recognizing that I had seen them.Q. And do you recall any patents you looked at and decided not to consider?A. No. I certainly don't recall any any of those.	2 3 4 5 6 7	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON:
2 3 4 5 6 7 8	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at 	2 3 4 5 6 7 8	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent.
2 3 4 5 6 7 8 9	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? 	2 3 4 5 6 7 8 9	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And
2 3 4 5 6 7 8 9 10	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, 	2 3 4 5 6 7 8 9 10	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my
2 3 4 5 6 7 8 9 10 11	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. 	2 3 4 5 6 7 8 9 10 11	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A,
2 3 4 5 6 7 8 9 10 11 12	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't 	2 3 4 5 6 7 8 9 10 11 12	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from.
2 3 4 5 6 7 8 9 10 11 12 13	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or 	2 3 4 5 6 7 8 9 10 11 12 13	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say
2 3 4 5 6 7 8 9 10 11 12 13 14	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or were those just things you looked at on your own? 	2 3 4 5 6 7 8 9 10 11 12 13 14	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say Claim 1 of the '204 patent have you had a
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or were those just things you looked at on your own? A. Those were things that I looked at on my 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say Claim 1 of the '204 patent have you had a chance to look at that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or were those just things you looked at on your own? A. Those were things that I looked at on my own. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say Claim 1 of the '204 patent have you had a chance to look at that? A. While I have reviewed Claim 1 of the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or were those just things you looked at on your own? A. Those were things that I looked at on my own. Q. Were there any things that were provided 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say Claim 1 of the '204 patent have you had a chance to look at that? A. While I have reviewed Claim 1 of the '204 patent, I certainly haven't spent a lot of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or were those just things you looked at on your own? A. Those were things that I looked at on my own. Q. Were there any things that were provided by counsel that you did not consider? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say Claim 1 of the '204 patent have you had a chance to look at that? A. While I have reviewed Claim 1 of the '204 patent, I certainly haven't spent a lot of time reading it. That certainly was not my focus.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 looked at but decided not to spend any more time on, other than recognizing that I had seen them. Q. And do you recall any patents you looked at and decided not to consider? A. No. I certainly don't recall any any of those. Q. How much time did you spend looking at the things you decided not to consider? A. A small small number of hours, one hour, not very much time at all. Q. Were those things that you didn't consider, were those provided to you by counsel or were those just things you looked at on your own? A. Those were things that I looked at on my own. Q. Were there any things that were provided by counsel that you did not consider? A. Not that I can recall. This list seems to be complete in that regard. Q. And the CV that's attached to your declaration, is it the same CV as yesterday? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 fabrication. Q. And this figure's coming from the '204 patent, is that correct? A. Yes, I believe it's Fig. 4A. (Document marked previously as Exhibit Number 1012 was presented.) BY MR. GIBSON: Q. I'm going to hand you the '204 patent. And A. To be clear, it's been colorized in my declaration. So it's a modification of Fig. 4A, but that's where it's from. Q. Right. Now, when you look at say Claim 1 of the '204 patent have you had a chance to look at that? A. While I have reviewed Claim 1 of the '204 patent, I certainly haven't spent a lot of time reading it. That certainly was not my focus. Q. Okay, fair enough. What would you consider to be a representative claim that would embody what's in 4A in the '204 patent?

Page 12 Page 12 1 features that you see in Fig. 4A of the '204 2 patent? 3 A. Well, Fig. 4A is an embodiment of 4 Claim 31 and maybe others. So is that what you're 5 asking, what my opinion is? 6 Q. Yeah, and what specific claim do you 7 think would cover that embodiment? 8 MR. SCHLITTER: Objection, form. 9 TEM WITNESS: Well, I'm quite certain 10 that Fig. 4A covers multiple claims in this 11 patent The one that comes to mind first is 12 Chim 31, but by no means is it limited to that. 13 BY MR. GUBSON: 14 Q. Okay. And I'm not asking for a limit. 15 I'm asking for something that would be 16 represstantive. 17 And Claim 31, use the language of 18 'first'' and 'second,'' for example? There's those 19 indeil nclaim 31, ubt of course applied to lines 21 indeed in Claim 31, but of course applied to lines 22 - oh, I'm sory. Well, there's the insulating <td< th=""><th></th><th></th><th>1</th><th></th></td<>			1	
2 petent? 2 terms "first insulating film" and "second 3 A. Well, Fig. 4A is an embodiment of 4 are part of the claim in a duey 4 Claim 31 and maybe others. So is that what you're 5 asking, what my opinion is? 6 Q. Yeah, and what specific claim in a sequence of 5 asking, what my opinion is? 7 Mink would cover that embodiment? 6 the ground work for my answer, right. 8 MR. SCHLITTER: Objection, form. 9 transistors, pixel electrodes each electrically 10 that Fig. 4A covers multiple claims in this 11 conter substrate facing the substrate, a liquid 12 claim 31, but yo means is it limited to that. 13 BY MR. GIBSON: 14 Q. Okay. And I'm not asking for a limit. 15 I'm asking for something that would be 16 representative. 16 there's an auxiliary line, an external connection 17 Made Claim 31 uses the language of 18 insulating film interposed there between. So 18 words "first" and "second," for example? There's thoes 16 There's an auxiliary line, which also I think applies, 2 - oh, I'm sorry. Well, there's the insulating 21 imbe words first'' in this use doesn't 2 - oh, I'm sorry. Well, there's the insulating film. 21 The word "first'' in this use doesn't 3 Q. All right. And when you - or when an 4 ordimary second'' and 'second, and'' words "first'' and 'second, "first'' and 'second," would you understand	1	Page 10		
3 A. Well, Fig. 4A is an embodiment of 3 insulating film" are part of the claim and they 4 Claim 31 and what specific claim do you 4 are part of the claim in a sequence of 6 Q. Yeah, and what specific claim do you 6 the ground work for my answer, right. 7 MR. SCHLITTER: Objection, form. 9 thisk would cover that tembodiment? 8 MR. SCHLITTER: Objection, form. 9 transistors, pixel electrodes each electrically 10 that Fig. A covers multiple claims in this 10 connected to one of the thin film transistors, a 11 patent. The one that comes to mind first is 12 curystal material and a sealant provided between 13 BY MR. GIBSON: 11 connected to one of the thin film transistors, a 14 Q. Okay. And I'm not asking for a limit. 15 finstain all sets the language of 15 'ms strift and "second," for example? There's those 16 There's an auxiliary line, an external connection 17 And Claim 31, but of course applied to lines 22 reguire a sequence. It's not so much the word 25 if's mary and "second," readim that states 6 16 16 24 In Claim 31, but				
4 are part of the claim in a sequence of saking, what my opinon is? 5 asking, what my opinon is? 6 Q. Yeah, and what specific claim do you 7 think would cover that embodiment? 8 MR. SCHLITTER: Objection, form. 9 THE WITNESS: Well, I'm quite certain 10 that Fig. 4A covers multiple claims in this 11 parts for something that would be 12 claim 31, but by no means is it limited to that. 13 BY MK. GIBSON: 14 And Claim 31 uses the language of 17 rang are something that would be 16 representative. 17 And Claim 31, but of course applied to limits 18 first" and "second," for example? There's thos 2 - oh, I'm sory. Well, there's the insulating 2 - oh, I'm sory. Well, there's the insulating 23 films in Claim 31. 2 - on films word "first" and "second" do appear in 2 claim 31. 3 Q. All right. And when you - or when an 4 ordinary - when a person of - an ordinary particlarly applied to the algoriship between those threce 2 f		<u>^</u>	1	-
5 asking, what my opinion is? 5 limitations, which I d like to go through to lay 6 Q. Yeah, and what specific claim do you 5 limitations, which I d like to go through to lay 6 Q. Yeah, and what specific claim do you 6 the ground work for my answer, right. 7 bink would cover that embodiment? 8 device. There must be a substrate with thin film 9 THE WITNESS: Well, I'm quite certain 10 connected to one of the thin film transistors, a 11 patent. The one that comes to mind first is 2 claim 31, but by no means is it limited to that. 12 Claim 31, but by no means is it limited to that. 11 counter substrate and the counter substrate. 14 Q. Okay. And I'm not asking for a limit. 12 crystal material and a sealant provided between 15 I'm asking for something that would be 13 the substrate and the counter substrate. 16 representative. 14 And then we get into the claim 17 And Claim 31, but of course applied to limes 2 21 indeed in Claim 31, but of course applied to limes 2 22 if is used in a different way, those words. But 2 18 the words "first" and "second" to appear in 2 2 Claim 31. 1 describes the relationship between those three 2 claim 31. 1 describes the relationship between those three 2 elements. 3 Q. All			1	· · · ·
6 Q. Yeah, and what specific claim do you 6 the ground work for my answer, right. 7 think would cover that embodiment? So it's clearly a liquid crystal display 8 MR. SCHLITTER: Objection, form. 9 THE WITNESS: Well, I'm quite certain 10 that Fig. 4A covers multiple claims in this 11 11 patent. The one that comes to mind first is 12 claim 31, but by no means is it limited to that. 13 BY MR. GIBSON: 11 14 Q. Okay. And I'm not asking for a limit. 15 15 I'm asking for something that would be 16 There's an auxiliary film attrate and the counter substrate. 14 And Claim 31 uses the language of 13 the substrate and the counter substrate. 18 'mscand,'' for example? There's those 16 There's an auxiliary film interposed there between. So 20 A. The words "first" and "second" are 20 applied to the insulating film. 21 Indeed in a different way, those words. But 21 The words "first" and "second" are 21 the words "first" and "second" are 3 Q. All right. And when you - or when an 3 Q. All right. And when you - or when an 3 Q. All right. And when you - or when are 3 Q. All right. And so it's			1	
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8 MR. SCHLITTER: Objection, form. 9 Revice. There must be a substrate with thin film 9 THE WITNESS: Well, I'm quite certain 9 10 that Fig. 4 A covers multiple claims in this 11 0 connected to one of the thin film transistors, a 11 patent. The one that comes to mind first is 11 0 connected to one of the thin film transistors, a 12 Claim 31, but by no means is it limited to that. 12 crystal material and a sealant provided between 13 BY MR. GIBSON: 14 And then we get into the claim 15 16 representative. 16 There's an auxiliary line, an external connection 17 And Claim 31, uses the language of 17 line overlapping the auxiliary line, an external connection 17 indeed in Claim 31, but of course applied to lines 16 There words "first" and "second," are 21 ond, fine or ention 31. 21 The words "first" and "second," do appear in 21 22 requires a cequence, but its relationship between these three 2 claim 31. 14 describes the relationship between these three 2 3 Q. All right. And when you - or when an 4 ordin	6		1	· · · · · · · · · · · · · · · · · · ·
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13 BY MR. GIBSON: 13 the substrate and the counter substrate. 14 Q. Okay. And I'm not asking for a limit. 14 And then we get into the claim 15 I'm asking for something that would be 15 I'm asking for something that would be 16 representative. 16 There's an auxiliary line, an external connection 17 And Claim 31 uses the language of 17 I'm eoverlapping the auxiliary line, an external connection 18 "first" and "second," for example? There's those 19 19 that's the first instance of the word "first" 20 A. The words "first" and "second" and "second" the instalting 21 The word "first" in this use doesn't 21 reduct a sequence. but its relationship of this 23 element to the other elements identified here does 24 In Claim 31. 23 element to the other elements identified here does 24 In Claim 54, which also I think applies, 25 ifts," but rather that whole limitation that 25 reduct and fifterent way, those words. But 24 inglie a different way, those words. But 3 Q. All right. And when you - or when an 3 Q. All right. And when you - or when an 4 odinary - when a person of			11	counter substrate facing the substrate, a liquid
14 Q. Okay. And I'm not asking for a limit. 15 Tr masking for something that would be 16 representative. 17 And Claim 31 uses the language of 18 "first" and "second," for example? There's those 19 words in that claim? 20 A. The words "first" and "second" are 21 indeed in Claim 31, but of course applied to lines 22 -oh, I'm sorry. Well, there's the insulating 23 films in Claim 31. 24 In Claim 31. 25 it's used in a different way, those words. But 26 first" and "second," do appear in 2 Claim 31. 3 Q. All right. And when you or when an 4 ordinary when a person ofan ordinary person 5 of skill in the art reads a claim that states 6 "first" and "second," would you understand that 7 that's referring to the order that the layers are 8 deposited 9 MR. SCHLITTER: Objection, form. 10 BY MR. GIBSON: 11 Q. Well, the Claim 31, for example, how 14 claim that the p	12	Claim 31, but by no means is it limited to that.	12	crystal material and a sealant provided between
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16 representative. 16 There's an auxiliary line, an external connection 17 And Claim 31 uses the language of 17 line overlapping the auxiliary line with a first 18 "first" and "second," for example? There's those 19 words in that claim? 20 A. The words "first" and "second" are 19 words in that claim 31. 21 indeed in Claim 31. 21 The word "first" in this use doesn't 22 oh, I'm sorry. Well, there's the insulating 21 The word "first" in this use doesn't 23 films in Claim 31. 21 The word "first" in this use doesn't 24 In Claim 54, which also I think applies, 25 "first," but rather that whole limitation that 25 it's used in a different way, those words. But 25 "first," but rather that whole limitation that 2 Claim 31. 9 All right. And when you or when an 11 describes the relationship between those three 2 elements. 3 Q. All right. And so it's obviously not 4 what you're saying is it's not the word "first" by 5 of skill in the art reads a claim that states 6 "first" and "second," would you understand that 6 Claim when you see the words "first" and "second," 7 that's referring to the order that the layers are 8 you're going to deposit these layers? 9 MR. SCHLITTER: And foundation. 13 THE WITNESS: It would depend on the 14 that is and sequence of the word "second,"	14	Q. Okay. And I'm not asking for a limit.	14	And then we get into the claim
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Γ	Dage 14	1	
1	Page 14 A. Yes, they're used and applied on first	1	Page 16 A. Well, in that case, I don't think a
	conductive line, second conductive line as well as		person of ordinary skill would would be able to
3	-		see that as the inverse. So in that case, it's
4		1	building on top of that first conductive line
5			because of the word "over."
	would understand that element to be telling you a	6	
7			previous element.
1	layer, correct?	8	A. It is.
9		9	Q. First conductive line over the
	a substrate, there should be a in this claim		substrate.
	limitation, there should be a first conductive	11	A. It is.
	line over that substrate. I think a person of	12	Q. So how is the word "over" being used
	ordinary skill would normally expect that the		differently in the element of first insulating
1	substrate is first somehow manufactured and then		film over the first conductive line?
	prepared for the deposition of that conductive	15	A. Well, I'd like to be clear. I think a
	line, but the claim certainly doesn't require	1	person of ordinary skill would normally read this,
	that. It could be the inverse.		a first conductive line over the substrate
18	Q. What do you mean it could be the		limitation and understand that the substrate would
1	inverse?		be prepared first and then the first wiring line
20	A. It's entirely possible to have a metal		would be deposited and patterned on top of it, but
21	layer formed and a material deposited onto that	1	the claim limitation does not require that.
1	that will later serve the function of the	1	That's simply what I'm I'm pointing out.
	substrate. You know, for example, in flexible	23	And the use of the word "over," the
1	displays, that's a possibility. I'm not saying	1	first time it's used refers to the arrangement of
	it's common or or preferred, but it's certainly		just two things. Whereas its second use refers to
	Page 15		
1	an aspect that's explored in that context.	1	Page 17 its use with respect to more than two things.
$\begin{vmatrix} 1\\ 2 \end{vmatrix}$	Q. Okay. But looking at Claim 54, you	2	Q. So would you then read a limitation into
	would not understand Claim 54 to be directing that		a first conductive line over the substrate as
	kind of step, right?		saying the substrate's going to have to come
5	A. It doesn't direct either way. It simply	4	
	says there must be a first conductive line over	1	element of first insulating film over the first
	the substrate and that word "over" then places a	1	conductive line requires the insulating film to be
	direction above a substrate that's going to be	1	over the conductive line?
	built upon in the rest of the claim limitations.	9	MR. SCHLITTER: Objection, form.
10	Q. All right. So you're saying the	10	THE WITNESS: I I don't think that a
	substrate could come after the first conductive		person of ordinary skill would read the phrase "a
	line?		first conductive line over the substrate" as
13	A. Claim 54 could certainly apply to		requiring that the substrate come first. That is
1	terminals where a first conductive line is first	1	a preferable way to do it certainly, but it's not
15	somehow prepared and then a substrate material is		required.
	applied onto that.	16	However, when it's used in the next
17	It sounded to me like you were asking me		limitation, the first insulating film over the
18	if this limitation required a sequence between a	1	first conductive line, there is an order that's
	substrate first and then a first conductive line	1	required there because it's it's describing the
20	and I'm simply commenting that that's not the what		relationship of the first insulating film which
	claim limitation requires. It could be the		now must be over the first conductive line, which
1	inverse as well.		of course is already over the substrate.
23	Q. When you look at a first insulating film	1	BY MR. GIBSON:
24	over the first conductive line, could that be the	24	Q. Now, when you look at the next element,
	inverse as well?	25	a second conductive line actually let me just
23 24	Q. When you look at a first insulating film over the first conductive line, could that be the	23 24	BY MR. GIBSON: Q. Now, when you look at the next element

5 (Pages 14 - 17)

Page 30Page 301 follow-up on what you just said.1 conductive line and then put down put an2When you look at the two elements3 together, a first conductive line over the3 next and then put a substrate on top of that?4 substrate, a first soulating film over the first5 conductive line, any you saying that that does5 cell you that the substrate is going to come first7 and then you're going to have a conductive line8 and then you're going to have a conductive line8 that it requires what 1 think 1 heard you9 over the conductive line?9 describe. This whole thing could have been10 A. Perhaps I misunderstand what you meanby10 fabricated in an inverted way.11 "first." What sequence that is used during the10 fabricated in an inverted way.12 specifically, the sequence that is used during the11 Q. As one of ordinary skill in the art,13 actual fabrication or in12 would you be able to fabricate this? If you look13 actual fabrication or in13 actual fabrication in the ends matter.16 understand, if what you understand, if19 you look those two clim elements, a first19 you look those two clim elements, a first20 the claim limits how the structure is gointe to the21 asubstrate and then a conductive line, and11 toare asking me to agree to, but I don't think22 does that the low risk for the law about as20 were stain gain fill were's aging to have the first3 asubstrate and then a conductive line, and11 you're asking me to agree to, but I don't think2 does that that sustrate is required by those2 the claim limitations, there	r			
2When you look at the two elements3together, a first conductive line over the4substrate, a first conductive line, are you saying that that does6tell you that the substrate is going to come first7and then you're going to have a conductive line,8and then you're going to have a nonductive line,9over the conductive line?10A. Perhaps I misunderstand what you mean by11"first." What sequence are you referring to more12specifically, the sequence that is used during the13actual fabrication or in -14Q. No, Tm looking at the claim language15and I want to make sure it's not what I16understand, it's what you understand about the17words "first" that matter.18And I'm just trying to understand, if19you look at those two claim elements, a first20conductive line, over the substrate, a first20the first conductive line, over the substrate, a first21understand, which i'd prefer to talk about as24substrate and then a conductive line, over25the first conductive line, over the substrate, a first20then the next element should be a first conductive line, over22the substrate, which i'd prefer to talk about as3being on the lower side of the clement. The next26there ache deven if the substrate is required by those21Q. Ax oue et element should be a first conductive line, and3being on the lower side of	1			-
 3 together, a first conductive line over the 4 substrate, a first insulating film over the first 5 conductive line, are you saying that that does 6 tell you that the substrate is going to come first 7 and then you're going to have a conductive line? 9 over the conductive line? 1 "first." What sequence are you referring to more 12 specifically, the sequence that is used during this 13 actual fabrication or in - 14 Q. No, I'm looking at the claim language 15 and I want to make sure it's not what I 10 understand, it's what you understand about the 17 words "first" that matter. 18 And I'm just trying to understand, if 19 you look at those two claim elements, a first 20 conductive line over the substrate, a first 21 insulating film over the substrate, a first 22 does that tell you that there's going to be a 23 substrate and then a conductive line, over the substrate, a first 24 substrate and then a conductive line, over the substrate, a first conductive line? 1 A. At the end of whatever process is used 2 to implement these claim limitations, there should 3 be a substrate, which I'd prefer to talk about as 4 being on the lower side of the element. The next 5 clement should be a first conductive line, over the substrate is required by those 8 claim limitations. I think th difference that 9 firm. Think that structure is required by those 8 claim limitations. I think the difference that 9 the ryp ould exact als econd conductive line is coming after the 16 first conductive line as econd conductive line is coming after the 16 first conductive line as econd conductive line is ocoming after the 16 first tomuchive ine as econd conductive line is ocoming after the 16 first tomuchive first mealting film 20 deposition and patte				
4 substrate, a first insulating film over the first A. Well, the claim refers to the final relative relationships between these elements. The claim doesn't have forming language. It's not The shole the art, The shole the art, The shole the art, The strip out have the ent the relative relationships between these The trip form that matter. The strip forming the matter. The strip form that matter.<td></td><td>-</td><td>1</td><td>÷ .</td>		-	1	÷ .
5conductive line, are you saying that that does5relative relationships between these elements.6tell you that the substrate is going to come first7and then you're going to have an insulating film9over the conductive line?6The claim doesn't have forming language. It's not9over the conductive line?9describe. This whole thing could have been10A. Pethaps I misunderstand what you mean by10fabrication or in12specifically, the sequence are you referring to more11Q. As one of ordinary skill in the art,13actual fabrication or in14Q. No, I'm looking at the claim language1314Q. No, I'm looking at the claim language1414in an inverted way.15and I'm ant to make sure it's not what I10As at all the claims, would you be able to fabricate this? I'you look18actual fabrication or in16A. Well, what I'm what I'm I guess most19you look at hose two claim elements, a first20conductive line over the substrate, a first20conductive line over the substrate, a first20the claim limits how the structure is gotten to.21insulating film over the first insulating10would an a first insulating film over25the first conductive line, and6Netwer y sole of the element. The next26the element these claim limitations, the difference that1you're asking me to agree to, but I don't think2ord maty skill would anticipate building this2 </td <td></td> <td></td> <td></td> <td></td>				
 6 tell you that the substrate is going to come first 7 and then you're going to have a conductive line 8 and then you're going to have a conductive line 9 over the conductive line? 1 "first." What sequence are you referring to more 12 o. A. Perhaps I misunderstand what you mean by 13 actual fabrication or in - 14 O. No, I'm looking at the claim language 15 and I want to make sure it's not what I 16 understand, if's what you understand, if 19 you look at those two claim clements, a first 20 conductive line over the substrate, a first 21 insulating film over the first conductive line, 22 does that tell you that there's going to be a 23 substrate and then a conductive line, 24 ubstrate and then a conductive line, 25 the first conductive line? 1 A. A tthe end of whatever process is used 2 to implement these claim limitations, there should 2 be a substrate, which I' prefer to talk about as 4 being on the lower side of the element. The next 5 element should be a first conductive line, 2 Q. Okay. When we get to the next element fishould be a first conductive line, and 11 m. I think that structure is equired by those 2 c. O. Kay. When we get to the next element, fishould be a first conductive line, and 9 film, yould you understand that to require that 12 A. Well, again, if we're talking about the 13 ascond conductive line is corning after the 14 first insulating film as requiring that the 15 the structure. 16 would would read a second conductive line or ordinary skill 16 would would read a second conductive line ordinary skill 11 me should happen alter the first insulating film 22 o. Okay. When we get to the next element, film and patterning of the second conductive line dordinary skill 16 the first insu		-		
7 and then you're going to have a conductive line 7 a process claim. So no, I don't think I can agree 8 and then you're going to have an insulating film 9 describe. This whole thing could have been 10 A. Perhaps I misunderstand what you mean by 11 "first." What sequence that is used during the 12 specifically, the sequence that is used during the 2 actual fabrication or in — 13 actual fabrication or in — 12 would you be able to fabricate this? If you look 14 Q. No, I'm looking at the claim language 13 and I want to make sure it's not what I 15 and I want to make sure it's not what I 14 this in an inverted way, opening up the particular 16 understand, if's what you understand, if 19 you look at those two claim elements, a first 17 insulating film over the first conductive line? 21 It does limit the relations, there should 24 substrate and then a conductive line, and 21 It does limit the relations there should 25 the first conductive line? 22 of of discret's a normal way that I think one 24 of ordinary skill would anticipate building this 25 and that's certainly corresponding with what 1 1 work asking me to agree to, but I don't think 2 the first conductive line, and 1 you're asking me to agree to, but I don't think 3 as substrate, which I'd prefer to talk about as 4 being on the lower side of t				-
8 and then you're going to have an insulating film 9 over the conductive line? 9 over the conductive line? 9 describe. This whole thing could have been 10 A. Perhaps I misunderstand what you mean by 10 fabrication or in verted way. 11 Q. As one of ordinary skill in the art, 12 specifically, the sequence that is used during the 13 at all the claims, would you be able to fabricate 14 Q. No, I'm looking at the claim language 13 at all the claims, would you be able to fabricate 14 M. And I'm just trying to understand, if 16 A. Well, what I'm - what I'm I guess most 17 clearly trying tos any is that the path of 18 fabrication, the process of creating these layers 19 you look at those two claim elements, a first 20 the claim limits how the structure is gotten to. 21 insulating film over the first conductive line, 20 the claim limits how the structure is gotten to. 22 does that tell you that there's going to be a 23 substrate and then a first insulating film over 23 substrate and then a first insulating film over 23 at the first conductive line, 24 to implement these claim limitations, there should 24 of ordinary skill would anticipate building this 25 element should be a first conductive line, and 0. So you wouldn't agree to, but I don't think 24 being on the lower side of the element. The next 1 you're asking me	6		1	
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10A. Perhaps I misunderstand what you mean by 11 "first." What sequence are you referring to more 12 specifically, the sequence that is used during the 13 actual fabrication or in 14106 As one of ordinary skill in the art, 12 would you be able to fabricate this? If you look 13 at all the claims, would you be able to fabricate 14 this in an inverted way, opening up the particular 15 layers and 16 A. Well, what 1'm - what 1'm I guess most 17 clearly trying to say is that the path of 18 fabrication, the process of creating these layers 19 you look at those two claim elements, a first 20 conductive line over the substrate, a first 20 conductive line over the substrate, a first 21 insulating film over the first conductive line, 23 substrate and then a conductive line, 24 substrate and then a first insulating film over 25 the first conductive line, and 3 be a substrate, which I'd prefer to talk about as 3 be ing on the lower side of the element. The next 5 element should be a first insulation 3 film. I think the structure is equired by those 8 claim limitations. I think the difference that 9 I'm trying to express is that that structure can 10 be reached even if the substrate isn't the first 11 think that structure is a conductive line, and 6 then the next element should be a first insulation 11 think that structure is a first insulation 12 Q. Okay. When we get to the next element. 13 a second conductive line is coming after the 16 first onductive line is coming after the 17 A. I think a person of ordinary skill10film were the first insulation 14 thing. I'w ere talk about the sequence looking at 15 the structure is equine different 16 mater. So the claim dengit final structure.120. Okay. When we get to the next element. 13 a second conductive line is coming after the 16 first ons				
11 "first." What sequence are you referring to more 11 Q. As one of ordinary skill in the art, 12 specifically, the sequence that is used during the 13 actual fabrication or in 14 Q. No, I'm looking at the claim language 15 and I want to make sure it's not what I 16 understand, it's what you understand about the 17 No, I'm looking at the claim language 18 And I'm just trying to understand, if 19 you look at those two claim elements, a first 20 conductive line over the substrate, a first 21 insulating film over the first conductive line, 23 substrate and then a conductive line over the 24 substrate and then a conductive line over the 25 the first conductive line? 11 A. At the end of whatever process is used 2 to implement these claim limitations, there should 3 be a substrate, which I'd prefer to talk about as 5 the next element should be a first insulating 7 film. I think that structure is required by those 8 being on the lower side of the element. The next 9 R. Well, it d			1	-
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13 actual fabrication or in 13 at all the claims, would you be able to fabricate 14 Q. No, I'm looking at the claim language 13 at all the claims, would you be able to fabricate 14 Q. No, I'm looking at the claim language 13 at all the claims, would you be able to fabricate 15 and I want to make sure it's not what I 16 A. Well, what I'm what I'm I guess most 17 words "first" that matter. 16 A. Well, what I'm what I'm I guess most 18 abrication, the process of creating these layers 19 coulock at those two claim elements, a first 20 conductive line over the substrate, a first 20 the claim limits how the structure is going to be a 23 substrate and then a first insulating film over 23 substrate and then a first insulating film over 24 substrate and then a first insulating film over 24 of ordinary skill would anticipate building this 25 the first conductive line? 23 a barter, which I'd prefer to talk about as 16 then the next element should be a first insulating 7 lim. I think that structure is required by those 8 claim limitations. I think the difference that 3 Q. So you wouldn't agree that in Claim 54, 17 decard onductive line were sis that that structure can 9 ordinary skill apposited, then the insulating 16 then the next element should be a first insulation 11 Q. What do you mean? 17 decard onductive	1		1	
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15 and I want to make sure it's not what I 15 layers and 16 understand, it's what you understand about the 17 clearly trying to say is that the path of 17 words "first" that matter. 16 A. Well, what I'm what I'm I guess most 17 words "first" that matter. 16 A. Well, what I'm what I'm I guess most 18 And I'm just trying to understand, if 17 clearly trying to say is that the path of 18 And I'm just trying to understand, if 16 A. Well, what I'm what I'm I guess most 10 be claim limits try that matter. 16 A. Well, what I'm what I'm I guess most 21 rearly trying to say is that the path of 18 fabrication, the process of creating these layers 22 cost that tell you that there's going to be a 20 10 the structure is gotten to. 23 substrate and then a first insulating film over 21 14 does limit the structure is gotten to. 24 of ordinary skill would anticipate building this 25 and that's certainly corresponding wit what 25 the first conductive line, and film the sequence to, but I don't think 24 25 the ment should be a	13	actual fabrication or in	1	
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	23 24	Q. All right. So, I mean, you wouldn't expect someone to build this backwards. In other	23 24	a first conductive line over the substrate. There are at least two ways to achieve that claim

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1 A. Do you mean the sequence of the 2 patterned - deposited and patterned on top of it. G. Viss. 3 I think that would be a very usual Q. Viss. 4 example, but the opposite could have also been the 2 deposition steps? 5 case, where the first conductive line is somehow 6 process claim. It's a claim that limits the 7 of that. In either way, you still wind up with 8 the relative relations stip of the two and you can 9 the relative relative sequence in 10 So in the ond, the relative sequence in 10 for 00 ket and of 7 creiting similar 11 looking at the finished product? 11 limitations, the sequence of the claim, the 12 substrate in the language of the claim, the 11 limitations, the sequence of the disclosed layers 13 substrate in the language of the claim, the 12 in the second conductive line metal, 14 4 claim 54. a deposited. Second, the first 15 insulating film 112 in Fig. 4A is deposited. Incut the second conductive line metal, 14 4 claim 54. advell, the oright on the second conductive line metal, 14 401 in Fig. 4A is deposited. Incut the second conductive line metal, 15 mudersham based on what 15 12 reversef. 2			-	
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19MR. SCHLITTER: Objection, form. THE WITNESS: What are you asking me to 21 reverse?19403 in Fig. 4A is deposited. Fourth, the second 20 insulating film 113 in Fig. 4A is deposited and 21 patterned to have an opening. Fifth, the 22 transparent conductive film 114 in Fig. 4A is 23 deposited and patterned."20Well, what I'm trying to understand is 24 the order of the deposition steps that you would 25 understand would happen from Claim 54. And I1021Page 23Page 23In Claim 54 says, that a person of ordinary skill in 5 the at is going to understand the sequence of the disclosed layers to be that the first conductive 7 line is deposited, followed by 11 the transparent conductive film? Isn't that what 12 Claim 54 is directing the sequence of 14 A. Claim 54 doesn't direct the sequence of 15 the deposition steps. It directs the sequence of 16 the layers in the final structure, the final 17 terminal. The sequence that you just described is 18 certainly one example that I think a	17	you're looking at the finished product?	17	connection between the first and second conductive
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 3 Don't you think that based on what 4 Claim 54 says, that a person of ordinary skill in 5 the art is going to understand the sequence of the 6 disclosed layers to be that the first conductive 7 line is deposited, then the insulating film is 8 deposited and patterned, then the then the 9 second conductive line is deposited, followed by 10 the second insulating film and then followed by 11 the transparent conductive film? Isn't that what 12 Claim 54 is directing the sequence of deposition 13 steps to be? 14 A. Claim 54 doesn't direct the sequence of 15 the deposition steps. It directs the sequence of 16 the layers in the final structure, the final 17 terminal. The sequence that you just described is 18 certainly one example that I think a person of 19 ordinary skill would would follow, but it's not 10 Ithat. It's limited in its relative sequence at 21 the end. 3 Layers necessarily follows"? 4 A. I certainly do. That's what I'm 5 expressing right now. The sequence of the 6 disclosed layers in the final terminal assembly 7 necessarily follows from the claim. What I list 9 is the most likely way, but it's not 10 Q. It doesn't say the most likely way in 11 your declaration. It says "necessarily follows," 12 correct? 13 A. It says that "the sequence of the 14 disclosed layers necessarily follows from 15 Claim 54." I still stand by that. 16 Q. Now, if you look at Fig. 4A and I 17 just want to check to see if I've got a blowup of 18 that. If not, we'll just use the one that's in 19 '204. I'll just use the one that's in the '204 20 patent. 21 So you've got that in front of you? 22 A. Yes, I do. 23 Q. And could you Claim 54 refers to a 24 first conductive	1			· · · ·
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7 (Pages 22 - 25)	25	language of Claim 54?	25	A. Yes, it does.
				7 (Pages 22 - 25)

		T	
1	Page 26 Q. And if you could write down for me next		Page 28 lines satisfy the first conductive line claim
1	to Fig. 4A what you would assume to be the first		limitation in Claim 54, yes.
3		$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	-
		1	
4	MR. SCHLITTER: Objection, form.		understand that is the corresponds to the 112?
5	THE WITNESS: You want me to label on my	5	0
6			does correspond or is that claim limitation is
1	BY MR. GIBSON:		met by element 112 in Fig. 4A.
8	Q. Yes, please.	8	
9	A where is the first conductive line?	1	the 403 external connection lines?
10	Q. Yes.	10	
11	A. Would you like me to just add the words		second conductive line.
	to the label or actually color through the	12	S
	element?	1	113, the resin inter-layer film?
14	Q. Oh, just add the words, please. That	14	1
	will be sufficient.	1	insulating film in Claim 54.
16	A. Okay. (Indicating.)	16	
17	Okay, I've done so.		think I've got the patent from the '204 matter.
18	Q. And then if you could Claim 54 also	18	5
19	refers to a first insulating film?	19	(Document marked previously as Exhibit
20	A. It does.	20	Number 1013 was presented.)
21	Q. If you could write where that first	21	BY MR. GIBSON:
22	8	22	Q. And this is one of the patents that you
23	A. (Indicating.)	23	reviewed in preparing your declaration for this
24	I've done that.	24	matter?
25	Q. Thank you.	25	A. Yes, it is.
	Page 27		Page 29
1	And Claim 54 also refers to a second	1	Q. And if you'd look at Fig. 1 of Shiba,
		1	Q. Allu li you u look at Fig. 1 of Shiba,
2	conductive line?	1	what's your understanding of what's being
2 3	conductive line? A. Yes.	2	
1		2	what's your understanding of what's being disclosed there?
3	A. Yes.	2 3 4	what's your understanding of what's being
3 4	A. Yes.Q. And if you could write that on Fig. 4A	2 3 4 5	what's your understanding of what's being disclosed there?A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active
3 4 5	A. Yes.Q. And if you could write that on Fig. 4A as well.	2 3 4 5 6	what's your understanding of what's beingdisclosed there?A. Well, Shiba describes Fig. 1 inColumn 3, line 32 as a plan view of an activematrix LCD panel according to an embodiment of the
3 4 5 6	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. 	2 3 4 5 6	what's your understanding of what's being disclosed there?A. Well, Shiba describes Fig. 1 inColumn 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention.
3 4 5 6 7	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second 	2 3 4 5 6 7 8	what's your understanding of what's beingdisclosed there?A. Well, Shiba describes Fig. 1 inColumn 3, line 32 as a plan view of an activematrix LCD panel according to an embodiment of the
3 4 5 6 7 8	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. 	2 3 4 5 6 7 8	what's your understanding of what's being disclosed there?A. Well, Shiba describes Fig. 1 inColumn 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention.Q. And there's a wiring 127, is that correct?
3 4 5 6 7 8 9 10	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. 	2 3 4 5 6 7 8 9 10	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in
3 4 5 6 7 8 9 10 11	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well 	2 3 4 5 6 7 8 9 10 11	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left
3 4 5 6 7 8 9 10	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. 	2 3 4 5 6 7 8 9 10 11 12	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of
3 4 5 6 7 8 9 10 11 12	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. 	2 3 4 5 6 7 8 9 10 11 12 13	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side.
3 4 5 6 7 8 9 10 11 12 13	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look 	2 3 4 5 6 7 8 9 10 11 12 13 14	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the
3 4 5 6 7 8 9 10 11 12 13 14	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127?
3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first conductive line is equivalent to 401 auxiliary 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form. THE WITNESS: I'm not sure I can
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first conductive line is equivalent to 401 auxiliary lines? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form. THE WITNESS: I'm not sure I can identify a length of wiring 127, but that's where
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first conductive line is equivalent to 401 auxiliary lines? A. I can't agree that it's equivalent, but I'm pointing to that label in Fig. 4A. The 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form. THE WITNESS: I'm not sure I can identify a length of wiring 127, but that's where it is located and illustrated. BY MR. GIBSON:
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first conductive line is equivalent to 401 auxiliary lines? A. I can't agree that it's equivalent, but I'm pointing to that label in Fig. 4A. The auxiliary lines correspond to the first conductive line of Claim 54. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form. THE WITNESS: I'm not sure I can identify a length of wiring 127, but that's where it is located and illustrated. BY MR. GIBSON: Q. And I'm going to ask for a specific dimension. I mean, if you knew the hypotenuse, I
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first conductive line is equivalent to 401 auxiliary lines? A. I can't agree that it's equivalent, but I'm pointing to that label in Fig. 4A. The auxiliary lines correspond to the first conductive line of Claim 54. Q. You understand that to satisfy that 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form. THE WITNESS: I'm not sure I can identify a length of wiring 127, but that's where it is located and illustrated. BY MR. GIBSON: Q. And I'm going to ask for a specific dimension. I mean, if you knew the hypotenuse, I suppose you could give us precise dimensions for
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. Q. And if you could write that on Fig. 4A as well. A. (Indicating.) I've done it. Q. And Claim 54 refers to a second insulating film? A. Yes. Q. And if you could write that down as well on Fig. 4A. A. (Indicating.) Yes. Q. All right. If I could just take a look at that. Thank you. So as you've indicated there, the first conductive line is equivalent to 401 auxiliary lines? A. I can't agree that it's equivalent, but I'm pointing to that label in Fig. 4A. The auxiliary lines correspond to the first conductive line of Claim 54. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 what's your understanding of what's being disclosed there? A. Well, Shiba describes Fig. 1 in Column 3, line 32 as a plan view of an active matrix LCD panel according to an embodiment of the present invention. Q. And there's a wiring 127, is that correct? A. I see it. It has at least two labels in Fig. 1. It's a wiring that begins on the left side, extends up the left side across the top of the display and down the right side. Q. That's the overall length of the wiring 127? MR. SCHLITTER: Objection, form. THE WITNESS: I'm not sure I can identify a length of wiring 127, but that's where it is located and illustrated. BY MR. GIBSON: Q. And I'm going to ask for a specific dimension. I mean, if you knew the hypotenuse, I

8 (Pages 26 - 29)

		T	
1	Page 30 MR. SCHLITTER: Objection, form.	1	Page 32 Page 32
2		2	
3		1	list of pads in Column 5 and 6 that wiring 127
1	"precise dimension."	1	connects to.
	BY MR. GIBSON:	5	
6		1	that the distance it's traveling along the three
	that runs there's a line that runs through the	1	sides of the rectangle is longer than the diagonal
	middle diagonally?	1	of the display?
9		9	MR. SCHLITTER: Objection, form.
	a rectangle. So we don't normally think of	10	· · · · · · · · · · · · · · · · · · ·
	hypotenuse applying to such a structure, right.		mean by the distance of the wiring 127?
	It's normally triangles that have hypotenuse. I'm	1	BY MR. GIBSON:
	not sure what you're asking.	13	Q. Well, if we just take a the distance
14		1	from the three sides of the triangle, if we
	side of the rectangle, you could figure out the		traverse those three sides, it would be longer to
	length of the overall wire 127, correct?		take that traverse than it would be to traverse
17			the diagonal of the display?
18	•	18	A. I still have trouble applying your
19	need to define what they mean by the length of	19	question to element 127 because it's a complicated
	that wiring. That's a very complicated pattern		pattern. But if you're asking me would the three
	that's disclosed in other figures of Shiba. And I		sides of this rectangle be longer than the
	don't think without more information I can define		diagonal dimension, then yes, it would. I think
23	a length of such a pattern.		that would always be true.
24	BY MR. GIBSON:	24	Q. What's the impact of the resistance of
25	Q. All right. But you do agree the wiring	25	the 127 wiring on the ability to support frame
	Page 31		Page 33
1	runs from the bottom left corner up to the top and	1	inversion?
	then across and then down to the bottom right	2	MR. SCHLITTER: Objection, form.
	corner?	3	THE WITNESS: What do you mean by
4	A. That's correct. It's also I	4	MR. SCHLITTER: Foundation.
5	illustrate that in page 47 of my declaration.	5	THE WITNESS: What do you mean by "frame
6	Q. You put it in green, I believe. We have	6	inversion"?
7	a black and white copy right now, but you put that	7	BY MR. GIBSON:
	in green?	8	Q. Is that a term that you've heard?
9	A. That's correct. I'm trying to highlight	9	A. It certainly is.
10	what Shiba indicates as Fig. 127 (sic) in Fig. 1	10	Q. Okay. How would one of ordinary skill
	there as well as in Fig. 3.	11	in the art interpret frame inversion?
12	Q. And what is the purpose of wiring 127?	12	A. Well, frame inversion is what generally
	A Wall Chiba disalages that the sum age	13	is designed into displays because the DC bias, the
13	A. Well, Shiba discloses that the purpose		
	of wiring 127 in Column 5 and Column 6 is to	14	average voltage that appears in liquid crystal
14			average voltage that appears in liquid crystal layer, needs to be zero. In other words, it needs
14 15	of wiring 127 in Column 5 and Column 6 is to	15	
14 15 16	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have	15	layer, needs to be zero. In other words, it needs
14 15 16 17 18	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so	15 16 17	layer, needs to be zero. In other words, it needs to be unbiased on average.
14 15 16 17 18	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so that a steady reference voltage is would be	15 16 17 18	layer, needs to be zero. In other words, it needs to be unbiased on average. And what that means is that then the
14 15 16 17 18 19	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so that a steady reference voltage is would be supplied to those pads so that the counter	15 16 17 18 19	layer, needs to be zero. In other words, it needs to be unbiased on average. And what that means is that then the voltages on either side of the pixel need to flip
14 15 16 17 18 19 20	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so that a steady reference voltage is would be	15 16 17 18 19 20	layer, needs to be zero. In other words, it needs to be unbiased on average. And what that means is that then the voltages on either side of the pixel need to flip or invert periodically and quite often, that's
14 15 16 17 18 19 20 21	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so that a steady reference voltage is would be supplied to those pads so that the counter electrode can have a steady reference voltage. I don't think he uses the word "steady," but that's	15 16 17 18 19 20 21	layer, needs to be zero. In other words, it needs to be unbiased on average. And what that means is that then the voltages on either side of the pixel need to flip or invert periodically and quite often, that's every frame or every other frame kind of a thing.
15 16 17 18	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so that a steady reference voltage is would be supplied to those pads so that the counter electrode can have a steady reference voltage. I don't think he uses the word "steady," but that's the idea.	15 16 17 18 19 20 21 22 23	layer, needs to be zero. In other words, it needs to be unbiased on average. And what that means is that then the voltages on either side of the pixel need to flip or invert periodically and quite often, that's every frame or every other frame kind of a thing. So that's typically what is what is done in frame inversion. Q. And does the wiring 127 have any impact
14 15 16 17 18 19 20 21 22 23 24	of wiring 127 in Column 5 and Column 6 is to connect the power supply pads and the common pads that are around the seal region. They have numbers, for example, 731 to 734 and even 731 to 738, and these are all being connected together so that a steady reference voltage is would be supplied to those pads so that the counter electrode can have a steady reference voltage. I don't think he uses the word "steady," but that's	15 16 17 18 19 20 21 22 23	layer, needs to be zero. In other words, it needs to be unbiased on average. And what that means is that then the voltages on either side of the pixel need to flip or invert periodically and quite often, that's every frame or every other frame kind of a thing. So that's typically what is what is done in frame inversion.

Page 34 inversion itself, but the connection to the	1	Page 36 Q. And would you also understand they can
		be formed in the same step of forming the scanning
		lines Yj?
-	Ι.	A. While Shiba doesn't illustrate that, it
-	1	is in Column 6, around lines 33 where it says
-	6	depending on the kind of TFTs, the aforementioned
		wiring lines can be formed in the same step of
		forming the scanning lines Yj. So that's an
-		alternate embodiment that he identifies.
		Q. And then it goes on to explain that
-	•	the wiring lines 127 may also be formed in the
		step of forming the scanning lines Yj and the data
		lines Xi respectively, thereby constituting a
		two-layer structure.
-		Do you see that?
	1	A. Yes, I certainly do. After all, this
	1	comes after his paragraph where he says they can
		be used it could be formed from the data line,
		alternatively it can be formed in the scan lines,
	1	and here he says it can be formed from both to
-	21	make a two-layered structure.
small line, for example, among other reasons as	22	Q. So would you agree that Shiba discloses
far as why he split it up. So I don't think Shiba	23	a single layer wiring, that is, a wiring that's
recognizes that that's a problem for him.	24	formed from the same material as data lines Xi as
Q. Right. But the wiring of having low	25	one possible option?
Page 35		Page 37
-	1	MR. SCHLITTER: Objection, form.
		THE WITNESS: Can you tell me what you
		mean by a "single layer wiring."
		BY MR. GIBSON:
		Q. I think we talked a little bit about
-		yesterday that these wiring lines can be put down
		as a layer. That's what I was referring to.
-		A. I think then that Shiba does illustrate
		and talk about how wiring 127 is formed from a
· · ·		single deposition step and a single layer of a
		conductor that is the same as the data lines.
		Q. And it also can be the same as the
•		scanning lines Yj, that's also disclosed by Shiba?
		A. It could also be a single layer wire
		using your definition formed instead by the data
-		lines I'm sorry, the scanning lines Y.
		Q. The scanning lines?
· · · · · · · · · · · · · · · · · · ·		A. Yes.
-		Q. And then it also goes on to disclose a
		double layer wiring where one layer is made from
A. I notice that Shiba in Column 6 and in		the material the data lines, Xi and one layer is
the figures of Shiba does disclose exactly that,		made from the material the scanning lines, Yj?
that the wiring lines 127 are formed in the same	23	A. Is that a question?
step of deposition and patterning as the data	24	Q. Yes.
	counter electrode. Q. And how does it how does it how does it perform that function? A. Well, Shiba discloses that this wiring spread out along the sides of the display and connected to those eight pads, as well as the multiple terminal connections to that conductive pattern, all go to support an even voltage that can be supplied to that. So that in general, the the time it takes to reach the desired voltage on that counter electrode would be small. I mean, I don't think he uses that language, but that's certainly my my recognition of what he's talking about. Q. Now, if 127 has high resistance, can it support frame inversion? A. Well, it doesn't appear to me that line 127 has high resistance. It seems to me that that's the express purpose of why he split it up into multiple lines and he didn't use just one small line, for example, among other reasons as far as why he split it up. So I don't think Shiba recognizes that that's a problem for him. Q. Right. But the wiring of having low Page 35 resistance in wiring 127 is important so that you can support frame inversion, correct? A. Having a resistance that's low enough to support the design is important. Q. And wiring 127 is critical to that? A. It's important to that, but that doesn't necessarily mean that it needs to be as low as one can imagine. It needs to be good enough. Q. Right. It needs to be low enough so that you don't have a signal distortion because if you have a signal distortion, your image quality will be low? MR. SCHLITTER: Objection, form, foundation. THE WITNESS: I think that's a fair description of the disclosure in Shiba, yeah. BY MR. GIBSON: Q. Now, in Shiba, would you agree that the first wiring line 27 can be formed in the same step of forming the data lines Xi? A. I notice that Shiba in Column 6 and in the figures of Shiba does disclose exactly that,	counter electrode.2Q. And how does it how does it how3does it perform that function?4A. Well, Shiba discloses that this wiring5spread out along the sides of the display and6connected to those eight pads, as well as the7multiple terminal connections to that conductive8pattern, all go to support an even voltage that9can be supplied to that. So that in general, the10 the time it takes to reach the desired voltage11on that counter electrode would be small. I mean,12I don't think he uses that language, but that's13certainly my my recognition of what he's14talking about.15Q. Now, if 127 has high resistance, can it19that's the express purpose of why he split it up20into multiple lines and he didn't use just one21small line, for example, among other reasons as22far as why he split it up. So I don't think Shiba23recognizes that that's a problem for him.24Q. Right. But the wiring of having low25Neresistance in wiring 127 is important so that you3support frame inversion, correct?2A. Having a resistance that's low enough to3support the design is important.4Q. And wiring 127 is critical to that?5A. It's important to that, but that doesn't6necessarily mean that it needs to be as low as one7can imagine. It needs to be low enough so9

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	Page 38		Page 40
1	not trying to be difficult.	1	think of?
2		2	A. Well, I think one of ordinary skill
3	Would you agree that Shiba also	3	would not know what Shiba is talking about in
4	discloses that you can have a double layer wiring	4	these two sentences and it would be it would be
5	where one layer is made from the material of the	5	hard to implement anything in this direction. But
6	data line, Xi and one layer is made from the		I'll speculate on some things that would meet what
7	material the scanning lines, Yj?	7	he's describing if you'd like.
8	A. Well, the only disclosure in Shiba is in	8	Q. Go ahead. Let me know what your best
9	Column 6 where he mentions in one sentence that	9	thoughts are on this.
10	wiring line 127 may be formed from the scanning	10	A. So I think one of ordinary skill would
11	lines and the data lines and he refers to it as a	11	read two-layered structure to implement a wiring
12	two-layer structure. Clearly that's the sentence	12	line as, first of all, meaning that it would be
	that's disclosed in Shiba.	13	two conductors on top of each other forming a
14	And to me, it's very unclear what a	14	two-layered structure accomplishing a wiring line.
15	person of ordinary skill well, I I think it	15	And that's that's there are
16	would be very unclear to a person of ordinary	16	examples in our prior art in this case where
17	skill what Shiba is disclosing there. Whatever it	17	that's exactly the kind of wiring that's either
18	is, it should be a two-layer structure. That's	18	talked about in the specifications or illustrated
19	maybe the only thing that's clear.	19	in the figures in the other patents here. So I
20	Q. Well, it's saying more than it's a	20	think that's, first of all, what a person of
21	two-layer structure. It's also saying it may be	21	ordinary skill would turn to.
22	formed in the step of forming the scanning lines	22	But nevertheless, there's still many
23	and the data lines?	23	different ways to implement that wiring line 127
24	A. He's saying that a two-layer wiring line	24	where you still have only partial connection. One
25	may be formed from those two metals, to accomplish	25	example is if we turn to Fig. 1, one could imagine
	Page 39		Page 41
1	the purpose of wiring line 127 in two layers.	1	keeping the wiring 127 as disclosed, but then in
2	Q. And then it goes on to say that the	2	addition, extending from the right side the scan
3	layers may then be partially connected to each	3	lines, for example, element 724, a single terminal
4	other, correct?	4	or perhaps more that would extend from the
5	A. That's what the next sentence mentions,	5	terminal region under the sealant and over into
6	yes.	6	the portion that is 127, so that it could then
7	Q. And so we have a we have two options	7	thereby connect to it and provide additional
8	here. We have a single layer option or a double	8	support for that reference voltage. So that's one
	layer option that's being discussed in Shiba in		example.
10	this column?	10	Q. And what were the other two that you had
11	A. Well, in this column there's at least		thought of?
1	three options. There's a single layer formed from	12	A. Well, another way to imagine it would
1	the data lines, a single layer formed from the		be well, another another implementation
1	scanning lines and then he mentions that some		would be for some part of the wiring line inside
1	combination of the two is a third option, but he		the existing 127 without an additional terminal
	certainly doesn't describe what that third option		connection to the scanning lines, as I mentioned
1	involves. And there's I think likely many		in my first example, but for some parts of that to
	implementations that would meet the two sentences		have the additional metal deposited right on top.
	that he's described here.	19	So for example, one could have all
20	Q. The two-layered structure, there would		along the upper line, have both the material from
	be a number of ways to implement that?		the data lines and the scanning lines deposited on
22	A. Yes, there certainly would be. I can		top of one another to form that connection.
23			
	think of at least three.	23	A third example, of course, is that
24	think of at least three.Q. And of a between a well, why don't you tell me, what are those three that you can	24	wiring line 127 has six sublines in it and certainly one can imagine that you could divide

11 (Pages 38 - 41)

Γ		. 1	
	Page 4 1 those up between those patterning steps and	2 1	Page 44 A. He does. But he calls it a two-layered
	2 connect them at the start, at the end or perhaps		structure.
	3 even somewhere in the middle and then form a	3	Q. Wouldn't one of ordinary skill in the
	4 structure that meets what he seems to be		art understand that if it's going to be partially
		5	connected, that it's not going to be lying on top
	5 suggesting may be possible in those two sentences.	6	
	6 Q. Now, in terms of a single layer	-	A. What do you mean by "lying on top of
	7 structure that's mentioned earlier and then the	7	
	8 double-layer structures, some examples of which	1	
	9 you provided, which would have a lower resistance?	9	Q. In direct contact.
	0 A. Compared to what?	10	
	1 Q. The single layer that's mentioned		skill would would cannot come to that
	2 compared to the double-layer structure.		conclusion based on both sentences that he's
	3 A. You'd have to define from where to where	13	1 5
	4 you want me to comment on where the resistance	1	It's not a three-layered structure.
	5 would be.	15	Q. If it's if it's only a two-layered
	6 Q. In line 127 where line 127 traverses the		structure, how would it be how would that
	7 rectangle or the three sides of the rectangle?		structure not be in contact all the time?
1	8 A. Well, in all my cases I've I've	18	A. Well, first, let me note that Shiba
	9 identified only local regions where the two wires	19	1 51 5
2	20 are on top of one another. If you'd like me to	20	
	21 limit my answer to that I, of course, can.	21	connected, right. That's just one possible
	Q. Why don't we start with that?	22	implementation of his sentence about the
	A. Maybe the easiest thing to do is take my	23	
	24 second example and just use that. And in that	24	But nevertheless, in the case that I've
2	25 second example, I'm commenting that wiring	25	offered in my first example where there's a
	Page 4.		Page 45
	1 line 7 could have	1	connection that comes from the terminal on the
	2 Q. 127?	2	right side of the display in Fig. 1, for example,
	3 A. I'm sorry, yes, 127 could have the data	3	coming from the connections in element 724, then
	4 line layer as disclosed and then have the scanning	4	there would be a wiring that starts at the
	5 line metal applied, for example, across the top	5	terminal that is not overlapping 127. It goes
	6 border of the wiring line 127 only. And so if you	6	into the sealant. It's still not overlapping
	7 want me to comment would the resistance be lowered	7	until it reaches 127. So it would being partially
	8 from the top left of wiring 127 to the right, yes,	1	overlapping.
	9 it would be.	9	My third example also would apply to
1	0 Q. And why would it be lowered?	10	that where it's only connected at the ends, the
1			beginning and the end of the conductors where
	2 is more conductor. It would be a thicker wiring		those six lines are divided up, let's say three to
			£ ? • •
		13	the data lines and three to the scanning lines.
	3 than it would be if it was a single wiring. But		the data lines and three to the scanning lines. Q. All right. But you're reading
1	3 than it would be if it was a single wiring. But4 in no case that I've offered here is it a	14	Q. All right. But you're reading
1- 1-	3 than it would be if it was a single wiring. But4 in no case that I've offered here is it a5 three-layered structure with insulating material	14 15	Q. All right. But you're reading two-layered structure to exclude an insulating
1- 1- 1-	 3 than it would be if it was a single wiring. But 4 in no case that I've offered here is it a 5 three-layered structure with insulating material 6 in between. I think that's the one thing that's 	14 15 16	Q. All right. But you're reading two-layered structure to exclude an insulating film, correct?
1 1 1 1	 3 than it would be if it was a single wiring. But 4 in no case that I've offered here is it a 5 three-layered structure with insulating material 6 in between. I think that's the one thing that's 7 excluded from his description. 	14 15 16 17	Q. All right. But you're readingtwo-layered structure to exclude an insulatingfilm, correct?A. I'm commenting that Shiba calls it a
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1 1 1 1 1 1 2 2 2 2 2 2 2 2 2 2	 3 than it would be if it was a single wiring. But 4 in no case that I've offered here is it a 5 three-layered structure with insulating material 6 in between. I think that's the one thing that's 7 excluded from his description. 8 Q. Where does he exclude that? 9 A. Well, he calls it a two-layered 0 structure. A person of ordinary skill would never 1 look at a conductor and then an insulator and then 2 another conductor and understand that to be a 3 two-layered structure. 	14 15 16 17 18 19 20 21 22 23 24	 Q. All right. But you're reading two-layered structure to exclude an insulating film, correct? A. I'm commenting that Shiba calls it a two-layered structure and it's my opinion that a person of ordinary skill would listen to him and understand it must have two layers and only two layers and thereby, would not have an insulating film in between the two conductive films.

	Page 46	1	Page 48
1	insulating film?	1	parallel lines to it.
2	A. I think it was well-known in the art by	2	~
	1997 to have a multi-layer wiring that was very	3	scanning line Yj?
	standard. Almost all the patents here talk about	4	
	that. And certainly it's well-known that	5	metal in 127 was deposited with from the data
1	connecting through an opening in an insulator was	6	
	well-known in 1997 to connect two insulators.	7	
8	But nowhere except in the '204 or '413	8	•
	patent is the structure of two conductors with an	9	
	insulating film in between where their electrical	10	-
	contact is because of or through the openings	11	
	in that insulating layer is that being used to	12	
	provide some benefit in the in the direction of	13	
	the wiring. It is in Sukegawa, but that's	14	-
1	that's just for the terminal region.	15	data line layer, correct?
16	Q. Now, you would agree that when a	16	-
	person of ordinary skill in the art, they bring		the metal that's deposited along with the data
	the knowledge that they have to these patents,		lines is probably the most precise way to say it.
1	correct?	19	
20	A. Certainly they do.		127?
21	Q. And they're presumed to know not just	21	A. The layer below 127 is element 211 and
	about the one patent, but about the other patents		that is called the gate dielectric.
	as well in the field, correct?	23	Q. And is that an insulating layer?
24	A. Yes.	24	
25	Q. So you can't look at the patent just by	25	Q. Is there any other layer shown below
		ļ	· · ·
	Page 47		Page 40
1	Page 47 itself You are as one of ordinary skill in the	1	Page 49
	itself. You are, as one of ordinary skill in the		211?
2	itself. You are, as one of ordinary skill in the art, permitted to look at the patents together in	2	A. The next layer that's illustrated is
2 3	itself. You are, as one of ordinary skill in the art, permitted to look at the patents together in the field?	2 3	A. The next layer that's illustrated is element 200 which is the substrate. It's called
2 3 4	itself. You are, as one of ordinary skill in the art, permitted to look at the patents together in the field?A. Certainly a person of ordinary skill is	2 3 4	211?A. The next layer that's illustrated iselement 200 which is the substrate. It's calledthe array substrate.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 itself. You are, as one of ordinary skill in the art, permitted to look at the patents together in the field? A. Certainly a person of ordinary skill is permitted to do that. Q. Let's look at Fig. 6 of Shiba. A. I've got it. Oh, I notice that the sealant is in direct contact with a transparent conductive layer in Fig. 6. I couldn't I couldn't find the example yesterday in our discussion, but here it is. Q. I'll move to strike as nonresponsive. I hadn't asked a question. Now, if we look at if we look at this figure, you see wiring 127? A. I do see wiring 127 on the bottom right of the figure. Q. And is it a single layer or a double layer in that figure? A. In that figure, it is it's a cross-section, of course, of something that Shiba calls a first wiring 127 and it's formed from a 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 211? A. The next layer that's illustrated is element 200 which is the substrate. It's called the array substrate. Q. You wouldn't consider that to be a layer in the sense that we've been using the word "layer" to talk about wiring layers and insulating layers? A. It depends. Q. In terms of Shiba, is the substrate something you would understand to be a layer? A. It depends. Q. Well, in Fig. 6, would you consider the substrate to be a layer? A. I know I'm repeating myself, but it depends. Q. So it might be; it might not? A. I can't say either way at the moment. It depends on the context. Q. Looking at Fig. 6, would you consider that to be the glass substrate 200? A. Shiba calls it the array substrate and I
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 itself. You are, as one of ordinary skill in the art, permitted to look at the patents together in the field? A. Certainly a person of ordinary skill is permitted to do that. Q. Let's look at Fig. 6 of Shiba. A. I've got it. Oh, I notice that the sealant is in direct contact with a transparent conductive layer in Fig. 6. I couldn't I couldn't find the example yesterday in our discussion, but here it is. Q. I'll move to strike as nonresponsive. I hadn't asked a question. Now, if we look at if we look at this figure, you see wiring 127? A. I do see wiring 127 on the bottom right of the figure. Q. And is it a single layer or a double layer in that figure? A. In that figure, it is it's a cross-section, of course, of something that Shiba calls a first wiring 127 and it's formed from a 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 211? A. The next layer that's illustrated is element 200 which is the substrate. It's called the array substrate. Q. You wouldn't consider that to be a layer in the sense that we've been using the word "layer" to talk about wiring layers and insulating layers? A. It depends. Q. In terms of Shiba, is the substrate something you would understand to be a layer? A. It depends. Q. Well, in Fig. 6, would you consider the substrate to be a layer? A. I know I'm repeating myself, but it depends. Q. So it might be; it might not? A. I can't say either way at the moment. It depends on the context. Q. Looking at Fig. 6, would you consider that to be the glass substrate 200? A. Shiba calls it the array substrate and I

13 (Pages 46 - 49)

Page 50		Page 52
Q. That's fine. Would you consider the	1	A. Element 113 is called the sealing agent.
	2	Q. And layer 241 runs under element 113?
film?	3	A. Are you asking me if that's the case in
A. What do you mean by "first insulating	4	Fig. 6?
film"?	5	Q. Yes.
Q. Is it the first insulating film that's	6	A. In Fig. 6, it is illustrated that layer
on the substrate?	7	241 is is at least partially below the element
A. Well, it is the first layer that's	8	113. Of course, element 241 extends far beyond
illustrated in Fig. 6 in Shiba, but it is	9	that.
certainly not the first insulating film of the	10	Q. Now, if the wiring 127 is formed in the
claims in the '204 patent, specifically Claim 54.	11	same step of forming the scan lines Yj, how will
It cannot be because it doesn't have a first	12	they appear in Fig. 6?
conductor underneath it.	13	A. I don't think there's one answer to
Q. Putting that aside, is it in Fig. 6,	14	that.
is there any insulating film that comes before the	15	Q. Can you give me the different answers to
gate dielectric?	16	that then?
A. When you say "before," what do you mean?	17	A. Well, I guess the most because of
Q. There's nothing in between 211 and 200,		course Shiba doesn't say, right. Shiba has one
-		sentence that says it can be done and doesn't
		describe how. So it's not really fully disclosed
		to one of ordinary skill.
-		One example I can think of is that it
•	1	would be the same structure, those six lines, at
	(least in Fig. 6, and those would be those would
first	25	appear between element 200 and element 211 instead
Page 51		Page 53
		of being as illustrated being between 211 and 241.
		Q. Any other examples that you can think
		A. Well, in this cross-section, I mean, of
		course this is not all of the wiring line 127.
		There's also the rest of the display. And so
	1	there certainly are many variations on on how
-	i	to do that. I can't I don't think I could
recharged as being, in one example, formed as	1 7	
silicon nitride. So that's an insulating		enumerate all the other possibilities. It's just
silicon nitride. So that's an insulating	10	not not clear what else could be done for a
material.	10 11	not not clear what else could be done for a person of ordinary skill to implement this idea.
material. Q. So you would agree that 241 is an	10 11 12	not not clear what else could be done for a person of ordinary skill to implement this idea. MR. GIBSON: If we could marked this as
material. Q. So you would agree that 241 is an insulating layer?	10 11 12 13	not not clear what else could be done for a person of ordinary skill to implement this idea. MR. GIBSON: If we could marked this as 1008.
material.Q. So you would agree that 241 is an insulating layer?A. I can agree that it's an insulating	10 11 12 13 14	not not clear what else could be done for a person of ordinary skill to implement this idea. MR. GIBSON: If we could marked this as 1008. (Document marked as Exhibit Number 1008
material.Q. So you would agree that 241 is an insulating layer?A. I can agree that it's an insulating layer, yeah.	10 11 12 13 14 15	not not clear what else could be done for a person of ordinary skill to implement this idea. MR. GIBSON: If we could marked this as 1008. (Document marked as Exhibit Number 1008 for identification.)
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	 gate dielectric layer 211 to be a first insulating film? A. What do you mean by "first insulating film"? Q. Is it the first insulating film that's on the substrate? A. Well, it is the first layer that's illustrated in Fig. 6 in Shiba, but it is certainly not the first insulating film of the claims in the '204 patent, specifically Claim 54. It cannot be because it doesn't have a first conductor underneath it. Q. Putting that aside, is it in Fig. 6, is there any insulating film that comes before the gate dielectric? A. When you say "before," what do you mean? Q. There's nothing in between 211 and 200, right? A. Elements 211 and 200 are illustrated in Fig. 6, as least in the region of 127, as being in direct contact, yes. Q. What's the layer that's above 127? A. There are many layers above 127. The first 	gate dielectric layer 211 to be a first insulating2film?3A. What do you mean by "first insulating4film"?5Q. Is it the first insulating film that's6on the substrate?7A. Well, it is the first layer that's8illustrated in Fig. 6 in Shiba, but it is9certainly not the first insulating film of the10claims in the '204 patent, specifically Claim 54.11It cannot be because it doesn't have a first12conductor underneath it.13Q. Putting that aside, is it in Fig. 6,14is there any insulating film that comes before the15gate dielectric?16A. When you say "before," what do you mean?17Q. There's nothing in between 211 and 200,18right?19A. Elements 211 and 200 are illustrated in20Fig. 6, as least in the region of 127, as being in21direct contact, yes.22Q. What's the layer that's above 127?23A. There are many layers above 127. The24first25Page 5125Q. I meant the first layer. Let's talk1about that.2A. Well, for of course 127 has six3sublines and the all of them have element 2414on top of it and then beyond that, it varies. But5let me see what 241 is called.6Q. And what is 241?7A. It's the protective overcoat which is8

14 (Pages 50 - 53)

	Page 54		Page 50
1	A. We talked about many papers. I agree		crystalline silicon.
	that I did identify this paper in answer to one of	2	BY MR. GIBSON:
3	your questions. I don't remember specifically	3	
4	which one.	4	not made on a glass substrate?
5	Q. Okay. I think it had to do with work on	5	1 /
6	···· ··· · · · · · · · · · · · · · · ·	6	glass substrate, that's right.
7	······································	7	Q. And would you agree that the transistors
	work with TFTs and again, I don't remember the		used in this silicon backplane are conventional
9	specific question for which I identified this, but	9	single crystal silicon transistors?
10	this is this is one of the papers I identified	10	A. In this example, that's correct. In my
11	yesterday, yes.	11	other work that's unpublished, that's that's
12	Q. I think you identified this as the	12	not correct.
13	single paper where you dealt with active matrix	13	Q. Okay. But I'm talking about this
14	displays and peripheral driving circuits on the	14	particular piece.
15	same substrate.	15	So you would agree that the transistors
16	Do you recall that?	16	that are used here are conventional single crystal
17	A. Well, I don't recall exactly what I	17	silicon transistors?
18	said. What I do what is true is that this is	18	A. Well, they're actually unconventional
19	the maybe the only publication that came out of	19	because they have high voltage aspects to them,
20	my work involving TFTs and active matrix	20	but they are more standard. They're they're
21	substrates, but my work, as I said, was largely	21	not thin film transistors on glass.
22	unpublished. This is the only thing that did come	22	Q. Would a person of ordinary skill in the
23	out that I can point to and share with you.	23	art characterize a single crystal silicon
24	Q. And would you agree that this paper	24	transistor as a TFT?
25	deals with a 256-by-256 pixel silicon backplane?	25	A. Not in general.
	Page 55		Page 57
1	A. Yes, exactly. This was one of the many	1	Q. Who fabricated this silicon backplane
	implementations that we were working on.	2	that's discussed in the article?
3	Q. And what is the substrate for the	3	A. Well, this is this particular
	silicon backplane?		backplane came in a partnership with a third
5	A. What do you mean? What is the material?		company that's identified here. It's Boulder
6	Q. Yes.		Nonlinear Systems and it's a modification of one
7	A. Well, you said it, it's crystalline		of their standard silicon backplanes that we used
	silicon.		and we were able to then publish on.
9	Q. And the what's the substrate itself?	9	But by no means was this project limited
10	A. There are two substrates. The upper one		to just this prototype or what we described here.
	is glass and ITO. The lower one is predominantly		We had others where we we designed and at least
	silicon but, of course, it has other layers on it,		initially fabricated our own on on silicon as
	aluminum and other wirings and various dopings to		well as other TFTs that were on glass to form the
	achieve the transistors that are in the		active matrix.
	microdisplay.	15	Q. Now, did but this particular you
16	Q. Would you would you call that a		know, and I'll move to strike the last part as
	silicon wafer?		nonresponsive.
17	A. Well, it's a piece that came from a	17	The particular part here on dealing
	silicon wafer, yes.		with what's in this particular article, I think
* /	Q. Does the silicon backplane use a single		you agree that this was made and provided by
20	crystal silicon wafer?		Boulder Nonlinear Systems?
		21	A. It was a modification of one of their
21			π . It was a mounteauon of one of them
21 22	MR. SCHLITTER: Objection, form.		standard products for our project and then as we
22 23	MR. SCHLITTER: Objection, form. THE WITNESS: I think I'm not sure what	23	standard products for our project and then so we
21 22 23 24	MR. SCHLITTER: Objection, form.	23 24	standard products for our project and then so we modified it along with them. It's it's not a standard thing from them.

	D 70	Γ	
1	Page 58 Q. Do you know if Boulder Nonlinear Systems	1	Page 60 in your company to fabricate TFT-based backplanes?
1	provides commercial products such as reflective	2	A. No, our company is in many ways a
	liquid crystal spacial light modulators?		virtual company. We don't have independent office
4	A. That is one kind of product that they		or lab space in the company. We have multiple
	they provide and those can be used in various		employees, but we leverage the university and all
	applications, including near-to-eye displays.		its resources for the physical aspects of our
7	Q. I think you mentioned that you, in some	1	research and product development that we do here
	of your recent projects, were looking at gallium	1	domestically and then we produce commercial
	nitride TFTs?	1	products with our Japanese manufacturing partner.
10	A. Yes.	10	Q. And who is that?
11	Q. Are those really for LEDs as opposed to	11	A. I'm not sure I can say. I'm sorry.
	TFTs?	{	Yeah, I mean, I'd like to tell you, but I'm just
12	A. No, they're not.	1	not sure if it's public information.
13	Q. Is gallium nitride a material that's	14	Q. I understand.
	used for fabricating LEDs?	15	All right. Why don't we take a break?
16	A. Yes, it's a it's a very common and	16	VIDEOGRAPHER: We're going off record.
	very important one for green and blue.		This is the end of Media Unit Number 1. The time
17	Q. I think there's some acknowledgments and		is 11:10.
	there's a reference in your article to another	19	(Short recess.)
	-	20	VIDEOGRAPHER: We're back on record.
20	A. In addition to the reference to Boulder		This is the beginning of Media Unit Number 2 in
	Nonlinear Systems, there's an additional company		the deposition of Dr. Michael Escuti. The time is
	Goldeneye, Incorporated, yes.		11:26. Please continue.
23 24	Q. And what were the contributions of that		BY MR. GIBSON:
	company?	25	Q. All right. If you could look at page 52
1	Page 59 A. Well, you can see in the Fig. 4 right	1	Page 61 of your declaration in the '204 matter.
	above the acknowledgments that the LEDs, the light	2	A. I've got it.
	source for this projector, came or at least	3	Q. And these are the two figures we
	part of it came from the company Goldeneye. They	4	· · · · · · · · · · · · · · · · · · ·
	had a at the time this is not recent, right.	5	What was your purpose of putting this
	This is 2007, 2008. They had a technology that	_	into the declaration in the '204 matter?
	would produce light with LEDs and then collimate	7	A. Well, the paragraphs explaining it
	it in an advantageous way and we were taking	8	
	advantage of that.		summarize that if you'd like.
9 10	Q. And how were you taking advantage of	10	Q. So you're saying paragraph 107 sets
	that?		forth your purpose?
12	A. Well, our display approach would	12	A. It's certainly not limited to 107. It's
	needs light in this case, in this project		this I think there are there are subsequent
	needed light that would be produced by LEDs but		paragraphs that have to go carefully to notice
	also fairly well collimated efficiently. That was		which paragraphs it ends on, but it certainly
13	important to us. So their technique would provide		includes 108, 109, 110 and 111. It's the whole
16		10	section discussing those figures.
	-	17	
17	that collimation for us, right. It's the light		
17 18	that collimation for us, right. It's the light source for our projector.	18	Q. Okay. When you look at these two
17 18 19	that collimation for us, right. It's the lightsource for our projector.Q. And do you know if Goldeneye is involved	18 19	Q. Okay. When you look at these two figures, would you agree that there's a protective
17 18 19 20	that collimation for us, right. It's the lightsource for our projector.Q. And do you know if Goldeneye is involvedin making gallium nitride LEDs?	18 19 20	Q. Okay. When you look at these two figures, would you agree that there's a protective overcoat and then an opening formed over it, or
17 18 19 20 21	that collimation for us, right. It's the lightsource for our projector.Q. And do you know if Goldeneye is involvedin making gallium nitride LEDs?A. I don't recall to what extent they're	18 19 20 21	Q. Okay. When you look at these two figures, would you agree that there's a protective overcoat and then an opening formed over it, or formed into it might be a better way to say that?
17 18 19 20 21 22	that collimation for us, right. It's the lightsource for our projector.Q. And do you know if Goldeneye is involvedin making gallium nitride LEDs?A. I don't recall to what extent they'reactual fabricating their own LEDs or to what	18 19 20 21 22	Q. Okay. When you look at these two figures, would you agree that there's a protective overcoat and then an opening formed over it, or formed into it might be a better way to say that?A. That would be a better way to say it.
 17 18 19 20 21 22 23 	 that collimation for us, right. It's the light source for our projector. Q. And do you know if Goldeneye is involved in making gallium nitride LEDs? A. I don't recall to what extent they're actual fabricating their own LEDs or to what extent they're getting the dye from those that do 	18 19 20 21 22 23	Q. Okay. When you look at these two figures, would you agree that there's a protective overcoat and then an opening formed over it, or formed into it might be a better way to say that?A. That would be a better way to say it.Both figures have a protective overcoat 241 and
17 18 19 20 21 22 23	that collimation for us, right. It's the lightsource for our projector.Q. And do you know if Goldeneye is involvedin making gallium nitride LEDs?A. I don't recall to what extent they'reactual fabricating their own LEDs or to what	18 19 20 21 22 23 24	Q. Okay. When you look at these two figures, would you agree that there's a protective overcoat and then an opening formed over it, or formed into it might be a better way to say that?A. That would be a better way to say it.

			
	Page 62	1	Page 64
1	Q. Now, can a person of ordinary skill in		actually opening up the insulation layer?
	the art form the opening in the overcoat before	2	MR. SCHLITTER: Objection, form.
3	–	3	THE WITNESS: In that example, and to be
4	A. Using standard semiconductor processing,	1	more specific applied here, if the mask was
5	no, but there are exotic ways to do such a thing.		literally some some kind of metal perhaps or
6	Q. Okay. But they would not be standard?	1	other substrate that's placed on the edge of a
7	A. In my experience, they would not be	1	display, it's another object that's being brought
8	standard.		down to the glass substrate during the deposition
9	Q. Okay. So if we call the formation	9	process, then it would cover up that region during
10	A. Well, let me make one more comment.	10	that process.
11	There is I'm sorry. Can I clarify my answer?	11	And then when the deposition is done, it
12	Q. You weren't finished, so go ahead.	12	can be, of course, removed and there would be an
13	A. Okay. In the sense that it is it is	13	opening in that insulating layer that would appear
14	most common to create openings in an insulating	14	because the material was never deposited there to
15	layer in the way that we've been talking about,	15	begin with.
1	that first the layer is deposited and then it's	16	BY MR. GIBSON:
	etched away some opening is etched away, but	17	Q. Okay. But let's assume that you have
1	there's also a common technique which I don't	18	deposited an insulation layer, no mask and then
	think is uncommon and this involves using a mask	1	you've created openings.
	to cover up a portion of the substrate that you're	20	A. I can assume that, yeah.
	depositing your elements on.	21	Q. And let's call that formation of the
22	And in that case what's happening is, of	22	protective overcoat as step A.
1	course, only part of the substrate is getting the	23	A. I can assume that.
1	deposition of the insulating layer and then	24	Q. And then forming the opening in the
	another part is not and so that's another way to		protective overcoat is step B.
		20	
	Page 63		Page 65
1		1	A. Okay.
2	Q. All right. When you're looking at the	2	Q. And when I'm talking about forming the
3	204 patent as a person of ordinary skill in the		opening, I'm talking about all the steps necessary
	art, would you understand that the insulating		to accomplish that as step B.
	layer is being deposited and then it's being	5	Are you with me?
6	etched to create the openings?	6	A. I think so.
7	A. I'm I'm not sure that the '204 patent	7	Q. What is the sequence of those two steps?
	requires that. It's certainly a preferred	8	A. It sounds to me that it's in your
9	example, but I don't recall if the '204 patent	9	assumption, right. You said first let's assume
10	requires that.	10	that layer A is deposited wholly on the substrate
11	Q. Okay. When you look at the '204 patent,	11	without any kind of mask, whether it's an external
12	you understand that's certainly one way it would	12	mask or resist that's down there. And then after
13	be done, correct?	13	that, the next step is to form the opening by, for
14	A. Yes.	14	example, etching.
15	Q. And you would consider for an insulating	15	Q. So it's step A, then step B?
16	layer, that to be the more standard way it would	16	A. In your assumption, it is.
. ~ ~		17	Q. Now, looking at the two figures you have
1	be done rather than using a mask?	/	
17	be done rather than using a mask?A. I consider both of those techniques as		in your in your declaration, do you recognize
17 18	A. I consider both of those techniques as	18	in your in your declaration, do you recognize that there's another layer, the ITO layer?
17 18 19	A. I consider both of those techniques as standard. Which one is used depends on where the	18 19	that there's another layer, the ITO layer?
17 18 19 20	A. I consider both of those techniques as standard. Which one is used depends on where the opening is being made and how big the opening is.	18 19 20	that there's another layer, the ITO layer? A. There's several other layers. We talked
17 18 19 20 21	A. I consider both of those techniques as standard. Which one is used depends on where the opening is being made and how big the opening is. So I'm not sure I can point to one or the other as	18 19 20 21	that there's another layer, the ITO layer?A. There's several other layers. We talked about them all yesterday, but both figures have an
 17 18 19 20 21 22 	A. I consider both of those techniques as standard. Which one is used depends on where the opening is being made and how big the opening is. So I'm not sure I can point to one or the other as being more standard.	18 19 20 21 22	that there's another layer, the ITO layer? A. There's several other layers. We talked about them all yesterday, but both figures have an ITO layer that's illustrated.
 17 18 19 20 21 22 23 	A. I consider both of those techniques as standard. Which one is used depends on where the opening is being made and how big the opening is. So I'm not sure I can point to one or the other as being more standard.Q. When you're talking about using a mask,	18 19 20 21 22 23	that there's another layer, the ITO layer?A. There's several other layers. We talked about them all yesterday, but both figures have an ITO layer that's illustrated.Q. Okay. So in my example, let's now call
 17 18 19 20 21 22 23 24 	A. I consider both of those techniques as standard. Which one is used depends on where the opening is being made and how big the opening is. So I'm not sure I can point to one or the other as being more standard.	18 19 20 21 22 23	that there's another layer, the ITO layer? A. There's several other layers. We talked about them all yesterday, but both figures have an ITO layer that's illustrated.

	Page 66		Page 68
1 1	fine.	1	that A is a layer that's explicitly put down
2	Q. And can you list the different ways a	1	everywhere, right, not masked, there's no lift off
3 1	person of ordinary skill in the art would	3	resist. And step B is the whatever process is
4 1	recognize that exists for performing these three	4	used to create an opening in the layer that's put
5 5	steps	5	down in step A. So those two have to go in that
6	MR. SCHLITTER: Objection, foundation.	6	sequence, A and then B in processing by your
71	BY MR. GIBSON:	7	assumptions. And so then the only two possible
8	Q in sequence?	8	variations would be for C to either be before A
9	A. I'm not sure I understand your question.	9	and B or after.
10 I	Fig. C shows the example of first ITO A is	10	Q. Do you still have Shiba around?
11 0	deposited and patterned on whatever is below it.	11	A. Yes, I have Shiba.
12 1	Then the protective overcoat 241 is applied and	12	Q. If you look at Fig. 4?
13 t	hen lastly, the opening is created and that's	13	A. I see it.
14 c	consistent with what's in Sukegawa.	14	Q. Do you see the ITO layer?
15	Alternatively is what's in D, where the	15	A. I see two ITO layers.
1	nsulating film is applied first, then the opening	16	
	and then the ITO's deposited and patterned.	17	2
18	Q. Okay. But if we have these as three	18	Q. And where are you getting 741 from, what
	steps, an A, a B and a C, one obvious sequence you	1	part of the specification?
1	could do is A and then B and then C.	20	A. I'm not very good at word searching.
21	Are there any other ways to reorder		Electronically it's much easier.
	hose three steps?	22	Q. I mean, there may be other references,
23	A. Well, the A, B, C order in your	23	but I was looking at Column 5, line it's
	assumptions or assuming the way you've defined		probably around line 38. I think it refers to
25 t	hose steps would correspond to Fig. D at least	25	Shiba refers to 741 as a connecting projection?
	Page 67		Page 69
-	partially. And Fig. C, however, would be	1	A. Yes, yes, exactly. So these are
	different. It would be C, A, B, consistent with		thank you for finding it. This is the contact on
	Sukegawa, not just my Fig. C.		the counter substrate which extends out. It's the
4	Q. Right. So Fig. C, the steps would be		portion of the ITO layer 7 I'm sorry the
	step C, then step A, then step B?	1	counter substrate electrode which is explicitly
6	A. Yes.	1	ITO, counter electrode 541, and the projection to
	Q. And then Fig. D, the steps would be A, B, C?		the left side is the portion I understand that
9	A. Yes, but let's also keep in mind that		to be the portion of the electrode on the other substrate that gets the contact from those pads
	there could be other steps in between and		that are all around Shiba's display.
	sometimes there has to be.	11	Q. Where does it call 741 a transparent
12	Q. I'm just talking about what we see in		conductive layer or an ITO?
	these two figures.	13	A. I don't think it's it's text that
13 1	It would be A, B, C for Fig. D?		text is in the specification, but that's what
15	A. Sure. I'll say it again. Fig. D would		Fig. 4 shows. The layer 741 goes from the left
1	correspond to A, B, C.		side and all the way to the right. And on the
17	Q. Are there any other ways to in terms		right side, I see 541, which is the pixel
			electrode and pixel electrode 541 appears both in
	of the sequence that we've been discussing, the	10	
19 s	of the sequence that we've been discussing, the steps A, B and C, are there any other ways to do		
	steps A, B and C, are there any other ways to do	19	Fig. 4, Fig. 6 and 541 is I think it's clear
	· · · ·	19	Fig. 4, Fig. 6 and 541 is I think it's clear from the specification that that is ITO.
20 i 21	steps A, B and C, are there any other ways to do it or are these the only two?	19 20 21	Fig. 4, Fig. 6 and 541 is I think it's clearfrom the specification that that is ITO.Q. Well, and why would the patent call 741
20 i 21	steps A, B and C, are there any other ways to do it or are these the only two?A. You're asking me is there any other	19 20 21 22	Fig. 4, Fig. 6 and 541 is I think it's clear from the specification that that is ITO.
20 i 21 22 c 23	steps A, B and C, are there any other ways to do it or are these the only two?A. You're asking me is there any other ordering of three things?	19 20 21 22	Fig. 4, Fig. 6 and 541 is I think it's clearfrom the specification that that is ITO.Q. Well, and why would the patent call 741something different than 541 if it was the same

_		-	
	Page 70	1.	Page 72
1	many of its regions identified with different		· · · · ·
1	numbers. For example, the wiring 127, the pad		disclosure in Shiba shows in Fig. 1. So 741 is
	125, 731, the line 121, the terminal 751, that's		part of the layer 541 and there are many other pad
	all formed from the same deposition step and then		protrusions. I mean, this is how the counter
	these element numbers correspond to different		electrode gets its potential, by those eight
1	pieces of it. So it's very consistent with Shiba	1	connections.
	to do that.	7	Q. Well, the connection doesn't have to be
8		1	an ITO layer for there to be a connection, right?
	actual different different structures in	9	A. It doesn't, you're correct, but that's
1	Fig. 3, right?		what's shown.
11	A. Well, yes, but 741 is a different	11	Q. As I said, we disagree about that, but
	structure. We can see it in Fig. 1. So Fig. 1		I'm just trying to get to what you're basing your
	has 741 on the bottom left. Of course Fig. 3 is		view on that the sealant is connecting to an ITO
1	the expanded view of the box labeled A in Fig. 1		layer and that's based on the connection at the
1	and we see 741 identified there and we can see	1	top of Fig. 4, there's there's some touching of
	that there's a dashed line that runs all around	16	sealant and 741?
	the display. That's labeled 541. That's the	17	A. Fig. 6 clearly shows the sealant on the
18	counter electrode.		counter substrate touching element 541.
19	And then shooting off like peninsulas,	19	Q. What
1	there are eight little protrusions of the same	20	A. In Fig. 4, it shows it shows what
	dashed line, that same region and those are	21	might be a combination. It depends on where you
22	labeled 741 and other numbers.	22	define what the boundary between 741 and 541 is.
23	Q. Those are connectors, right? They're	23	So 541 is the counter electrode that must go
24	connecting projections is what Shiba calls them?	24	through most of the display, it's off to the right
25	A. They are. That's their function, but	25	side of Fig. 4. And then 741 appears to be this
	Page 71	1	Page 73
1	they are from Fig. 1 it's clear that it's all	1	this protrusion which is in direct contact with
	the same conducting layer. And while I don't		the glass substrate 501.
1	think Shiba requires that it be formed of ITO, it	3	\tilde{Q} . And are you is it your view that
1	certainly is disclosed as such.	4	sealant is contacting the ITO layer in Fig. 4?
5	Q. Well, there's nothing that says 741 is		Let me is it your view that sealant is
	an ITO layer, correct?		contacting 741?
7	A. The specification does not say it, but	7	A. It appears that 741 is connected to both
1	it is disclosed in Fig. 4 and Fig. 1.	1	element 115, which is the conductive resin or
9	Q. Well, we may just have to disagree about		the I think it's called the transfer material
	that. But the sealant I take it, your		made of a conducting resin, as well as a small
	reference earlier today that the sealant is over	1	part of the sealant 113 there.
	the ITO was based on 741 being an ITO?	12	Q. All right. Then Fig. 6, at the bottom
12	A. It's not. Fig. 6 also shows 541, the		of Fig. 6, you would agree that there's no contact
1	ITO counter electrode, as in contact on the		between the sealant and the ITO layer?
1	counter electrode substrate with the sealant 113.	15	A. In Fig. 6, I agree that the bottom part
16	Q. Okay. So let's start with Fig. 4 then		of the sealant does not contact ITO.
	we'll move to Fig. 6.	17	Q. And at the top, where do you think
18	So Fig. 4, at the bottom of the figure,	1	there's a touching between the sealant and 541?
ł	you would agree that the sealant is not in contact	19	A. Element 541 is extending from the left
1	with the ITO, correct?	20	side of the figure of Fig. 6 to most of the way
20	A. On the bottom substrate, I do agree with	21	across toward the right side, and it is in direct
	that.		contact with the majority of the sealant that's
23	Q. And on the upper substrate, because you		illustrated in Fig. 6.
1	believe 741 is an ITO layer, you would say there's	23	541 is called the counter electrode.
1	some contact with the sealant?		Column 5 has some language about that counter
25	some contact with the scaldit!	25	Column 5 has some language about that counter
			19 (Pages 70 - 73)

	Pogo 74	1	Dame 76
1	Page 74 electrode around lines 24 through 28 or so. It	1	Page 76 substrate and the sealant that contacts it. It
2		1	mentions that there's a counter substrate facing
3		1	the substrate and, of course, the sealant has to
	made of ITO, has a relatively high resistance" and		connect to that.
5	• -	5	But I don't see an explicit electrode
6		1	mentioned in Claim 54 for that counter electrode,
7		1	but certainly it's implicit.
8		8	Q. But it's not something that's described
9	immediately adjacent to the liquid crystal layer,	1	in the claims?
1	then that corresponds to the orientation film. I	10	A. It is implicit to Claim 54. If you
1	do suspect somewhere in Shiba he does disclose	1	didn't have it, you would most LCD modes would
	what that's called, but I'm not finding it.	1	not function; not all, but most.
13	-	13	Q. So would you say that the claims are
14		14	limited to that requirement that you're finding
15	would be insulating, an insulating material. It's	1	implicit?
1	not typically a conductor.	16	A. Maybe I'm being clumsy with the terms.
17	•••	17	It's it's not explicit in the claim and as
18	left to the right in Fig. 6?	1	such, the claim applies to both of those
19	A. It extends partially, right. You can		circumstances.
20	see that it only stays within the liquid crystal	20	Q. Is the you would agree that Claim 54
21	portion and ends immediately before the sealant	21	is not directed to the type of structure we see in
22	and there's a good reason for that's because that	22	Fig. 6 with respect where we have element 541
23	very thin polymer film is even worse to adhere to	23	connecting with the we have element 541 along
24	than ITO.	24	the top of the substrate?
25	Q. Now, you would agree with me that the	25	MR. SCHLITTER: Object to form.
	Page 75		Page 77
1			
	'204 patent is not directed to the fabrication	1	THE WITNESS: Do you mean Fig. 6 of
2	-		THE WITNESS: Do you mean Fig. 6 of Shiba?
2 3		2	
	area that you're talking about where 541 extends into the sealant area?	2	Shiba? BY MR. GIBSON: Q. Yes.
3 4 5	area that you're talking about where 541 extends into the sealant area?A. I don't think I can agree with the second part of your characterization. Fig. 1	2 3 4 5	Shiba?BY MR. GIBSON:Q. Yes.A. Fig. 6 in Shiba is not a cross-section
3 4 5 6	area that you're talking about where 541 extends into the sealant area?A. I don't think I can agree with the second part of your characterization. Fig. 1shows that element 541 goes all around the display	2 3 4 5 6	Shiba?BY MR. GIBSON:Q. Yes.A. Fig. 6 in Shiba is not a cross-section of the terminal portion, but it's clear from
3 4 5 6 7	area that you're talking about where 541 extends into the sealant area? A. I don't think I can agree with the second part of your characterization. Fig. 1 shows that element 541 goes all around the display and has it's roughly a rectangle with these	2 3 4 5 6 7	Shiba?BY MR. GIBSON:Q. Yes.A. Fig. 6 in Shiba is not a cross-sectionof the terminal portion, but it's clear fromFig. 1 that element 541 extends all around the
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20 (Pages 74 - 77)

Page 781 BY MR. GIBSON:1 the connecting protrusions I'm sor2 Q. Well, it's you call it 741. Now2 connecting projections, 741 to 748.3 you Fig. 4 shows 741, not 541, correct?3 Q. What's the let me just see i4 A. That's not correct. Fig. 4 shows 741 on5 the left side. It's the flat part that's in6 direct contact with the upper substrate. But6 the sealant?7 element 541 is labeled on the right side and it7 A. That's the rest of the layer.8 similarly extends across the substrate right above9 A. If I understand what you're re9 the orientation layer, just like it is in Fig. 6.9 A. If I understand what you're re10 Q. Where does 541 begin and 740 or I'm10 to, 541 corresponds to a layer that be11 sorry.11 the left side and goes all the way to t12 Where does 541 end and 741 begin?13 A. I don't think that's the correct13 A. I don't think that's the correct13 Q. Right. And but you're also sa14 characterization. I think 541 is talked about as15 A. Yes.16 entire region that's in the dashed line of Fig. 1.16 Q. All right. And what comes ri17 And those protrusions that Shiba identifies as18 left?	if I can ribe. g after eferring egins from the portion aying that
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17 And those protrusions that Shiba identifies as 17 what you've marked in red when you	ight after
	6
19 are a subset of the element 541. 19 A. That's also 541.	
20 Q. In Fig. 6, can you just mark in pen on 20 Q. All right. That was my quest	tion.
21 Shiba where you believe there's contact between 21 A. Yes.	
22 541 and the sealant? 22 Q. How far does that extend?	
23 A. On my copy here? 23 A. Do you want me to draw it or	r to fill it
24Q. Yes, please.24 in maybe with blue?	
25A. Anyone have a blue pen?25Q. With blue, that would be greated	at.
Page 79	
1 MR. MANZO: What color do you want? 1 A. (Indicating.)	Page 81
2 MR. GIBSON: Red is fine. It may stand 2 So I've marked in blue the p	ortion of
3 out more. 3 541 that is directly over the liquid	
4 THE WITNESS: I'm not sure it's possible 4 region.	orystar
5 for me to simply identify the interface of 5 Q. And then along the top of the	he substrate
6 contact, but I can identify where in 541 that the 6 541 extends and then terminates in	
7 sealant 113 does contact it, which is what I've 7 MR. SCHLITTER: Objection	
8 tried to draw. 8 THE WITNESS: No, it doe	
9 BY MR. GIBSON: 9 has no relationship to well, it do	
10 Q. What do you mean by "interface"? 10 with 521, which is a completely di	
11 A. Well, the interface is a line that on 11 BY MR. GIBSON:	nerent element.
12 that printout is a black line. That's the surface 12 Q. Okay. Where does it end a	t the top of
13 of contact. I can't simply draw a red line 13 the substrate or does it just continu	-
14 through that, you wouldn't see it. So I'm 14 A. It continues off to the left a	
15 highlighting the portion of the layer 541 that 15 display. Of course what's illustrate	
16 is you know, is the layer above which that 16 just one pixel, or one TFT more sp	
17 contact occurs. 17 there should be more if it's a displa	-
17 contact occurs. 18 Q. And does 541 you've got a lower part 18 Q. And then I may have asked	· ·
19 of 541. Well, let me just hand it back to you. 19 already, but would you agree in Fig	
20 Does 541 end on the left part where it's 20 bottom of the sealant, there's not	•
21 touching the sealant? 21 contact with an ITO layer?	11010 5 110
22 A. The material that corresponds to 541 22 A. On the bottom substrate of	Fig 4 there
1	
	-
24 in Fig. 6. In Fig. 4, it's different. It does24Q. Now, this Fig. 4, this is the25 extend out and protrude and form what Shiba calls25 you modified for your declaration?	
25 extend out and provide and form what Sinda cans 25 you mounted for your decidiation?	

	Page 82		Page 84
1		1	correct?
2	MR. GIBSON: I'm going to mark this as	2	A. Yes, we did.
3	an exhibit in this matter so we have it. Let's	3	Q. And yesterday you explained that this
4	mark these two as the next in order.	4	modification would have two capacitors.
5	(Documents marked as Deposition	5	Do you remember that?
6	Exhibit Nos. 1009 and 1010 for	6	A. At least two capacitors, but yes,
7	identification.)	7	there's two capacitors two capacitive
8	BY MR. GIBSON:	8	structures that are shown.
9	Q. And those are 1009 and 1010. And 1009	9	Q. And you said they'd be in series even
10	should be the drawing that you made on page 49	10	though the pixel electrode is electrically
11	from your declaration.	11	connected to the source electrode?
12	Do you have that in front of you?	12	A. In a very small portion of the source
13	A. That's correct. It seems to be a	13	electrode, the pixel electrode is being
14	magnification of that.	14	illustrated as being connected.
15	Q. And as you stated yesterday, this is	15	Q. And that makes you say that they'd be
	what's in your declaration here, this is your	16	connected the capacitors would be connected in
1	attempt to draw out in color what is Fig. 4 in	17	series?
	Shiba?	18	MR. SCHLITTER: Objection, form.
19	A. I'm not sure I'd characterize it that	19	THE WITNESS: I'm observing that the
20	way. It is I'm trying to represent what is		structure you're showing me is a sequence of three
21	1 2 6		conductors with insulating material in between
	quite a lot of things and, you know, I'm using it	22	those three, and I'm observing that that is one
	as a way to discuss the possibility of the ITO	23	way to describe that is two capacitors in series.
	layer being applied differently than what's	24	BY MR. GIBSON:
25	disclosed in Shiba.	25	Q. And the is there any reason that the
	Page 83		Page 85
1	Q. All right. And then Exhibit 110 or	1	contact portion between the pixel electrode and
2	1010, excuse me, is your modified version of	2	the source electrode could not be made bigger?
3	Shiba?	3	Could one of ordinary skill in the art do that?
4	A. It's my modification of Shiba's	4	A. It depends. I didn't create this
5	disclosure according to Dr. Hatalis' hypothesis,	5	figure.
6	or at least one variation of his hypothesis.	6	Q. Well, if you just etched out more of the
7	Q. As you understood his hypothesis?	7	protective overcoat on the left, you could create
8	A. Yes.	8	a bigger connection between the blue and the
9	Q. And you understood that from his		black?
10	deposition testimony?	10	MR. SCHLITTER: Objection, form.
11	A. At least.	11	THE WITNESS: Well, I suppose you could
12	Q. And it may have also been from the	12	do a lot of variations on on this figure, on
13	declaration that he submitted in this matter?	13	this hypothesis. Now, whether or not they would
14	A. Yes, that's correct. For example, he	14	be either obvious or successful is not clear to
	I think he explicitly asserts that it would be	15	me.
	obvious to reorganize the layers of fabrication	16	BY MR. GIBSON:
17	in Shiba and I'm considering how that could	17	Q. If in this kind of a structure, do
18	possibly be.	18	you have to have the pixel electrode on top of the
19	MR. GIBSON: Then if we could mark this	19	storage electrode?
20	as 1012 1011.	20	MR. GIBSON: Objection, form.
21	(Document marked as Exhibit Number 1011	21	THE WITNESS: I don't understand this
22	for identification.)	22	structure at all beyond what you're showing me.
23	BY MR. GIBSON:	23	It's not my hypothesis. So what I see is a
24	Q. And Exhibit 1011 is another modification	24	cross-section of a structure and I'm commenting on
25	of Shiba and we discussed this yesterday as well,	25	that. I can't I don't think I can speculate
L			22 (Pages 82 - 85)

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1 beyond that. 2 BY MR. GIBSON: 3 Q. Okay. So you can't tell me one way or 4 the other? 5 A. I can't tell you one way or the other. 6 Q. And what's - in your mind, what's 7 cassing the two capacitors is that - well, strike 8 that. 9 Would you agree that one of ordinary skill 10 skill in the att would know how to cht ob perimose 11 pottective overcoat so that it could be removed so 12 A. I do agree that one of ordinary skill 13 A. I do agree that one of ordinary skill 14 hows how to	1	Page 86	1	Page 88
2 BY MR. GIBSON: 2 protective overcoat, would that eliminate the 3 Q. Okay. So you can't tell me one way or 4 the other: 4 the other? 9 would you and wats in your mind, what's 5 A. 1 can't tell you one way or the other. 6 wour can's with two capacitors is that well, strike 7 causing the two capacitors is that well, strike 7 what you mean? Because it does sound like an 8 additional hypothesis. It's not vhat's shown, 9 would you agree that one of ordinary skill 10 skill in the art would know how to etch the 10 BY MR. GIBSON: 11 protective overcoat so that it could be removed so 12 that it was no longer above the capacitor line C/? 10 BY MR. GIBSON: 12 how show to - would know how to etch openings 11 protective overcoat so that it could be prostective 15 not instating films; for example, protective 10 BY MR. GIBSON: 11 or the blue, you would hone harking, so you removed the protective 10 Gapacitors issue that you raised yestraday? 17 Q. So maybe1 can just mark for you A. I hat a diminal hypothesis, I think 18 tims. I've put a blue marking on the protective Q. Wauld that the memsion? 21 would no longer have that protective overcoat. Q. Wau tother dimension is into the page. 23 would no longer have that protective overcoat. Q. Wau tother dimension is into the page. 24 could make it. A. I h	1		1	
3 Q. Okay. So you can't tell me one way or 4 the other? 4 the other? 3 issue you raise with two capacitors? 4 MR. SCHLITTER: Objection, form. 5 A. I can't tell you one way or the other. 6 0 Would you agree that one of ordinary 9 0 Skill in the art would know how to tetch the 7 11 protective overcoat so that it could be removed so 12 12 A. I do agree that one of ordinary skill 10 BY MR. GIBSON: 11 Q. It's probably easier to mark it on this. 12 how to bow to etch the 11 Q. It's probably easier to mark it on this. 13 A. I do agree that one of ordinary skill 10 BY MR. GIBSON: 14 how specific the ordinary skill in the art would know how to etch openings 15 into insulating films, for example, protective 15 not indicate if you etched to the right of 0 0 0 16 ordinary skill in the art would know 20 Q. What other dimension? 21 21 overcoat to indicate if you etched to the right of 10 11 11 20 Q. What other dimension?	1	-	1	-
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23 (Pages 86 - 89)

		1	
1	Page 90 clarify for me what you mean by "format"?	1	Page 92 A. Are you asking specifically if the word
	BY MR. GIBSON:		"redundancy" is in here?
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	Q. Something like VGA, would you consider	3	Q. Or or words that would convey that
	that to be a display format back in 1997?		concept.
5	A. That resolution and video standard was	5	A. Okay. I'll take a minute and look.
	certainly well-known by that point. Whether or		Okay. I think I've reminded myself enough. I
1	not it's a display format, it depends on the	•	apologize for the delay.
1	context, but yes, VGA, WVGA, there's SVGA. By	8	Certainly the reduced electrical
1	that point there were many.		resistance is identified in multiple places, but
10	Q. Any others that come to mind?		the there is redundancy that's mentioned, but
11	A. I don't think I could list with	1	that's indeed mentioned with respect to the
	confidence which ones were before 1997 and which	1	peripheral driving circuits in, I think, Fig. 1.
1	were after. So none others come to mind with any	13	So I'm recognizing that it's true about
	surety.		his structure, that it would be it would have
15	Q. And do you know how a display, how		redundancy, in addition to simply reducing the
	many lines and how many columns it had in 1997?		resistance.
17	A. Likewise there's no one answer to that.	17	Q. That's not something that's identified
18	Q. Can you give me some examples?		in the text that you were able to find as being an
19	A. I think an example would be displays	1	mprovement over the prior art?
20	with, for example, 600-by-400 lines. As best I	20	A. The specification does not explicitly
	remember, that would be a fairly high resolution	21 t	alk about that, but I'm recognizing that the
22	or medium resolution display.	22 s	specification does disclose it in its figures. I
23	Q. Any others?	23 r	mean, it's related to the fact that there's two
24	A. Yeah, there are many others.	24 v	wires instead of one going at least partially in
25	Q. Can you just list any that from 1997	25 ť	he same direction.
1	Page 91		Page 93
1	Page 91 that come to mind?	1	Page 93 Q. Okay. Did you consider that to be an
1 2			
	that come to mind? MR. SCHLITTER: Objection, form, foundation.		Q. Okay. Did you consider that to be an
2	that come to mind? MR. SCHLITTER: Objection, form, foundation. THE WITNESS: I'm going to have a hard	2 in 3 4	Q. Okay. Did you consider that to be an mprovement over the prior art?A. I do.Q. Okay. Do you understand that Shiba
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24 (Pages 90 - 93)

1	Page 94		Page 96
1	I'll also point out that, again, 127 is already	· 1	opposed to some other kind of transparent
	split split up into six lines and that by		conductive layer?
3		3	-
4	Q. All right. And I take it when you just	4	comparing to, so it's hard to say where the
5		5	advantage is, but I can comment on ITO if you
6	-	6	like.
7	Q you did consider Column 8 and	7	Q. Particularly in 1997, why would a person
8		8	of ordinary skill in the art, why would they want
9	resistance, but they don't claim an advantage of	1	to use an ITO?
	redundancy in Columns 8 and 9 of the '204?	10	A. The LCDs that we're talking about in
11	A. Well, of course these columns aren't	11	this case are of a format where the electrodes
12	claims. So they don't claim anything, but they do		need to be both conductive and transparent. And
6	refer to reducing the electrical resistance, but	1	ITO is a material that's been known for a long
	not explicitly to the aspect of redundancy that		time that is a conducting oxide that is
	I'm observing is true.		transparent largely in the visible region.
16	-	16	So we can see through it, but it can
	patent claim. I was using it as an argument or a	17	also hold a charge and act similar to metals and
	statement.	1	other conductors. And I think it's become
19	But you would agree in Example 3 on	1	standard because its deposition has become
20	Column 8 and 9, there's no statement that about	20	1. I I I I I I I I I I I I I I I I I I I
	there being an advantage of redundancy?	21	obviously very successful even in 1997.
22	A. I don't see an explicit description to	22	Q. And that was known in 1997, correct?
23	that extent, but it is implicit to the structures	23	A. It was very well-known by then.
	that are being talked about. I'm simply	24	Q. And in your view, would one of ordinary
25	recognizing that and I think one of ordinary skill	25	skill in the art be motivated to use an ITO in the
	Page 95		Page 97
1	would as well.	1	terminal to connect to the flexible printed
2	Q. In Fig. 4 strike that.	2	circuit?
3	Example 3 is discussing Fig. 4A,	3	MR. SCHLITTER: Objection, foundation.
4	correct?	4	THE WITNESS: Can you be more specific
5	A. Example 3 refers to Fig. 4A and B at	5	of the motivation that I'm commenting on?
6	least.	6	BY MR. GIBSON:
7	Q. Do you know if the '204 patent asserts	7	O Tatana adaitti a mana Ta
8			Q. Let me ask it this way: To your
-	or states any advantages to using an ITO or		
		8	knowledge, in 1997, were ITO layers used in the terminal pad region of commercial display
	or states any advantages to using an ITO or	8 9	knowledge, in 1997, were ITO layers used in the
9 10	or states any advantages to using an ITO or transparent conductive layer?	8 9	knowledge, in 1997, were ITO layers used in the terminal pad region of commercial display
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9 10 11 12	or states any advantages to using an ITO or transparent conductive layer? A. I don't recall any explicit mention of the advantage of using ITO as opposed to anything	8 9 10 11 12	knowledge, in 1997, were ITO layers used in the terminal pad region of commercial display products?A. I don't have specific knowledge of its use in commercial display products. I don't have
9 10 11 12 13	or states any advantages to using an ITO or transparent conductive layer? A. I don't recall any explicit mention of the advantage of using ITO as opposed to anything else. I think the '204 patent says that there	8 9 10 11 12 13	knowledge, in 1997, were ITO layers used in the terminal pad region of commercial display products? A. I don't have specific knowledge of its
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1			
1	Page 98 Q. But Sukegawa and Nakamoto would be	1	Page 100
	examples of advantages of that?	2	A. There are probably several copies of
3			Fig. 4 in my declaration.
	some of those advantages, yeah. Well, to be	4	Q. I'm sure there are copies of Fig. 4 in
5			your declaration. I've seen several myself. I
6		1	-
-			think the easiest thing to do, why don't you on
-	It may just be that he discloses it and doesn't		the Fig. 4A that's before you that's in the '204
8		1	patent that's Exhibit 1001, why don't you just
9	Q. In Fig. 4A, we talked about the ITO		cross-hatch out
	layer a little bit yesterday in terms of this	10	A. Would you like to cross-hatch out the
	upside down L.		portion you want to remove?
12	A. I see the upside down L. I have to	12	Q. (Indicating.)
	admit I don't remember our discussion yesterday.	13	Okay. I've done that in blue.
14	Q. That's fine.	14	A. Thank you. Can you remind me the
15	Could you pattern the ITO so that the		question?
	bottom part of the upside down L was not there?	16	Q. Sure. So if we have the structure
17	A. Are you referring to the upper portion	17	that's before you in 4A the way I crossed it
	that's horizontal, the highest most portion of the	18	crossed it out, you would agree that that conforms
19	ITO?	19	to Claim 54 still?
20	Q. Yes, yes.	20	A. I do. The little piece that you've
21	A. That could be patterned away like the	21	crossed out has no bearing to me on Claim 54.
22	rest of the ITO that is that is missing on the	22	Q. And if you have the structure that I put
23	left to the left side which would appear	23	before you, how would a person of ordinary skill
24	underneath the sealant but, of course, it's been	24	in the art determine in which order layers 113 and
25	etched away.	25	114 are formed?
	Page 99		Page 101
1	Q. You could etch away all of the upside	1	A. It would not be apparent from that
2	down L if you wanted to, right?	.2	figure or from that cross-section alone.
3	A. I think it's at least possible to do	3	Q. So you could form the ITO layer first
4	that kind of thing and I don't know if it's		· · · · ·
		4	and then form the resin layer second?
5			and then form the resin layer second? MR. SCHLITTER: Objection, misstates his
	practically feasible to really get precise about	5	MR. SCHLITTER: Objection, misstates his
6	practically feasible to really get precise about that, probably not worth the trouble, but that's	5 6	MR. SCHLITTER: Objection, misstates his testimony.
6 7	practically feasible to really get precise about that, probably not worth the trouble, but that's my speculation. But nevertheless, it would still	5 6 7	MR. SCHLITTER: Objection, misstates his testimony. THE WITNESS: The figure the modified
6 7 8	practically feasible to really get precise about that, probably not worth the trouble, but that's my speculation. But nevertheless, it would still meet the claims, especially Claim 54 that we	5 6 7 8	MR. SCHLITTER: Objection, misstates his testimony. THE WITNESS: The figure the modified figure doesn't give enough information to
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6 7 8 9 10	practically feasible to really get precise about that, probably not worth the trouble, but that's my speculation. But nevertheless, it would still meet the claims, especially Claim 54 that we talked about explicitly. Q. Without the upside down L, you say that	5 6 7 8 9 10	MR. SCHLITTER: Objection, misstates his testimony. THE WITNESS: The figure the modified figure doesn't give enough information to determine the sequence of deposition during fabrication between element 113 and 114.
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26 (Pages 98 - 101)

I		T	
	Page 102		Page 104
	A. It does I do think that that is a		This is the end of Media Unit Number 2. The time
2	1 5 5 7	1	is 12:47.
3	course, that is not what would meet Claim 54, if	3	(Whereupon, the deposition in the
4	that was done.	4	above-entitled cause was recessed to
5	Q. So we could have a completed structure	5	1:51 p.m. this date.)
6	and you wouldn't know whether it met Claim 54	6	
7	unless you knew the steps that were used to	7	
8	deposit the materials?	8	
9	MR. SCHILITTER: Objection, form.	9	
10	THE WITNESS: Well, Claim 54 has	10	
11	limitations that relate to how contacts are being	11	
12	formed. For example, there's a limitation near	12	
1	the end of the claim that says there must be	13	
	direct contact through an opening between the	14	
4	second conductive line and the transparent	15	
	conducting layer. And so if that contact is is	.16	
	not through that opening, then it wouldn't meet	17	
1	the claim. And so one would need to be able to	18	
1	determine that that's true.	19	
	BY MR. GIBSON:	20	
21	Q. And if you're looking at the modified	21	
1	Fig. 4A, you don't know if that's true with that	22	
1	figure unless you know the steps that were taken	23	
1	to deposit and etch, correct?	24	
25	A. Well, what I'm saying is this modified	25	
	Page 103		Page 105
1	figure is inconclusive to that regard.	1	AFTERNOON SESSION
2	Q. So you wouldn't know if that type of a	2	VIDEOGRAPHER: We're now on record.
3	structure was covered by Claim 54 unless you knew	3	This is the beginning of Media Unit Number 3 in
4	the deposition and etching steps, is that correct?	4	the deposition of Dr. Michael Escuti and the time
5	A. Well, as far as this figure goes, I	5	is 1:51. Please continue.
6	think that's correct. But it's most likely the	6	EXAMINATION (Resumed)
7	case that if it was a real display, you could	7	BY MR. GIBSON:
8	analyze it in such a way that you could tell the	8	Q. Welcome back. You understand you're
9			
	difference of whether the ITO was deposited before	9	still under oath?
10	or after the element 113 insulating film.	9 10	still under oath? A. Yes.
10 11	*	10 11	A. Yes.Q. And have you discussed your testimony
11	or after the element 113 insulating film.	10 11	A. Yes.
11	or after the element 113 insulating film. Q. But in terms of this figure, my question	10 11 12 13	A. Yes.Q. And have you discussed your testimony
11 12 13 14	or after the element 113 insulating film. Q. But in terms of this figure, my question you agree with? A. In terms of the figure, it's inconclusive. If a display was made in reality,	10 11 12	A. Yes.Q. And have you discussed your testimony with anyone at any of the breaks either today or
11 12 13 14	or after the element 113 insulating film. Q. But in terms of this figure, my question you agree with? A. In terms of the figure, it's	10 11 12 13 14	A. Yes.Q. And have you discussed your testimony with anyone at any of the breaks either today or last night?
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	Page 106		Page 108
1	yesterday's testimony?	1	discusses the importance of layer 8 protecting
2	A. I don't. It was very brief and I don't	1	layer 7 everywhere. His central invention, after
1	•		all, is to provide a double coverage where one of
4	Q. Let's talk about Sukegawa, which is		those coverages comes from the transparent
	another patent that you considered in your		conductor 8 and where the other one comes from
6	declaration for the '204 patent, is that correct?	1	several things.
7	A. Yes.	7	
8	(Document marked previously as Exhibit	8	terminal portion only?
9	Number 1005 was presented.)	9	
	BY MR. GIBSON:	10	terminal portion. Could you identify that for me?
11	Q. I've got another one. Apologize for	11	Q. Well, what we're looking at, for
12	that.	12	example, in 2C, would you consider that to be part
13	And would you agree that Sukegawa is		of the terminal portion?
14	addressing the exposed part of the wiring that's	14	
	used for testing the contact with the FPC?	15	portion, certainly.
16	A. Could you clarify what you mean by	16	
17		17	portion where Sukegawa is saying there should be
18	Q. That's what it's directed to.	1	double coverage with both a layer 8 and an
19	A. Among other things, it's it involves	19	insulator 9?
20	the open portion of the terminal, the opening in	20	A. Fig. 3C shows a TFT cross-section which
	layer 9, so that the FPC can have electrical	21	would be inside the display portion and, of
22	contact with the structures below it.	22	course, within the seal region. And Fig. 3D shows
23	Q. Right. And one of the problems with the	23	the two substrates 100, 200, between which would
24	prior art was that there could be corrosion in	24	be the seal region well, the sealant, I should
25	that open region?	25	say.
	Page 107		Page 109
1	A. That is what is disclosed in Sukegawa	1	So I think the clear teaching from
2	and Fig. 2 shows an example of that.	2	Sukegawa in the specification is that double
3	Q. Is Sukegawa directed to protecting a	3	coverage is necessary of layer 7 and as long as it
4	wire under an insulating layer?	4	is exposed to the environment outside the seal.
5	A. I'm not sure I can agree with that. It	5	Q. Right.
6	is a consequence or part of the diselecture in		
7	is a consequence or part of the disclosure in	6	A. So
1	Sukegawa, but I don't think his disclosure is	6 7	A. SoQ. I didn't mean to interrupt you.
8 9	Sukegawa, but I don't think his disclosure is focused on that. Q. When we look at Fig. 2C, for example, if	7 8 9	Q. I didn't mean to interrupt you.A. Just to get to the final point in your question then, the Fig. 3C doesn't have the
8 9 10	Sukegawa, but I don't think his disclosure is focused on that. Q. When we look at Fig. 2C, for example, if the wiring 7 were to continue to extend under 9,	7 8 9 10	Q. I didn't mean to interrupt you.A. Just to get to the final point in your question then, the Fig. 3C doesn't have the layer 8 in it because indeed, it's no longer
8 9 10 11	Sukegawa, but I don't think his disclosure is focused on that. Q. When we look at Fig. 2C, for example, if the wiring 7 were to continue to extend under 9, do you think there needs to be any other material	7 8 9 10 11	Q. I didn't mean to interrupt you.A. Just to get to the final point in your question then, the Fig. 3C doesn't have the layer 8 in it because indeed, it's no longer needed at that point because the additional
8 9 10 11	Sukegawa, but I don't think his disclosure is focused on that. Q. When we look at Fig. 2C, for example, if the wiring 7 were to continue to extend under 9, do you think there needs to be any other material above it to protect it from corrosion?	7 8 9 10 11 12	 Q. I didn't mean to interrupt you. A. Just to get to the final point in your question then, the Fig. 3C doesn't have the layer 8 in it because indeed, it's no longer needed at that point because the additional coverage comes from the other elements in the
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28 (Pages 106 - 109)

		1	
1	Page 110 where Sukegawa would end layer 8 in between	1	Page 112 about the relationship of layer 8 and 7.
	Fig. 3C and any of the other terminal portions and	$\begin{vmatrix} 1\\2 \end{vmatrix}$	Q. In looking at 2C, would one of ordinary
	he's silent on that.		skill in the art understand that once wiring 7
4	Q. Where there is sealant, would that		goes under strike that.
1	provide extra protection for wiring 7?	5	Assume in 2C you continued wiring line 7
6	A. It should. You know, it would be	1	under insulator 9, but didn't continue the ITO
1	speculation on my part to know if Sukegawa would		layer. Are you with me?
8		8	MR. SCHLITTER: Objection, form.
9	-	9	THE WITNESS: I can assume that, but of
	Q. And maybe you answered this, but I'm		course, I don't agree that that's at all
1	not I'm not sure I got a clean answer to it.		disclosed.
11	Would you agree that the display portion		BY MR. GIBSON:
1	of Sukegawa does not teach covering wire 7 with	12	
	both a layer 8 and an insulating film 9? A. I don't think it teaches one way or	13	Q. Just assume it for me. Would you do you believe there's any
14	•	1	need in terms of corrosion to have 8 continue
	another. It does show Fig. 3C, which is inside		
1	the display portion and the metal 7A and, of		above 7 as 7 goes further under insulator 9? A. I think the disclosure in Sukegawa is
1	course, 7B does not have layer 8 on it clearly.	17	6
	It's but it, of course, could be elsewhere. He's silent on it.		clear on exactly this question. He wants double coverage above wiring 7 because of the corrosion
			potential and that corrosion comes from the air
20	Q. It's not shown in Fig. 3C?	1	that's above and around both in fabrication and in
21	A. Indeed, it's it's not shown above		the use of this device.
	layer 7. Of course Fig. 3C does have ITO. It's		
1	on the left. It's 8A, forming the pixel	23	And so I think it's clear from Sukegawa
	electrode.		that if layer 7 is extended under the sealant,
25	Q. Right, but it's not covering wiring 7	25	then layer 8 must be, according to his teaching,
	Page 111		Page 113
	throughout the entire Fig. 3C?		extended as well, at least as far as as under
2	A. It's only covering the ITO element 8		the sealant to provide that double coverage and
1	is only covering the element 7C on part of it and		most likely a bit longer.
4	it's not above it in other regions.	4	Q. What in Sukegawa are you relying on for
5	Q. And when you say that Sukegawa is	5	that answer?
1	silent, you would agree there's nothing in the	6	A. His disclosure, his specification,
	text that says you're going to have wire		illustrations.
	layering wire 8 covering 7 and also being covered	8	Q. Can you be specific?
1	by 9 in the display region?	9	A. Every cross-section that illustrates
10	A. Could you rephrase the question or make		both element 7 and element 8 has the indium tin
	it more concise?		oxide 8 surrounding and going beyond wiring 7 on
12	Q. Sure. You said that Sukegawa is silent		all sides and that is because it's protecting it.
	on the need for 8 to be over 7 in the display		So it has to seal it all the way around.
	region, correct?	14	So if we if we extend 7, Sukegawa is
15	A. It seems that's largely correct. He has		clearly saying for corrosion protection, it needs
1	an instance where it is over where they do		to also extend 8 and this corrosion protection is
1	1		principally necessary at least on the inside of
18	Q. And you're looking at Fig. 3C that you		I'm sorry on the outside of the sealant during
1	just testified about when you say that?		its use, but during fabrication there's also the
20	A. Yes.		potential for corrosion and even in that case it
21	Q. All right. And is there anything in the		would likely be extended beyond as well, beyond
22	text that describes 8 overlapping 7 in the display	22	the sealant as well.
23	region?	23	Q. And if 7 is extending into the display
24	A. There is no disclosure on what should	24	region, is Sukegawa saying that 8 has to cover 7
25	happen in the display region, aside from Fig. 3C,	25	into the display region as well?
			29 (Pages 110 - 113)

	······································	T	
1 1	Page 114		Page 116
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	A. I think my answer's the same as it just was before. He shows in Fig. 3C an example where		inside well inside the display, it only has layer 9 over layer 7A.
1		1	
	part of it does and part of it doesn't and he doesn't say much more about the display portion		
	than that.	1	out of something like silicon nitrate nitride?
		5	
6	•		Sukegawa does mention that.
	art or your in your view, would one of the		8 1
	ordinary would one of ordinary skill in the art		that's used commonly in the microelectronics
	at some point stop layer 8 over layer 7 once it	ł	industry, is that right?
	enters the display region?	10	·
11	A. Yes, and that's certainly what's	11	Q. And that was known to someone of
	disclosed in Fig. 3C, in part of it.		ordinary skill in the art in 1997 to be a good
13	Q. Where would that happen?	1	protection layer?
14	A. He doesn't show.	14	2 I
15	Q. So how would one of ordinary skill in	1	ordinary skill in 1997 that it's an insulating
16	the art determine that?	1	material that can be used to protect the circuits
17	A. It would depend on, I suppose, many	1	below. Whether it's characterized as good or not
1	things, the design of of the display. I'm not		probably depends on the context. Sukegawa seems
19	sure I can say if there's a single answer to that.		to teach that it's not good enough, at least in
20	Q. In terms of the prior art, the prior art	20	the terminal portion.
	shows 7 extending into 13 and beyond it, correct,	21	Q. And that wasn't quite my question. So
22	in Fig. 2C, for example?	22	I'll move to strike as nonresponsive.
23	A. In Fig. 2C, wiring 7 extends beneath	23	Would someone of ordinary skill in the
24	element 13, certainly, and beyond it.	24	art in 1997 recognize that silicon nitride could
25	Q. And in 3E, wiring 7 is stopped, correct?	25	be used as a protection layer in the
	Page 115		Page 117
1	A. Well, Fig. 3E is the cross-section of	1	microelectronics industry?
2	the terminal which has a top-down view in 3A. So	2	A. Yes.
3	what you see is that wiring 7 is broken up into	3	Q. If we look at 3D?
4	two pads or rectangles. And in the cross-section,	4	A. I see it.
5	yes, there's a separation between the two.	5	
		5	Q. And Fig. 3C, there's a in 3D there's
6	Q. If you look at 3C	6	Q. And Fig. 3C, there's a in 3D there's a gap between element 200 and 31A, is that
6 7	Q. If you look at 3C A. I see it.		
		6	a gap between element 200 and 31A, is that
7 8	A. I see it.	6 7	a gap between element 200 and 31A, is that correct? A. Yes.
7 8 9	A. I see it.Q 7 is just covered by 9 there in	6 7 8	a gap between element 200 and 31A, is that correct?
7 8 9	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that 	6 7 8 9	a gap between element 200 and 31A, is that correct?A. Yes.Q. And then why don't you look at Fig. 2C?A. I see it.
7 8 9 10	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that correct? 	6 7 8 9 10 11	a gap between element 200 and 31A, is that correct?A. Yes.Q. And then why don't you look at Fig. 2C?
7 8 9 10 11	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that correct? A. 7A and 7B are only covered by 9. 	6 7 8 9 10 11	 a gap between element 200 and 31A, is that correct? A. Yes. Q. And then why don't you look at Fig. 2C? A. I see it. Q. And there's also a gap shown there as
7 8 9 10 11 12	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that correct? A. 7A and 7B are only covered by 9. Q. And would you agree that that's 	6 7 8 9 10 11 12	 a gap between element 200 and 31A, is that correct? A. Yes. Q. And then why don't you look at Fig. 2C? A. I see it. Q. And there's also a gap shown there as well, is that correct?
7 8 9 10 11 12 13	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that correct? A. 7A and 7B are only covered by 9. Q. And would you agree that that's sufficient to prevent corrosion? 	6 7 8 9 10 11 12 13 14	 a gap between element 200 and 31A, is that correct? A. Yes. Q. And then why don't you look at Fig. 2C? A. I see it. Q. And there's also a gap shown there as well, is that correct? MR. SCHLITTER: Objection, form.
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that correct? A. 7A and 7B are only covered by 9. Q. And would you agree that that's sufficient to prevent corrosion? MR. SCHLITTER: Objection, foundation. THE WITNESS: I can't say. The figure speaks for itself. It's I have no idea if Sukegawa would find that sufficient for that purpose, but it is an example of what he's shown here. BY MR. GIBSON: Q. All right. And there's not as we've said before, there's no ITO layer over there to 	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 a gap between element 200 and 31A, is that correct? A. Yes. Q. And then why don't you look at Fig. 2C? A. I see it. Q. And there's also a gap shown there as well, is that correct? MR. SCHLITTER: Objection, form. THE WITNESS: Which gap are you referring to in Fig. 2C? BY MR. GIBSON: Q. Well, let me ask it like this: If you're in 3D, the display portion, you're going to have that where 200 and 100 in the beginning of that, where 100 and 200 meet? A. The precise beginning of that is not clear. Some of the other prior art identifies the
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. I see it. Q 7 is just covered by 9 there in let's say 7A is just covered by 9, is that correct? A. 7A and 7B are only covered by 9. Q. And would you agree that that's sufficient to prevent corrosion? MR. SCHLITTER: Objection, foundation. THE WITNESS: I can't say. The figure speaks for itself. It's I have no idea if Sukegawa would find that sufficient for that purpose, but it is an example of what he's shown here. BY MR. GIBSON: Q. All right. And there's not as we've 	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 a gap between element 200 and 31A, is that correct? A. Yes. Q. And then why don't you look at Fig. 2C? A. I see it. Q. And there's also a gap shown there as well, is that correct? MR. SCHLITTER: Objection, form. THE WITNESS: Which gap are you referring to in Fig. 2C? BY MR. GIBSON: Q. Well, let me ask it like this: If you're in 3D, the display portion, you're going to have that where 200 and 100 in the beginning of that, where 100 and 200 meet? A. The precise beginning of that is not

30 (Pages 114 - 117)

	Page 118	T	Page 120
1	Q. But either in what we see in Fig. 3D or	1	Fig. 3E with that difference.
1	off to the left of what would be in Fig. 3D, we're	2	
3	going to have a display area, correct?	3	in Fig. 3B either, correct?
4	A. Yes.	4	A. That's correct, it's not.
5	Q. And when you're as I understand it,	5	Q. But we would know or a person of
6	there's going to be a layer 7 that's going to be	6	ordinary skill in the art would know that there's
	connected through that gap in 3D?	7	going to be sealant and a substrate 200 even
8	A. I'm not sure what you mean about	8	though they're not shown in 3B?
9	Fig. 3D. Maybe you could point me to it or draw	9	MR. SCHLITTER: Objection, form.
10	it. Of course layer 7 is not shown in Fig. 3D.	10	THE WITNESS: Well, those elements
11	Q. Right. But would you assume that there	11	well, the substrate 200 and 100 are shown in 3D
12	is a layer 7 in Fig. 3D based on what you see in	12	and a person of ordinary skill knows that the
13	the other figures?	13	sealant has to be between those and it would be
14	MR. SCHLITTER: Objection, form.	14	most common to place that offset from the edge as
15	THE WITNESS: Well, the other parts of	15	we've talked about.
16	Fig. 3 show an FPC and the terminal portion and	16	BY MR. GIBSON:
17	that does include Fig. 7. How that precisely	17	Q. But what I'm asking you specifically is,
18	matches up with Fig. 3D is not clear. It's not		in 3B, there's no sealant shown even though we
1	shown. But I do expect that there is a wiring 7	19	know it's going to be there?
20	or 7-1, 7-2 in Fig. 3D, largely underneath the FPC	20	MR. SCHLITTER: Objection, form.
	and the anisotropic conducting film that's	21	THE WITNESS: Fig. 3B does not show
	identified there.	1	sealant. A person of ordinary skill would not put
23	BY MR. GIBSON:	23	the sealant in the terminal portion. That's why
24	Q. Would you expect that it's going to		it's not shown.
25	extend beyond what we have as 31A, the left of	25	
	Page 119		Page 121
1	Page 119 31A, do you expect layer 7 is going to extend	1	BY MR. GIBSON:
1 2	Page 119 31A, do you expect layer 7 is going to extend beyond that?	1 2	BY MR. GIBSON: Q. You would agree that the terminal
1	Page 119 31A, do you expect layer 7 is going to extend beyond that? A. Figs. 3E, for example, 3B, show that	1 2 3	BY MR. GIBSON: Q. You would agree that the terminal portion connects the display portion, correct?
1 2 3 4	Page 119 31A, do you expect layer 7 is going to extend beyond that? A. Figs. 3E, for example, 3B, show that there's at least some portion of wiring 7 that is	1 2 3 4	BY MR. GIBSON:Q. You would agree that the terminal portion connects the display portion, correct?A. Perhaps through other portions that we
1 2 3 4 5	Page 119 31A, do you expect layer 7 is going to extend beyond that? A. Figs. 3E, for example, 3B, show that there's at least some portion of wiring 7 that is to the left, however slightly, but to the left of	1 2 3 4 5	BY MR. GIBSON:Q. You would agree that the terminalportion connects the display portion, correct?A. Perhaps through other portions that wemight identify, but certainly the substrate 100 in
1 2 3 4 5 6	Page 119 31A, do you expect layer 7 is going to extend beyond that? A. Figs. 3E, for example, 3B, show that there's at least some portion of wiring 7 that is to the left, however slightly, but to the left of the FPC in element 10.	1 2 3 4 5 6	BY MR. GIBSON:Q. You would agree that the terminal portion connects the display portion, correct?A. Perhaps through other portions that we might identify, but certainly the substrate 100 in 3D corresponds to the element 1 in Fig. 3B, 3C,
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Page 119 31A, do you expect layer 7 is going to extend beyond that? A. Figs. 3E, for example, 3B, show that there's at least some portion of wiring 7 that is to the left, however slightly, but to the left of the FPC in element 10. Q. And can you tell from Figs in Fig. 3D how far that's going to extend to the left after 31A ends? A. It's it's not shown in Fig. 3D, so I can't tell. But one thing I can tell is that in Fig. 3E and 3B, the terminal I'm sorry the substrate 200 is not included or shown, nor is the sealant. So wherever it is, it has to be the left of any wiring 7 in the terminal portion in this disclosure. Q. And that's just because you see that there's the substrate 200 isn't shown in 3E? A. It's because the sealant is not shown and the substrate is not shown. Q. Okay. But even if you look at say 3B, no substrate 200 is shown in 3B, correct?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 BY MR. GIBSON: Q. You would agree that the terminal portion connects the display portion, correct? A. Perhaps through other portions that we might identify, but certainly the substrate 100 in 3D corresponds to the element 1 in Fig. 3B, 3C, 3E. Q. If you look at 2C A. I see it. Q and wiring 2, you would consider that to be a scan line? A. That corresponds to the gate metal layer, so that is the same metal layer as the scan lines. There may be a difference between calling it a scan line in this portion or not, but it's certainly the same metal layer. Q. As the scan line? A. As the scan line. Sukegawa, of course, calls it the lower layer metal wiring 2. Q. But one of ordinary skill in the art would understand that's going to be a scan line, right?

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	Page 122		Page 124
	l it to that. It could be used for other things.	1	Fig. 3E. Well, to be more precise, he shows in
	2 Q. And if we're talking about a bottom gate		Fig. 3E that the upper layer metal wiring is split
1 3	3 TFT, would you assume 2 is a scan line?	3	· · · ·
	A. A person of ordinary skill cannot assume	4	
1	5 that.	5	1 8 9
(6	,
	7 bottom gate TFT?	7	layer metal wiring 2 as well as the transparent
8	8 1	8	conductor 8.
9	9 underneath the semiconducting layer, so at the	9	Q. But if we go to the right if you look
10) bottom of the TFT.	10	at 3E well, strike that.
11	Q. And if you assume that the let's	11	As we go into the display portion and we
12	2 assume that you've got a bottom gate TFT and that	12	go from 3E to say 3C, is there going to be a
13	³ wiring line 2 is a scan line.	13	connection that's made it's not shown here, but
14	A. I can assume that.	14	there's going to be a connection that's made
15	Q. And that's a structure that someone	15	between wire 7 and wire 2?
16	5 would see in industry?	16	MR. SCHLITTER: Objection, form.
17		17	THE WITNESS: Well, that that is not
18	certainly a person sees in industry, yeah, and	18	
	that's disclosed in Sukegawa in Fig. 3C, for	19	BY MR. GIBSON:
) example.	20	Q. Isn't it necessary to connect the data
21	-		line to the scan line?
	with 2A. That would be a scan line?	22	A. I think it's expressly incorrect to do
23		23	
1	electrode. At least in this portion, it's a gate	24	Q. I may have asked it incorrectly.
	electrode. It should also be part of the scan	25	But how are you going to connect to your
<u> </u>			
1	Page 123 line, but I'm not sure that's expressly in the	1	Page 125 data lines in what's disclosed in 3C?
1	specification.	2	A. Well, 3C includes a source and a drain.
3	-		Of course those are the data lines or involve the
4			data lines, for example, 7A. And the rest of the
5	· · · · · · · · · · · · · · · · · · ·		disclosure of Sukegawa is about the terminal
6		1	portion and there are many ways to connect what's
7			
1			shown in the terminal portion to that wiring 7.
8	Q. And what if it's a top gate TFT or let me first ask you, are you familiar with top	8	One way would be that somewhere off to the left of these terminal participations incide the
1			the left of these terminal portions inside the
1	gate TFTs as a term of art in the industry?		display to form an opening in insulator 3 and have
11	,		contact through that opening with the upper layer
	structure is at least nominally inverted and the		metal wiring 7, or whatever you want to call it,
	gate is the upper metal.		7A. That seems to be to me to be the first
14			thing that would come to the mind of a person of
	line?		ordinary skill looking at Sukegawa.
16		16	Q. And that's the structure you've just
1	the gate electrode.		discussed has the advantage of doesn't require
18	-		extra contacts and would conserve space?
19	*	19	MR. SCHLITTER: Objection, form.
	yes.	20	THE WITNESS: I'm I'm not sure what
21			you mean by those advantages. I don't see it has
	wiring 2 and a wiring 7?		any consequence on the amount of space being used.
23		23	And I'm not sure what you mean by extra contacts.
	does he call it? He shows a lower layer metal	24	One terminal is generally used to contact to one
105	-		
	wiring 2 and an upper layer metal wiring 7 in		data or scan line.

			De 100
1	Page 126 BY MR. GIBSON:	1	Page 128 foundation.
2		2	
	use a third wiring, for example, to connect your		complicated depends. I don't have enough
1	to have 2 to connect to 7; you can open up a	1	information to make any kind of statement to that
	hole and have 2 connect to 7?	1	regard
6			BY MR. GIBSON:
7		7	Q. Would you think
	wiring, for example?	8	A in general.
9	A. I'm not sure I'd use the phrase "third	9	Q. Would you think that it would take extra
	wiring" in this context because, you know, it's a		space?
1	claim term. So it would be an additional let	11	A. It depends.
	me let me clarify.	12	Q. Do you think it would well, strike
13	So if we did what I described, then		that.
	layer 7A can have electrical contact through the	14	In your view in 1997, would it have
	opening in insulator 3 to the lower metal wiring 2		been for the ordinary person of skill in the
1	without an additional wiring somewhere. But I		art been more common to use an additional wiring
1	don't want to characterize any of these as third	17	
	wirings.	1	be in contact?
19	Q. And I wasn't looking for that. I'm just	19	MR. SCHLITTER: Objection, foundation.
1	saying there's not an additional wiring that's	20	THE WITNESS: I can't say if there was a
21	going to be required the way you suggested you're		preference in that case.
	avoiding that additional wiring, correct?	1	BY MR. GIBSON:
23	A. Yes, that's that's true in the	23	Q. You don't know one way or the other?
	suggestion that I offered.	24	A. There's not enough information to know
25	Q. And that saves space?	25	one way or the other.
			Page 129
1	Page 127 A. Saves space compared to what?	1	Q. Would you agree in 1997 that a person of
$\begin{vmatrix} 1\\2 \end{vmatrix}$	Q. Compared to having a third wiring. I'm		ordinary skill in the art was aware of opening up
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	sorry, I don't want to use the term "third		contact holes in layer 3 as depicted in Fig. 7C to
4			enable a connection between 7A and 2A or between
5	It's better to avoid having additional		wiring 7 and wiring 2?
6		6	A. No, I'm not aware of anything like that.
7			It would make the TFT not work.
8	MR. SCHLITTER: Objection, form,	8	Q. And maybe I misspoke when I said 7A and
_	foundation.		2A.
10	THE WITNESS: I'm trying to follow you,	10	When you're talking about opening up
	but I don't know what you mean by a "third	l l	contact holes in 3, you were talking about
1	wiring."	1	having enabling a connection between 7 and 2,
	BY MR. GIBSON:		correct?
14	Q. I'm using the word "additional wiring"	14	A. The one option not the only option,
	now that you used		but one option would be indeed to create an
16	A. Okay. Well, can you tell me what you	1	opening somewhere inside the display portion, an
	mean by "additional wiring"?		opening in layer 3, so that some portion of 7A
18	Q. Well, how you suggested it. I'm not	F	could have contact with the lower layer metal
1	you're the you're the expert here. What if	1	wiring 2 through that opening.
1	you were going to not open up a contact hole	20	Q. And that was something that was known to
	between in layer 3 for 7 and 2 in Fig. 3C and		one of ordinary skill in the art in 1997?
	instead you use an additional wiring, wouldn't	22	A. It was known as one of multiple options.
	that be more complicated than just opening up a	23	Q. So if we look at still looking at the
	hole in 3 for contact between 7 and 2?	1	figures on where we have Figs. 3A, 3B and 3C?
25	MR. SCHLITTER: Objection, form and	25	A. I see it.
. L		1	
			33 (Pages 126 - 129)

	Page 130		Page 132
1	Q. Is 2A the gate of the TFT?	1	very strange display.
2	A. 2A is the gate electrode of that TFT.	2	Q. Right. Because you need to have lots of
3	Q. And what is to the left of the gate	3	pixels to have a good display?
4	electrode?	4	A. Usually.
5	MR. SCHLITTER: Objection, form.	5	Q. And so you would agree that you're going
6	THE WITNESS: Immediately to the left is	6	to have a number of pixel electrodes in the
7	the insulator 3, of course in that same horizontal	7	display portion that are going to extend out to
8	direction. Above that are the other elements of	8	the terminal portion, you're not just going to
9	the TFT, including one of the source drain	9	have one?
10	electrodes and the pixel electrode, 8A, formed of	10	MR. SCHLITTER: Objection, form.
11	the same transparent conductor, most commonly is 8	11	THE WITNESS: I don't think you're going
12	in the terminal portion.	12	to have any pixel electrodes in the display
13	BY MR. GIBSON:	13	portion that are going to extend to the terminal
14	Q. So you would agree that 8A is the pixel		portion.
15	electrode?	15	BY MR. GIBSON:
16	A. I do. That's what Sukegawa calls it,	16	Q. Instead you're going to have a plurality
17	the pixel electrode, 8A.	17	of pixels in the display portion?
18	Q. And you would agree that above the pixel	18	A. Certainly a plurality of pixels and each
19	electrode, there is no layer 9?	19	1 01
20	A. I can't agree to that. Layer 9	20	in a at least approximately rectangular shape
1	partially overlaps 8A.		connected to the TFT.
22	Q. Well, the part that there is part of	22	Q. To the right of the TFT we see 7A?
1	it that part of 8A right there that does not	23	A. Yes.
1	have a insulating layer 9 on top of it, correct?	24	Q. And I think we agreed that that is a
25	A. There is a portion of 8A that is not	25	data line?
		1	
	Page 131	1	Page 133
	covered by insulator 9, that's true.	1	A. Yes.
2	covered by insulator 9, that's true. Q. Do you know why that would have been	2	A. Yes.Q. Is the data line in the in the
2 3	covered by insulator 9, that's true. Q. Do you know why that would have been removed?	2 3	A. Yes.Q. Is the data line in the in the display region continuous across the display?
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34 (Pages 130 - 133)

	Page 124	T	Pogo 126
1	Page 134 Q. And the data lines are also isolated	1	Page 136 the terminal portion according to the disclosure
	from one another?	t	in Sukegawa.
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	A. Yes.	$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	Q. If you look at 3E
4	Q. And in Fig. C3 (sic) we have the	4	A. I see it.
		5	Q the scan line 2 is what's going from
	insulating layer 9 above 7A?		
6	A. In Fig. 3C we do, yes.	6	Do you know where that is going to
	Q. All right. And as this line 7A extends		
8	across the display region, is 9 going to be over	8	
	the entire length of that?	E	the way across through the display portion?
10	A. It's not shown, so it's not clear. It's	10	A. Element 2 is the conductor that is
	not disclosed.		illustrated in Fig. 3E that does go into the
12	Q. Is there anything to suggest that it	1	display portion. I disagree that it is identical
	would not?	1	to the scan line, as we talked about earlier.
14	A. There's nothing explicit that suggests	14	But it is the single conductor, the only
	it would not. I just note that in Fig. 3C,	1	one that does extend to the left towards the
	layer 9 does end over the pixel region.	1	display portion. So I think one of ordinary skill
17			would understand that at least that does go toward
1	portion, would you expect 7A to as 7A is	1	the display portion.
1	extending, to have 9 over it?	19	Q. And if you matched it with 3C, would you then up downtond that 2 would be the seen line?
20	A. I can't say one way or another. It's		then understand that 2 would be the scan line?
	just not shown.	21	A. Well, I wouldn't go quite that far. I
22	Q. And in Fig. 3C, the only place we don't		think if Fig. 3E were assumed to be connecting to
	have layer 9 is where we have the pixel electrode,		Fig. 3C, then I think it's appropriate to say that
	8A, correct?		element 2 in 3E does connect to element 2A in 3C.
25	A. That's true in Fig. 3C.	23	Whether or not they should be characterized as all
1	Page 135		Page 137
	Q. And everywhere we see 7A, we see layer 9		the same scan line, it's not clear. That
1	on top of it, correct?	2	connection is not shown.
3	\mathbf{A} \mathbf{C}		
	MR. SCHLITTER: Objection, form.	3	Q. Do you think that if you're connecting
4	THE WITNESS: In Fig. 3C, that is	3 4	3E to 3C, that 2 could be a data line?
45	THE WITNESS: In Fig. 3C, that is correct.	3 4 5	3E to 3C, that 2 could be a data line? A. Let me see if I understand your
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	THE WITNESS: In Fig. 3C, that is correct. BY MR. GIBSON: Q. And Fig. 3C shows the line 7A is going to be extended toward the terminal portion? A. Well, it shows it extending off the illustration and then there's an additional arrow showing us the direction of the terminal portion on that side. It doesn't say whether it actually extends out there. Q. Would a person of ordinary skill in the art understand that it would extend that way? A. There's not enough information given to know one way or the other. Well, on the other hand, I mean, we have lots of terminal portions disclosed here and clearly the metal 7 does not extend all the way there in a continuous fashion. It has to end at some point. Q. But you're not sure at what point that	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 3E to 3C, that 2 could be a data line? A. Let me see if I understand your question. You're asking me can the terminal in Fig. 3E be used to connect to the data line? Q. No. I'm asking you if you're connecting 3E to 3C if 2 is going to be the data line. MR. SCHLITTER: Object to form. THE WITNESS: If the terminal in 3E is used to connect to the gate electrode 2A in Fig. 3C, then it can be that that whole line could be referred to as the scan line. It's not necessary to be so, but that's certainly a common configuration. BY MR. GIBSON: Q. I mean, would you expect that someone of ordinary skill in the art would understand that configuration when looking at Fig. 3C and 3E? A. Well, one of ordinary skill would understand that that's one possibility. I don't

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	Page 138		Page 140
	by description from element 2 and neither of them		correct?
	are called scan lines.	$\begin{vmatrix} 2 \\ 2 \end{vmatrix}$	1 5 5 7
3			
	in the art would recognize that it would be a	4	Q. So even if you have plenty of available
	common configuration to have 2 be a scan line if	ł	contact area, you're limited by the size of the
	you were connecting Fig. 3 to Fig. 3C?	1	wiring on the flexible substrate 31, for example?
7			
1	that as a common, typical situation.	8	· · · · · ·
9			your contact area is in your terminal portion, the
10			contact the actual area where there's contact
11	Q. And Sukegawa, I think, uses the term	i	is limited by the size of what you have as 31?
12		12	A. I'm not trying to be difficult, but I
13	-	1	don't understand the question.
	not shown in Fig. 3A.	14	Q. Okay. Well, you see in 3D you see
15			31A and 31B?
1	carrier package also could be a flexible printed	16	A. Yes, I do.
	circuit?	17	
18		18	A. Well, element 31 is the flexible wiring
	terms that are often used interchangeably.		substrate of the tape carrier package 300 and 3
20	•		31B is the copper foil wirings. I don't see yet
	printed circuit is going to overlap Fig. 3A?		what 31A is. I could find that, but clearly the
22	A. Well, the tape carrier package that is		conductive portion is 31B.
	disclosed overlaps part of it. It's illustrated	23	Q. And you say that's part of the flexible
	in, for example, 3E, kind of the right portion of	1	substrate?
25	what's shown in Fig. 3A.	25	A. It appears that both 31A and 31B
	Page 139		Page 141
1			together form element 31 and that is the flexible
1	are you referring to?	2	wiring substrate.
3	A. Well, if we look at Fig. 3E, we see the	3	Q. And you're going to connect that to your
	anisotropic conducting film 10 which extends from		terminal portion?
1	the rightmost almost the rightmost portion of	5	A. It's shown in Fig. 3E, for example, as
	the terminal region, not quite, but almost, most	1	connecting through the anisotropic conducting film
1	of the way across the opening that's been formed		to the conductors in the terminal portion.
	in insulating film 9.	8	Q. And the film is element 10?
9	8 ,	9	A. Yes, thank you.
	see that the opening in element 9 is also shown	10	Q. And your contact area is going to be
	and so that anisotropic conducting film goes from		limited by the size of the wiring on the flexible
	the right side of Fig. 3A only part of the way		substrate, correct?
	through, at least approximately halfway through.	13	MR. SCHLITTER: Objection, form.
14	Q. And would you agree that when we're	14	THE WITNESS: That will be one of the
1	looking at Fig. 3A, there's transparent conductive		limitations in this context, but there are many
1	film 8 where the flexible printed circuit can		others.
1	overlap and then connect?		BY MR. GIBSON:
18	A. There is a portion in Fig. 3A, as well	18	Q. That would be one?
1	as in 3E where the anisotropic conducting film is	19	A. That would certainly be one.
	in direct contact with the ITO and that is through	20	Q. And if the flexible printed circuit is
	the opening in layer 9. That's not shown in		smaller than the available contact area, would you
	Fig. 3A, but we could identify that region. I		5
	think I did in my declaration.		way.
24	Q. And then in and the flexible printed	24	Why don't you turn to page 40 of your
25	circuit is going to have a certain dimension,	25	declaration?
			36 (Pages 138 - 141)

	Page 142	1	Page 144
1		1	is limiting the resistance, couldn't one of
2	-		ordinary skill in the art increase its size?
3	· · · · · · · · · · · · · · · · · · ·	3	A. That is one option available to those of
4	darker shade of gray, which you had in red in your	4	ordinary skill but, of course, that then makes the
5	declaration.	5	entire terminal portion larger and, of course,
6	Do you see that darker shade?	6	there are other terminals next to this that aren't
7	A. Well, the darker shade, of course, is	7	illustrated and there's a there's a limit to
8	indicating the opening in layer 9 through which	8	that.
9	*	9	Q. Let's take a look at Watanabe.
10		10	A. Thank you.
11	A. That's a subset of the contact area most	11	(Document marked previously as Exhibit
	likely.	12	Number 1004 was presented.)
13	Q. Why is it only a subset?		BY MR. GIBSON:
14	A. Most likely the anisotropic conducting	14	Q. And this is another one of the prior art
	film overlays much more than just that little		pieces that you considered?
	area.	16	A. Yes, it is.
17	Q. Where is it actually connecting then, to	17	Q. Do you know how wide a typical seal
	that area?		region of an LCD is?
19	A. Well, direct contact could be outside	19	A. There is no one answer to that.
1	that opening and but electrical contact would	20	Q. What would be typical?
1	be just in that opening.	21	A. In in 1997, I think a typical region
22	Q. And if the flexible printed circuit		would be in the range of millimeters.
	substrate is smaller than that available area,	23 24	Q. Can you give me an estimate?
24	that could be a possibility, correct?	24	A. It depends on the display.Q. But millimeters, not centimeters?
25	A. Well, I think it's unlikely. I think	23	
1	Page 143 the way design the design process generally	1	Page 145 A. I think for the larger sized displays,
	goes at least would be that a particular size of	ł	it could even get large enough to be close to the
	the terminal is determined based on other		scale of a centimeter, not multiple centimeters,
1	constraints and then a tape carrier package or		clearly not.
1	flexible substrate is chosen or designed to meet	5	Q. And would that be true in 1997?
	exactly what's needed in that terminal portion.	6	A. Yeah, I think that the upper bound for
7	Q. But let's assume that you've got a	7	the size of a seal region would be could be as
8	flexible substrate that's smaller than the	8	high as tens of millimeters but not that many tens
9	available area.	9	of millimeters.
10	A. I can assume that, sure.	10	Q. Do the adhesive properties of the seal
11	Q. Would you agree then that the shaded	11	material affect the weight the width of the
12	area is not limiting the resistance?	12	seal region?
13	A. In this unlikely assumption and	13	A. They certainly do. And Shiba, for
14	hypothesis, I can agree to that.	14	example, goes to some effort to complement those
15	Q. Then let's assume if the flexible		properties by structuring the bottom surface so
1	printed circuit is larger but the resistance of		that it has a little more surface area and thereby
1	the contact formed is within the specifications of		use the same set of materials but shrink the width
1	the system, would you then agree that the shaded		of the seal region and not compromise the
1	area is not limiting the performance of the LCD		adhesion.
	display?	20	Q. And so if you have a stronger adhesive,
21.	MR. SCHLITTER: Object to form.		it requires less width?
22	THE WITNESS: I can't agree to that in	22	A. That may be, but subject to other
	general, even under your assumptions.		constraints.
	BY MR. GIBSON:	24	Q. Such as? A Wall from one material to enother a
25	Q. Okay. In the event that the shaded area	25	A. Well, from one material to another, a
L			37 (Pages 142 - 145

<u> </u>			
1	Page 146 seal may be stronger or not. And let's say we	1	Page 14 MR. SCHLITTER: What page are you
1	have two materials that are both equally strong in		referring to?
	their adhesion properties, but there are other	3	MR. GIBSON: Page 54.
	factors in displays that are very important.	4	THE WITNESS: Yeah, I've reviewed it.
5	First would be lifetime behavior or I	5	BY MR. GIBSON:
-	should say reliability to temperature variations	6	Q. All right. So the sentence that begins
1	in the lifetime of the display and that may be		"Fig. 5 below shows," what do you mean by that
1	different, quite apart from the initial adhesive	8	statement?
9		9	A. Well, there's two sides to what I'm
	other considerations like that.		meaning there. First, I'm observing that when
11	Q. All right. But you would agree that in	11	compared to the prior art that's disclosed in
	general, a stronger adhesive requires less width?	12	
13	A. In general I can agree to that.		region by a factor of 8 or so, maybe 5. All
14	Q. And would you give would you agree		right. That's just what's illustrated in the
	that a given seal material has an optimum width		figures.
	that can be established?	16	In addition, I'm observing that I
17	MR. SCHLITTER: Objection, foundation.	17	also mean to say that central to the to the
18	THE WITNESS: It depends on how you're	18	disclosure in Watanabe is the presence of the
19	defining "optimum."	19	adjustment layers or adjusting layers let me
	BY MR. GIBSON:	20	get the term right the adjustment layers in the
21	Q. A width that is neither too wide nor too	21	sealing region around the lead portions. And by
22	small.	22	doing so, what he's of course trying to do is
23	MR. SCHLITTER: Same objection.	23	create a more equal gap between the substrates.
24	THE WITNESS: If you define it that way,	24	And when compared to the prior art, of
25	then you can you can a person of ordinary	25	course there's a less equal gap in the prior art.
	Page 147		Page 149
1	skill could find the optimum according to those	1	And so if we look at Shiba, for example, Shiba
	constraints, whatever you want to define those		improves his adhesion by having peaks and valleys,
	for.		an uneven surface, which in Fig. 5 Watanabe is
	BY MR. GIBSON:		removing or at least minimizing and decreasing by
5	Q. Well, for example, you don't want to use		the presence of those gap adjusting layers. So to
	more sealant material than you need, right?		compensate for that, it seems that he is forced to
7	A. As a general principle, I can agree with		widen the sealant region.
8	that.	8	Q. All right. So is it your testimony then
9	Q. And you don't want to use less than you	9	that the width of the sealing region in Watanabe
10	need, that wouldn't have good results?		is it doesn't depend upon the seal material,
11	A. As a general principle, I can agree with		but rather by the design of the gap adjusting
	that.		layers?
13	Q. If you look at I think it's page 55	13	A. That's not my testimony.
	of your declaration.	14	Q. Well, what you said here was, Watanabe
	You have a couple figures there and	15	is removing or at least minimizing and decreasing
15			the presence of the gap adjustment adjusting
	those are coming out of Watanabe?		
16	A. Yes, the figures on page 55 are	17	layers, so to compensate for that, it seems that's
16 17			layers, so to compensate for that, it seems that's forced to widen the sealant region.
16 17 18	A. Yes, the figures on page 55 are		
16 17 18 19	A. Yes, the figures on page 55 are reproductions, without modification as far as I	18 19	forced to widen the sealant region.
16 17 18 19 20	A. Yes, the figures on page 55 are reproductions, without modification as far as I can tell. Oh, I think in my declaration, I may	18 19 20	forced to widen the sealant region. And what I'm trying to understand is are
16 17 18 19 20 21	A. Yes, the figures on page 55 are reproductions, without modification as far as I can tell. Oh, I think in my declaration, I may have highlighted something in them, but they are	18 19 20 21	forced to widen the sealant region. And what I'm trying to understand is are you so you're saying he's widening the sealing
17 18 19 20 21 22 23	 A. Yes, the figures on page 55 are reproductions, without modification as far as I can tell. Oh, I think in my declaration, I may have highlighted something in them, but they are Fig. 9 and Fig. 5 from Watanabe. Q. And I think regarding Fig. 5 I thought you made a statement regarding Fig. 5. 	18 19 20 21	forced to widen the sealant region. And what I'm trying to understand is are you so you're saying he's widening the sealing region because he's using these gap adjusting
16 17 18 19 20 21 22 23	 A. Yes, the figures on page 55 are reproductions, without modification as far as I can tell. Oh, I think in my declaration, I may have highlighted something in them, but they are Fig. 9 and Fig. 5 from Watanabe. Q. And I think regarding Fig. 5 I 	18 19 20 21 22 23	forced to widen the sealant region. And what I'm trying to understand is are you so you're saying he's widening the sealing region because he's using these gap adjusting layers?

1			
	Page 150 He's widening it because he has removed unevenness	1	Page 15 Q. Where does it say that he will then
	from the seal region and, therefore, he needs a		require wider space for the sealant?
	wider seal to get the same adhesive strength even	$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	A. He shows a wider space in all of his
	with the same materials as compared to the prior		inventions.
4 5	art that he has.	5	Q. Where does he say that by decreasing the
-			unevenness, he has to have a wider space for the
6	Q. Is there any statement that you're		sealant?
	basing this on or is it just on Fig. 5?	8	A. I don't recall that he says something to
8	A. I'm recognizing what's true about his disclosure in Fig. 5 as compound to Fig. 0. I		that regard. He discloses it in his
9 10		1	illustrations.
	don't think he states this, but I'll note that		
	it's also exactly the same principle that Shiba	11	Q. But there's nothing disclosed in the
	uses to narrow the seal region.		in the text itself that this wider sealing range
13	Q. All right. But is there anything		this wider sealing area is required?
	where is there anything that other than	14	A. There is not a discussion of that in the
	Fig. 5 and your comparison to Fig. 9 of the prior		specification, but the principle is is true
	art, is there anything else that you have to		nonetheless. If he wants to keep the same seal
	support your statement?		strength and he has removed unevenness, then he
18	A. Well, in addition to that would be the	1	will need a larger width to a seal region as he's
19	other examples and embodiments that he has of		illustrating.
20	adjustment layers and all of them have a wider	20	Q. What if he just uses stronger sealant?
21	seal region. It seems to be every embodiment has	21	A. That might be done.
22	a wider seal region than the prior art that he's	22	Q. He doesn't rule out using a stronger
23	showing.		sealant?
24 25	Q. What are you referring to in particular?	24	A. He doesn't speak about changing
25	A. Well, I'm referring to we were just	25	sealants. He's silent on that.
	Page 151		Page 15
	talking about Fig. 5 and in compared with	1	Q. Are there any quantitative measurements
	Fig. 9. Fig. 9 is the prior art and it does not	2	that you're using to form this conclusion?
3	have gap adjusting layers and clearly, Watanabe is	3	A. What do you mean by "quantitative
4	saying that that has a more uneven lead portion	1	measurements"?
		4	
5	surface underneath the sealant.	5	Q. Dimensions, are there any dimensions
6	So Fig. 5 adds those adjustment layers	5 6	Q. Dimensions, are there any dimensions that you're using?
6 7	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a	5 6 7	Q. Dimensions, are there any dimensionsthat you're using?A. I'm observing the illustrations from the
6 7 8	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is	5 6 7 8	Q. Dimensions, are there any dimensions that you're using?A. I'm observing the illustrations from the figure and recognizing the effect of his invention
6 7 8 9	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as	5 6 7 8	Q. Dimensions, are there any dimensionsthat you're using?A. I'm observing the illustrations from thefigure and recognizing the effect of his inventionon the evenness of the bottom substrate.
6 7 8 9 10	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal	5 6 7 8 9 10	Q. Dimensions, are there any dimensionsthat you're using?A. I'm observing the illustrations from thefigure and recognizing the effect of his inventionon the evenness of the bottom substrate.Q. And the figures themselves don't have
6 7 8 9 10	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a	5 6 7 8 9 10	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct?
6 7 8 9 10 11	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider	5 6 7 8 9 10	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no.
6 7 8 9 10 11	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art.	5 6 7 8 9 10 11 12 13	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the
6 7 8 9 10 11 12 13 14	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just	5 6 7 8 9 10 11 12 13 14	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break.
6 7 8 9 10 11 12 13 14 15	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just looking at the proportions of the figures where	5 6 7 8 9 10 11 12 13 14 15	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break. VIDEOGRAPHER: Going off record. This
6 7 8 9 10 11 12 13 14 15	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just	5 6 7 8 9 10 11 12 13 14 15	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break.
6 7 8 9 10 11 12 13 14 15 16	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just looking at the proportions of the figures where the sealing region is shown compared to the prior art?	5 6 7 8 9 10 11 12 13 14 15 16	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break. VIDEOGRAPHER: Going off record. This
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just looking at the proportions of the figures where the sealing region is shown compared to the prior art? A. I'm doing more than that. As I've just explained, there's a technical reason why that	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break. VIDEOGRAPHER: Going off record. This is the end of Media Unit Number 3. The time is 3:15. (Short recess.) VIDEOGRAPHER: We're back on record.
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just looking at the proportions of the figures where the sealing region is shown compared to the prior art? A. I'm doing more than that. As I've just explained, there's a technical reason why that should be. Q. All right. Is that technical reason	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break. VIDEOGRAPHER: Going off record. This is the end of Media Unit Number 3. The time is 3:15. (Short recess.) VIDEOGRAPHER: We're back on record. This is the beginning of Media Unit Number 4 in the deposition of Dr. Michael Escuti. The time is
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	So Fig. 5 adds those adjustment layers and the unevenness is reduced and as a consequence, we also see that the seal region is wider. And that general trend is also true as well in Fig. 1, Fig. 6, Fig. 8A which has a seal- region that is not a constant width, so it's a little more nuanced, but they all have a wider seal region than the prior art. Q. And you're observing that from just looking at the proportions of the figures where the sealing region is shown compared to the prior art? A. I'm doing more than that. As I've just explained, there's a technical reason why that should be. Q. All right. Is that technical reason explained by Watanabe?	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. Dimensions, are there any dimensions that you're using? A. I'm observing the illustrations from the figure and recognizing the effect of his invention on the evenness of the bottom substrate. Q. And the figures themselves don't have dimensions, correct? A. There's no scale provided for them, no. MR. GIBSON: If we could change the media and we'll take a break. VIDEOGRAPHER: Going off record. This is the end of Media Unit Number 3. The time is 3:15. (Short recess.) VIDEOGRAPHER: We're back on record. This is the beginning of Media Unit Number 4 in the deposition of Dr. Michael Escuti. The time is 3:31. Please continue.

Page 154	Page 1
1 Would you agree that these figures are	1 figure that you could understand?
2 frequently not drawn to scale?	2 A. In many cases, that is true. Of course,
3 A. Are you referring to the figures in the	3 that's not always true, but yes.
4 Watanabe patent?	4 Q. Would you agree that in Fig. 5, the
5 Q. The figures in patents in general, do	5 distinctive features are trying to show the
6 you agree they're frequently not drawn to scale?	6 absence of substrate gap adjusting regions?
7 A. In general, that's that's true. I	7 MR. SCHLITTER: Objection, form.
8 would I would agree that most commonly scale is	8 THE WITNESS: Maybe you mean you
9 not provided in patent figures.	9 should rephrase.
10 Q. And do you have any reason to believe	10 BY MR. GIBSON:
11 that these are drawn to scale?	11 Q. You mean the presence?
12 A. Well, based on the absolute dimensions,	12 A. Well, could you just restate the
13 they're not likely drawn to scale. After all, the	13 question for me? I don't understand it.
14 dimensions of the seal regions in all of this are	14 Q. All right. Fig. 5 is trying to show
15 substantially similar to the area of the nine	15 something regarding substrate gap adjusting
16 pixels that are disclosed and, of course, there's	16 regions, correct?
17 more than nine pixels in the displays that would	17 MR. SCHLITTER: Objection, form.
18 typically be imagined here.	18 THE WITNESS: Well, Fig. 5 is referred
19 But the but most of my comments we	19 to as a plan view showing a liquid crystal display
20 just discussed about refer to the relative	20 apparatus according to the second embodiment of
21 comparison between the figures, not the absolute.	21 the present invention. There are gap adjusting
22 Q. And the comparison you're making between	22 layers identified, 25 and 27, in that figure.
	23 BY MR. GIBSON:
24 Fig. 9 to Fig. 5, for example?	24 Q. And those are discussed in the text of
24 Fig. 9 to Fig. 5, for example?	
24 Fig. 9 to Fig. 5, for example?25 A. Well, for example, when comparing Fig. 5Page 155	Q. And those are discussed in the text of25 the specification, correct?
 24 Fig. 9 to Fig. 5, for example? 25 A. Well, for example, when comparing Fig. 5 Page 155 1 to Fig. 9, the prior art, the seal region relative 	 Q. And those are discussed in the text of 25 the specification, correct? Page 1 A. Elements 25 and 27 are indeed discussed
 24 Fig. 9 to Fig. 5, for example? 25 A. Well, for example, when comparing Fig. 5 Page 155 1 to Fig. 9, the prior art, the seal region relative 2 to the other dimensions is substantially smaller 	 Q. And those are discussed in the text of the specification, correct? Page 1 A. Elements 25 and 27 are indeed discussed 2 in the text.
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 24 Fig. 9 to Fig. 5, for example? 25 A. Well, for example, when comparing Fig. 5 Page 155 1 to Fig. 9, the prior art, the seal region relative 2 to the other dimensions is substantially smaller 3 as illustrated and the seal in Fig. 5 is larger as 4 illustrated. 5 Q. Would you expect that Fig. 9 is drawn to 6 scale? 7 A. I don't suspect that any of these 8 figures are drawn to an absolute scale. 9 Q. Would you understand that artwork such 10 as this in patents is designed to describe certain 11 features or to show distinctive features?	 Q. And those are discussed in the text of 25 the specification, correct? Page 1 1 A. Elements 25 and 27 are indeed discussed 2 in the text. 3 Q. And if you look at 3A and 3B 4 actually, let's look at I meant to look at 5 '204, 3A and 3B. 6 A. So I've got 3A and 3B of the '204 before 7 me. 8 Q. All right. And those are 3A is 9 showing an adjustment layer 301? 10 A. 3A shows multiple adjustment layers 301. 11 Q. And 3B calls 301 an adjustment film, but
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Page 155 1 to Fig. 9, the prior art, the seal region relative 2 to the other dimensions is substantially smaller 3 as illustrated and the seal in Fig. 5 is larger as 4 illustrated. 5 Q. Would you expect that Fig. 9 is drawn to 6 scale? 7 A. I don't suspect that any of these 8 figures are drawn to an absolute scale. 9 Q. Would you understand that artwork such 10 as this in patents is designed to describe certain 11 features or to show distinctive features? 12 MR. SCHLITTER: Objection, foundation, 13 form. 14 THE WITNESS: Well, that's my 15 understanding, that the figures in patents are 16 meant to convey some kind of relationship between 17 the elements and not an engineering drawing. 18 BY MR. GIBSON: 19 Q. And they don't show all the usually a 20 figure doesn't show all the elements? 21 A. It's quite common that a figure does not 22 show all the elements.	 Q. And those are discussed in the text of 25 the specification, correct? Page 1 A. Elements 25 and 27 are indeed discussed 2 in the text. Q. And if you look at 3A and 3B 4 actually, let's look at I meant to look at 5 '204, 3A and 3B. A. So I've got 3A and 3B of the '204 before 7 me. Q. All right. And those are 3A is 9 showing an adjustment layer 301? A. 3A shows multiple adjustment layers 301. Q. And 3B calls 301 an adjustment film, but 12 you would understand that to be an adjustment 13 layer? A. I understand that those are the same 15 element and I don't think there's a difference 16 between the adjustment layer terminology and 17 adjustment film terminology. Q. And would you agree that they're located 19 next to the external connection lines? A. One of the adjustment layers is adjacent 21 to the external connection lines but, of course, 22 there are many others that are not. The second

40 (Pages 154 - 157)

	Page 158		Page 1
	3A and 3B?		two conductors that are labeled the external
2			connection line are an external connections to
3		1	something external to the sealant, whereas all the
4	•	1	other adjustment layers that are conductors serve
5	-		to adjust the height difference.
6		6	Q. Isn't their purpose to create a uniform
7	· · ·		
8	·	8	A. The adjustment layers would have that
9	A. It does, both 6A and 6B include those	9	purpose, yes.
	two elements.	10	Q. And would you understand that to be the
11	Q. And they're both below and next to the	1	purpose in Claim 54 as well?
	external connection lines?	12	A. The purpose of what in Claim 54?
13	A. Some of them are below and some are to	13	Q. To conduct the first and second
	the side and external to it.		conductive layers?
15	Q. Where are the first and second	15	A. In Fig. 6A and 6B, I don't see a
	conductive layers in the '204 patent?		structure that meets the limitations Claim 54.
17	A. In these figures?	17	Q. But Claim 54 does refer to a first and
18	· •	1	second conductive layer, correct?
19	A. Well, by the terms first and second	19	A. It does, of course with many limitations
	conductive layers, are you referring to Claim 54		on it.
21	claim terms?	21	Q. What's your understanding of the purpose
22	Q. That's fine. You can use Claim 54.		of those layers?
23	A. Well, I think that the first	23	A. Are you referring to the layers that are
24		1	in 6A or are you referring to the first and second
25	first conductive line over the substrate also then	25	conductive layers in Claim 54?
3 4 5 6 7 8 9 10 11 12 13 14	 Fig. 6A and B. But I can, of course, identify that there are two metal layers in 6A and 6B that are patterned for different purposes. Q. Okay. What are those? A. Well, the lower conductive layer that's shown in 6A and 6B is used to form multiple first adjustment layers 501, and the second conductive layer that's been deposited and patterned forms both the external connection lines 108 and the 502 second adjustment layers. Q. Do those overlap with the sealant? A. In 6A and 6B, all of those elements are underneath the sealant. Q. And what would you understand the 	4 5 6 7 8 9 10 11 12 13 14 15	 A. The claim doesn't say what the purpose of those are. It speaks to the relative relationship of the first and second conductor and the connection between them and what's above them and regions of of them, but doesn't say what the purpose of them is. Q. What would one of ordinary skill in the art, after reading the '204 patent, learn would be the purpose of having those two layers? MR. SCHLITTER: Objection, form. THE WITNESS: In Claim 54, one possibility is what's illustrated in Fig. 4A, where there's a connection that goes across the sealant toward the display portion. So they serve to connect the terminal to something inside the
17 18 19 20	purpose of the first and second conductive layers to be?A. Do you mean in these figures 6A and 6B?Q. We can start with that.A. Well, I'll have to refresh my memory on	17 18 19 20	display. BY MR. GIBSON: Q. Any other purpose? A. That's one example. There certainly
16 17 18 19 20 21	 to be? A. Do you mean in these figures 6A and 6B? Q. We can start with that. A. Well, I'll have to refresh my memory on the figures in the specification. In Figs. 6A and 	17 18 19 20 21	BY MR. GIBSON:Q. Any other purpose?A. That's one example. There certainly could be other purposes.
16 17 18 19 20 21 22	 to be? A. Do you mean in these figures 6A and 6B? Q. We can start with that. A. Well, I'll have to refresh my memory on the figures in the specification. In Figs. 6A and 6B, a cross-section of a the cross-section of B 	 17 18 19 20 21 22 	BY MR. GIBSON:Q. Any other purpose?A. That's one example. There certainlycould be other purposes.Q. What would they be?
16 17 18 19 20 21 22 23	 to be? A. Do you mean in these figures 6A and 6B? Q. We can start with that. A. Well, I'll have to refresh my memory on the figures in the specification. In Figs. 6A and 6B, a cross-section of a the cross-section of B to B prime, which appears most likely somewhere 	 17 18 19 20 21 22 23 	BY MR. GIBSON:Q. Any other purpose?A. That's one example. There certainlycould be other purposes.Q. What would they be?A. Can you rephrase the question for me to
16 17 18 19 20 21 22 23 24	 to be? A. Do you mean in these figures 6A and 6B? Q. We can start with that. A. Well, I'll have to refresh my memory on the figures in the specification. In Figs. 6A and 6B, a cross-section of a the cross-section of B 	 17 18 19 20 21 22 23 	BY MR. GIBSON:Q. Any other purpose?A. That's one example. There certainlycould be other purposes.Q. What would they be?

	b 1/0	1	
	Page 162 skill in the art understand from reading the '204	1	A. I see it.
	2 patent would be the purpose of the first and	2	Q. And that's located across the sealant?
1 3		3	-
4			do extend from one side to the other and also
1 5			extend away from the terminals.
	to reduce the unevenness in the gap, whether or	6	
	not they extend it all the way through the sealant		connection lines?
	and into the display portion.	8	
1	BY MR. GIBSON:		looking in Fig. 5, that's not the case everywhere.
10	Q. Any other purpose?	10	
11			parallel adjustment layer and external connection
12		1	lines?
	Fig. 5.	13	A. In 3A, it shows the adjustment layers
14	-		that are at least illustrated in parallel with the
15			external connection lines.
16		16	Q. And in 6A, which we looked at a minute
17		1	ago, the two adjustment layers 501 and 502 are
18			located across the sealant?
	layers is to provide an equal gap between the two	19	A. They do extend from one side of the
	substrates, ultimately to improve display image	1	sealant to the next and underneath.
	quality and display image contrast as he says in	21	Q. And they're also in parallel to the
	Column 3.		external connection lines?
23		23	A. While 501, the first adjustment layers
24	sealant located?	1	are in parallel, 502 is not. 502 is illustrated
25		1	as orthogonal.
	Page 163		Page 165
1	figures that that show it, Fig. 5, for example,	1	Q. If we look at Shiba.
1	and I think that's fairly emblematic. It's	2	A. Which part?
3	-	3	Q. Oh, Fig. 3. I don't think we've talked
	display, but there needs to be an opening, at	4	a lot about Fig. 3 yet. We wouldn't want to leave
	least one opening sometimes there's many	1	that one out.
6		6	Are the signal lines identified as X1,
	filled after the seal has been applied and the two	i i	X2, X3, X4?
8			,,
9		Ιð	A. No.
		8	 A. No. O. What lines do you believe those are?
10	Q. And would you understand that the	9	Q. What lines do you believe those are?
	Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap	9 10	Q. What lines do you believe those are?A. Those are referred to as the data lines,
11	Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe?	9 10 11	Q. What lines do you believe those are?A. Those are referred to as the data lines, for example, Column 5, line 5.
11 12	Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe?A. In Fig. 5, they completely overlap. In	9 10 11 12	Q. What lines do you believe those are?A. Those are referred to as the data lines, for example, Column 5, line 5.Q. Would you understand that one of
11 12	Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe?A. In Fig. 5, they completely overlap. In other figures they partially overlap.	9 10 11 12 13	 Q. What lines do you believe those are? A. Those are referred to as the data lines, for example, Column 5, line 5. Q. Would you understand that one of ordinary skill in the art might use data and
11 12 13 14	Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe?A. In Fig. 5, they completely overlap. In other figures they partially overlap.Q. And so you would agree that typically	9 10 11 12 13	 Q. What lines do you believe those are? A. Those are referred to as the data lines, for example, Column 5, line 5. Q. Would you understand that one of ordinary skill in the art might use data and signal lines?
11 12 13 14 15	 Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe? A. In Fig. 5, they completely overlap. In other figures they partially overlap. Q. And so you would agree that typically the sealant is along the edge of the display; it's 	9 10 11 12 13 14 15	 Q. What lines do you believe those are? A. Those are referred to as the data lines, for example, Column 5, line 5. Q. Would you understand that one of ordinary skill in the art might use data and signal lines? A. Yes. I think I'm getting tired and
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111 122 133 144 155 166 177 188 199 200 21	 Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe? A. In Fig. 5, they completely overlap. In other figures they partially overlap. Q. And so you would agree that typically the sealant is along the edge of the display; it's not, for example, in the middle of the display? MR. SCHLITTER: Object to form. THE WITNESS: It is typically on the periphery or edge of the display. BY MR. GIBSON: Q. And if you could look at Fig. 3A of the 	9 10 11 12 13 14 15 16 17 18 19 20 21	 Q. What lines do you believe those are? A. Those are referred to as the data lines, for example, Column 5, line 5. Q. Would you understand that one of ordinary skill in the art might use data and signal lines? A. Yes. I think I'm getting tired and and didn't hear them as essentially the same thing to a person of ordinary skill, but yeah, I agree that they they can be used interchangeably. Q. But I will agree with you that the patent does call them data lines. A. I didn't mean to be so abrupt, but it's
111 12 13 14 15 16 17 18 19 20 21 22	 Q. And would you understand that the substrate gap adjusting layers 25 and 27 overlap with the sealant in Watanabe? A. In Fig. 5, they completely overlap. In other figures they partially overlap. Q. And so you would agree that typically the sealant is along the edge of the display; it's not, for example, in the middle of the display? MR. SCHLITTER: Object to form. THE WITNESS: It is typically on the periphery or edge of the display. BY MR. GIBSON: Q. And if you could look at Fig. 3A of the '204 patent. 	9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. What lines do you believe those are? A. Those are referred to as the data lines, for example, Column 5, line 5. Q. Would you understand that one of ordinary skill in the art might use data and signal lines? A. Yes. I think I'm getting tired and and didn't hear them as essentially the same thing to a person of ordinary skill, but yeah, I agree that they they can be used interchangeably. Q. But I will agree with you that the patent does call them data lines. A. I didn't mean to be so abrupt, but it's been a long long few hours.

42 (Pages 162 - 165)

1	Page 166	1	Page 168
1	region 11?	1	A. Fig. 3 is, after all, an expansion of
2		2	the box labeled A in Fig. 1 and what's true in
3		E E	Fig. 3 should be true in Fig. 1 as well for that
4		1	portion.
5	· · · · · · · · · · · · · · · · · · ·	5	Q. And in Fig. 1, do you see where the scan
6		6	lines are?
7	the data lines in Fig. 1?	7	A. I see where their driver is and where
8		8	their wirings in those big blocks are, 7-21 to
9	they're not illustrated X1, X2, X3, but there are	1	7-24, but I don't see the lines themselves.
1	the elements 7-11 through 7-18 that hold the	1	They're not illustrated.
	connections to the data lines and immediately	11	Q. Would you agree the scan lines are going
1	above them on the substrate would be the data	12	to be fed into the display from the right-hand
13	lines.	1	side of Fig. 1?
14	Q. So they're fed into the display from the	14	A. I do agree, in a manner that's at least
	bottom of Fig. 1?	15	similar and analogous to Fig. 3, they would extend
16	A. That's that's generally correct, yes.		from the wiring film and go underneath the sealant
17	Q. And how do the data lines get their	1	toward the display area. Although, the one
	signal in Shiba?	1	important difference is they would also have to
19	A. Do you mean what connects to the	19	cross the wiring 127.
	terminal regions around the data lines?	20	Q. Right, because we don't have the wiring
21	Q. Right. Isn't there a driver?	21	127 at the bottom of the rectangle?
22	A. There may be. I don't recall. I'd have	22	A. That's correct because it would short
23	to look to find out. Maybe you can point me to	23	all those lines.
1	where that is. There is a driver board mentioned	24	Q. But you would expect the scan lines to
25	in, for example, Column 5. I don't think it's	25	go in from the right-hand side and be connected to
	Page 167		Page 169
1	illustrated or numbered.	1	the drivers you pointed out, 7-21 to 7-24?
2	Q. Would you understand that driver board	2	A. Yes, that's correct.
	would be at the bottom of Fig. 1?	3	Q. Are the looking at the bottom side of
4	A. The driver board could be could be		Fig. 1 and the right side of Fig. 1 where the
	arranged somewhere near the bottom of Fig. 1.		lines are going in, how are they positioned
	It's not disclosed and I think there are many ways		relative to the sealant?
	to do it. Certainly one could put it off to the	7	A. I'll try to answer your question, but
	side and then connect it up that way. But I think	8	
			you may need to repinase it. The data lines and
9	a very common way to do it would be to have the	9	you may need to rephrase it. The data lines and the scan lines extend across the sealant in a way
	a very common way to do it would be to have the driver board at the bottom or near the bottom of		the scan lines extend across the sealant in a way
10	driver board at the bottom or near the bottom of	10	the scan lines extend across the sealant in a way that might be characterized as orthogonal to it,
10 11	driver board at the bottom or near the bottom of Fig. 1.	10 11	the scan lines extend across the sealant in a way that might be characterized as orthogonal to it, not parallel to the sealant.
10 11 12	driver board at the bottom or near the bottom of	10	the scan lines extend across the sealant in a way that might be characterized as orthogonal to it,
10 11 12 13	driver board at the bottom or near the bottom ofFig. 1.Q. And in Fig. 1, would you understand	10 11 12 13	the scan lines extend across the sealant in a way that might be characterized as orthogonal to it, not parallel to the sealant. Q. Could you call it transverse?
10 11 12 13	driver board at the bottom or near the bottom of Fig. 1.Q. And in Fig. 1, would you understand these data lines to go across the sealant region the same way it's shown in Fig. 3?	10 11 12 13	the scan lines extend across the sealant in a way that might be characterized as orthogonal to it, not parallel to the sealant.Q. Could you call it transverse?A. I think that's an alternate way to
10 11 12 13 14 15	driver board at the bottom or near the bottom of Fig. 1.Q. And in Fig. 1, would you understand these data lines to go across the sealant region	10 11 12 13 14 15	the scan lines extend across the sealant in a way that might be characterized as orthogonal to it, not parallel to the sealant.Q. Could you call it transverse?A. I think that's an alternate way to express it, yeah.
10 11 12 13 14 15 16	driver board at the bottom or near the bottom of Fig. 1.Q. And in Fig. 1, would you understand these data lines to go across the sealant region the same way it's shown in Fig. 3?A. I'm sorry. I should correct myself just	10 11 12 13 14 15	 the scan lines extend across the sealant in a way that might be characterized as orthogonal to it, not parallel to the sealant. Q. Could you call it transverse? A. I think that's an alternate way to express it, yeah. Q. And if you look at Fig. 3 again of
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	Page 170		Page 172
1	A. I might reverse the order of that. The	1	A. Yes, that's correct.
2	seal region 111 covers a substantial portion of	2	Q. Would you agree that the gap adjusting
3	wiring 127, at least four of the lines. Two of	3	layers that are described in Watanabe can also be
4	the lines are, of course, inside the seal region	4	made from the same material that's used to form
5	and not under it.	5	the signal lines?
6	Q. And then there's several that are under	6	MR. SCHLITTER: Objection, form and
7	it?	7	foundation.
8	A. There are several that are under it and	8	THE WITNESS: Well, Column 12 and
9	those are pictured in Fig. 6.	9	beginning in line roughly 49 and then that
10	Q. And then would you agree that there are	10	following paragraph discusses that issue and I
11	portions of the sealant region that have no wiring	11	think maybe more generally says that the material
12	lines 127?	12	of the substrate gap adjusting layers 25 and 27 is
13	A. I do agree. For example, in Fig. 1, the	13	the same, in this embodiment at least, as the
14	entire bottom horizontal portion of the seal does	14	material used in the first embodiment. And then
15	not have wiring 127 under it.	15	he goes on to clarify it could be used as the same
16	Q. But even in Fig. 3, you can see areas	1	material as the signal lines and so on.
17	where there's sealant and no wires, correct?	17	BY MR. GIBSON:
18	A. Yes.	18	Q. So you would agree?
19	Q. And looking back at Watanabe, would you	19	A. That's I do agree that's what's
20	agree that Watanabe discloses an adjustment layer?	20	disclosed in Watanabe.
21	A. To be precise, he calls it a gap	21	Q. So let's look back at Shiba for a
22	adjusting layer and he discloses several kinds.	22	moment.
23	Q. Is that the gap adjusting layer	23	In Fig. 4 where you identified Item 741,
24	electrically isolated from the auxiliary line?	24	that's on the counter substrate, correct?
25	MR. SCHLITTER: Objection, form	25	A. Yes, the connecting protrusion 741 and
	Page 171		Page 173
1	Page 171 THE WITNESS: I don't	1	Page 173 its brothers and sisters are on the counter
1 2	-		-
	THE WITNESS: I don't		its brothers and sisters are on the counter
2	THE WITNESS: I don't MR. SCHLITTER: and foundation.	2 3	its brothers and sisters are on the counter substrate.Q. And that's where you say the sealant is
2 3	THE WITNESS: I don't MR. SCHLITTER: and foundation. THE WITNESS: I don't think that	2 3 4	its brothers and sisters are on the counter substrate.
2 3 4	THE WITNESS: I don't MR. SCHLITTER: and foundation. THE WITNESS: I don't think that Watanabe references an auxiliary line at all.	2 3 4	its brothers and sisters are on the counter substrate.Q. And that's where you say the sealant is contacting an ITO layer is on the counter substrate, is that correct?
2 3 4 5	THE WITNESS: I don't MR. SCHLITTER: and foundation. THE WITNESS: I don't think that Watanabe references an auxiliary line at all. BY MR. GIBSON:	2 3 4 5 6	its brothers and sisters are on the counter substrate.Q. And that's where you say the sealant is contacting an ITO layer is on the counter
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	THE WITNESS: I don't MR. SCHLITTER: and foundation. THE WITNESS: I don't think that Watanabe references an auxiliary line at all. BY MR. GIBSON: Q. Is the you say there's multiple gap adjustment layers. Do you agree there's at least two in Watanabe? A. There's at least two designs of those adjusting layers. Q. And you have a 25 and a 27 in Watanabe, correct? A. In Fig. 5, there's adjusting layer 25 and 27, and they correspond to those that are near the scan and data lines respectively. Q. Is 25 electrically isolated? A. All of the adjusting layers in Fig. 5 are said to be electrically isolated from the lead portions that they're next to. Q. They're electrically isolated from the TFTs?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 its brothers and sisters are on the counter substrate. Q. And that's where you say the sealant is contacting an ITO layer is on the counter substrate, is that correct? A. I am saying that, but it's not limited to that. As you can see, 741 is part of what it what the sealant 113 contacts. But as the layer the ITO layer comes up well, I should say it comes diagonally down and then across the display, it's it's labeled 541. So it touches both of those regions. Q. But that's on the counter substrate side? A. It is all on the counter substrate side. Q. And there is no sealant touching the ITO on the substrate side? A. Not that's disclosed in Shiba. Q. And if you look at Fig. 6, the sealant that you're saying is touching an ITO layer is
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$2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 $	THE WITNESS: I don't MR. SCHLITTER: and foundation. THE WITNESS: I don't think that Watanabe references an auxiliary line at all. BY MR. GIBSON: Q. Is the you say there's multiple gap adjustment layers. Do you agree there's at least two in Watanabe? A. There's at least two designs of those adjusting layers. Q. And you have a 25 and a 27 in Watanabe, correct? A. In Fig. 5, there's adjusting layer 25 and 27, and they correspond to those that are near the scan and data lines respectively. Q. Is 25 electrically isolated? A. All of the adjusting layers in Fig. 5 are said to be electrically isolated from the lead portions that they're next to. Q. They're electrically isolated from the TFTs?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 its brothers and sisters are on the counter substrate. Q. And that's where you say the sealant is contacting an ITO layer is on the counter substrate, is that correct? A. I am saying that, but it's not limited to that. As you can see, 741 is part of what it what the sealant 113 contacts. But as the layer the ITO layer comes up well, I should say it comes diagonally down and then across the display, it's it's labeled 541. So it touches both of those regions. Q. But that's on the counter substrate side? A. It is all on the counter substrate side. Q. And there is no sealant touching the ITO on the substrate side? A. Not that's disclosed in Shiba. Q. And if you look at Fig. 6, the sealant that you're saying is touching an ITO layer is again on the counter substrate? A. In Fig. 6 it's even more clear and yes,

44 (Pages 170 - 173)

Page 174		Page 176
-	1	the substrate.
	2	Q. Which we would understand to be an array
	3	substrate based on the fact that it's got a TFT
		and pixel electrodes and it's for an LCD display,
	6	A. Well, that's not the language of this
substrate or element 200.	7	specification.
Q. Now, if you look at the '204 patent, if	8	Q. I understand. But someone of ordinary
we look at Claim 54.	9	skill in the art would understand that we're
A. I've got it.	10	talking about the array substrate there, not the
Q. And in Claim 54, we're talking about the	11	counter substrate?
array substrate when we look at the first use of	12	A. Well, the language of array substrate is
the word "substrate"?	13	what's used in Shiba. I'm simply holding to the
A. If the substrate has thin film	14	language that the spec in in the '204 which
transistors and pixel electrodes and it is an LCD	15	refers to these two substrates as simply a
device, then yes, it would correspond to the array	16	substrate in Claim 54 which, yes, would include
substrate in Shiba.	17	the thin film transistors and the active matrix
Q. All right. And we know in the very	18	electronics and the counter substrate, which would
bottom line on Column 19, it says a counter	19	be the other one. And certainly nearly all of the
substrate facing a substrate.	20	limitations in Column 20 apply to the substrate
Do you see that?	21	which would have the active matrix on it.
A. Yes, I do.	22	Q. And would that also be the same for
Q. Is there any other mention about what	23	Claim 31?
the counter substrate is going to be strike	24	A. I'll have to verify.
that.	25	Claim 31 includes in its first few
Page 175		Page 177
_	1	limitations a very similar set that refers to the
-		substrate having thin film transistors and a
	3	counter substrate facing that first substrate. So
A. Claim 54 is silent on that.	4	what we just talked about in Claim 54 I think
Q. So the limitations about what's on the		applies to Claim 31.
substrate strike that.	6	MR. GIBSON: All right. Why don't we
The limitations that follow in claim	7	take a break? I want to check my notes and then
in Column 20 apply to what is on the array	8	I'll probably wrap up.
substrate, correct?	9	VIDEOGRAPHER: We're going off record.
A. Except for the first limitation, I think	10	The time is 4:13.
that's correct, at least for Claim 54.	11	(Short recess.)
Q. And the limitation you're referring to	12	VIDEOGRAPHER: We're now back on record.
is a liquid crystal material provided between the	13	The time is 4:24. Please continue.
substrate and the counter substrate?	14	MR. GIBSON: I don't have any further
A. That's correct.	15	questions at this point, but I'll reserve my right
Q. So we know there's going to be a liquid	16	to ask additional questions if you ask questions.
	17	MR. SCHLITTER: Okay. I have a topic.
crystal material in between the two substrates	17	
crystal material in between the two substrates from that limitation, correct?	18	EXAMINATION
	18	EXAMINATION BY MR. SCHLITTER:
from that limitation, correct?	18	
from that limitation, correct? A. From that limitation, of course the	18 19 20	BY MR. SCHLITTER:
from that limitation, correct? A. From that limitation, of course the first one where it's called the liquid crystal	18 19 20	BY MR. SCHLITTER: Q. So would you please refer to the '204
from that limitation, correct?A. From that limitation, of course the first one where it's called the liquid crystal display device.Q. All right. And then everything after that is applying to what's on the array substrate,	18 19 20 21	BY MR. SCHLITTER: Q. So would you please refer to the '204 patent?
from that limitation, correct?A. From that limitation, of course the first one where it's called the liquid crystal display device.Q. All right. And then everything after	18 19 20 21 22 23	BY MR. SCHLITTER:Q. So would you please refer to the '204 patent?A. I've got it.
	 we look at Claim 54. A. I've got it. Q. And in Claim 54, we're talking about the array substrate when we look at the first use of the word "substrate"? A. If the substrate has thin film transistors and pixel electrodes and it is an LCD device, then yes, it would correspond to the array substrate in Shiba. Q. All right. And we know in the very bottom line on Column 19, it says a counter substrate facing a substrate. Do you see that? A. Yes, I do. Q. Is there any other mention about what the counter substrate is going to be strike that. Page 175 Is there any mention in the in Claim 54 about what is going to be on the counter substrate? A. Claim 54 is silent on that. Q. So the limitations about what's on the substrate strike that. The limitations that follow in claim in Column 20 apply to what is on the array substrate, correct? A. Except for the first limitation, I think that's correct, at least for Claim 54. Q. And the limitation you're referring to is a liquid crystal material provided between the substrate and the counter substrate? A. That's correct.	substrate is not touching the ITO layer, correct?1A. Well, just to be clear, the other2substrate we're talking about is element 200 in3this answer and the question previously and that's4called the array substrate. So yes, I agree the5sealant is not touching the ITO on the array6substrate or element 200.7Q. Now, if you look at the '204 patent, if8we look at Claim 54.9A. I've got it.10Q. And in Claim 54, we're talking about the11array substrate when we look at the first use of12the word "substrate"?13A. If the substrate has thin film14transistors and pixel electrodes and it is an LCD15device, then yes, it would correspond to the array16substrate facing a substrate.20Do you see that?21A. Yes, I do.22Q. Is there any other mention about what23the counter substrate is going to be strike24that.25Page 17515Is there any mention in the in1Claim 54 is silent on that.6Q. So the limitations about what's on the5substrate strike that.6The limitation stat follow in claim7in Column 20 apply to what is on the array8substrate, correct?9A. Except for the first limitation, I think10that's correct, at least for Claim 54.11Q. And the limitation you're referri

	Page 178		Page 180
1	'204 patent?		that region and that could be serving one of the
2	A. In the '204 patent, there's multiple		other objectives I mentioned.
3	objectives and one of them certainly is to provide	3	BY MR. SCHLITTER:
4	*	4	Q. You also mentioned unevenness. Is there
5	the display portion.	5	any limitation in Claim 31 that relates to the
6	Q. Is there any other?	6	objective of preventing unevenness of the gap?
7	A. There's a another that involves the	7	A. Yes, certainly. There's an adjustment
8	objective of reducing the gap unevenness by means	8	layer that's identified and that adjustment layer
9	of the adjustment layers that are provided.	9	must extend under the sealant and that goes to
10	Q. Any other objectives that you can	10	that objective.
11	recall?	11	Q. Are there any limitations in Claim 31
12	A. There are two other objectives, as best	12	that relate to the objective of providing strong
13	I recall. One of them is to provide a strong	13	adhesion of the sealant?
14	adhesion of the sealant to the lower substrate.	14	MR. GIBSON: Objection, scope.
15	And the last objective I can recall is to provide	15	THE WITNESS: Yes, there is. There's a
16	a reliable connection to the FPC in the terminal	16	limitation that says the sealant is in direct
17	portion.	17	contact with the second insulating film and so
18	Q. Would you refer, please, to Claim 31?	18	that's toward that objective.
19	A. I've got it.	19	BY MR. SCHLITTER:
20	Q. Do you see that one of the limitations	20	Q. Is there any limitation well, are
21	in Claim 31 is an auxiliary line?	21	there any other limitations in Claim 31 that
22	A. I do see in Claim 31 the auxiliary line	22	relate to the objective of stronger adhesion?
23	limitation.	23	MR. GIBSON: Objection, scope.
24	Q. And another limitation is an external	24	THE WITNESS: Well, at least indirectly,
25	connection line?	25	the transparent conductive film is expressly not
	 Page 1'79		Page 181
1	A. Yes, and there's several limitations on	1	in contact with the sealant. There's a limitation
2	that external connection line.	2	that says the flexible printed circuit over an
3	Q. What is the objective of the '204 patent	1	electrical contact with the external connection
	with respect to the adjustment strike that.	4	line through a transparent conductive film.
5	What is the objective of the '204 patent	5	So there is a transparent conductive
6	with respect to the auxiliary line and the	6	film involved and the next limitation that I
7	external connection line?	7	already read about, the sealant, dictates that it
8	MR. GIBSON: Objection, scope.	8	should not it should not be under the seal.
9	THE WITNESS: Well, the objective in	9	BY MR. SCHLITTER:
10	that case has to do with the reducing the	10	Q. Are there any limitations in Claim 31
	resistance of the connection from the terminal	1	that relate to the objective of providing a
			reliable connection to the FPC?
12	portion at least partially into the sealant but	14	
	portion at least partially into the sealant but potentially beyond.		
13	potentially beyond.	13	MR. GIBSON: Objection, scope.
13 14	potentially beyond. BY MR. SCHLITTER:	13 14	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read
13 14 15	potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in	13 14 15	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that
13 14 15 16	potentially beyond.BY MR. SCHLITTER:Q. What are there any limitations inClaim 31 that relate to the objective of lowering	13 14 15 16	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with
13 14 15 16 17	potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance?	13 14 15 16 17	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the
13 14 15 16 17 18	potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance? A. Well, those those two lines and the	13 14 15 16 17 18	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the transparent conductive film.
13 14 15 16 17 18 19	 potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance? A. Well, those those two lines and the connection that's formed between them, the 	13 14 15 16 17 18 19	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the transparent conductive film. BY MR. SCHLITTER:
13 14 15 16 17 18 19 20	 potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance? A. Well, those those two lines and the connection that's formed between them, the electrical connection, would serve that objective. 	13 14 15 16 17 18 19 20	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the transparent conductive film. BY MR. SCHLITTER: Q. Is there any limitation in Claim 54
 13 14 15 16 17 18 19 20 21 	 potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance? A. Well, those those two lines and the connection that's formed between them, the electrical connection, would serve that objective. Q. Would they serve any other objective? 	13 14 15 16 17 18 19 20 21	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the transparent conductive film. BY MR. SCHLITTER: Q. Is there any limitation in Claim 54 relating to the objective of lowering resistance?
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 13 14 15 16 17 18 19 20 21 22 23 	 potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance? A. Well, those those two lines and the connection that's formed between them, the electrical connection, would serve that objective. Q. Would they serve any other objective? MR. GIBSON: Objection, scope. THE WITNESS: They may. They also 	 13 14 15 16 17 18 19 20 21 22 23 	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the transparent conductive film. BY MR. SCHLITTER: Q. Is there any limitation in Claim 54 relating to the objective of lowering resistance? MR. GIBSON: Objection, scope. THE WITNESS: Well, after this long day,
 13 14 15 16 17 18 19 20 21 22 23 24 	 potentially beyond. BY MR. SCHLITTER: Q. What are there any limitations in Claim 31 that relate to the objective of lowering resistance? A. Well, those those two lines and the connection that's formed between them, the electrical connection, would serve that objective. Q. Would they serve any other objective? MR. GIBSON: Objection, scope. 	 13 14 15 16 17 18 19 20 21 22 23 24 	MR. GIBSON: Objection, scope. THE WITNESS: The limitation I just read about the flexible printed circuit goes to that end. It's meant to be an electrical contact with the external connection line through the transparent conductive film. BY MR. SCHLITTER: Q. Is there any limitation in Claim 54 relating to the objective of lowering resistance? MR. GIBSON: Objection, scope.

	Page 182		Page 184
1	external connection line that needs to overlap it	1	the sealant.
	and have electrical contact to it, and this can be		BY MR. SCHLITTER:
1	used toward that objective.	3	Q. Are there any limitations in Claim 54 of
4		1	the '204 patent that pertain to the objective of
5	Q. Are there any limitations in Claim 54		
	relating to the objective of preventing unevenness	6	MR. GIBSON: Objection, scope.
		7	THE WITNESS: Yes, there is. There is a
8	A. Yes, the adjustment layer that's		sealant that is limited to be in direct contact
1	provided in the limitation says an adjustment	1	with the second insulating film.
	layer at least part of the adjustment layer		BY MR. SCHLITTER:
	extending under the sealant goes toward that	11	Q. Do any of the other elements of Claim 54
1	objective.		pertain to this objective
13	I'm sorry. I just noticed that in the	13	MR. GIBSON: Objection, scope.
	second round of questions, you started to ask me		BY MR. SCHLITTER:
1	about Claim 54 instead of Claim 31 and I didn't	15	Q of providing strong adhesion of the
1	track that. So I apologize. Maybe you should		sealant?
17	Q. This is why I can't find it.	17	MR. GIBSON: Objection, scope.
18	A re-ask ask me again. As I said,	18	THE WITNESS: The other elements refer
1	it's been a long day. I'm sorry. Could you		to a transparent conductive layer that are over a
	perhaps ask me again?		first region of the second conductive line and
21	Q. Okay. With respect to Claim 54, are		it's clear that the FPC is meant to connect in
	there any limitations in Claim 54 that relate to		that region as well, and that also corresponds to
	•		allowing the sealant to connect directly to the
24	MR. GIBSON: Objection, scope.		second insulating film without the ITO below it.
25	THE WITNESS: Yes, there's a first	25	
	Page 183		Page 185
1	conductive line, a second conductive line and	1	BY MR. SCHLITTER:
	these are both mentioned that to have a	2	Q. Are there any limitations in Claim 54
1	limitation where they are in electrical contact		that relate to providing a reliable connection of
		1	the FPC?
	that objective.	5	MR. GIBSON: Objection, scope.
1	BY MR. SCHLITTER:	6	THE WITNESS: Yes, there is. There's a
1		-	,
17	O. Are there any elements of Claim 54 that		limitation that reads the second conductive line
7	Q. Are there any elements of Claim 54 that relate to preventing unevenness of the gap between		limitation that reads the second conductive line and the flexible printed circuit are in electrical
8	relate to preventing unevenness of the gap between	8	and the flexible printed circuit are in electrical
8 9	relate to preventing unevenness of the gap between the substrates?	8 9	and the flexible printed circuit are in electrical contact through the transparent conductive layer.
8 9 10	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the	8 9 10	and the flexible printed circuit are in electrical
8 9 10 11	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose.	8 9 10 11	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record?
8 9 10 11 12	relate to preventing unevenness of the gap between the substrates?A. Yes, there's a conductive layer over the substrate that's provided for that purpose.Q. Is there any other limitation relating	8 9 10 11 12	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the
8 9 10 11 12 13	relate to preventing unevenness of the gap between the substrates?A. Yes, there's a conductive layer over the substrate that's provided for that purpose.Q. Is there any other limitation relating to the conductive layer that pertains to the	8 9 10 11 12	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38.
8 9 10 11 12 13 14	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap?	8 9 10 11 12 13	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.)
8 9 10 11 12 13 14 15	 relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap? MR. GIBSON: Objection, form. 	8 9 10 11 12 13 14 15	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.) VIDEOGRAPHER: We're back on record.
8 9 10 11 12 13 14 15 16	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap? MR. GIBSON: Objection, form. THE WITNESS: Well, the full claim	8 9 10 11 12 13 14 15 16	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.)
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8 9 10 11 12 13 14 15 16 17 18	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap? MR. GIBSON: Objection, form. THE WITNESS: Well, the full claim limitation that mentions a conductive layer reads a conductive layer over the substrate. And then	8 9 10 11 12 13 14 15 16 17 18	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.) VIDEOGRAPHER: We're back on record. The time is 4:40. Please continue. BY MR. SCHLITTER: Q. Earlier today you were asked about
8 9 10 11 12 13 14 15 16 17 18 19	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap? MR. GIBSON: Objection, form. THE WITNESS: Well, the full claim limitation that mentions a conductive layer reads a conductive layer over the substrate. And then an additional limitation says wherein the	8 9 10 11 12 13 14 15 16 17 18 19	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.) VIDEOGRAPHER: We're back on record. The time is 4:40. Please continue. BY MR. SCHLITTER: Q. Earlier today you were asked about Example 3 of the '204 patent and Figs. 4A and 4B
8 9 10 11 12 13 14 15 16 17 18 19 20	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap? MR. GIBSON: Objection, form. THE WITNESS: Well, the full claim limitation that mentions a conductive layer reads a conductive layer over the substrate. And then an additional limitation says wherein the conductive layer is electrically isolated from the	8 9 10 11 12 13 14 15 16 17 18 19 20	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.) VIDEOGRAPHER: We're back on record. The time is 4:40. Please continue. BY MR. SCHLITTER: Q. Earlier today you were asked about Example 3 of the '204 patent and Figs. 4A and 4B and you said that redundancy was implicit in the
8 9 10 11 12 13 14 15 16 17 18 19 20 21	relate to preventing unevenness of the gap between the substrates? A. Yes, there's a conductive layer over the substrate that's provided for that purpose. Q. Is there any other limitation relating to the conductive layer that pertains to the objective of preventing unevenness of the gap? MR. GIBSON: Objection, form. THE WITNESS: Well, the full claim limitation that mentions a conductive layer reads a conductive layer over the substrate. And then an additional limitation says wherein the conductive layer is electrically isolated from the other conductive elements that are listed.	8 9 10 11 12 13 14 15 16 17 18 19 20 21	and the flexible printed circuit are in electrical contact through the transparent conductive layer. MR. GIBSON: Why don't you go off the record? VIDEOGRAPHER: We're going off the record. The time is 4:38. (Short recess.) VIDEOGRAPHER: We're back on record. The time is 4:40. Please continue. BY MR. SCHLITTER: Q. Earlier today you were asked about Example 3 of the '204 patent and Figs. 4A and 4B and you said that redundancy was implicit in the structure that's disclosed in the '204 patent.
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		1	
1	Page 186 A. There are no limitations in Claim 31 or	1	Page 188 well, in 1997 it was well-known to one of ordinary
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$			skill in the art that if you had two lines running
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	Claim 54 that require that, but if the two conductors in both of those claims are connected	1	in parallel, that could lower the resistance
	through the first inter-layer film or the first		versus just having one line?
4	insulating film, there will be at least partial	5	
1			
	redundancy by that connection.		1997 and Shiba shows a good example of that.
	Q. Is it necessary to know the process by		• • • • • • • • • • • • • • • • •
	which a structure is made in order to determine	1	of this in the '403 (sic) the '204 doesn't
	whether it is covered by Claim 31 or Claim 54?		describe any sort of problem with sealant
10	MR. GIBSON: Objection, form.		connections, correct?
11	THE WITNESS: It is certainly not	11	A. In your question you referred to '403.
	required to know the process by which it's made to		I assume you mean the '413?
	determine if it meets Claim 51 (sic) or the	13	Q. I'm sorry. The '413 we talked about
	structure in Claim 54.	}	yesterday.
15	MR. SCHLITTER: What specifically was	15	A. Well, the specification is the same in
1	your objection?		both of those patents. So whatever I said about
17	MR. GIBSON: I objected to form.		that applies to the '204 patent as well.
18	MR. SCHLITTER: In what respect? In	18	Q. Right. There's nothing in the '204
	what respect?		patent that discusses that somehow the prior art
20	MR. GIBSON: The let me look back at		as having trouble having the sealant connect to
	the question. The question was compound and		the substrate or bond with the substrate?
1	vague.	22	
	BY MR. SCHLITTER:		discussion about the '413 specification, that
24	Q. Let me restate the question.		there is no explicit discussion of that in the
25	Is it necessary to know the process by	23	'204 specification.
	Page 187		Page 189
	which a structure is has been made in order to	1	Q. And, in fact, it was well-known in the
2	determine whether it is covered by Claim 31?	2	art that a sealant would bond better with an
2 3	determine whether it is covered by Claim 31? MR. GIBSON: Objection, form.	2 3	art that a sealant would bond better with an insulating layer than a transparent conductive
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48 (Pages 186 - 189)

Page 190	Page 192
1 in order. The '204 patent, which the witness made	1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER
2 some annotations on, we're going to mark as	2 I, Sandra L. Rocca, a State of Illinois
3 Exhibit 1012. And the Shiba patent, which is	3 licensed Certified Shorthand Reporter, License No.
4 Patent No. 5,684,555, where the witness made some	4 084-003435, do hereby certify:
5 markings on, we are going to mark that as	5 That on the 6th day of September, 2013,
6 Exhibit 1013.	6 at 9:49 a.m., 115 South LaSalle Street, Chicago,
7 MR. MANZO: You hadn't used those	7 Illinois, the deponent MICHAEL J. ESCUTI, Ph.D.
8 numbers before.	8 personally appeared before me;
9 MR. GIBSON: Not today.	9 That the said MICHAEL J. ESCUTI, Ph.D.
10 MR. SCHLITTER: That's fine.	10 was duly sworn by me to testify and that the
11 (Whereupon, the proceedings concluded	11 foregoing was stenographically recorded and
12 at 4:50 p.m.)	12 constitutes a true record of the testimony given
13	13 and the proceedings had at the aforesaid
14	14 deposition;
15	15 That the deposition terminated at
16	16 4:50 p.m.;
17	
18	
	18 deposition was not waived, and the deposition was
19	19 submitted for signature. Pursuant to Rule 30(e)
20	20 of the Rules of Civil Procedure, if deponent does
21	21 not appear or read and sign the deposition within
22	22 30 days, or make other arrangements for reading
23	23 and signing, the deposition may be used as fully
24	24 as though signed, and this certificate will then
25	25 evidence such failure to appear as the reason for
Page 191	Page 193
1 UNITED STATES PATENT AND TRADEMARK OFFICE	1 signature not being obtained;
BEFORE THE PATENT TRIAL AND APPEAL BOARD 2	2 That I am not counsel for nor related to
3 INNOLUX CORPORATION,)	3 any of the parties herein, nor a relative or
) 4 Petitioner,)	4 employee of such attorney or counsel for any of
)	5 the parties hereto, nor am I interested directly
5 vs.) IPR2013-00068	6 or indirectly in the outcome hereof.
) U.S. Pat. No. 6 SEMICONDUCTOR ENERGY) 8,066,204	7 IN WITNESS WHEREOF, I have hereunto set
LABORATORY CO., LTD.,)	8 my hand and seal of office this day of
7) Defect Occurrence	9 , 2013.
Patent Owner.) 8	10
9 I, MICHAEL J. ESCUTI, Ph.D., being first	11
10 duly sworn, on oath say that I am the deponent in 11 the aforesaid deposition taken on September 6,	12 SANDRA L. ROCCA, CSR, RPR, RMR, CRR
12 2013; that I have read the foregoing transcript of	CSR License No. 084-003435
13 my deposition, consisting of pages 1 through 193	13 Expires May 31, 2015
14 inclusive, and affix my signature to same.15	14
as it now appears	15
16 as it now appears with corrections	16
17 18 MICHAEL J. ESCUTI, Ph.D.	17
19	18
20 SUBSCRIBED and sworp to	19
SUBSCRIBED and sworn to 21 before me this day of	20
, 2013.	21
22	22
23 Notary Public	23
24	24
25	25

49 (Pages 190 - 193)

[& - 301]

Page 1

o	1100 2:3	00.25 05.16 17 20	100.10 25 100.1
&	1100 2:3 111 61:16 169:24	90:25 95:16,17,20 96:7,21,22 97:8	188:18,25 190:1 211 48:21 40:1 50:2
& 2:2,8 4:6,22	170:2	116:12,15,24	211 48:21 49:1 50:2
0	112 24:15 28:4,7	128:14 129:1,21	50:18,20 52:25 53:1 2200 2:14
084-003435 192:4	112 24:13 28:4,7 113 24:20 28:13,14	128.14 129.1,21	2200 2:14 24 74:1
193:12	51:25 52:1,2,8	188:6 189:4,11	
1	71:15 73:11 79:7	1:51 104:5 105:5	241 51:4,6,7,12 52:2 52:7,8 53:1 61:23
	99:16 100:24		66:12 86:16
1 9:14,16 29:1,4,11	101:10 103:10	2	25 156:22 157:1
31:10 40:25 45:2	173:8	2 60:21 104:1 107:2	162:15 163:10
60:17 70:12,12,14	114 24:22 99:17	121:10,19 122:3,13	171:12,14,17
71:1,8 72:2 75:5,11	100:25 101:10	123:22,25 124:4,7	172:12
75:18 77:7,20,21	115 1:15 2:9 4:6	124:15 126:4,5,15	251 68:17
78:16 92:12 121:6	73:8 192:6	127:21,24 128:17	256 54:25,25
151:10 166:6,7,15	11:10 60:18	129:5,12,19 136:5	230 34.23,23 27 35:19 93:12
167:3,5,11,12,19,23	11:26 60:23	136:10,20,24 137:4	156:22 157:1
168:2,3,5,13 169:4	11.20 00.25 12 172:8	137:9 138:1,5	162:15 163:10
169:4 170:13	120 2:14	20 175:8 176:20	171:12,15 172:12
191:13	120 2.11	200 49:3,21 50:18	28 3:20 74:1
10 119:6,24 139:4	121 70:3	50:20 52:25 108:23	2a 122:22,23 123:6
141:8	12 7 29:8,15,18,24	109:23 117:6,19,20	123:14,16 129:4,9
100 89:11 108:23	30:16 31:10,12,14	119:13,18,22 120:7	130:1,2 136:24
109:23 117:19,20	31:25 32:3,5,11,19	120:11 174:3,7	130:1,2 130:24
120:11 121:5	32:25 33:23 34:16	2007 59:6	2c 107:9,24 108:12
1001 100:8	34:19 35:1,5,23	2008 59:6	108:14 112:2,5
1004 3:10 144:12 1005 3:11 106:9	36:11 37:9 38:10	2011 3:21 6:2	114:22,23 117:9,15
1005 3:11 106:9 1008 3:12 53:13,14	39:1 40:23 41:1,6	2013 1:17 4:3	121:8
53:17	41:15,24 42:16,16	191:12,21 192:5	3
1009 3:14 82:6,9,9	43:2,3,6,8 45:5,7	193:9	
1010 3:16 82:6,9	47:15,16,22 48:5,20	2013-00068 4:10	3 2:3 29:5 31:11
83:2	48:21 50:21,23,24	2015 193:13	69:25 70:10,13
1011 3:17 83:20,21	51:3 52:10 53:5	204 3:15,16 5:22	94:19 95:3,5 105:3
83:24	70:2 93:7 94:1	8:21 9:2,8,14,17,22	118:16 125:10
1012 3:19 9:6 83:20	168:19,21 169:16	10:1 25:19,19 28:17	126:15 127:21,24
190:3	169:20,24 170:3,12	46:8 50:11 61:1,6	128:17 129:3,11,17
1013 3:20 28:20	170:15	63:3,7,9,11 75:1,20	130:7 138:6 140:19
190:6	12:47 104:2	91:11,21 93:20 94:5	153:16 162:22
106 3:11	13 107:24 114:21,24	94:10 95:7,12 100:7	165:3,4 166:2
107 61:10,12	144 3:10	106:6 157:5,6 158:4 158:16 161:9 162:1	167:14,25 168:1,3
107 01:10,12 108 61:16 159:10	177 3:5	162:25 163:22	168:15 169:15
109 61:16	187 3:5		170:16 185:19
11 166:1	19 174:19	174:8 176:14	30 192:19,22
110 61:16 83:1	193 191:13	177:20,24 178:1,2 179:3,5 184:4	300 138:12 140:19 301 157:0 10 11
	1997 46:3,7 88:25	179:3,3 184:4 185:19,21 188:8,17	301 157:9,10,11 163:25
	89:10,13 90:4,12,16	103.17,21 100.0,17	105.25

[31	- 6	b]
-----	-----	----

Page 2

21 10.4 12 17 21 22	110.7 0 10 12 10 20	4b 185:19	104.11 105.0 106.0
31 10:4,12,17,21,23	118:7,9,10,12,18,20		184:11 185:2 186:2 186:9,14 187:13,17
11:2,17,22 12:1	119:8,10 120:11	5	, , ,
13:10 119:24 140:6	121:6 140:14	5 3:4 31:14 32:3	541 69:6,17,18,19,22
140:11,18 141:1	3e 114:25 115:1	68:23 73:25 147:21	70:17 71:13 72:3,18
176:23,25 177:5	119:3,12,18 120:1	147:22,23 148:7,12	72:22,23 73:18,19
178:18,21,22	121:7 123:21,21	148:13 149:3 150:7	73:24 74:3,3 75:2,6
179:16 180:5,11,21	124:1,2,10,12 136:3	150:9,15 151:1,6	75:10,22 76:22,23
181:10 182:15	136:11,22,24 137:4	154:24,25 155:3	77:7,15,21,24 78:3
185:25 186:1,9	137:7,9,11,20	156:4,14,18 162:13	78:7,10,12,14,19,22
187:2,6,8 193:13	138:24 139:3,19	163:1,12 164:9	79:6,15,18,19,20,22
312 2:10,10,15,15	141:5	165:11,11 166:25	80:8,10,14,19 81:3
31a 117:6 118:25	4	171:14,18	81:6 173:11
119:1,9 140:15,21	4 3:18 59:1 68:12	5,504,601 3:10	55 147:13,17
140:25	69:15,19 71:8,16,18	5,636,329 3:11	577-1250 2:10
31b 140:15,20,22,25	72:15,20,25 73:4	5,684,555 3:20	577-1370 2:10
32 29:5	75:17 77:22 78:3,4	190:4	581 74:6,8,8,17
33 36:5	79:24 81:19,22,24	50 3:16	6
36 93:24	82:17,21 95:2 99:25	501 73:2 158:7	6 3:21 31:14 32:3
38 68:24	100:3,4 153:20	159:8 164:17,23	35:21 36:5 38:9
3:15 153:17	172:23 189:19	502 158:8 159:10	47:6,9 48:4 49:13
3:31 153:22	40 3:14 141:24	164:17,24,24	49:20 50:9,14,21
3a 115:2 129:24	400 90:20	51 186:13	52:4,6,12,24 69:19
138:9,14,21,25	401 24:14 27:17,25	52 8:10 60:25	71:13,17 72:17
139:9,12,15,18,22	403 24:19 28:9,10	521 81:6,10	73:12,13,15,20,23
157:3,5,6,8,10	188:8,11	526-1535 2:15	74:18 75:12,13,14
158:1 163:21	413 46:8 188:12,13	53 3:13	76:22 77:1,5,12,16
164:10,13	188:23	54 10:24 13:24,24	77:18 78:9,20 79:24
3b 119:3,12,21,22	42 93:24	15:2,3,13 21:3	93:12,18,24 151:10
119:23,25 120:3,8	47 31:5	22:25 23:4,12,14,25	170:9 173:19,22
120:18,21 121:6	49 82:10 172:9	24:9,9,10,25 25:2	191:11
129:24 157:3,5,6,11	4:13 177:10	25:15,23 26:18 27:1	600 90:20
158:1	4:24 177:13	27:8,22 28:2,5,15	60603 2:10
3c 108:20 109:9	4:38 185:13	50:11 75:20,24,25	60606 2:15
110:2,15,20,22	4:40 185:16	76:6,10,20 77:14	61 24:10
111:1,18,25 114:2	4:47 189:19	99:8,11 100:19,21	623-7200 2:4
114:12 115:6,25	4:50 190:12 192:16	101:17 102:3,6,10	623-7202 2:4
117:5 121:6 122:19	4a 9:4,11,22 10:1,3	103:3 148:3 158:20	655-1501 2:15
122:21 124:12	10:10 24:14,15,19	158:22 160:11,12	68 24:10
125:1,2 127:21	24:20,22 25:16 26:2	160:16,17,25	6a 158:4,9 159:2,3,7
129:24 134:6,15,22	26:6 27:4,12,20	161:12 162:3 174:9	159:13,18,21
134:25 135:4,7	28:7 91:14,17 95:3	174:11 175:2,4,11	160:15,24 164:16
136:19,23,24 137:4	95:5 98:9 100:7,17	176:16 177:4	6b 158:4,9 159:3,7
137:9,13,20 138:6	102:22 161:13	181:20 182:5,15,21	159:13,18,22
3d 108:22 109:24	185:19	182:22 183:7 184:3	160:15
117:3,5,18 118:1,2	100117	102.22 103.7 101.3	100.12

[6th - agree]

Page 3

6th 1:16 4:3 192:5	134:18 135:1,7	a	adhesive 145:10,2
7	7b 110:17 115:11	a.m. 1:17 192:6	146:8,12 150:3
7 43:1 69:4 107:10	7c 111:3 129:3	ability 32:25	adjacent 74:9
107:15,17,23 108:2	8	able 16:2 20:12,13	157:20
109:3 110:5,12,22	8 94:7,10,20 107:14	57:8 91:5 92:18	adjust 160:5
110:25 111:8,13,22	107:18,22 108:1,5	102:18	adjusting 148:19
112:1,3,5,16,16,19	108:18 109:10	abrupt 165:21	149:5,11,16,21
112:24 113:10,11	110:1,13,17 111:2,8	absence 156:6	151:3 156:6,15,2
113:14,23,24 114:9	111:13,22 112:1,15	absolute 154:12,21	162:15,18 163:10
114:21,23,25 115:3	112:25 113:10,11	155:8	170:22,23 171:11
115:8 118:6,10,12	113:16,24 114:9	accomplish 38:25	171:14,18 172:2,1
118:17,19 119:1,4	124:8 130:11	65:4	adjustment 148:1
119:15 123:22,25	139:16 148:13	accomplishing	148:20 149:16
124:5,15 125:7,12	8,066,204 1:6 4:10	40:14	150:20 151:6 157
126:4,5 127:21,24	191:6	achieve 21:20,24	157:10,11,12,16,1
128:17 129:5,12	8,068,204 3:19,21	55:14	157:20,23,24 158
135:19	80 89:11	acknowledgments	159:8,11 160:4,8
7-1 118:20 124:3,5	800 167:17	58:18 59:2	163:24 164:3,11,1
7-11 166:10	82 3:15,16	act 96:17	164:17,23 170:20
7-18 166:10	83 3:18	active 29:5 54:13,20	171:7 178:9 179:4
7-2 118:20 124:3,6	8a 110:23 130:10,14	57:14 75:25 176:17	180:7,8 182:8,9,1
7-21 168:8 169:1	130:17,21,23,25	176:21	admit 98:13
7-24 168:9 169:1	131:20 134:24	actual 18:13 59:22	advantage 59:9,10
7 24 41:3 45:3	151:10	70:9 140:10	93:14 94:9,21 95:
731 31:17,17 70:3	9	add 26:11,14	95:22,23 96:5
734 31:17		addition 6:20 41:2	125:17
735 32:1,2	9 3:19 94:8,10,20	58:21 92:15 148:16	advantageous 59:
738 31:18 32:1,2	106:21 107:10	150:18	advantages 91:17
740 78:10	108:19 110:13	additional 41:7,15	95:8,19 97:20,25
741 68:17,18,25	111:9 112:6,16	41:18 58:22 87:22	98:2,4 125:21
69:11,15,21 70:11	115:8,9,11 116:2,3	88:1,8,17 109:11	affect 145:11
70:13,15,22 71:5,12	130:19,20,24 131:1	126:11,16,20,22	affix 191:14
71:24 72:2,16,22,25	131:15,19 134:5,8	127:5,14,17,22	aforementioned
73:6,7 78:2,3,4,12	134:16,19,23 135:1	128:16 131:8	36:6
78:18 80:2 172:23	139:8,10,21 142:8	135:10 177:16	aforesaid 191:11
172:25 173:7	147:21 150:9,15	183:19 189:25	192:13
745 78:18	151:2,2 154:24	addressing 106:14	agent 52:1
748 80:2	155:1,5	106:17	ago 164:17
751 70:3	900 167:18	adds 151:6	agree 20:7 21:1,3
76 24:10	92614 2:4	adhere 74:23	23:23 24:4 27:19
7a 110:16 115:9,11	949 2:4,4	adhesion 145:19	30:25 32:5 35:18
116:2 125:4,13	9:49 1:17 4:4 192:6	146:3 149:2 178:14	36:22 38:3 45:23
126:14 129:4,8,17		180:13,22 184:5,15	46:16 51:12,14 54
132:22 134:5,7,18		100.15,22 101.5,15	54:24 56:3,7,15
152.22 154.5,1,10			57:20 61:19 71:19

[agree - available]

Page 4

71:21 73:13,15	annotations 190:2	appreciate 38:2	151:17 155:1,23
74:25 75:4,14,16	answer 12:6 42:21	167:21	161:9 162:1 165:13
76:20 77:14,19	52:13 54:2 62:11	approach 59:12	176:9 188:2,19
-			· · · · · ·
81:19 86:9,13 94:19	89:9,15,21,24 90:17	appropriate 47:24	189:2,11
100:18 101:18	110:10 113:5	136:23	article 57:2,19
103:12 106:13	114:19 133:14	approximately 4:4	58:19
107:5 110:8,11	144:19 169:7 174:4	132:20 139:13	articulate 8:17
111:6 112:10	181:24	area 75:2,3 117:23	artisan 8:20
115:12 116:3,5	answer's 114:1	118:3 140:5,9,10	artwork 155:9
121:2 129:1 130:14	answered 110:9	141:10,21,22	aside 8:6 50:14
130:18,20 132:5	answers 52:15	142:10,11,16,18,23	111:25
133:17 139:14	anticipate 20:24	143:9,12,19,25	asked 47:13 81:18
141:22 143:11,14	apart 146:8	145:16 152:13	124:24 185:18
143:18,22 146:11	apologize 92:7	154:15 166:5	asking 10:5,14,15
146:13,14 147:7,11	106:11 182:16	168:17	11:20 15:17 21:1
154:1,6,8 156:4	apparatus 156:20	areas 170:16	22:20 30:13 32:20
157:18 163:14	apparent 101:1	argument 94:17	52:3 67:21 87:25
165:17,19,24	appeal 1:1 4:12	arranged 167:5	92:1 120:17 137:6,8
168:11,14 170:10	191:1	arrangement 16:24	aspect 15:1 94:14
170:13,20 171:8	appear 6:7 7:23 8:8	arrangements	aspects 56:19 60:6
172:2,18,19 174:5	11:1 34:18 52:12,25	192:22	assembly 25:6
187:25 189:9	64:13 98:23 192:21	array 49:4,22 174:5	asserts 83:15 95:7
agreed 132:24	192:25	174:6,12,16 175:8	assume 23:1,1 26:2
ahead 40:8 62:12	appearances 2:1	175:23 176:2,10,12	64:17,20,23 65:9,25
99:22 147:25	appeared 2:6,17	arrow 135:10	112:5,9,13 118:11
air 112:20	91:9 192:8	art 11:5,23 20:11	122:3,4,11,12,14
albeit 8:6	appears 7:23 33:14	21:18 23:5 33:11	143:7,10,15 188:12
allowing 184:23	69:18 72:25 73:7	40:16 44:4 45:24	assumed 136:22
alternate 36:9	74:8 140:25 159:23	46:2,17 47:2 56:23	assuming 66:24
169:13	159:25 191:15,16	62:2 63:4 66:3 85:3	assumption 65:9,16
alternative 95:24	appendices 6:8	86:10,24 87:6,20	143:13
alternatively 36:19	appendix 6:10	88:1 92:19 93:2	assumptions 66:24
66:15	applicable 1:14	95:19 96:8,25 97:15	67:25 68:7 143:23
aluminum 55:13	applications 58:6	97:19,23 99:15	attached 7:21 8:4
amount 125:22	applied 10:21 12:20	100:24 101:19,22	attempt 82:17
analogous 168:15	14:1 15:16 22:6	106:24 109:19	attorney 193:4
analyze 103:8,21	43:5 64:4 66:12,16	112:3 114:7,8,16,20	attorneys 4:14
analyzed 97:13	82:24 163:7	114:20 116:12,24	authors 53:20
103:15	applies 10:24 75:25	117:22 120:6	auxiliary 12:16,17
angle 29:25	76:18 175:25 177:5	121:20 123:4,10	27:17,21,25 170:24
anisotropic 118:21	188:17	128:16 129:2,21	171:4 178:21,22
139:4,11,19 141:6	apply 15:13 45:9	135:15 137:19	179:6 181:25
142:14	175:8 176:20	138:4 144:2,14	available 140:4
ann 2:21 4:2	applying 30:11	148:11,24,25 150:5	141:21 142:23
	32:18 131:9 175:23	150:16,22 151:2,13	143:9 144:3

[average - certainly]

Page 5

22.14.16	154.10 165.0	h	04.77
average 33:14,16	154:10 165:9	bound 145:6	capacitive 84:7
avoid 127:5	beneath 114:23	boundary 72:22	capacitor 86:12
avoided 131:14	benefit 46:13	box 70:14 168:2	capacitors 84:4,6,7
avoiding 126:22	best 40:8 90:20	break 60:15 103:24	84:16,23 86:7 87:21
aware 129:2,6	178:12	105:18 153:14	88:3,16
b	better 61:21,22	177:7	caption 4:8
b 3:16 6:10 64:25	127:5 189:2,12	breaks 105:12,15	carefully 61:14
65:4,15 66:19,20,23	beyond 51:5 52:8	brief 106:2	carrier 138:12,16,22
67:2,5,8,14,16,19	85:22 86:1 89:20	briefly 167:16	140:19 143:4
68:3,6,9 95:5 159:2	97:23 113:11,21,21	bring 46:17	case 4:8,9 16:1,3
159:22,23	114:21,24 118:25	broke 153:24	22:5 40:16 43:14
back 60:20 79:19	119:2 179:13	broken 115:3	44:24 52:3 59:13
88:25 90:4 91:11	bias 33:13	brothers 173:1	62:22 74:2 96:11
105:8 153:19	big 63:20 140:8	brought 64:7	97:24 103:7 113:20
162:12 170:19	168:8	build 19:24	123:16 128:21
172:21 177:12	bigger 85:2,8	building 16:4 20:24	164:9 179:10
185:15 186:20	bit 37:5 98:10 113:3	built 15:9	cases 42:18 156:2
background 5:12	black 31:7 79:12	butler 2:2	catastrophic 131:13
backplane 54:25	85:9 87:9	c	cause 104:4
55:4,20 56:3,8 57:1	blackwell 2:13 4:23	c 5:10 65:24 66:10	causing 86:7
57:4	blocks 168:8	66:19,20,23 67:1,2	centimeter 145:3
backplanes 57:7	blowup 25:17	67:3,4,5,8,14,16,19	centimeters 144:25
60:1	blue 58:17 78:25	68:8	145:3
backwards 19:24	80:24,25 81:2 85:8	c3 134:4	central 108:2
based 23:3 29:24	86:18,20,21,22 87:8	ca 2:4	148:17 151:25
44:12 60:1 71:12	87:9 88:12 100:13	call 47:24 55:16	certain 10:9 139:25
72:14 107:19	board 1:1 4:12	62:9 64:21 65:23	155:10
118:12 143:3	166:24 167:2,4,10		certainly 7:6 8:9
	191:1	69:11,21 78:2 123:24 125:12	9:17,18 14:16,25
154:12 176:3	boards 167:17,17		15:13 17:14 20:25
basing 72:12 150:7	bond 188:21 189:2	140:17 165:20	23:18 25:4 33:9
bearing 100:21	189:11	169:12	34:14 36:16 39:16
began 91:9	border 43:6	called 1:12 48:22	39:22 41:25 44:10
beginning 8:23	bottom 8:22 31:1,2	49:3 51:6 52:1	46:5,20 47:4 50:10
45:11 60:21 105:3	47:16 70:13 71:18	58:20 73:9,24 74:12	53:7 61:8,8,12,15
117:19,21 153:20	71:21 73:12,15	138:2 166:5 174:5	63:8,12 71:4 76:7
172:9	81:20,22 98:16	175:20	77:8 90:6 92:8
begins 29:11 80:10	122:2,7,10,12,21	calling 121:14	99:12 108:15
148:6	145:15 151:24	calls 43:19 44:1	114:11,24 116:14
behalf 2:6,17 4:19	153:9 166:15 167:3	45:17 47:22 49:22	121:5,16 122:18
4:23	167:5,10,10,19,23	70:24 79:25 121:19	132:18 133:11
behavior 146:5	168:21 169:3	122:23 130:16	137:15 141:19
belief 72:1	170:14 174:19	157:11 170:21	145:13 161:20
believe 9:4 31:6	boulder 57:5,21	capabilities 59:25	167:7 176:19 178:3
71:24 78:21 112:14	58:1,21		180:7 186:11
	30.1,21		100.7 100.11

312-442-9087

[certainty - conductive]

Page 6

			1107
certainty 91:8	24:5,6,6,10,10 25:7	151:24 164:8 166:2	common 14:25
certificate 192:1,24	25:8,15,23 26:18	clock 89:5	31:15 58:16 62:14
certified 192:1,3	27:1,8,22,24 28:1,2	close 145:2	62:18 120:14
certify 192:4	28:5,6,10,15 50:11	clumsy 76:16	128:16 137:15
cetera 119:25	75:20,24,25 76:6,10	collimate 59:7	138:5,8 155:21
chance 9:15	76:17,18,20 77:14	collimated 59:15	167:9
change 153:13	94:9,12,16,17 99:8	collimation 59:17	commonly 49:23
changing 152:24	99:11 100:19,21	color 26:12 79:1	116:8 130:11 154:8
characterization	101:17,17 102:3,6	82:17 142:3	company 57:5 58:20
75:5 78:14	102:10,13,18 103:3	colorized 9:10	58:22,25 59:4 60:1
characterize 56:23	126:11 158:20,21	column 29:5 31:14	60:2,3,4
82:19 126:17	158:22 160:11,12	31:14 32:3 35:21	compared 42:10,12
characterized	160:16,17,25 161:2	36:5 38:9 39:10,11	95:22,23 127:1,2
116:17 136:25	161:12 162:3 174:9	68:23 73:25 93:12	148:11,24 150:4,9
169:10	174:11 175:2,4,7,11	93:18,24 94:7,8,20	151:1,16
charge 96:17	176:16,23,25 177:4	162:22 165:11	comparing 96:4
check 25:17 177:7	177:5 178:18,21,22	166:25 172:8	154:25
chicago 1:16 2:10,15	179:16 180:5,11,21	174:19 175:8	comparison 150:15
4:7 192:6	181:10,20 182:5,15	176:20	154:21,22
choice 95:14,15	182:15,21,22 183:7	columns 90:16	compensate 149:6
chosen 143:5	183:16 184:3,11	94:10,11	149:17
circuit 97:2 138:17	185:2,25 186:1,2,9	combination 39:15	complement 145:14
138:21 139:16,25	186:9,13,14 187:2,6	72:21	complete 7:20
141:20 142:22	187:8,13,17	come 15:11 17:4,13	completed 102:5
143:16 167:17,17	claims 10:10 20:13	18:6 44:11 54:22	completely 81:10
171:25 181:2,15	25:2 50:11 76:9,13	90:10,13 91:1 99:16	163:12
185:8	94:12 99:8 186:3	125:14	complicated 30:20
circuits 54:14 92:12	clarify 62:11 90:1	comes 10:11 36:17	32:19 127:23 128:3
116:16	106:16 126:12	45:1 50:15 80:16	compound 186:21
circumstances	172:15	108:4,5 109:12	comprehensive
76:19	clean 110:10	112:20 173:9,10	11:21
civil 192:20	clear 9:10 16:15	coming 9:2 19:15	compromise 145:18
cj 86:12	38:19 53:10 69:19	45:3 51:16 80:5	concept 92:4
claim 9:14,16,21,24	71:1 77:6,20 85:14	147:16	concise 111:11
9:25,25 10:4,6,12	87:3 88:5 96:3 98:5	comment 42:14 43:7	concluded 190:11
10:17,19,21,23,24	99:18 107:13,25	62:10 96:5 98:8	concludes 189:17
11:2,5,14,17,19,22	109:1 112:18,23	99:19	conclusion 44:12
12:1,3,4,14 13:6,10	117:22 118:18	commenting 15:20	153:2
13:16,24,24 14:10	134:10 135:24,25	42:25 45:17 85:24	conduct 160:13
14:16 15:2,3,9,13	137:1 173:22 174:2	97:5	conducting 71:2
15:21 16:21 18:14	184:21 187:17	comments 105:19	73:10 96:14 102:16
18:19 19:2,8 20:4,6	clearly 12:7 20:17	154:19	118:21 139:4,11,19
20:7,20 21:2,3,16	38:12 72:17 110:17	commercial 58:2	141:6 142:14
21:22,24 22:13,25	113:15 135:19	60:8 97:9,12	conductive 14:2,2,5
23:4,12,14,20,25	140:21 145:4 151:3		14:11,15 15:6,11,14

312-442-9087

[conductive - correct]

15 10 04 16 40 14	10/01/00 100 00		
15:19,24 16:4,9,14	184:21,23 188:20	considering 83:17	contrast 162:21
16:17 17:3,5,7,8,12	connected 12:10	consistent 66:14	contributions 58:24
17:18,21,25 18:3,5	31:18 34:7 39:3	67:2 70:6	convenience 149:25
18:7,9,20,21,23,25	43:25 44:5,20,21	consisting 191:13	conventional 56:8
19:5,13,15,16,18,20	45:10 73:7 84:11,14	constant 151:11	56:16
20:1,2 21:6,23 22:1	84:16,16 118:7	constitutes 192:12	conversations
22:5 23:6,9,11	124:4 132:21	constituting 36:13	105:25
24:13,17,18,22	168:25 186:3	constraints 143:4	convey 92:3 155:16
25:24 26:3,9 27:2	connecting 46:6	145:23 147:2 189:7	copies 7:24 8:2,7
27:17,21 28:1,8,11	68:25 70:24 72:13	contact 44:9,17	100:2,4
34:8 45:22 47:9	76:23 80:1,2 136:22	46:11 47:8 50:22	copper 140:20
69:12,25 73:8 95:9	137:3,8 138:6 141:6	69:2,9 71:14,19,25	copy 6:4 26:6 31:7
96:2,12 102:15	142:17 172:25	73:1,13,16,22 77:24	78:23 99:25
139:15 140:22	connection 12:16	78:6,21 79:6,7,13	copying 8:5
158:16,20,24,25	21:8 24:17 28:9	79:17 81:21,23 85:1	corner 31:1,3
159:6,8,16 160:14	34:1 40:24 41:16,22	102:14,16 106:15	corp 4:8
160:18,25 162:3	45:1 72:7,8,14 85:8	106:22 124:6	corporation 1:3
180:25 181:4,5,18	124:13,14 129:4,12	125:11,24 126:14	191:3
183:1,1,10,13,17,18	137:2 157:19,21,25	127:20,24 128:17	correct 9:3 14:8
183:20,21,24	158:3,12 159:10	128:18 129:3,11,18	24:24 25:12 29:9,24
184:19,20 185:7,9	160:2 161:5,14	139:20 140:5,9,10	30:16 31:4,9 35:2
189:3	164:7,11,15,22	140:10 141:10,21	39:4 45:16 46:19,23
conductor 37:11	178:16,25 179:2,7	142:9,10,11,19,20	48:15 56:10,12
43:12,21,22 50:13	179:11,19,20 181:3	143:17 180:17	63:13 71:6,20 72:9
74:16 95:13 107:14	181:12,17 182:1	181:1,3,16 182:2	78:3,4,13 80:14
108:5 124:8 130:11	185:3 186:6	183:3 184:8 185:9	82:13 83:14 84:1
136:10,14 161:4	connections 34:8	contacting 73:4,6	91:20 93:15 95:4
conductors 40:13	45:3 72:6 97:21	87:9 173:4	96:22 101:25
45:11 46:9 84:21	160:2 166:11	contacts 76:1	102:24 103:4,6,19
96:18 141:7 160:1,4	188:10	102:11 125:18,23	106:6 111:14,15
186:3	connectors 70:23	173:8	114:21,25 115:10
confidence 90:12	connects 32:4 121:3	contain 61:8	116:10 117:7,12
configuration	166:19	context 13:5 15:1	118:3 119:22 120:3
137:16,20 138:5	consequence 107:6	49:19 90:8 116:18	120:4 121:3 126:6
configured 133:11	125:22 151:8	126:10 141:15	126:22 129:13
confirm 6:5	conserve 125:18	contexts 131:12	130:24 134:24
conforms 100:18	consider 7:5,9,13,18	continue 60:23	135:2,5 138:13
confused 48:12	9:20 49:5,13,20	81:13 105:5 107:10	140:1 141:12
connect 31:15 41:7	50:1 63:15,18 90:3	112:6,15 153:22	142:24 153:11
42:2 46:7 76:4 97:1	93:1 94:7 108:12	177:13 185:16	156:16,25 158:8
123:18 124:20,25	121:10	continued 112:5	160:18 166:16
125:6 126:3,4,5	considerations	continues 81:14	167:15 168:22
136:24 137:7,12	146:10	continuous 133:3,6	169:2 170:17
139:17 141:3	considered 106:5	133:12 135:20	171:13,23 172:1,24
161:16 167:8	144:15		173:5 174:1 175:9

312-442-9087

[correct - deposition]

Page 8

175:11,15,18,24	125:3 130:7 138:13	csr 1:15 193:12,12	decreasing 149:4,15
176:5 188:10 189:4	140:2 142:7 144:4,5	curious 53:25	152:5
189:13	148:22,25 154:16	cv 7:21,22 8:6	define 30:19,22
corrections 191:16	156:2 157:21 159:2	d	32:10 42:13 72:22
correspond 27:21	160:19 169:21		108:9 146:24 147:2
28:6 66:25 67:16	170:4 175:19	d 2:13 3:1 66:15,25	defined 66:24
70:5 75:10,15,23	court 4:16	67:7,14,15	defining 146:19
171:15 174:16	cover 10:7 62:20	darker 142:4,6,7	definition 37:15
corresponding	64:9 107:19 113:24	dashed 70:16,21	delay 92:7
20:25 75:12 132:19	169:24	78:16	depend 11:13
correspondingly	coverage 108:3,7,18	data 35:20,24 36:12	114:17 149:10
107:19	109:3,12 112:19	36:18,24 37:11,15	depending 36:6
corresponds 28:4,14	113:2	37:21 38:6,11,23	depends 21:9 49:9
74:10 79:22 80:10	coverages 108:4	39:13 41:21 43:3	49:12,16,19 63:19
121:6,12 184:22	covered 103:3 111:8	45:13 48:2,5,15,16	72:21 85:4 88:18
corrosion 106:24	115:8,9,11 131:1	48:17 124:20 125:1	90:7 108:9 116:18
107:12 112:15,19	186:9 187:2,6 188:7	125:3,4,25 132:25	128:3,11 131:7
112:20 113:15,16	covering 107:15,23	133:2,10,23 134:1	144:24 146:18
113:20 115:13,24	110:12,25 111:2,3,8	137:4,7,9 165:10,13	depicted 129:3
counsel 7:13,18	covers 10:10 170:2	165:20,24 166:7,11	deponent 191:10
193:2,4	create 62:14 63:1,6	166:12,17,20	192:7,20
counter 12:11,13	68:4 85:4,7 87:13	167:13,22 169:8	deposit 13:8 14:7
31:20 34:2,12 69:3	129:15 148:23	171:16	21:19 102:8,24
69:5,6 70:18 71:14	160:6	date 4:3 104:5	deposited 11:8
71:15 72:4,18,23	created 61:25 64:19	day 1:16 181:23	14:21 16:20 19:16
73:24,25 74:2,3	66:13	182:19 191:21	19:22 21:6,7 22:2
76:2,6 78:15 109:13	creating 20:18	192:5 193:8	23:7,8,9 24:14,15
172:24 173:1,4,13	critical 35:5	days 192:22	24:19,20,23 41:18
172:27175:1,1,15	cross 47:21 53:4	dc 33:13	41:21 48:5,17 51:19
174:19,24 175:2,14	77:5,10,19 85:24	dealing 5:22 57:18	62:16 63:5 64:14,18
176:11,18 177:3	100:9,10 101:2	deals 54:25	65:10 66:11,17
couple 133:21	108:20 113:9 115:1	dealt 54:13	103:9 121:24 159:9
147:15 187:21	115:4 159:22,22	decided 7:2,5,9	depositing 11:25
189:24	168:19	189:25	62:21 63:25
course 10:21 17:22	crossed 100:17,18	declaration 3:15,16	deposition 1:11 3:9
41:23 42:21 47:21	100:21	3:21 5:23 6:6,7,8,11	4:5 5:13,18 11:18
51:3,23 52:8,18	crr 1:15 193:12	6:14,17,19,25 7:22	14:15 19:20 22:15
53:5 55:12 62:23	crystal 3:13 12:7,12	8:11 9:11 24:8	22:24 23:12,15,24
64:12 70:13 76:3	33:14 53:18 55:21	25:11 28:23 31:5	24:2 35:24 37:10
81:15 94:11 95:14	55:25 56:9,16,23	61:1,6 65:18 81:25	47:23 60:22 62:24
97:16 98:24 101:16	58:3 74:9,20 81:3	82:11,16 83:13	64:8,11 70:4 82:5
102:3 108:22	131:6,10,18 156:19	89:20 100:3,5 106:6	83:10 96:19 99:16
102.3 108.22	163:6 175:13,17,20	139:23 141:25	101:9 103:4 104:3
110:22 112:10	crystalline 55:7 56:1	142:5 147:14,19	101.9 103.4 104.3
118:10 121:18	Crystamme 55.7 50.1		153:21 189:18
110.10 121.10			133.41 107.10

312-442-9087

[deposition - dr]

Page 9

191:11,13 192:14	different 10:25	124:18 125:1	108:21 109:13
192:15,18,18,21,23	20:19 21:15 40:23	134:11 135:19	110:11,16 111:9,13
describe 13:15 20:9	52:15 66:2 67:2	138:23 148:11	111:22,25 113:23
24:5 39:16 52:20	69:22 70:1,5,9,9,11	152:11 154:16	113:25 114:4,10,18
80:4 84:23 155:10	77:10 79:24 81:10	167:6 172:20	116:1 117:18,23
188:9	89:4 146:8 159:4	173:18 185:21	118:3 121:3 124:11
described 23:17	differently 16:13	discloses 31:13 34:5	125:10 129:16
39:19 57:10 75:23	82:24 137:25	36:22 38:4 48:6	131:25 132:1,3,7,12
76:8 126:13 172:3	difficult 38:1 140:12	93:14 97:20 98:6,7	132:17 133:3,3,13
177:24,25	dimension 29:22	109:21 152:9	134:8 136:6,9,12,16
describes 13:1 29:4	30:4,14 32:22 88:19	170:20,22	136:18 143:20
111:22	88:20,23 139:25	disclosing 38:17	144:24 146:7
describing 17:19	dimensional 88:22	disclosure 35:16	156:19 159:24
40:7	dimensions 29:23	38:8 51:21 72:2	161:15,17 162:8,20
description 35:16	88:21 140:3 153:5,5	83:5 93:11 107:6,7	162:21,23 163:4,15
43:17 74:8 94:22	153:11 154:12,14	107:13,20 111:24	163:16,19 166:4,5
138:1	155:2	112:17 113:6	166:14 168:12,17
descriptions 13:14	direct 15:5 23:14	119:16 121:25	173:11 175:21
design 35:4 114:18	44:9 47:8 50:22	125:5 136:1 137:23	176:4 178:5
143:1,1 149:11	73:1,21 78:6 102:14	148:18 150:9	displays 14:24 33:13
designated 107:24	139:20 142:19	disclosures 98:3	54:14 58:6 88:25
designed 33:13	180:16 184:8	discuss 82:23	90:19 145:1 146:4
57:11 143:5 155:10	directed 13:7 75:1	105:17,22	154:17
designs 171:10	76:21 77:15 106:18	discussed 39:9 57:2	distance 32:6,11,13
desired 34:11	107:3	61:4 83:25 105:11	distinctive 155:11
determine 100:24	directing 15:3 23:12	105:14 109:18	156:5
101:9 102:19	direction 11:24 15:8	125:17 154:20	distortion 35:10,11
114:16 186:8,13	40:5 46:13 92:25	156:24 157:1	divide 41:25
187:2,12,16	130:8 131:12	discusses 108:1	divided 45:12
determined 143:3	135:11	172:10 188:19	document 6:1 9:5
development 60:7	directly 81:3 173:24	discussing 61:17	28:19 53:14 83:21
device 12:8 112:22	184:23 193:5	67:18 95:3 107:22	106:8 144:11
174:16 175:21	directs 23:15	189:23	documents 82:5
diagonal 32:7,17,22	disagree 71:9 72:11	discussion 47:11	doing 45:24 148:22
diagonally 30:8	136:12	54:7 97:25 98:13	151:18
173:10	disclose 35:22 37:19	152:14 185:23	domestically 60:8
dictates 181:7	74:11 92:22 109:16	188:23,24 189:7	dopings 55:13
dielectric 48:22 50:2	disclosed 21:4 23:6	display 12:7 29:13	double 37:20 38:4
50:16 51:17	24:11 25:2,6,14	32:8,17 34:6 45:2	39:8 42:8,12 47:18
difference 19:8	29:3 30:21 37:13	53:6 59:12 64:7	108:3,7,18 109:2
103:9,16,19 120:1	38:13 41:1 43:4	69:10 70:17 72:24	112:18 113:2
121:14 157:15	52:20 71:4,8 82:25	75:6 77:8 81:15,17	115:23
160:5 168:18	93:5 107:1,18	89:5,13,14 90:4,7	dr 4:13 60:22 83:5
179:24	109:15 112:11	90:15,22 97:9,12,14	105:4 153:21
	114:12 122:19	103:7,14,18 108:16	189:18
			1

[drain - excluded]

Page 10

ducin 125.2 120.0	170.24 171.17 10	159.10 150.12	102.24
drain 125:2 130:9	170:24 171:17,19	158:10 159:13	102:24
draw 79:8,13 80:23	171:21,24 183:20	166:10 183:4,7,21	etched 62:17,17
82:17 99:18 118:9	electrode 31:21 34:2	184:11,18	63:6 85:6 86:19
drawing 82:10	34:12 69:5,6,8,18	eliminate 87:21 88:2	88:13 98:25
155:17	69:18 70:18 71:14	88:15	etching 65:14 103:4
drawn 154:2,6,11	71:15 72:5,23 73:24	emblematic 163:2	evenness 153:9
154:13 155:5,8	74:1,2,3 76:5,6	embodiment 10:3,7	event 143:25
driver 166:21,24	78:15 84:10,11,13	29:6 36:9 150:21	evidence 192:25
167:2,4,10,16,17	84:13 85:1,2,18,19	156:20 172:13,14	exactly 24:4 35:22
168:7	110:24 122:24,25	embodiments	40:17 54:17 55:1
drivers 169:1	123:17 130:2,4,10	150:19	69:1 112:18 143:6
driving 54:14 92:12	130:15,17,19 131:9	embody 9:21	150:11
duly 5:2 191:10	131:21 132:19	employee 193:4	examination 1:13
192:10	134:23 137:12	employees 60:5	5:4 105:6 177:18
dye 59:23	electrodes 12:9	enable 21:7 24:16	187:23
e	96:11 130:10 132:6	129:4	examined 3:3 5:2
	132:12 174:15	enabling 129:12	example 6:23 10:18
e 3:1 5:10 105:1,1 192:19	176:4	ends 45:10 61:15	11:17 14:23 21:21
earlier 42:7 71:11	electron 103:20	74:21 79:23 119:9	22:4 23:18 31:17
	electronically 68:21	energy 1:6 4:9 191:6	34:22 40:25 41:3,9
136:13 185:18	electronics 176:18	engineering 155:17	41:17,19,23 42:24
easier 68:21 88:11	element 12:23 14:6	enters 114:10	42:25 43:5 44:25
easiest 42:23 100:6	16:7,13 17:6,24	entire 78:16 111:1	45:2,9 47:10 51:9
edge 64:6 120:14	19:4,5,6,12 26:13	134:9 144:5 170:14	52:22 56:5,10 63:9
133:8,9 163:15,19	28:7,14 32:19 41:3	entirely 14:20	64:3 65:14,23 66:10
edward 2:13 4:22	45:3 48:21 49:3	entitled 104:4	70:2 77:22 83:14
edward.manzo 2:16	51:4,25 52:1,2,7,8	enumerate 53:9	86:15 90:19,20
effect 131:18 153:8	52:25,25 70:5 72:18	environment 109:4	94:19 95:3,5 102:12
efficiently 59:15	73:8,19 75:6,10,22	equal 148:23,25	107:2,9 108:12
effort 145:14	76:22,23 77:7,20,24	162:19	114:2,22 115:18
eight 34:7 70:20	78:7,19 81:10	equally 146:2	119:3 122:20 125:4
72:5 75:8 78:18	101:10 103:10	equivalent 27:17,19	126:3,8 138:24
either 8:5 15:5 22:7	111:2,3 113:10,10	error 7:25,25	140:6 141:5 145:14
33:18 40:17 49:18	114:24 117:6 119:6	escuti 1:12 3:2,15,16	140.0 141.3 143.14
68:8 85:14 105:12	121:6 136:10,24,24	3:21 4:13 5:1,11	147.5 149.1 154.24
118:1 119:23 120:3	121.0 130.10,24,24	60:22 105:4 153:21	163:1,16 165:11
electric 131:7	139:10 140:18	189:18 191:9,18	166:25 169:18
electrical 21:8 24:16	141:1,8 157:15		
46:10 92:8 94:13	-	192:7,9	170:13 185:19
106:21 124:6	174:3,7	especially 99:8	188:6 189:8
126:14 142:20	elements 12:23 13:2	essentially 165:16	examples 40:16 42:8
179:20 181:3,16	18:2,19 20:5 50:20	established 146:16	53:2 90:18 98:2
182:2 183:3 185:8	62:21 109:12	estimate 144:23	150:19
electrically 12:9	119:24 120:10	et 119:25	exclude 43:18 45:15
84:10 133:20,23	130:8 155:17,20,22	etch 86:10,14,25	excluded 43:17
,	155:24 157:1	87:6 99:1 101:14,24	

[excuse - figure's]

Page 11

excuse 83:2	162:7 164:4,5,19	factor 148:13	108:14,20,22 109:9
exhibit 3:9 6:1,8 9:5	168:15 169:9 180:9	factors 146:4	108.14,20,22 109.9
28:19 53:14,17 82:3	extended 112:24	failure 192:25	110:22 111:1,18,25
82:6 83:1,21,24	113:1,21 135:8	fair 9:19 35:15	110.22 111.1,18,25
100:8 106:8 144:11	extending 41:2	fairly 59:15 90:21	
190:3,6	73:19 113:23	163:2	115:1,25 117:5,9,15
exhibits 3:7 6:9	114:21 134:17,19	familiar 97:19 123:9	118:1,2,9,10,12,16
189:24	135:9 182:11	far 34:23 52:8 80:22	118:17,18,20 119:8
existing 41:15	extends 29:12 52:8	103:5 113:1 119:8	119:10,12,25 120:1
existing 41.15 exists 66:4	69:3 74:19 75:2	136:21 147:18	120:3,21 121:6
exists 00.4 exotic 62:5	77:7,9,21 78:8 81:6		122:19,21 124:1,2
expanded 70:14	114:23 134:7	fashion 135:20	127:21 129:3 134:4
expanded 70.14 expansion 168:1	135:13 139:4	fax 2:4,10,15 feasible 99:5	134:6,15,22,25
expect 14:13 19:24	extensive 54:7	features 10:1 155:11	135:4,7 136:11,22
118:19,24 119:1			136:23 137:7,13,20
134:18 137:18	extent 59:21,23 94:23 151:23	155:11 156:5	138:6,6,14,21,25
155:5 168:24	external 12:16 28:9	fed 166:14 168:12 field 46:23 47:3	139:3,9,12,15,18,22
experience 62:7	65:11 97:21 157:19	131:7	141:5 147:21,21,22
experience 02.7 expert 127:19	157:21,25 158:3,12	fifth 24:21	147:23 148:7,12
expires 193:13	157.21,25 158.5,12	fig 3:14,16,18 9:4,11	149:3 150:7,9,9,15 150:15 151:1,2,2,6
explain 36:10	160:1,2,3 164:6,11	10:1,3,10 24:14,15	
explained 84:3	164:15,22 178:24	24:19,20,22 25:16	151:10,10,10
151:19,22,23	179:2,7 181:3,17	26:2,6 27:4,12,20	154:24,24,25 155:1
explaining 61:7	179.2,7 181.3,17	28:7 29:1,4,11	155:3,5 156:4,14,18 159:2 160:15
explicit 76:5,17	extra 87:18 110:5	31:10,10,11 40:25	161:13 162:13
94:22 95:10 134:14	125:18,23 127:6,6	45:2 47:6,9 48:4	163:1,12,21 164:9
188:24	125.18,25 127.0,0	49:13,20 50:9,14,21	165:3,4 166:2,6,7
explicitly 68:1 69:5	eye 58:6	52:4,6,12,24 59:1	166:15 167:3,5,11
82:21 83:15 92:20		66:10,25 67:1,3,4,7	167:12,14,19,23,25
94:14 99:9	f	67:14,15 68:12	168:1,2,3,3,5,13,15
explored 15:1	f 105:1	69:15,19,19,25	169:4,4,15 170:9,13
exposed 106:14	fabricate 20:12,13	70:10,12,12,13,14	170:16 171:14,18
109:4 142:9	59:24 60:1	71:1,8,8,13,16,17,18	172:23 173:19,22
express 19:9 34:20	fabricated 8:22	72:2,15,17,20,25	figs 119:3,7 129:24
169:14	19:11 20:10 57:1,12	73:4,12,13,15,20,23	159:21 185:19
expressed 6:19	fabricating 58:15	74:18 75:5,11,12,13	figure 30:15 47:15
expressing 25:5	59:22	75:14,17,18 76:22	47:17,19,20 71:18
expressly 123:1	fabrication 9:1	77:1,5,7,12,16,18,20	73:20 85:5,12 99:20
124:18,22 180:25	18:13 20:18 21:13	77:21,22 78:3,4,9	99:21 101:2,7,8
extend 41:4 74:17	75:1 83:16 101:10	78:16,20 79:24,24	102:23 103:1,5,11
79:25 80:22 107:10	112:21 113:19	81:19,22,24 82:17	103:13 115:15
113:14,16 118:25	facing 12:11 76:2	82:21 91:14,17	153:8 155:20,21
119:1,8 131:20	174:20 177:3	92:12 95:2,3,5 98:9	156:1,22
132:7,13 133:15	fact 92:23 93:18	99:25 100:3,4,7	figure's 9:2
135:15,20 136:15	176:3 189:1	102:22 107:2,9	U

312-442-9087

[figures - further]

Page 12

r			
figures 30:21 35:22	fine 50:1 66:1 79:2	flip 33:18	37:15 38:10,22,25
40:19 48:7 61:3,17	98:14 158:22	focus 9:18	39:12,13 47:22 51:9
61:19,23 65:17,21	190:10	focused 107:8	51:22 52:10 61:20
67:13 92:22 118:13	finished 22:17 62:12	foil 140:20	61:21 70:4 71:3
129:24 147:15,17	first 5:2 10:11,18,20	follow 18:1 23:19,24	74:14 100:25
148:15 151:15	11:1,6,24 12:1,2,17	127:10 175:7	102:12 130:10
153:10,25 154:1,3,5	12:19,19,21,25 13:4	187:22	139:7 143:17
154:9,21,23 155:8	13:6,13,17,21,25	followed 23:9,10	179:19
155:15 158:17,18	14:1,3,5,11,14 15:6	following 172:10	forming 6:18,24
159:18,21 163:1,13	15:11,14,14,19,19	189:21	20:6 35:20 36:2,8
fill 80:23	15:23,24 16:4,9,13	follows 5:3 21:5	36:12 38:22 40:13
filled 163:7	16:14,17,19,19,24	24:12 25:3,7,11,14	52:11 62:3 63:24
film 12:2,3,8,10,18	17:3,5,6,6,12,13,17	forced 149:6,18	64:24 65:2,24
12:20 14:3,3 15:23	17:18,20,21 18:3,4	foregoing 191:12	110:23
16:14 17:6,7,17,20	18:4,6,11,17,19,20	192:11	forms 159:9
18:4,8,21,24 19:7	18:21,24,25 19:5,6	form 10:8 11:9 13:9	forth 11:19 61:11
19:14,19,21 20:2	19:10,13,16,19,21	17:9 22:19 26:4	foundation 8:23
21:7 23:7,10,11	20:2 21:5,22,23	29:16 30:1,17 32:9	11:12 33:4 35:14
24:15,20,22 26:19	22:1,5 23:6 24:13	33:2 35:13 37:1	66:6 91:3 97:3
26:22 27:9 28:3,5	24:13,14,17 25:24	41:22 42:3 55:22	115:14 127:9 128:1
28:12,13,15 45:16	26:2,9,19,21 27:16	57:13 62:2 64:2	128:19 146:17
45:22 46:1,10 50:3	27:21 28:1,3,5	65:13 76:25 77:17	155:12 171:2 172:7
50:5,6,10,15 56:21	35:19 40:12,20	79:25 81:7 84:18	four 170:3
66:16 74:10,23	41:17 44:18,25	85:10,20 87:10 88:4	fourth 24:19
103:10 110:13	47:22 50:2,4,6,8,10	91:2 101:3,4,12,13	fpc 97:22 106:15,21
118:21 139:4,8,11	50:12,25 51:1 62:16	102:9 112:8 117:13	118:16,20 119:6,24
139:16,19 141:6,8	65:9 66:10,16 99:16	118:14 120:9,20	178:16 181:12
142:15 157:11,17	101:3,13 123:9	124:16 125:10,19	184:21 185:4
168:16 174:14	125:13 146:5	127:8,25 130:5	frame 32:25 33:5,11
176:17 177:2	148:10 157:23	132:10 133:4 135:3	33:12,20,20,22,24
180:17,25 181:4,6	158:3,15,19,23,25	137:10 141:1,13	33:25 34:17 35:2
181:18 184:9,24	159:7,16 160:13,17	143:21 153:2	88:24 89:8
186:4,5	160:24 161:4 162:2	155:13 156:7,17	frequency 88:25
films 10:23 13:18	164:23 172:14	159:7 161:11 162:4	89:8
45:22 86:15 87:14	174:12 175:10,20	163:17 170:25	frequently 154:2,6
final 20:4 21:17	176:25 177:3	172:4,6 183:15	front 25:21 82:12
22:11 23:16,16 24:7	182:25 184:20	186:10,17 187:3,14	full 5:10 183:16
25:6 109:8	186:4,4 191:9	format 89:13,16	fully 24:25 52:20
find 47:10 49:25	flat 78:5	90:1,4,7 96:11	192:23
87:5 92:18 115:17	flexible 14:23 97:1	formation 62:9	function 13:16
138:7 140:21 147:1	138:16,20 139:16	64:21	14:22 34:4 70:25
159:25 166:23	139:24 140:6,18,23	formats 89:14,18	76:12 133:20
182:17	141:1,11,20 142:22	formed 14:21 22:1	further 3:5 87:24
finding 69:2 74:7,12	143:5,8,15 171:25	35:19,23 36:2,7,11	112:16 177:14
76:14	181:2,15 185:8	36:18,19,20,24 37:9	187:19,23 189:15
		· · · ·	

312-442-9087

[further - hypothesis]

Page 13

189:16	97:6 101:11 102:20	180:9 181:15	happen 19:21 22:25
	103:23 105:7	180.9 181.15	111:25 114:13
g	105:25 105:7	going 5:13 6:4 9:8	133:25
gallium 58:8,14	115:20 117:16	13:8 14:7 15:8 17:4	happened 7:25
59:20	118:23 120:16	18:6,7,8,22 21:5,19	happening 62:22
gap 117:6,11,14	121:1 124:19 126:1	22:11 23:5 29:21	hard 40:5 91:4 96:4
118:7 148:23,25			
149:5,11,16,21	127:13 128:6,22	44:4,5 60:16 80:17 82:2 91:4 92:24	harder 80:4
151:3 156:6,15,21	130:13 132:15		hatalis 83:5
160:7 162:6,15,18	133:7 135:6 137:17	93:19 103:25 111:7	hatch 100:9,10
162:19 163:10	141:17 143:24	113:11 117:18	hear 165:16
170:21,23 171:6	144:13 146:20	118:3,6,6,24 119:1	heard 20:8 33:8
172:2,12 178:8	147:4 148:3,5	119:8 120:7,19	height 160:5 179:24
180:6 182:7 183:8	153:13,23 155:18	121:21 124:12,14	179:25
183:14	156:10,23 161:18	124:25 126:21	held 4:5
gate 48:22 50:2,16	162:9 163:20 171:5	127:20 132:5,7,8,11	hereof 193:6
51:16 121:12 122:2	172:17 177:6,14	132:13,16 134:8	hereto 193:5
122:7,8,12,21,23,24	179:8,22 180:14,23	135:7 136:5,7,8	hereunto 193:7
123:6,8,10,13,17	181:13,22 182:24	137:9 138:21	hertz 89:11
130:1,2,3 137:12	183:15 184:6,13,17	139:25 141:3,10	high 34:16,19 56:19
general 34:10 56:25	185:5,10 186:10,17	153:15 166:3	74:4 90:21 145:8
128:8 133:24	186:20 187:3,14,21	167:22 168:11	higher 131:11
138:18 143:23	187:24 189:15,23	169:5 174:24 175:2	highest 98:18
146:12,13 147:7,11	190:9	175:16 177:9	highlight 31:9
151:9 154:5,7 188:5	give 11:21 29:23	185:12 190:2,5	highlighted 147:20
189:5,14	52:15 90:18 101:8	goldeneye 58:20,23	highlighting 79:15
generally 8:22 11:20	144:23 146:14	59:4,19	hold 96:17 166:10
33:12 125:24	given 135:16 146:15	good 5:6,9 35:8	holding 176:13
	179:25 192:12	68:20 69:24 74:22	hole 126:5 127:20
131:10,13 143:1 166:16 172:11	glass 49:21,24 55:11	116:7,12,17,19	127:24
	56:4,6,21 57:13	132:3 147:10 188:6	holes 128:17 129:3
getting 59:23 62:23	64:8 73:2	gotten 20:20	129:11
68:18 165:15	go 12:5 34:9 40:8	gray 142:4	horizontal 98:18
gibson 2:3 3:4,5	61:14 62:12 68:5	great 80:25	130:7 170:14
4:19,19 5:5 6:3 9:7	72:23 99:21 124:9	green 31:6,8 58:17	hour 1:17 7:11
10:13 11:10,16	124:11,12 136:8,11	ground 12:6	hours 7:10 165:22
13:19 17:23 22:22	136:17,21 147:24	guess 20:16 52:17	husch 2:13 4:22
26:7 28:21 29:20	167:13,24 168:16	166:5	huschblackwell.co
30:5,24 32:12 33:7	168:25 185:10	h	2:16
35:17 37:4 53:12,16	goes 13:17 36:10		hypotenuse 29:22
56:2 60:24 64:16	37:19 39:2 45:5	halfway 79:23	30:6,11,12
66:7 77:3 78:1 79:2	69:15 74:5 75:6	139:13	hypotheses 87:15
79:9 81:11 82:2,8	80:11 103:5 112:4	hand 6:4 9:8 79:19	hypothesis 83:5,6,7
83:19,23 84:24	112:16 139:11	135:18 168:12,25	85:13,23 87:23 88:8
85:16,20 86:2 87:17	143:2 145:14	193:8	88:17 143:14
88:10 90:2 91:10	143:2 143:14 161:14 172:15		00.1/143.14
	101:14 1/2:15		

[idea - involving]

Page 14

i	imagined 154:18	indicates 31:10	101:24,24 103:10
	immediately 74:9	indicating 26:16,23	107:4 110:13
idea 31:23 53:11	74:21 130:6 166:11	27:6,13 81:1 100:12	116:15 130:24
109:16 115:16	impact 32:24 33:23	142:8	134:5 139:8 180:17
identical 136:12	implement 19:2	indirectly 180:24	184:9,24 186:5
identification 53:15	39:21 40:5,11,23	193:6	189:3,12
82:7 83:22	53:11 93:23	indium 113:10	insulation 19:13
identified 12:23	implementation	individual 133:19	64:1,18
42:19 51:9 54:9,10	41:13 44:22	industry 116:9	insulator 43:21 46:6
54:12 57:5 70:1,15	implementations	117:1 122:16,18	
92:9,17 118:22	39:18 55:2	123:10	108:19 112:6,16
137:25 156:22	implicit 76:7,10,15	information 30:22	125:10 126:15
165:6 167:16	94:23 185:20		130:7 131:1
172:23 180:8		60:13 97:13 101:8	insulators 46:7
identifies 36:9 78:17	imply 12:24	128:4,24 135:16	131:8
117:22 183:23	importance 107:22	infringement	intention 8:9
identify 4:15 13:17	108:1	187:17	inter 28:13 186:4
29:18 54:2 79:5,6	important 35:1,4,6	infringes 187:7,13	interchangeably
91:5 108:10 121:5	58:17 59:16 146:4	initial 146:8	138:19 165:18
139:22 159:2	168:18	initially 57:12	interested 193:5
il 2:10,15	improve 162:20	innolux 1:3 4:8	interface 79:5,10,11
illinois 1:16 4:7	improved 93:25	191:3	interfaces 103:22
192:2,7	improvement 92:19	inside 41:14 108:21	interposed 12:18
illustrate 31:5 36:4	93:2	110:15 113:17	interpret 11:18
37:8	improves 149:2	116:1,1 125:9	33:11
illustrated 29:19	include 108:14	129:16 161:16	interrupt 109:7
40:18 48:4 49:2	118:17 158:9	170:4	invention 29:7
50:9,20 52:6 53:1	176:16	instance 12:19	108:2 151:25 153:8
61:24 65:22 73:23	included 32:2	111:16,17	156:21 177:24
81:15 84:14 136:11	119:13	instructing 89:23	inventions 152:4
138:23 144:7	includes 61:16	insulating 10:22	177:25
148:14 155:3,4	78:15 125:2 176:25	12:2,3,18,20 13:18	inverse 14:17,19
161:13 164:3,14,24	including 58:6	14:3,3 15:23 16:13	15:22,25 16:3
166:2,9 167:1,20	109:13 130:9	17:6,7,17,20 18:4,8	inversion 33:1,6,11
168:10	inclusive 191:14	18:21,24 19:6,19,21	33:12,22,24 34:1,17
illustrates 113:9	inconclusive 103:1	20:2 21:6 23:7,10	35:2
illustrating 149:24	103:14	24:15,20 26:19,22	invert 33:19
149:25 152:19	incorporated 58:23	27:9 28:3,5,12,15	inverted 20:10,14
illustration 135:10	incorrect 124:22	43:15 45:15,21 46:1	123:12
illustrations 113:7	incorrectly 124:24	46:10,12 48:23,24	involve 125:3
152:10 153:7	increase 144:2	49:7 50:2,4,6,10,15	involved 59:19
image 35:11 162:20	independent 3:13	51:10,13,14,17,23	181:6
162:21	53:18 60:3	62:14,24 63:1,4,15	involves 39:17 62:19
imagine 35:8 40:25	indicate 86:19	64:13 66:16 74:13	106:19 178:7
41:12,25	indicated 27:16	74:15,15 84:21	involving 54:20
ل كر كر 1 • 1 • 1		86:15 87:13 97:17	-

[ipr - layers]

Page 15

ipr 4:10	kind 15:4 33:20	laboratory 1:6	107:21,22,23 108:1
ipr2013-00068 1:5	36:6 40:17 49:23	191:6	107.21,22,25 108.1
191:5	58:4 64:5 65:11	language 10:17	110:1,13,17,22
irvine 2:4	85:17 96:1 99:4	18:14 20:6 22:13	110:1,13,17,22
		23:25 34:13 73:25	112.1,7,24,23 114.9
isolated 133:18,20	128:4 131:11		
133:23 134:1	138:24 155:16	99:11 158:24 176:6	116:2,2,7,13,25
170:24 171:17,19	kinds 170:22	176:12,14	118:6,10,12 119:1
171:21,24 183:20	knew 29:22 30:6,14	large 131:24 145:2	121:13,13,16,19,24
issue 12:15 88:3,16	102:7 103:3	largely 54:21 96:15	122:9 123:24,25
172:10	know 8:14 14:23	111:15 118:20	124:2,7 125:11
item 172:23	40:3,8 46:21 49:15	119:25 169:20	126:14 127:21
ito 55:11 65:19,22	57:16 58:1 59:19	larger 143:16 144:5	129:3,17,18 130:19
65:24 66:10 68:14	79:16 82:22 86:10	145:1 152:18 155:3	130:20,24 131:7,18
68:15 69:4,6,12,20	86:14,24 87:12,13	lasalle 1:15 2:9 4:7	134:5,16,23 135:1
71:3,6,12,12,14,20	87:20 88:24 89:12	192:6	139:21 142:8 157:9
71:24 72:8,13 73:4	90:15 93:7 95:7,19	lastly 66:13	157:13,16,23,24
73:14,16 74:4,24	97:24 99:4,15 102:6	late 3:12 53:17	159:6,9 160:18
77:24 81:21,23	102:22,23 103:2	lay 12:5	163:24 164:11
82:23 95:8,11,13,19	110:6,7 120:5,6,19	layer 14:8,21 22:12	170:20,22,23
95:25 96:5,9,13,25	126:10 127:11	28:13 33:15 36:14	171:14 173:4,9,9,20
97:8,15,20 98:9,15	128:23,24 131:2	36:23 37:3,7,10,14	174:1 180:8,8 182:8
98:19,22 99:14	135:17 136:7 142:2	37:20,20,21 38:4,5	182:10,10 183:10
101:3,12,14,23,25	144:17 174:18	38:6,12,18,21,24	183:13,17,18,20,24
103:9 110:22 111:2	175:16 186:7,12,25	39:8,9,12,13 42:6,8	184:19 185:9 186:4
112:6 115:22	187:11,16,18	42:11,12 43:4 46:3	189:3,4,12,12
139:20 142:9 173:4	knowledge 46:18	46:12 47:9,18,19,23	layered 36:21 39:20
173:9,16,20,23	97:8,11	47:24 48:15,19,21	40:11,14 43:15,19
174:1,6 184:24	known 45:24 46:2,5	48:23,25 49:2,5,7	43:23 44:1,13,14,15
189:12	46:7 90:6 96:13,20	49:11,14 50:2,8,23	44:23 45:15,18
ito's 66:17	96:22,23 116:11,14	51:1,13,15,17,23	93:19
i	129:20,22 188:1,5	52:2,6 62:15,16,24	layering 111:8
i 1:11 3:2 5:1 191:9	189:1,6,10	63:1,5,16 64:1,13	layers 8:24 11:7,25
191:18 192:7,9	knows 86:14 120:12	64:18 65:10,19,19	13:8,11 20:15,18,22
james 5:10	l	65:22,24 68:1,4,14	21:4 23:6,16 24:11
japanese 60:9	I 1:14 98:11,12,16	68:17 69:4,12,15,25	25:3,6,14 39:1,3
jeffer 2:2	99:2,10,14 192:2	71:2,6,24 72:3,8,14	44:20 45:20,21,25
jmbm.com 2:5	193:12	73:4,14 74:9,13	49:7,8 50:24 55:12
johnson 2:8 4:6,22	lab 4:9 60:4	78:9 79:15,16 80:7	65:20 68:15 83:16
joined 163:8	label 26:5,12 27:20	80:10 81:21,23	97:8 100:24 103:21
	labeled 70:14,17,22	82:24 95:9 96:2	148:19,19,20 149:5
k	78:7 99:23 160:1	97:17,20 98:10	149:12,17,22
keep 47:25 67:9	168:2 173:11	101:3,4,13,13,14,15	150:20 151:3,6
152:16	labels 29:10	101:23,24,25,25	156:22 157:10,20
keeping 41:1	140015 27.10	102:16 106:21	158:7,16,20 159:3,8
		107:4,14,15,17,18	159:11,16 160:4,8

[layers - look]

Page 16

	20
	20
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	
lcd29:6 76:11limitations12:5,15134:7 135:7 136:5listed91:16,18143:19144:1815:919:2,8 24:11136:13,20137:1,4,7183:21162:23174:15102:11141:15137:9,13,14138:5listen45:19176:4159:1160:16,19157:25158:3,25lists53:19lcds96:10175:5,7176:20160:2165:11litterally64:5lead148:21151:4177:1178:20170:24171:4172:9little37:570:20171:19179:15180:11,21174:19178:21,2298:10100:20little37:570:20learn161:9181:10182:5,22178:25179:2,6,7142:15145:16leave165:4184:3185:2,24181:4,17,25182:1151:12leds58:11,1559:2,7186:1183:1,1184:20lip2:2,8,13josit4,20,22limited10:1223:20185:7186:1lines10:2124:18valx69:7,1570:1376:14140:5,1127:18,2128:1,9157:18162:2,4valx69:7,1570:1376:14140:5,1127:18,2128:1,9164:2,18165:2579:2080:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:19:6:13109:3165:2,22218:2,2519:5,5,824:638:7,11,11,22,23longer32:7	5
143:19144:1815:919:2,824:11136:13,20137:1,4,7183:21162:23174:15102:11141:15137:9,13,14138:5listen45:19176:4159:1160:16,19157:25158:3,25lists53:19lcds96:10175:5,7176:20160:2165:11literally64:5lead148:21151:4177:1178:20179:1170:24171:4172:9171:19179:15180:11,21174:19178:21,2298:10100:20learn161:9181:10182:5,22178:25179:2,6,7142:15145:16leave165:4184:3185:2,24181:4,17,25182:1151:12leds58:11,1559:2,7186:1183:1,1184:20lip2:2,8,13jo:14,20,22limited10:1223:20185:7188:4local42:19left29:11,1231:123:20,2157:961:12lines10:2124:18iditing143:12,1936:3,5,7,8,11,12,13located4:629:19idits20:2021:237:16,16,17,21,22164:2,18165:22,22idits20:2021:237:16,16,17,21,22181:23180:3idits20:2021:237:16,16,17,21,22181:2310:3idits22:119:5,5,824:638:7,11,11,22,23looger32:7,15,21idits15:12,14,19,2416:448:1,1852:11,23<	
162:23 174:15102:11 141:15137:9,13,14 138:5listen 45:19176:4159:1 160:16,19157:25 158:3,25lists 53:19lcds 96:10175:5,7 176:20160:2 165:11literally 64:5lead 148:21 151:4177:1 178:20 179:1170:24 171:4 172:9little 37:5 70:20171:19179:15 180:11,21174:19 178:21,2298:10 100:20lcarn 161:9181:10 182:5,22178:25 179:2,6,7142:15 145:16leave 165:4184:3 185:2,24181:4,17,25 182:1151:12leds 58:11,15 59:2,7186:1183:1,1 184:20llp 2:2,8,13j59:14,20,22limited 10:12 23:20185:7 188:4local 42:19left 29:11,12 31:123:20,21 57:9 61:12lines 10:21 24:18located 4:6 29:1943:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting 143:12,1936:3,5,7,8,11,12,13long 87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits 20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer 32:7,15,21119:14 125:9 130:3line 12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:19:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:2 <td></td>	
176:4159:1 160:16,19157:25 158:3,25lists 53:19lcds 96:10175:5,7 176:20160:2 165:11literally 64:5lead 148:21 151:4177:1 178:20 179:1170:24 171:4 172:9little 37:5 70:20171:19179:15 180:11,21174:19 178:21,2298:10 100:20learn 161:9181:10 182:5,22178:25 179:2,6,7142:15 145:16leave 165:4184:3 185:2,24181:4,17,25 182:1151:12leds 58:11,15 59:2,7186:1183:1,1 184:20llp 2:2,8,1359:14,20,22limited 10:12 23:20185:7 188:4local 42:19left 29:11,12 31:123:20,21 57:9 61:12lines 10:21 24:18located 4:6 29:1943:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting 143:12,1936:3,5,7,8,11,12,13long 87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits 20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer 32:7,15,21130:6 131:2214:2,25,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:130:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20lever 89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage 60:518:25 19:5,13,15,16133:12,17,19,22	
lcds96:10175:5,7 176:20160:2 165:11literally64:5lead148:21 151:4177:1 178:20 179:1170:24 171:4 172:9little37:5 70:20171:19179:15 180:11,21174:19 178:21,2298:10 100:20learn161:9181:10 182:5,22178:25 179:2,6,7142:15 145:16leve165:4184:3 185:2,24181:4,17,25 182:1151:12leds58:11,15 59:2,7186:1183:1,1 184:20llps9:14,20,22limited10:12 23:20185:7 188:4localleft29:11,12 31:123:20,21 57:9 61:12lines10:21 24:18v3:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting143:12,1936:3,5,7,8,11,12,13long81:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits20:20 21:237:16,16,17,21,22l81:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2215:12,14,19,24 16:448:1,18 52:11,23look6:5,10,22 8:130:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,1	
lead148:21151:4177:1178:20179:1170:24171:4172:9little37:570:20learn161:9181:10182:5,22178:25179:2,6,7142:15145:16leave165:4184:3185:2,24181:4,17,25182:1151:12leds58:11,1559:2,7186:1183:1,1184:20llp2:2,8,13jeft29:11,1231:123:20,2157:961:12lines10:2124:18dist69:7,1570:1376:14140:5,1127:18,2128:19located4:629:1943:869:7,1570:1376:14140:5,1127:18,2128:19located4:629:1943:869:7,1570:1376:14140:5,1127:18,2128:19located4:629:1943:869:7,1570:1376:14140:5,1127:18,2128:19located4:629:1943:869:7,1570:1376:14140:5,1127:18,2128:19located4:629:1931:1482:2185:7144:136:19,2437:6,11,13long87:196:1381:1482:2185:724:638:7,11,11,22,23longer32:7,15,2198:23,23110:23line12:16,17,1739:13,1441:3,16,2186:12,23109:10130:6131:2214:2,25,12,1615:641:2145:12,13,13113:3136:15157:2315:12,14,1	
171:19179:15 180:11,21174:19 178:21,2298:10 100:20learn161:9181:10 182:5,22178:25 179:2,6,7142:15 145:16leave165:4184:3 185:2,24181:4,17,25 182:1151:12leds58:11,15 59:2,7186:1183:1,1 184:20Ilp2:2,8,13j9:14,20,22limited10:12 23:20185:7 188:4local42:19left29:11,12 31:123:20,21 57:9 61:12lines10:21 24:18located4:6 29:1943:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21130:6 131:2215:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:1130:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:130:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20lever age60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
learn161:9181:10182:5,22178:25179:2,6,7142:15145:16leave165:4184:3185:2,24181:4,17,25182:1151:12leds58:11,1559:2,7186:1183:1,1184:20Ilp2:2,8,13joint123:20,2157:961:12185:7188:4Iocal42:19left29:11,1231:123:20,2157:961:12185:7188:4Iocal42:1943:869:7,1570:1376:14140:5,1127:18,2128:1,9157:18162:2473:1974:1878:5141:11173:6184:834:2135:20,23,25164:2,18165:2579:2080:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:196:1381:1482:2185:7144:136:19,2437:6,11,13109:3165:22,2298:23,23110:23limits20:2021:237:16,16,17,21,22181:23182:19118:2,25119:5,5,824:638:7,11,11,22,23longer32:7,15,21130:6131:2214:2,2,5,12,1615:641:2145:12,13,13113:3136:15157:2315:12,14,19,2416:448:1,1852:11,23look6:5,10,228:130:16,19,23134:917:5,7,8,12,18,21,2593:8,16,17,2494:217:2418:2415:130:16,19,23134:917:5,7,8,12,18,21,2593:8,16,17,2494:217:2418:2,16 <td></td>	
leave165:4184:3 185:2,24181:4,17,25 182:1151:12leds58:11,15 59:2,7186:1183:1,1 184:20llp2:2,8,13j9:14,20,22limited10:12 23:20185:7 188:4local42:19left29:11,12 31:123:20,21 57:9 61:12lines10:21 24:18located4:6 29:1943:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look6:5,10,22 8:19:13,15 13:24 15:30:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
leds58:11,1559:2,7186:1183:1,1184:20Ilp2:2,8,1359:14,20,22limited10:1223:20185:7188:4local42:19left29:11,1231:123:20,2157:961:12lines10:2124:18local42:1943:869:7,1570:1376:14140:5,1127:18,2128:1,9157:18162:2473:1974:1878:5141:11173:6184:834:2135:20,23,25164:2,18165:2579:2080:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:196:1381:1482:2185:7144:136:19,2437:6,11,13109:3165:22,2298:23,23110:23limits20:2021:237:16,16,17,21,22181:23182:19118:2,25130:3line12:16,17,1739:13,1441:3,16,2186:12,23109:10130:6131:2214:2,2,5,12,1615:641:2145:12,13,13113:3136:15157:2315:12,14,19,2416:448:1,1852:11,23look6:5,10,228:31ength29:14,1830:616:9,14,17,1917:374:190:16,2093:89:13,1513:2415:330:16,19,23134:917:5,7,8,12,18,21,2593:8,16,17,2494:217:2418:2,1920level89:718:3,5,7,9,20,21,23121:14,25125:1,3,424:825:1627:14leverage <td></td>	
59:14,20,22limited10:1223:20185:7188:4local42:19left29:11,1231:123:20,2157:961:12lines10:2124:18located4:629:1943:869:7,1570:1376:14140:5,1127:18,2128:1,9157:18162:2473:1974:1878:5141:11173:6184:834:2135:20,23,25164:2,18165:2579:2080:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:196:1381:1482:2185:7144:136:19,2437:6,11,13109:3165:22,2298:23,23110:23limits20:2021:237:16,16,17,21,22181:23182:19118:2,25119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14125:9130:3line12:16,17,1739:13,1441:3,16,2186:12,23109:10130:6131:2214:2,2,5,12,1615:641:2145:12,13,13113:3113:3136:15157:2315:12,14,19,2416:448:1,1852:11,23look6:5,10,228:130:16,19,23134:917:5,7,8,12,18,21,2593:8,16,17,2494:217:2418:2,1920level89:718:3,5,7,9,20,21,23121:14,25125:1,3,424:825:1627:14leverage60:518:2519:5,13,15,16133:12,17,19,22,2328:1629:143:21	
left29:11,12 31:123:20,21 57:9 61:12lines10:21 24:18located4:6 29:1943:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look6:5,10,22 8:11ength29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:30:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
43:8 69:7,15 70:1376:14 140:5,1127:18,21 28:1,9157:18 162:2473:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting 143:12,1936:3,5,7,8,11,12,13long 87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits 20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer 32:7,15,21119:14 125:9 130:3line 12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:1length 29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:30:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20:14level 89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage 60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
73:19 74:18 78:5141:11 173:6 184:834:21 35:20,23,25164:2,18 165:2579:20 80:11,18limiting 143:12,1936:3,5,7,8,11,12,13long 87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits 20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer 32:7,15,21119:14 125:9 130:3line 12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:119:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:30:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 200level 89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage 60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
79:20 80:11,18limiting143:12,1936:3,5,7,8,11,12,13long87:1 96:1381:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:1length29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:130:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 200level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
81:14 82:21 85:7144:136:19,24 37:6,11,13109:3 165:22,2298:23,23 110:23limits 20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer 32:7,15,21119:14 125:9 130:3line 12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:1length 29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:30:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20:14level 89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage 60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
98:23,23 110:23limits20:20 21:237:16,16,17,21,22181:23 182:19118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look6:5,10,22 8:1length29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:330:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 203level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
118:2,25 119:5,5,824:638:7,11,11,22,23longer32:7,15,21119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look6:5,10,22 8:1length29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:130:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20:1level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
119:14 125:9 130:3line12:16,17,1739:13,14 41:3,16,2186:12,23 109:10130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:1length29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:130:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20:1level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
130:6 131:2214:2,2,5,12,16 15:641:21 45:12,13,13113:3136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look 6:5,10,22 8:1length 29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 1530:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20level 89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage 60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
136:15 157:2315:12,14,19,24 16:448:1,18 52:11,23look6:5,10,22 8:1length29:14,18 30:616:9,14,17,19 17:374:1 90:16,20 93:89:13,15 13:24 15:330:16,19,23 134:917:5,7,8,12,18,21,2593:8,16,17,24 94:217:24 18:2,19 20:3level89:718:3,5,7,9,20,21,23121:14,25 125:1,3,424:8 25:16 27:14leverage60:518:25 19:5,13,15,16133:12,17,19,22,2328:16 29:1 43:21	
length29:14,1830:616:9,14,17,1917:374:190:16,2093:89:13,1513:2415:30:16,19,23134:917:5,7,8,12,18,21,2593:8,16,17,2494:217:2418:2,1920level89:718:3,5,7,9,20,21,23121:14,25125:1,3,424:825:1627:14leverage60:518:2519:5,13,15,16133:12,17,19,22,2328:1629:143:21	
30:16,19,23134:917:5,7,8,12,18,21,2593:8,16,17,2494:217:2418:2,1920level89:718:3,5,7,9,20,21,23121:14,25125:1,3,424:825:1627:14leverage60:518:2519:5,13,15,16133:12,17,19,22,2328:1629:143:21	0
level89:718:3,5,7,9,20,21,23121:14,25125:1,3,424:825:1627:14leverage60:518:2519:5,13,15,16133:12,17,19,22,2328:1629:143:21	23
leverage 60:5 18:25 19:5,13,15,16 133:12,17,19,22,23 28:16 29:1 43:21	12
license 192:3 193:12 19:18,21 20:1,2 134:1 138:2 157:19 46:25 47:2,6,14,1	
licensed 192:3 21:6,23 22:1,5 23:7 157:21 158:12 60:25 61:18 63:1	
lifetime 146:5,7 23:9 24:13,18 25:24 159:10 164:7,12,15 68:12 69:24 75:24	
lift68:226:3,9 27:2,17,22164:22 165:6,9,1091:11,14 92:5	
light 58:3 59:2,7,13 28:1,8,11 29:5 30:7 165:14,20,24 166:7 103:17,21 107:9	
59:14,17 34:19,22 35:19 166:8,11,13,17,20 115:6 117:3,9	
likewise 90:17 36:18 38:6,10,24 167:13,22 168:6,9 119:21 121:8	
limit 10:14 20:21 39:1 40:12,14,23 168:11,23,24 169:5 123:21 124:9	
42:21 121:25 144:7 41:14,20,24 42:16 169:8,9,16,24 170:3 129:23 136:3 138	9
limitation 12:25 42:16 43:1,4,5,6 170:4,12 171:16 139:3,9 144:9	
14:11 15:18,21 48:2,3,6,15,16 53:5 172:5,16 179:18 147:13 149:1 157	3
16:18,21 17:2,17 68:23,24 70:3,16,21 188:2 157:4,4 158:4	
21:22,25 27:24 28:2 78:16 79:11,12,13 linked 13:12 162:12 163:21	
28:6,10 101:17 86:12 93:12 102:15 liquid 3:13 12:7,11 165:1 166:6,23	
102:12 175:10,12112:5 121:11,15,1733:14 53:18 58:3169:15 172:21	

312-442-9087

[look - mitchell]

Page 17

	1	1	
173:19 174:8,9,12	manzo 2:13 4:22	mean 9:23 14:18	166:24 180:2,4
186:20	79:1 190:7	18:10 19:23 21:9,11	183:2
looked 7:2,4,14,15	mark 78:20 82:2,4	24:1 29:22 30:3,19	mentions 38:9 39:5
93:13,18 94:5	83:19 86:17 87:8	32:11 33:3,5 34:12	39:14 76:2 183:17
164:16	88:6,11 99:19,21,24	35:7 37:3 44:7 50:4	met 28:7,12 99:11
looking 7:8 15:2	189:25 190:2,5	50:17 51:18 53:4	102:6
18:14 21:14 22:11	marked 6:1 9:5	55:5,24,25 60:12	metal 14:20 24:13
22:17 49:20 58:8	28:19 53:12,14	68:22 72:4 77:1	24:18 41:18 43:5
63:2 65:17 68:23	80:12,17 81:2 82:5	79:10 88:6,7 90:1	48:5,16,17 64:5
75:19 102:21	83:21 88:12 99:22	92:23 95:21,25	110:16 121:12,13
108:11 111:18	106:8 144:11	105:17 106:16	121:16,19,24 123:6
112:2 125:15	189:24	109:7 118:8 125:21	123:13,24,25 124:2
126:19 129:23	marking 86:18,20	125:23 127:11,17	124:7 125:12
137:20 139:15	86:21	133:5 135:18	126:15 129:18
151:15 153:24	markings 190:5	137:18 140:8 148:7	135:19 159:3
164:9 169:3 170:19	mary 2:21 4:2	148:17 153:3 156:8	metals 38:25 96:17
lot 9:17 82:22 85:12	mask 62:19 63:17	156:11 159:18	michael 1:11 3:2
165:4	63:23,25 64:4,18	165:21 166:19	4:13 5:1,10 60:22
lots 132:2 135:18	65:11,12	187:7 188:12	105:4 153:21
low 34:25 35:3,7,9	masked 68:2	meaning 40:12	189:18 191:9,18
35:12 91:18 94:8	matched 136:19	148:10	192:7,9
lower 19:4 42:9	matches 118:18	means 10:12 33:17	microdisplay 55:15
55:11 79:18 121:19	material 12:12	57:9 178:8	microdisplays 3:13
123:23,24 124:6	14:21 15:15 22:6	meant 51:1 155:16	53:19
126:15 129:18	36:24 37:21,22 38:5	157:4 181:16	microelectronics
131:18 159:6	38:7 41:20 43:15	184:21	116:8 117:1
178:14 188:3	48:24 51:11 55:5	measurements	microscope 103:20
lowered 43:7,10,11	58:14 64:14 73:9	153:1,4	middle 30:8 42:3
lowering 179:16	74:15 79:22 84:21	media 60:17,21	163:16
181:21	96:13 107:11	104:1 105:3 153:14	millimeters 144:22
lying 44:5,7	116:16 145:11,25	153:16,20 189:19	144:25 145:8,9
m	146:15 147:6	medium 90:22	mind 10:11 47:25
m 2:3	149:10 172:4,11,14	meet 39:18 40:6	67:9 86:6 90:10,13
magnification 82:14	172:16 175:13,17	99:8 101:17 102:3	91:1 125:14
majority 73:22	materials 6:13	102:17 117:20	minimizing 149:4
making 59:20	102:8 145:17 146:2	143:5	149:15
154:22	150:4	meets 28:10 42:4	minute 92:5 164:16
mangels 2:2	matrix 29:6 54:13	160:16 186:13	missed 37:25
mangers 2.2 manner 168:14	54:20 57:14 75:25	memory 91:24	missing 98:22
manufactured	176:17,21	159:20	misspoke 129:8
14:14	matter 5:23 18:17	mention 7:1 95:10	misstates 101:5
manufacturing 60:9	21:16 28:17,24 61:1	116:6 174:23 175:1	misunderstand
127:7	61:6 77:10 82:3	mentioned 41:16	18:10 101:20
14/•/	83:13 109:25	42:7,11 53:24 58:7	mitchell 2:2
	138:18 189:5,14	76:6 92:10,11 98:3	

312-442-9087

.

[modes - ones]

Page 18

		1	<u> </u>
modes 76:11	111:13 112:15	nuanced 151:12	187:3,14
modification 9:11	132:2 147:6,10	number 3:8 4:10 6:2	objective 178:8,15
57:6,22 83:4,24	152:18 169:8	7:10 9:6 28:20	179:3,5,9,16,20,21
84:4 147:18	187:11,16,18	39:21 53:14 60:17	180:6,10,12,18,22
modified 3:17 57:24	needed 8:25 59:14	60:21 83:21 89:2	181:11,21 182:3,6
81:25 83:2 101:7	109:11 115:23	104:1 105:3 106:9	182:12,23 183:5,14
102:21,25 107:17	143:6	132:6 144:12	184:4,12
107:19	needs 33:15,15 35:7	153:16,20 189:19	objectives 177:23
modulators 58:3	35:8,9 59:13 107:11	numbered 167:1,20	178:3,10,12 180:2
moment 8:13 49:18	113:15 133:25	numbering 137:25	observe 93:22
74:7 172:22	150:2 163:4 182:1	numberings 78:18	observing 84:19,22
morning 5:6,9	negative 131:12	numbers 31:17	94:15 148:10,16
105:20,22,25	neither 138:1	68:16 70:2,5,22	151:14 153:7
motivated 96:25	146:21	189:25 190:8	obtained 193:1
motivation 97:5	never 43:20 64:14	0	obvious 66:19 83:16
move 47:12 57:16	87:14 97:13		85:14 87:15
71:17 116:22	nevertheless 40:22	0 105:1,1,1	obviously 13:3
multi 46:3	44:24 99:7	oath 105:9 191:10	96:21
multiple 10:10 34:8	new 3:17	object 64:7 76:25	occurs 79:17
34:21 47:25 60:4	news 3:12 53:17	89:19 137:10 140:2	offered 43:14 44:25
92:9 93:7 129:22	night 105:13,18	143:21 163:17	126:24
145:3 157:10 159:7	nine 154:15,17	objected 186:17	office 1:1 4:6,11
162:25 171:6 178:2	nitrate 116:4	objection 10:8 11:9	60:3 191:1 193:8
· n	nitride 51:10 58:9	13:9 17:9 22:19	offset 120:14
	58:14 59:20 116:4	26:4 29:16 30:1,17	oh 10:22 26:14 47:7
n 3:1 105:1,1,1	116:24	32:9 33:2 35:13	99:12 147:19 165:3
naas 2:21 4:2	nominally 123:12	37:1 55:22 64:2	okay 4:1 8:3 9:19
nakamoto 97:17	nonfunctioning	66:6 77:17 81:7	10:14 15:2 19:12
98:1,6	124:23	84:18 85:10,20	26:16,17 28:16
name 4:2,13 5:7,7,9	nonlinear 57:6,21	87:10 88:4 91:2	33:10 48:14 54:5
5:10	58:1,22	97:3 101:5 102:9	56:13 61:18 62:6,9
narrow 150:12	nonresponsive	112:8 115:14	62:13 63:11 64:17
near 58:6 102:12	47:12 57:17 116:22	117:13 118:14	65:1,23 66:18 71:16
167:5,10 171:15	normal 20:23	120:9,20 124:16	81:12 86:3 87:18
nearly 176:19	normally 14:13	125:19 127:8,25	88:24 89:25 92:5,6
necessarily 21:4	16:16 30:10,12	128:19 130:5	93:1,4 100:13
23:24 24:12 25:3,7	nos 82:6	132:10 133:4 135:3	103:23 119:21
25:11,14 35:7 77:8	notary 191:23	141:13 146:17,23	122:6 123:3 127:16
121:23 187:18	note 44:18 97:14	155:12 156:7,17	140:14 143:25
necessary 65:3	134:15 150:10	161:11 162:4	157:24 158:24
109:3 113:17	notes 177:7	170:25 172:6 179:8	159:5 167:21
124:20 137:15	notice 1:13 35:21	179:22 180:14,23	177:17 182:21
186:7,25	47:7 61:14	181:13,22 182:24	once 5:6 112:3 114:9
need 5:17 30:19	noticed 182:13	183:15 184:6,13,17	ones 90:12
33:18 96:12 102:18		185:5 186:10,16	
1			

[ongoing - patent]

Page 19

		T	
ongoing 105:15	33:10 38:15,16 40:2	overlaps 130:21	123:4,6,19 130:22
open 101:14 106:20	40:10,21 43:20 44:3	138:23	130:22,23 138:23
106:25 107:23	44:10 45:19 46:17	overlays 142:15	139:12 140:23
126:4 127:20	47:1,4 52:21 53:11	owner 1:7 2:17 4:23	165:2 173:7 182:10
128:17	56:22 62:1 63:3	191:7	183:24
opening 20:14 24:21	66:3 85:3 86:9,13	oxide 96:14 113:11	partial 40:24 186:5
46:6 61:20,24 62:2	86:24 87:6,11,16,19	р	partially 39:3 43:24
62:17 63:20,20,24	88:1 94:25 95:18	p.m. 104:5 190:12	44:4,19,20 45:7
64:1,13,24 65:3,13	96:8,24 99:15	192:16	52:7 67:1 74:19
66:13,16 68:4	100:23 101:18,22	package 138:12,16	92:24 130:21
102:14,17 106:20	102:2 103:15	138:22 140:19	163:13 173:24
125:10,11 126:15	109:19,22 112:2		179:12
127:23 129:2,10,16	114:6,8,8,15 116:12	143:4	particular 20:14
129:17,19 139:7,10	116:15,23 120:6,12	pad 32:1 70:2 72:3	53:24 56:14 57:3,15
139:21 142:8,20,21	120:22 121:20	97:9	57:18,19 67:24
163:4,5	122:4 123:3 125:15	pads 31:15,15,20	103:17 109:25
openings 46:11	128:15 129:2,21	32:3 34:7 69:9	143:2 150:24
62:14 63:1,6 64:19	135:14 136:16	115:4	particularly 12:15
86:14 87:13 163:6	137:19,21 138:3,7	page 3:1 31:5 60:25	94:8 96:7 155:23
opinion 10:5 45:18	144:2,4 146:25	82:10 88:23 141:24	parties 4:15 193:3,5
opinions 6:18,25	161:8,25 165:13,17	147:13,17,24 148:1	partner 60:9
opposed 58:11	176:8 187:15 188:1	148:3	partnership 57:4
95:11 96:1	189:10	pages 191:13	parts 41:17 118:15
opposing 133:9	orientation 74:10	panel 29:6	124:3
opposite 22:4	78:9	paper 3:12 53:18,24	pat 1:5 3:10,11,19
optical 131:17	original 8:4 142:2	53:25 54:2,13,24	3:20,21 191:5
optimum 146:15,19	orthogonal 164:25	papers 54:1,10	patent 1:1,1,7 2:17
147:1	169:10	paragraph 8:10	4:9,10,11,12,23
option 36:25 39:8,9	outcome 193:6	24:9,9,25 36:17	5:22 8:21 9:3,8,14
39:15,16 116:5	outside 109:4	61:10 172:10	9:17,22 10:2,11
129:14,14,15 144:3	113:18 142:19	paragraphs 61:7,14	25:20 28:17 46:9,22
options 39:7,12	overall 29:14 30:16	61:15	46:25 50:11 63:3,7
129:22	overcoat 51:8 61:20	parallel 48:1 164:6	63:9,11 69:21 75:1
order 11:7,18 13:7	61:23,25 62:2,3	164:11,14,21,24	75:20 91:12,22
13:10,22 17:18	64:22,25 66:12 85:7	169:11,19,20 188:3	93:20 94:5,17 95:7
21:20 22:24 66:23	86:11,16,19,21,23	park 2:3	95:12 100:8 106:5,6
82:4 100:24 170:1	87:7,19,25 88:2,13	part 12:3,4 41:14	154:4,9 158:5,16
186:8 187:1,12	overlap 111:17	57:16,18 59:4 62:23	161:9 162:2,25
190:1	138:21 139:17	62:25 68:19 72:3	163:22 165:20
ordering 67:22	159:12 163:10,12	73:11,15 75:5 77:13	174:8 177:21,24
ordinarily 8:20	163:13 182:1	78:5 79:18,20 80:5	178:1,2 179:3,5
ordinary 11:4,4,14	183:23	80:14 98:16 99:14	184:4 185:19,21
11:23 14:13 16:2,16	overlapping 12:17	106:14 107:6	188:17,19 190:1,3,4
17:11 19:17 20:11	45:5,6,8 111:22	108:12 110:7 111:3	191:1,1,7
	12.2,0,0 111.22	114:3,3,12 122:25	1/1+1919/
20:24 21:18 23:4,19			

[patents - previously]

.

Page 20

(22 7 /			
patents 6:22 7:4	pg 3:14,16	polarization 3:12	79:4 86:16 95:14
28:22 40:19 46:4,18	ph.d. 1:12 3:2 5:1	53:18	99:3 101:12
46:22 47:2 154:5	191:9,18 192:7,9	polymer 74:14,23	possibly 83:18
155:10,15 188:16	phrase 17:11 126:9	portion 41:6 62:20	potential 72:5
path 20:17	physical 60:6 140:2	69:4,7,8 74:21	112:20 113:20
paths 20:19	pictured 170:9	75:13,15 77:6,14,19	131:10
pattern 30:20,23	piece 55:18 56:14	79:15 80:11 81:2	potentially 179:13
32:20 34:9 98:15	100:20	84:12 85:1 97:16	power 31:15,25
patterned 16:20	pieces 70:6 97:15	98:17,18 100:11	practically 99:5
21:7 22:2,2 23:8	144:15	106:20 108:8,10,13	precise 29:23 30:4
24:16,21,23 66:11	pixel 12:9 33:18	108:15,17,21	48:18 89:2 99:5
66:17 98:21 159:4,9	54:25 69:17,18	110:11,16 114:4	117:21 124:1
patterning 19:20	81:16 84:10,13 85:1	116:20 117:18	170:21
35:24 42:1 47:23	85:18 110:23	118:16 119:4,15	precisely 117:24
peaks 149:2	124:23 130:10,14	120:23 121:3,3,15	118:17
pen 78:20,25	130:17,18 131:21	122:24 124:11	predominantly
peninsulas 70:19	131:25 132:6,12,19	125:6,7 129:16,17	55:11
people 189:10	134:16,23 174:15	130:12,25 131:22	prefer 19:3
perform 34:4	176:4	131:24 132:7,8,13	preferable 17:14
performance 143:19	pixels 132:3,17,18	132:14,17 134:18	preference 128:21
performing 66:4	154:16,17	135:8,11 136:1,6,9	preferred 14:25
periodically 33:19	place 120:14 134:22	136:12,16,18	63:8
peripheral 54:14	placed 64:6	138:24 139:1,5,18	prepare 6:14
92:12	places 15:7 92:9	140:9,22 141:4,7	prepared 14:15
periphery 163:3,19	169:25	143:6 144:5 151:4	15:15 16:19 22:6
permitted 47:2,5	plan 29:5 156:19	161:15 162:8 164:8	preparing 6:17,19
person 11:4,4,14,23	159:24	166:4 168:4 170:2	6:25 28:23
14:12 16:2,16 17:11	plaza 2:3,14	170:14 178:4,5,17	prescribed 22:14
19:17 23:4,18 38:15	please 4:14 26:8,14	179:12	presence 148:18
38:16 40:20 43:20	60:23 78:24 91:25	portions 75:11 77:9	149:5,16 156:11
44:10 45:19 46:17	105:5 153:22	77:21,23 110:2	present 2:20 13:12
47:4 53:11 56:22	177:13,20 178:18	121:4 124:5 125:9	29:7 156:21 179:24
62:1 63:3 66:3	185:16	135:18 148:21	presented 3:8 6:2
87:11,16 95:18 96:7	plenty 140:4	169:21 170:11	9:6 28:20 106:9
99:15 100:23	plurality 132:16,18	171:20	144:12
116:14 120:5,12,22	point 54:23 63:21,24	position 109:24	presumed 46:21
122:4,18 125:14	90:6,9 94:1 109:8	positioned 122:8	prevent 115:13
128:15 129:1	109:11 114:9 118:9	169:5	preventing 180:6
135:14 146:25	135:21,22 166:23	possibilities 53:9	182:6 183:8,14
165:17 187:15	177:15	122:17	previous 16:7
personally 192:8	pointed 133:21	possibility 14:24	147:24
pertain 184:4,12	169:1	82:23 102:2 137:22	previously 6:1 9:5
pertains 183:13	pointing 16:22	142:24 161:13	28:19 106:8 144:11
petitioner 1:4,12 2:6	27:20	possible 14:20 36:25	174:4
4:20 191:4		42:5 44:21 68:7	

312-442-9087

[prime - recall]

Page 21

nuima 150.22	nuadurata 57.32 59.3	manidag 59.2	amostiona 54.2
prime 159:23	products 57:23 58:2	provides 58:2	questions 54:3
principally 13:12,17 113:17	60:9 97:10,12	providing 180:12	177:15,16,16
1	project 57:9,23	181:11 184:5,15	182:14 187:20,22
principle 133:24	59:13	185:3	quite 10:9 33:19
147:7,11 150:11	projection 68:25	public 60:13 191:23	82:22 116:21
152:15 188:5 189:5	69:6	publication 54:19	136:21 139:6 146:8
printed 97:1 138:16	projections 70:24	publish 57:8	155:21
138:21 139:16,24	80:2	purpose 6:24 31:12	r
141:20 142:22	projector 59:3,18	31:13 34:20 39:1	r 105:1
143:16 171:25	projects 58:8	61:5,8,11 115:18	raise 88:3
181:2,15 185:8	properties 145:10	159:16 160:6,9,11	raised 88:16
printing 8:1	145:15 146:3,9	160:12,21 161:2,7	range 89:10 144:22
printout 79:12	proportions 151:15	161:10,19 162:2,5	152:12
prior 40:16 92:19	proprietary 97:13	162:10,17,18	rate 88:24 89:6,8
93:2 97:15,19,23	protect 107:12	183:11	rates 89:5
106:24 114:20,20	115:23 116:16	purposes 159:4	reach 34:11
117:22 144:14	protecting 107:3	161:21	reached 19:10
148:11,24,25 150:4	108:1 113:12	pursuant 1:13,13	reaches 45:7
150:15,22 151:2,13	protection 110:5	192:19	read 8:14,16 16:16
151:16 155:1	113:15,16 116:7,13	put 20:1,1,2,3 31:6,7	17:2,11 19:18 40:11
188:19	116:25	37:6 68:1,4 80:14	147:25 181:7,14
probably 48:18	protective 51:8	86:18 100:22	191:12 192:21
68:24 88:11,18 99:6	61:19,23 64:22,25	101:23,23 120:22	reading 9:18 11:15
100:2 116:18	66:12 85:7 86:11,15	167:7	45:14 161:9 162:1
155:25 177:8	86:18,20,23 87:7,19	putting 8:6 50:14	192:17,22
probing 109:25	87:25 88:2,13	61:5	reads 11:5 183:17
problem 34:24	prototype 57:10	q	185:7
188:9	protrude 79:25	quality 35:11	real 103:7
problems 106:23	protrusion 73:1	162:21	reality 103:14
procedure 192:20	172:25	quantitative 153:1,3	really 12:15 52:20
proceed 4:18 5:19	protrusions 70:20	question 23:2 30:3	58:11 99:5
proceedings 189:21	72:4 75:8,8 78:17	32:19 37:23,25	reason 5:18,20
190:11 192:13	80:1	47:13 54:9 66:9	74:22 84:25 151:19
process 19:1 20:7,18	provide 41:7 46:13	69:24 80:20 87:1	151:21 154:10
22:9 24:6 64:9,10	58:5 59:16 108:3	89:22 97:14 100:15	192:25
68:3 99:16 101:19	110:5 113:2 117:24	101:20 103:11	reasons 34:22
143:1 186:7,12,25	162:19 178:3,13,15	109:9 111:10	recall 7:4,6,19 54:6
187:11	179:25 183:24	112:18 116:21	54:16,17 59:21 63:9
processing 8:25	provided 7:13,17	137:6 140:7,13	95:10 98:6 105:23
59:25 62:4 68:6	12:12 13:14 33:25	156:13 161:23	105:24 152:8
produce 59:7 60:8	42:9 44:13 57:20	169:7 174:4 186:21	166:22 177:23
produced 59:14	153:12 154:9	186:21,24 187:10	178:11,13,15
131:8	175:13 178:9	188:11	185:22,23
product 22:17 58:4	181:25 182:9		
60:7	183:11		

312-442-9087

[recess - resources]

Page 22

			1
recess 60:19 153:18	references 68:22	regions 42:19 70:1	rephrase 30:2 87:1
177:11 185:14	171:4	75:18 111:4 154:14	111:10 140:7 156:9
recessed 104:4	referred 93:23	156:6,16 161:6	161:23 169:8
reciting 24:10	137:14 156:18	166:20 173:12	reporter 4:16 192:1
recognition 34:14	165:10 175:25	relate 102:11 179:16	192:3
recognize 65:18	188:11	180:12,22 181:11	represent 4:16
66:4 116:24 138:4	referring 11:7 18:11	182:22 183:8 185:3	82:20 88:6
recognizes 34:24	37:7 80:9 89:6 93:7	185:25	representative 9:21
recognizing 7:3	93:9 98:17 105:21	related 92:23 193:2	9:24 10:16
92:13,21 94:25	117:15 139:2 148:2	relates 180:5	represented 75:17
150:8 153:8	150:24,25 154:3	relating 181:21	reproductions
recollect 91:23	158:20 160:23,24	182:6 183:12	147:18
record 4:1 5:8 60:16	175:12	relationship 12:22	require 12:22 14:16
60:20 103:25 105:2	refers 16:24,25 20:4	13:1 17:20 22:8	16:21 19:14 21:16
153:15,19 177:9,12	25:23 26:19 27:1,8	81:9 112:1 155:16	44:19 125:17 152:2
185:11,13,15	38:11 68:24,25 95:5	161:4	186:2
189:20,22 192:12	176:15 177:1	relationships 20:5	required 8:24 15:18
recorded 192:11	reflective 58:2	20:21	17:15,19 19:7 21:8
rectangle 30:10,15	refresh 159:20	relative 20:5,21	24:16 126:21
32:7,21 42:17,17	regard 7:20 103:1	21:16 22:8,10 23:21	152:13 186:12
75:7 167:18 168:21	128:5 152:9	154:20 155:1 161:3	187:4
rectangles 115:4	regarding 105:25	169:6 193:3	requirement 76:14
rectangular 132:20	147:22,23 156:15	relatively 74:4	requires 15:21 17:7
red 79:2,13 80:14,17	regardless 140:8	reliability 146:6	20:8 49:24 63:8,10
142:4	region 31:16 41:5	reliable 178:16	71:3 131:10 145:21
reduce 162:6	46:15 50:21 64:9	181:12 185:3	146:12
reduced 92:8 151:7	70:21 75:9 78:16	relying 113:4	requiring 17:13
178:4	81:4 96:15 97:9	remember 54:3,8	19:19 137:24
reducing 92:15	106:25 107:23	84:5 90:21 91:19	research 60:7
94:13 151:24 178:8	108:22,24 111:9,14	98:13	reserve 177:15
179:10 182:23	111:23,25 113:24	remind 100:14	resin 28:13 73:8,10
reduction 183:25	113:25 114:10	reminded 92:6	101:4,13,14
redundancy 91:18	133:3 134:8,16	removal 87:24	resist 65:12 68:3
91:22 92:2,10,15	136:6 139:6,22	remove 100:11	resistance 32:24
93:5,15,25 94:3,10	144:18,21 145:7,12	131:15	34:16,19 35:1,3
94:14,21 185:20,25	145:18 148:13,21	removed 64:12	42:9,14 43:7 74:4
186:6	149:7,9,18,21,24	86:11,20 87:18 88:1	91:18 92:9,16 94:9
redundant 93:8,21	150:2,12,21,22	131:3,19 150:1	94:13 143:12,16
refer 91:22 94:13	151:8,11,13,16	152:17	144:1 178:4 179:11
154:20 160:17	152:18 155:1	removing 149:4,15	179:17 181:21
177:20 178:18	165:25 166:1,4	reorder 66:21	182:23 188:3
184:18	167:13,24 169:24	reorganize 83:16	resolution 90:5,21
reference 31:19,21	170:2,4,11 179:25	repeat 5:13,15	90:22
41:8 58:19,21 71:11	180:1 184:20,22	repeating 49:15	resources 60:6
158:18			

[respect - sealant]

Page 23

		T	1
respect 17:1 76:22	162:11 166:21	scale 145:3 153:12	180:3,19 181:9,19
92:11 179:4,6	167:19 168:12,20	154:2,6,8,11,13	182:4 183:6 184:2
182:21 186:18,19	168:25 169:4	155:6,8	184:10,14 185:1,17
respectively 36:13	174:18 175:22	scan 36:19 41:2	186:15,18,23 187:5
167:19 171:16	177:6,15 188:18	52:11 121:11,13,15	187:19 189:16
response 131:6	189:9	121:17,18,21,25	190:10
rest 15:9 22:9 53:6	rightmost 139:5,5	122:3,13,22,25	scope 89:19 91:6
80:7 98:22 125:4	riverside 2:14	123:5,7,14,18,19	179:8,22 180:14,23
restate 101:21	rmr 193:12	124:21 125:25	181:13,22 182:24
156:12 186:24	rocca 1:15 4:17	133:12,17,19,22	184:6,13,17 185:5
results 147:10	192:2 193:12	136:5,13,20 137:1	screen 89:6
resumed 105:6	rough 89:1,3	137:14 138:2,5	seal 31:16 108:22,24
reveal 101:25	roughly 75:7 172:9	168:5,11,24 169:9	109:4 113:13
reverse 22:21 170:1	round 182:14	171:16	144:17 145:7,10,12
reversed 22:16	rpr 193:12	scanning 36:2,8,12	145:18 146:1,15
review 6:16,20	rule 152:22 192:19	37:13,16,17,22 38:7	148:12 149:10
reviewed 6:14 9:16	rules 1:14 5:12	38:10,22 39:14	150:2,3,12,21,22
28:23 148:4	192:20	41:16,21 43:4 45:13	151:8,10,13 152:16
right 5:21 9:13 11:3	running 188:2	48:3	152:18 154:14
12:6 13:3 15:4,10	runs 30:7,7 31:1	schematic 3:14,16	155:1,3 163:7 170:2
19:23 25:5 27:14	52:2 70:16	3:17	170:4,14 179:24
29:13,24 30:11,25	S	schlitter 2:9 3:5	181:8 193:8
31:2,7 34:25 35:9	s 5:10 105:1,1,1	4:21,21 10:8 11:9	sealant 12:12 41:5
41:2,18 43:8 44:21	s s s s s s s s s s	11:12 13:9 17:9	45:6 47:8 71:10,11
45:2,14 47:16 48:19	192:2 193:12	22:19 26:4 28:18	71:15,19,25 72:13
50:19 52:18 56:6	satisfy 27:23 28:1	29:16 30:1,17 32:9	72:16,17 73:4,5,11
59:1,5,17 60:15,25	saves 126:25 127:1	33:2,4 35:13 37:1	73:14,16,18,22
63:2 65:9 67:4 68:2	saves 120.23 127.1 saying 13:4 14:24	55:22 64:2 66:6	74:21 75:3 76:1,3
69:16,17 70:10,23	15:10 17:4 18:5	76:25 77:17 81:7	77:24 78:22 79:7,21
72:8,24 73:12,21	38:20,21,24 61:10	84:18 85:10 87:10	79:23 80:6 81:20,23
74:18,19 78:7,8	80:13 102:25	88:4 89:19,23 91:2	98:24 108:24
80:13,16,16,20 83:1	108:17 113:15,24	91:6 97:3 101:5	109:14,15,20,21
86:19 88:9,21 94:4	126:20 131:24	102:9 112:8 115:14	110:4 112:24 113:2
99:2 106:23 109:5	149:20 151:4 173:6	117:13 118:14	113:18,22 119:14
110:25 111:21	173:20	120:9,20 124:16	119:19 120:7,13,18
115:21,24 116:9	says 8:19,19 15:6	125:19 127:8,25	120:22,23 147:6
118:11 119:25	23:4 25:1,11,13	128:19 130:5	149:7,18,24 151:5
120:2 121:22 124:9	36:5,17,20 44:20	132:10 133:4 135:3	152:2,7,20,23
127:7 130:23 132:2	52:19 71:5 74:2	137:10 141:13	159:12,14 160:3
132:22 134:7	95:12 102:13 111:7	143:21 146:17,23	161:15 162:7,24
138:24 139:1,12	152:8 162:21	148:1 155:12 156:7	163:11,15 164:2,18
146:11 147:6 148:6	172:11 174:19	156:17 161:11	164:20 166:3
148:14,20 149:8	180:16 181:2 182:9	162:4 163:17	167:13,24 168:16
150:13 151:21			
150.15 151.21	183:19	170:25 171:2 172:6	169:6,9,11,19,21,25

312-442-9087

[sealant - side]

Page 24

			e
173:16,19,24,25	91:15 93:6 94:22	65:7 66:8,19 67:18	118:16 119:3
174:6 178:14	96:16 98:12 103:18	68:6 84:20 101:9	120:21 155:11,19
179:12 180:9,13,16	115:3,7 117:4,10	series 84:9,17,23	155:20,22,25 156:5
181:1,7 182:11	118:1,12 119:17	serve 14:22 160:4	156:14 158:7 163:1
183:23 184:1,5,8,16	121:9 122:16	161:15 179:20,21	showing 84:20
184:23 188:9,20	123:23 125:21	183:4	85:22 135:11
189:2,11	129:25 132:22	serving 180:1	149:23 150:23
sealant's 120:2	135:1,1 136:4 137:5	set 11:19 145:17	156:19 157:9
sealants 146:9	137:23 138:10	177:1 193:7	shown 48:25 72:10
152:25	139:3,10 140:14,14	sets 61:10	84:8 88:8 91:17
sealing 52:1 148:21	140:20 142:6 151:8	sgibson 2:5	110:20,21 115:18
149:9,20 151:16	158:6 160:15	shade 142:4,6,7	117:11 118:10,19
152:12,13 165:25	162:16 163:23,24	shaded 143:11,18,25	119:10,13,18,19,20
searching 68:20	164:1 166:6,8 168:5	shape 132:20	119:22,23 120:2,8
second 10:18,20	168:7,9 169:16,17	shapes 103:21	120:11,18,24
11:1,6,24 12:2 13:6	169:23 170:16	share 54:23	124:13 125:7
13:13,17,21,25 14:2	173:7 174:21	shiba 3:18 28:16	134:10,21 137:2
14:3 16:25 17:25	178:20,22	29:1,4 30:21 31:10	138:14,25 139:10
19:13,15,18,20,25	seeing 164:10	31:13 33:24 34:5,23	139:21 141:5 142:3
23:9,10 24:14,17,18	seen 7:3 87:14 100:5	35:16,18,21,22 36:4	151:16 157:25
24:19 27:1,8 28:8	sees 122:18	36:22 37:8,13 38:3	158:2 159:7 167:14
28:11,12,14 42:24	semiconducting	38:8,13,17 39:9	167:25
42:25 75:5 97:17	122:9	40:3 44:18 45:17,23	shows 66:10 69:15
101:4 102:15	semiconductor 1:6	47:6,21 49:10,22,24	71:13 72:2,17,20,20
107:15 156:20	4:9 62:4 191:6	50:9 51:22 52:18,18	75:6,11 78:3,4
157:22 158:15,19	sense 49:6 62:13	68:10,11,25 70:6,24	107:2 108:20,22
159:8,11,16 160:13	94:16	71:3 72:2 74:11	114:2,21 123:21,23
160:18,24 161:4	sentence 25:1 38:9	75:22 77:2,5,18	123:24 124:1 135:7
162:3 180:17	38:12 39:5 44:22	78:17,21 79:25	135:9 148:7 152:3
182:14 183:1 184:9	52:19 148:6	82:18,21,25 83:3,17	157:10 164:13
184:20,24 185:7	sentences 39:18	83:25 93:4,6 145:13	188:6 189:8
section 47:21 53:4	40:4 42:5 44:12	149:1,1 150:11	shrink 145:17
61:17 77:5,10,19	93:24	165:1 166:5,18	sic 31:10 134:4
85:24 101:2 108:20	separate 13:18	169:16 172:21	186:13 188:8
113:9 115:1,4	separated 45:25	173:18 174:17	side 19:4 29:12,12
159:22,22	separation 115:5	176:13 188:6 189:8	29:13 30:15 33:18
see 6:12 8:12 10:1	september 1:16 4:3	190:3	41:2 45:2 69:7,16
13:6 16:3 25:17	191:11 192:5	shiba's 69:10 83:4	69:17 72:25 73:20
29:10 36:15 47:15	sequence 12:4,22,24	shooting 70:19	73:21 78:5,7 80:11
47:16 51:6 53:21	13:11 14:7 15:18	short 60:19 153:18	98:23 133:15,15
59:1 67:12 68:13,14	18:11,12 21:4,10,13	168:22 177:11	135:12 139:12
68:15 69:17 70:12	21:14,17 22:10,14	185:14	158:14 164:4,19
70:15,15 74:20 76:5	22:16 23:5,12,14,15	shorthand 192:1,3	167:8,19 168:13,25
76:21 79:14 80:3	23:17,21 24:1,11	show 80:4 110:15	169:3,4 173:14,15
85:23 87:8 88:14	25:2,5,13 51:22	114:14 115:23	173:17

312-442-9087

[sides - strength]

Page 25

			1
sides 30:9 32:7,14	19:17 20:11,24	source 59:3,18	standard 46:4 56:20
32:15,21 34:6 42:17	21:18 23:4,19 33:10	84:11,12 85:2 125:2	57:7,23,25 62:4,6,8
75:9 113:12 148:9	38:15,17 40:2,10,21	130:9	63:16,19,22 89:16
sign 192:21	43:20 44:3,11 45:19	south 1:15 2:9,14	89:17 90:5 95:15
signal 35:10,11	46:17 47:1,4 52:21	4:6 192:6	96:19
165:6,14 166:18	53:11 56:22 62:1	space 60:4 125:18	stanley 2:3,9
172:5,16	63:3 66:3 85:3	125:22 126:25	start 19:25 42:2,22
signals 89:5	86:10,13,24 87:6,11	127:1,6 128:10	71:16 117:24 133:8
signature 191:14	87:16,19 88:1 94:25	152:2,3,6	159:19
192:19 193:1	95:18 96:8,25 99:15	spacial 58:3	started 182:14
signed 192:24	100:23 101:19,22	speak 152:24	starts 45:4
signing 192:17,23	102:2 103:16	speaking 14:9	state 5:7 24:9 192:2
silent 109:17 110:3	109:19,22 112:3	speaks 115:16 161:3	stated 82:15
110:19 111:6,12	114:6,8,15 116:12	spec 176:14	statement 8:19 14:4
152:25 175:4	116:15,23 120:6,12	specific 10:6 29:21	94:18,20 128:4
silicon 51:10 54:25	120:22 121:20	54:9 64:4 97:4,11	147:23 148:8 150:6
55:4,8,12,17,19,20	122:4 123:3 125:15	97:24 113:8 161:24	150:17
55:21,24,25 56:1,8	128:15 129:2,21	specifically 11:22	states 1:1 4:11 11:5
56:9,17,23 57:1,7	135:14 136:16	18:12 50:11 54:3	95:8 150:10 191:1
57:12 116:4,24	137:19,21 138:3,7	81:16 92:1 93:5	stays 74:20
similar 24:10 93:20	144:2,4 147:1 161:8	120:17 186:15	steady 31:19,21,22
96:17 154:15	162:1 165:13,17	specification 68:19	stenographically
168:15 177:1	176:9 187:15 188:2	69:14,20 71:7 91:21	192:11
similarly 78:8	189:10	92:20,22 109:2	step 15:4 35:20,24
simpler 126:7	skilled 8:20	113:6 123:2 152:15	36:2,7,12 37:10
simply 15:5,20	slightly 119:5	156:25 159:21	38:22 48:6 52:11
16:22 79:5,13 92:15	small 7:10,10 34:12	176:7 188:15,23,25	64:22,25 65:4,13,15
94:24 176:13,15	34:22 73:10 84:12	specifications 40:18	65:15,24 67:5,5,5
single 36:23 37:3,10	146:22 169:22	143:17	68:3,5 70:4 127:7
37:10,14 39:8,12,13	smaller 131:16	specified 25:8	steps 11:19 22:15,24
41:3 42:6,11 43:13	141:21 142:23	speculate 40:6 85:25	23:13,15,24 24:2
47:18,23,24 54:13	143:8 155:2	speculation 99:7	42:1 51:24 65:3,7
55:20,25 56:9,16,23	sorry 6:8 10:22	110:7	66:5,19,22,25 67:4
69:25 114:19	37:16,25 43:3 48:10	spell 5:7	67:7,10,19 102:7,23
131:25 136:14	48:13 55:24 60:11	spelled 5:9	103:4
sisters 173:1	62:11 69:4 74:3	spend 7:2,8	steptoe 2:8 4:6,22
situation 99:13	78:11 80:1 113:18	spent 9:17	steptoe.com 2:11
123:11 138:8	119:12 127:3	split 34:20,23 94:2,2	stop 114:9
six 41:24 45:12 51:3	167:15 182:13,19	124:2	stopped 114:25
52:23 93:8 94:2	188:13	spread 34:6	storage 85:19
size 140:5,11 141:11	sort 188:9	sschlitter 2:11	strange 132:1
143:2 144:2 145:7	sound 88:7	stan 4:19,21	street 1:15 2:9 4:7
sized 145:1	sounded 15:17	stand 8:20 24:25	192:6
skill 11:5,14,23	sounds 65:8 131:23	25:1,15 79:2	strength 150:3
14:13 16:2,16 17:11		,	152:17

[strictly - talking]

Page 26

atriative 140	substantial 106:3	successful 85:14	135:22 140:8
strictly 14:9	170:2	96:21	143:10 159:24
strike 13:22 47:12		sufficient 26:15	surety 90:14
57:16 86:7 95:2	substantially 148:12 154:15 155:2	115:13,17	-
112:4 116:22		,	surface 79:12
124:10 128:12	substrate 8:23 11:11	suggest 134:12	145:15,16 149:3
174:24 175:6 179:4	12:8,11,11,13,13	suggested 126:21	151:5
strong 146:2 178:13	14:5,10,12,14,23	127:18	surrounding 113:11
180:12 184:5,15	15:7,8,11,15,19	suggesting 42:5	suspect 74:11 155:7
stronger 145:20	16:10,17,18 17:3,12	87:22,24	svga 90:8
146:1,12 152:20,22	17:13,22 18:4,6,20	suggestion 126:24	swear 4:17
180:22	18:23,24 19:3,10	suggests 134:14	switch 131:11
structure 19:7,9	20:3 21:23,25 22:6	suite 2:3,14	sworn 5:2 191:10,20
20:20 21:15,17,20	22:12,13 49:3,4,10	sukegawa 46:14	192:10
22:11 23:16 24:7	49:14,21,22 50:7	66:14 67:3 97:16	system 143:18
30:9,11 36:14,21	54:15 55:3,9 56:4,6	98:1,5 106:4,13	systems 57:6,21
38:12,18,21 39:20	62:20,23 64:6,8	107:1,3,7,13,20,22	58:1,22
40:11,14 42:4,7,12	65:10 69:3,5,9	107:25 108:17	t
43:15,20,23 44:2,13	71:15,21,23 72:18	109:2,21 110:1,7,12	t 5:10 105:1
44:14,16,17,23	73:2 76:1,2,3,24	111:5,12 112:17,23	take 6:5 20:19 27:14
45:15,18 46:9 52:23	78:6,8 81:5,13,22	113:4,14,24 115:17	32:13,16 42:23
70:12 76:21 84:20	109:13,23 119:13	116:6,18 117:23	60:15 71:10 92:5
85:17,22,24 87:14	119:18,20,22,23	121:18 122:19,23	94:4 103:23 128:9
88:22 92:14 93:19	120:7,11 121:5	124:18 125:5,15	144:9 153:14 177:7
93:21 100:16,22	140:6,19,24 141:2	130:16 136:2	taken 1:14 102:23
102:5 103:3 115:23	141:12 142:23	137:23 138:9,11	191:11
122:15 123:12	143:5,8 151:25	summarize 61:9	takes 34:11 127:6
125:16 160:16	153:9 156:6,15	supplied 31:20	talk 19:3 21:14 37:9
185:21 186:8,14	158:25 163:10	34:10	43:24 46:4 49:7
187:1,12	166:12 172:12,24	supply 31:15,25	51:1 92:21 94:8
structures 42:8 70:9	173:2,5,13,15,17,21	supplying 31:25	106:4
84:8 91:17 94:23	173:23 174:1,3,5,7	support 32:25 33:25	talked 37:5 40:18
106:22	174:12,13,14,17,20	34:9,17 35:2,4 41:8	54:1 65:20 78:14
structuring 145:15	174:20,24 175:3,6,9	150:17	
studied 96:20	175:14,14,23 176:1	suppose 29:23 85:11	94:24 98:9 99:9
study 49:25	176:3,10,11,12,16	114:17	120:15 136:13
subject 145:22	176:18,20 177:2,3,3	sure 7:24 8:3 18:15	165:3 177:4 188:13
189:7	178:14 183:11,18	29:17 30:3,13 49:24	189:6
sublines 41:24 51:4	188:21,21	55:23 60:11,13 63:7	talking 21:12,22
submitted 5:23	substrate's 17:4	63:21 66:9 67:15	34:15 40:3 53:24
83:13 192:19	substrates 54:21	68:17 79:4 82:19	56:13 62:15 63:23
subscribed 191:20	55:10 108:23	86:16 91:8,23 98:5	65:2,3 67:12 70:8
subsequent 61:13	148:23 162:20	100:4,16 107:5	75:2 77:11,12 96:10
subset 78:19 142:11	163:8 175:17	110:10 111:12	107:21 122:2
142:13	176:15 182:7 183:9	114:19 118:8 123:1	129:10,11 151:1
1 14.10	170.15 102.1 105.7	125:20,23 126:9	154:23 174:3,11
		143.40,43 120.7	

[talking - topic]

Page 27

176:10	terminals 15:14	125:14 165:16	165:15 166:25
talks 93:12			
	97:21 144:6 164:5	things 7:1,9,12,14	167:6,8 169:13
tape 138:12,15,22	166:3	7:15,17 16:25 17:1	171:3 172:11
140:19 143:4	terminate 133:9	40:6 67:22,23,24	175:10 177:4
teach 110:12 116:19	terminated 192:15	82:22 91:7 106:19	181:24
teaches 110:14	terminates 81:6	108:6 114:18 122:1	third 24:18 39:15,16
teaching 109:1	terminology 157:16	140:17	41:23 45:9 57:4
112:25	157:17	think 10:7,24 14:12	88:23 126:3,7,9,17
technical 151:19,21	terms 11:24 12:2	16:1,15 17:10 19:7	127:2,3,11
technique 59:16	42:6 49:10 67:17	19:8,17 20:7,8,19	thought 41:11 99:25
62:18	76:16 98:10 103:11	20:23 21:1 22:3,15	147:23
techniques 63:18	103:13 112:15	23:3,18 28:17 30:10	thoughts 40:9
technology 59:6	114:20 138:19	30:22 31:22 32:22	three 13:1 30:9 32:6
tell 9:23 18:6,22	158:19,21 188:7	34:13,23 35:15 37:5	32:14,15,20 39:12
37:2 39:25 60:12	testified 5:3 111:19	37:8 38:15 39:17,23	39:23,25 42:17
86:3,5 95:21 103:8	testify 192:10	40:1,2,10,20 43:16	43:15 44:14 45:12
103:16,18 119:7,11	testimony 83:10	46:2 47:24 49:23	45:13 66:4,18,22
119:11 127:16	101:6 105:11,14	51:21 52:13,22 53:2	67:22,23,24 84:20
147:19	106:1 149:8,13	53:8,23 54:5,12	84:22 88:22
telling 14:6	192:12	55:23 57:19 58:7,18	time 4:3,14 7:2,8,11
temperature 146:6	testing 106:15	61:13 62:19 65:6	9:18 16:24 34:11
tens 145:8,8	text 69:13,14 92:18	68:24 69:13,19 71:3	44:17 45:23 51:19
term 33:8 123:10	111:7,22 152:12	73:9,17 75:4 78:13	59:5 60:17,22 91:5
126:11 127:3	156:24 157:2	78:14 83:15 85:25	96:14 104:1 105:4
138:11 148:20	tft 56:24 60:1 81:16	87:15 88:17 89:2,9	133:10,14 153:16
terminal 8:21 23:17	108:20 115:25	89:10 90:11,19	153:21 177:10,13
24:7 25:6 34:8 41:3	122:3,7,8,10,12,21	91:16,18 92:6,12	185:13,16 189:19
41:5,15 45:1,5	123:8 129:7 130:1,2	93:17 94:25 95:12	times 133:22
46:15 70:3 75:9,10	130:9 132:21,22	96:18 98:5 99:3	tin 113:10
75:13,15 77:6,9,14	133:25 176:3	100:6 102:1 103:6	tired 165:15
77:19,21,23 97:1,9	tfts 36:6 54:6,8,20	103:15 105:21	titled 53:17
97:16 106:20 108:8	57:13 58:9,12 89:7	106:3 107:7,11,13	today 5:19 71:11
108:10,13,14 110:2	123:10 171:22	107:25 109:1	105:12 185:18
115:2 116:20	thank 26:25 27:15	110:14 112:17,23	190:9
118:16 119:12,15	28:18 69:2 100:14	114:1 117:24	today's 4:2
120:23 121:2 125:5	141:9 144:10	124:22 128:7,9,12	top 16:4,20 20:3
125:7,9,24 130:12	thicker 43:12	131:4,23 132:11,24	22:2,6,9 29:12 31:1
131:21 132:8,13	thin 12:8,10 56:21	133:21 136:16,22	40:13 41:18,22
134:17 135:8,11,18	74:23 174:14	136:23 137:3,23	42:20 43:5,8 44:5,7
136:1,6 137:6,11	176:17 177:2	138:3,7,11 139:23	51:5 72:15 73:17
139:6 140:9 141:4,7	thing 8:2 19:11 20:9	142:3,25,25 144:21	75:11 76:24 81:5,12
143:3,6 144:5	21:14 33:20 38:19	145:1,6 147:13,19	85:18 115:2 123:8,9
161:16 166:20	42:23 43:16 54:22	147:22 150:10	130:24 135:2
178:4,16 179:11	57:25 62:5 69:23	157:15 158:23	topic 177:17
	99:4 100:6 119:11	162:11 163:2 165:3	

[touches - versus]

Page 28

	1		
touches 173:11	31:9 38:1 72:12	ultimately 162:20	189:19
touching 72:15,18	82:20 87:5 127:10	unbiased 33:16	united 1:1 4:11
73:18 79:21 173:16	140:12 148:22	unclear 38:14,16	191:1
173:20,24 174:1,6	149:19 156:5,14	uncommon 62:19	university 60:5
track 182:16	turn 40:21,25	unconventional	unpublished 54:22
trademark 1:1 4:11	141:24	56:18	56:11
191:1	two 7:24 8:1,7 13:18	underneath 50:13	update 89:6
transcript 191:12	16:25 17:1 18:2,19	98:24 118:20 122:9	upper 41:20 55:10
transfer 73:9	21:24 22:8 29:10	151:5 159:14	71:23 78:6 98:17
transistor 56:24	36:14,21 38:12,18	164:20 168:16	107:16 123:13,25
transistors 12:9,10	38:21,24,25 39:1,7	183:25	124:2 125:11 145:6
55:14 56:7,9,15,17	39:15,18,20 40:4,11	understand 11:6,23	upside 98:11,12,16
56:21 174:15	40:13,14 41:10 42:5	13:5,20 14:6 15:3	99:1,10,14
176:17 177:2	42:19 43:19,23 44:1	16:18 18:16,16,18	use 12:21 13:12,13
transparent 23:11	44:13,15,23 45:15	19:14 22:23,25 23:5	16:23,25 17:1 25:18
24:22 47:8 69:11	45:18,20,20,22,25	27:23,25 28:4 31:24	25:19 34:21 42:24
95:9,13 96:1,12,15	46:7,9 55:10 61:3	36:1 43:22 44:4	55:20 95:25 96:9,25
102:15 107:14	61:18 65:7,17 67:13	45:20 49:11 60:14	97:12 101:19
108:4 124:7 130:11	67:20 68:5,7,15	63:4,12 66:9 69:7	103:20 112:22
139:15 180:25	75:9 82:4 84:4,6,7,7	80:9 85:21 93:4	113:19 126:3,9
181:4,5,18 184:19	84:23 86:7 87:21	105:8 109:19,22	127:3,22 128:16
185:9 189:3	88:3,15,21 91:16	112:3 118:5 121:21	131:16 145:17
transverse 169:12	92:23 93:19,19,23	123:4 135:15	147:5,9 158:22
169:18	97:15 108:23 115:4	136:17,20 137:5,19	165:13 174:12
traveling 32:6	115:5 124:3,5	137:22 138:15,20	uses 10:17 31:22
traverse 32:15,16,16	140:17 146:2,9	140:13 149:19	34:13 138:11
traverses 42:16	148:9 158:10 159:3	155:9 156:1,13	150:12 152:20
trend 151:9	160:1 161:10	157:12,14 159:15	usual 22:3
trial 1:1 4:12 191:1	162:19 163:7	160:10 162:1 163:9	usually 132:4
triangle 29:25 32:14	164:17 170:3 171:8	165:12,23 167:2,12	155:19
triangles 30:12	171:10 175:17	167:23 176:2,8,9	v
tried 79:8 155:24	176:15 178:12	187:7	
trouble 32:18 99:6	179:18 186:2 188:2	understanding 29:2	vague 186:22 vaguely 185:23
188:20	type 76:21 103:2	89:1,3 122:6 155:15	vaguery 185.25 valleys 149:2
true 32:23 54:18	typical 89:12,15,18	160:21 187:9	variation 83:6
92:13 94:15 102:19	138:8 144:17,20,21	understands 8:21	variation 53:7 68:8
102:22 126:23	162:23	understood 83:7,9	85:12 146:6
131:1 134:25 145:5	typically 33:21	uneven 149:3 151:4	
150:8 151:9 152:15	74:14,16 89:10	unevenness 150:1	varies 51:5
154:7 156:2,3 168:2	154:18 163:3,14,18	151:7,24 152:6,17	various 55:13 58:5
168:3 169:22	u	162:6 178:8 180:4,6	verify 176:24
192:12	u 5:10	182:6 183:8,14,25	veritext 4:2,17 version 83:2
try 169:7	u 5:10 u.s. 1:5 3:10,11,19	uniform 160:6	version 83:2 versus 4:9 188:4
trying 8:17 18:18	u.s. 1:5 5:10,11,19 3:20,21 191:5	unit 60:17,21 104:1	veisus 4.9 108.4
19:9 20:17 22:23	5.20,21 171.5	105:3 153:16,20	

312-442-9087

[vga - wvga]

Page 29

00.2.9		151.11 150.10	70.4.01.0.04.10
vga 90:3,8	way 8:4 10:25 15:5	151:11 152:18	79:4 81:8 84:19
video 90:5 189:22	17:14 20:10,14,23	wind 22:7 124:23	85:11,21 87:11 88:5
videographer 2:21	22:7 25:9,9,10	wire 29:24 30:16	89:21,25 91:4,7
4:1 60:16,20 103:25	41:12 48:18 49:18	37:14 107:4 110:12	97:4 101:7 102:10
105:2 153:15,19	59:8 61:21,22 62:15	111:7,8 124:15,15	112:9 115:15
177:9,12 185:12,15	62:25 63:12,16	wires 42:19 92:24	117:14 118:15
189:17	66:24 69:16 73:20	170:17	120:10,21 124:17
videotaped 1:11	77:15 80:11 82:20	wiring 16:19 29:8	125:20 127:10
189:18	82:23 84:23 86:3,5	29:11,15,18 30:20	128:2,20 130:6
view 29:5 70:14	86:21 87:8 97:7	30:25 31:12,14,25	132:11 133:5 135:4
72:13 73:3,5 75:12	100:17 103:8	32:3,5,11,25 33:23	137:11 141:14
96:24 114:7 115:2	110:14 113:13	34:5,25 35:1,5,19	143:22 146:18,24
128:14 156:19	125:8 126:21	35:23 36:7,11,23,23	148:4 155:14 156:8
159:24	128:23,25 131:21	37:3,6,9,20 38:4,10	156:18 161:12
virtual 60:3	133:10 134:20	38:24 39:1 40:11,14	162:5 163:18 171:1
visible 96:15	135:15,17,20 136:8	40:17,23 41:1,14,24	171:3 172:8 179:9
voltage 31:19,21,25	136:9 139:7,12	42:25 43:6,8,12,13	179:23 180:15,24
33:14 34:9,11 41:8	141:23 143:1	45:4,25 46:3,14	181:14,23 182:25
56:19 131:16,17	146:24 162:7 167:8	47:15,16,22,25 49:7	183:16 184:7,18
voltages 33:18	167:9,14,24 169:9	52:10 53:5 70:2	185:6 186:11 187:4
131:11	169:13	93:7 106:14 107:10	187:15 190:1,4
vs 1:5 191:5	ways 21:24 39:21	107:16,16 110:5,25	193:7
· W	40:23 60:2 62:5	112:3,5,19 113:11	word 12:19,21,24
wafer 55:17,19,21	66:2,21 67:17,19	114:23,25 115:3	13:4,13,13,16 15:7
55:25	93:22 125:6 167:6	118:19 119:4,15	16:5,6,12,23 31:22
waived 192:18	we've 49:6 62:15	121:10,19 122:13	49:6 68:20 92:1
want 11:20 18:15	67:18 115:21	123:22,22,25,25	127:14 174:13
23:1 25:17 26:5	120:15 165:3	124:2,4,5,7 125:7	words 10:19,20,25
42:14 43:7 79:1	weight 145:11	125:12 126:3,8,10	11:1,24 13:6,21,25
80:23 96:8 100:11	welcome 105:8	126:15,16,20,22	18:17 19:25 24:24
125:12 126:17	went 5:12 8:7	127:2,4,6,12,14,17	26:11,14 33:15 92:3
127:3 147:2,5,9	whereof 193:7	127:22 128:16	131:15
127.3 147.2,3,9	white 31:7	129:5,5,19 140:6,18	work 12:6 54:5,8,20
wanted 99:2	wholly 65:10	141:2,11 168:16,19	54:21 56:11 129:7
wanted 99.2 wants 112:18	wide 144:17 146:21	168:20 169:16,20	133:25
152:16	167:18	169:24 170:3,11,15	working 55:2
watanabe 144:9	widen 149:7,18	wirings 55:13	worse 74:23
	widening 149:20	126:18 140:20	worth 99:6
147:16,21 148:12	150:1	168:8	wrap 177:8
148:18 149:3,9,14	wider 148:12 149:25	witness 3:1 4:13,17	write 26:1,21 27:4
151:3,22 153:25	150:3,20,22 151:9	10:9 11:13 13:10	27:11
154:4 162:12,12	151:12 152:2,3,6,12	17:10 22:20 26:5	wvga 90:8
163:11 170:19,20	152:13	29:17 30:2,18 32:10	8
171:4,9,12 172:3,20	width 145:11,17,21	33:3,5 35:15 37:2	
	146:12,15,21 149:9	55:23 64:3 77:1,18	

[x - zero]

[
X
x 3:1 35:25 167:16
x1 165:6 166:9
x2 165:7 166:9
x3 165:7 166:9
x4 165:7
xi 35:20,25 36:13,24
37:21 38:6 48:2,10
48:11,14,16
xj 48:6,9
У
y 37:16 167:17
yeah 10:6 35:16
51:15 60:12 64:20
87:3 89:8 90:24
98:3,4 99:12 122:18
145:6 148:4 165:17
169:14
yesterday 5:13 7:1
7:22 8:7 37:6 47:10
53:23 54:11 61:4
65:21 82:15 83:25
84:3 88:16 91:16
97:18 98:10,13
109:18 188:14
yesterday's 105:20
106:1
yj 36:3,8,12 37:13
37:22 38:7 48:3,8
52:11
Z
zero 33:15

847-406-3200