

1 ROUGH DRAFT - Goodman

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25 Case: Rembrandt vs. Samsung
Date: November 19, 2014

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Court Reporter's Name: Michelle A. Cox
Firm Name: Sound Depo

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2 THE VIDEOGRAPHER: Good morning. Today's
3 November 19, 2014. The time is approximately
4 9:11. This is the continuing deposition of

Goodman, David 11-19-14 ROUGH Transcript (CONF).txt
Dr. David Goodman.

We are on the record at this time.

If you want to re-swear or reaffirm the
witness, please.

DAVID GOOMAN, called as a witness, having been duly
sworn by a Notary Public, was examined and
testified as follows:

EXAMINATION BY

MR. ENGER:

Q Dr. Goodman, could I direct your attention
to Exhibit 2 OF your non-infringement report.

A Which is my copy?

Okay. Sorry.

Q Paragraph 51, please. Paragraph 51 of
your non-infringement report contains the
results of what you call your first test; is
that fair?

A Yes.

Q And during the first test, each of the
Samsung S3 and Note 3 devices were connected to
each of an EDR enabled Bluetooth headset and a

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non-EDR enabled Bluetooth headset and the power
usage was measured over the course of a
ten-minute cellular phone call, right?

A Yes.

Q The phone was using both Bluetooth and
cellular, correct?

A Yes. Bluetooth -- yes that's correct.

Q Was -- for the cellular parts was it using
three 3G or 4G?

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11 MR. MILLER: Objection; form.
12 A I don't know.
13 Q And it was also using Wi-Fi?
14 A The Wi-Fi was on. I don't know that there
15 was any Wi-Fi communication going on.
16 Q So there could have been Wi-Fi
17 communication, there could not have been
18 communication you just don't know?
19 A I -- that's correct.
20 Q How was it decided to perform a ten-minute
21 test?
22 A I felt that the power drain wouldn't
23 change from more than -- if the test went on
24 longer than ten minutes. They were suggesting
25 a much longer test, and I felt that wasn't

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2 necessary, that -- just my own professional
3 judgment, that ten minutes would be sufficient
4 to find out information we needed. We wanted
5 to find or we wanted to learn, which was what
6 would be the difference in the power
7 consumption with these two different headsets.
8 Q Now, does ten minutes of operation
9 represent the normal use of a cell phone during
10 battery charges?
11 A I don't have any information on the normal
12 use of phone. It's probably my use of a phone.
13 I might have a few phone calls two-minute phone
14 calls in the day and charge battery at night,
15 but that's just me.

16 Q Most people don't charge their cell phone
17 every ten minutes?
18 A No. Maybe some people talking for longer
19 than ten minutes and some people don't talk at
20 all during the day. Me, I just have a brief
21 couple of phone calls.
22 Q How was the power usage measured in the
23 power testing?
24 A As I -- sitting here I don't recall I read
25 the specifications of a power measurement

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2 device that was used by NTS. So I saw -- I
3 think I was directed to a website, but I -- I'm
4 totally blank, blank as to a company that
5 produced it. The one thing that did stick
6 to -- in my mind was very meticulous
7 instructions about how to connect the powerless
8 device to the telephone because it's a little
9 tricky. You have your battery there and the
10 battery is being drained of power, or power is
11 being consumed from to the battery. And
12 somehow you have to take the battery out and
13 put something else in and connect it in.

14 So they gave meticulous instructions on
15 how to do that.

16 Q You didn't cite the website that tells you
17 how to use the equipment in your report, did
18 you?

19 A I did not.

20 Q You said you do not know what equipment
21 was used to perform the power testing?

22 MR. MILLER: Objection; form.
23 A I don't remember.
24 Q Was the battery removed to test the power?
25 A I don't remember. I don't remember.

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2 Q Can you describe the configuration of the
3 power meter relative to the device under test?
4 A As I recall the power meter was a lot
5 bigger than device under test. And it was
6 connected by some LEEDS or wires to the device.
7 That's as much as I remember.
8 Q Do you recall if the power meter was
9 connected in series or in parallel with the
10 battery?
11 A I don't -- I don't recall.
12 Q Was the battery the only source of power
13 for S3 and Note3 devices under test?
14 A Yes.
15 Q Were the S3 and the Note devices connected
16 to any other equipment during the test?
17 A Other than what's described here in the
18 power meter?
19 Q Yes, sir.
20 A Not to my knowledge.
21 Q There's nothing connected via the USB
22 port?
23 A Not to my knowledge.
24 Q How often were measurements made during
25 your tests?

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