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	Page 1		Page 3
1	UNITED STATES PATENT AND TRADEMARK OFFICE	1	I N D E X
2	BEFORE THE PATENT TRIAL AND APPEAL BOARD	2	TESTIMONY OF GREGORY WELCH
3	SONY COMPUTER ENTERTAINMENT AMERICA LLC	3	CROSS-EXAMINATION BY MR. GILBERTSON 4
4	Petitioner	4	REDIRECT EXAMINATION BY MR. KEAN 27
5	V.	5	CERTIFICATE OF OATH
6	APLIX IP HOLDINGS CORPORATION Patent Owner	6	REPORTER'S DEPOSITION CERTIFICATE
7	Case No. IPR2015-00396 Patent No. 7,218,313	7	
8	Case No. IPR2015-00533	8	
9	Patent No. 7,218,313	9	ЕХНІВІТЅ
10	Case No. IPR2015-00476 Patent No. 7,218,313	10	(NONE)
11	* * * * * * * * * * * * * * * * *	11	
12	DEPOSITION OF: GREGORY WELCH	12	
13	DATE: December 17, 2015	13	STIPULATIONS
14	TIME: COMMENCED: 11:26 a.m.	14	It is hereby stipulated and agreed by and between counsel present for the respective parties, and
15	CONCLUDED: 12:38 p.m.	15	the deponent, that the reading and signing of the deposition are hereby RESERVED.
16	TAKEN BY: Patent Owner	16	
17	PLACE: Hyatt Regency Orlando International Airport	17	
18	9300 Jeff Fuqua Blvd Orlando, Florida 32827	18	
19	REPORTED BY: Mae Fisher, RMR, CRR	19	
20		20	
21		21	
22		22	
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24		24	
25		25	
	Page 2		Page 4
1	APPEARANCES:	1	PROCEEDINGS
2	ABRAN J, KEAN, ESOUIRE	2	THE COURT REPORTER: Do you solemnly swear or
1 2			
3	5600 Greenwood Plaza Boulevard Suite 200	3	affirm that the testimony you are about to give in
4	ABRAN J. KEAN, ESQUIRE Of: Erise IP, P.A 5600 Greenwood Plaza Boulevard Suite 200 Greenwood Village, CO 80111 (720) 689-5440	4	this cause will be the truth, the whole truth, and
4 5	(720) 689-5440 Abran.kean@eriseIP.com	4 5	this cause will be the truth, the whole truth, and nothing but the truth?
4 5 6	(720) 689-5440 Abran.kean@eriseIP.com Counsel for the PETITIONER	4 5 6	this cause will be the truth, the whole truth, and nothing but the truth? THE WITNESS: I do.
4 5 6 7	(720) 689-5440 Abran.kean@eriseIP.com Counsel for the PETITIONER	4 5 6 7	this cause will be the truth, the whole truth, and nothing but the truth? THE WITNESS: I do. GREGORY WELCH,
4 5 6 7 8	Counsel for the PETITIONER Counsel for the PETITIONER ROBERT J. GILBERTSON, ESQUIRE Of: Greene Espel, PLLP 222 South Ninth Street Suite 2200	4 5 6 7 8	this cause will be the truth, the whole truth, and nothing but the truth? THE WITNESS: I do. GREGORY WELCH, a witness herein, having been first duly sworn, was
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4 5 7 8 9 10 11 12	Counsel for the PETITIONER Counsel for the PATENT OWNER Counsel for the PATENT OWNER ALSO PRESENT:	4 5 7 8 9 10 11 12	<pre>this cause will be the truth, the whole truth, and nothing but the truth? THE WITNESS: I do. GREGORY WELCH, a witness herein, having been first duly sworn, was examined, and testified as follows: CROSS-EXAMINATION BY MR. GILBERTSON: Q. Dr. Welch, we're here for a deposition in</pre>
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Page: 2 Page 5 Page 7 declaration to paragraph 14, please. 1 2 A. Okay. Q. And the last page has your signature? 0. Would you agree that those two paragraphs are 3 substantively the same? 4 Q. And in the 00476 matter, Exhibit 1042, likewise, 5 A. Again, both from memory and from looking at it is your supplemental declaration in that matter? here, I believe that is correct. I believe they are 6 7 substantively the same. And the last page has your signature? Q. And in general, those paragraphs refer to US 8 Patent 7088342, to Rekimoto, R-E-K-I-M-O-T-O, and 9 And also, it's Exhibit 1042 in the 00533 matter. 10 others; is that right? That's your supplemental declaration? A. That's correct. 11 12 Q. And I'll just -- I'll note that in the 00396 And the last page of it has your signature? matter, Rekimoto was marked by your client Sony as 13 14 Exhibit 1004, and the exhibit -- excuse me, in the 00533 Q. Are there any aspects of those supplemental matter, it was marked as Exhibit 1056. In the 00533 15 declarations that you feel a need to clarify? 16 matter, you refer to Exhibit 1056 at page -- in paragraph 1 of your supplemental declarations; is that A. The only thing for the record, which we discussed 17 off the record, was the exhibit number clarification, 18 right? which should be really supplanted by the new exhibit A. Yes. I believe that's correct, yes. 19 that we entered in the previous proceedings. I'm not 20 0. And are you aware that this Rekimoto reference guite sure how to characterize that, but maybe you can was submitted by Sony in its 00396 petition as one of 21 ten pieces of prior art over which Sony argued that the 22 313 patent should be held invalid? 0. Well, the two sides have a point of difference on 23 that in that I object to the new exhibit, so I would not A. I don't recall the details, but I do recall or 24 say that -- I would not agree that it would be believe that it was -- as I stated here, was already 25 Page 6 Page 8 supplanted. But I think we could note here for the cited in other proceedings related to this, but I don't 1 record that the testimony you gave in your deposition remember the details. 2 earlier today in the '245 and '692 matters about the Lim Q. And are you aware that in the 00396 matter, the 3 exhibit applied as well to the 00533 matter; and in that board opted to go forward with the proceeding relating 4 matter, the exhibit we were talking about is to seven of the ten pieces of prior art but not 5 Exhibit 2036. Am I right about that, that the Lim including Rekimoto? 6 exhibit we were talking about in terms of the 00533 7 A. That sounds right, yes. I mean, I don't remember the specific orders, but that sounds right. 8

A. Correct. And the corresponding Mr. Lim 9 declaration, I believe, is Exhibit 2009. And the two 10 paragraphs where he cites the article are, I believe, 11 paragraphs 48 and 54, and it's the article that he cites 12 there that I'm referring to and included as a new 13 exhibit, or attempted to include as a new exhibit. 14 0. And given that the testimony that you gave 15 earlier this morning in the '245, '692 matter is 16 available to the judges to be used in the 00533 matter 17 as well, is there anything else about that issue that 18 you feel you would like to clarify? 19 A. No. I hope I made it clear earlier, and it would 20 be the same for the 00533. 21 Q. Okay. If you could turn with me, please, to your 2.2 00533 supplemental declaration paragraph 13. 23 А. Okay. 24 Q. And, also, turn in your 00396 supplemental 25

declaration?

A. Yes.

Α. Yes.

Ο.

А.

Ο.

Α. Yes.

Ο.

A. Yes.

do that better than I did.

matter was Exhibit 2036?

Yes.

A. That's correct.

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Q. And are you likewise aware that the Rekimoto 9 reference was also submitted by Sony in its 00476 10 petition as one of the pieces of prior art over which 11 Sony argued that the '313 patent should be held invalid? 12 A. That is correct. Again, for all of these, I 13 think, just to make clear, I'm not relying on these in 14 any way other than just as background art that I offer 15 in response to, in this particular case, some opinions 16 offered by Dr. MacLean. So I don't mean to imply that 17 there's anything beyond that. 18 Q. And you're likewise aware that the board opted in 19 the 00476 proceeding to go forward on some of the pieces 20 of prior art that Sony had offered but not Rekimoto? 21 A. Again, I don't remember the details of the order, 2.2 23

but that sounds -- that sounds right, just sitting here right now from memory. 24 Q. And are you likewise aware that the Rekimoto 25

		120	15 Page: 5
	Page 9		Page 11
1	reference was not submitted by Sony in connection with	1	I'd like you to point to that to me, please.
2	its 00533 petition?	2	MR. KEAN: Objection. Scope.
3	A. I can't tell you one way or the other. I don't	3	BY MR. GILBERTSON:
4	know.	4	Q. Well, picking up on that objection, let me ask
5	Q. Is it your opinion that the Rekimoto reference	5	you this preliminary question, Dr. Welch: Have you
6	was so well known that any person of ordinary skill in	6	offered testimony in connection with the 00396 matter
7	the art of as of 2003, would have known about it?	7	that Ishihara teaches multitouch capability explicitly?
8	MR. KEAN: Object to the form.	8	A. I don't recall whether I did or not. I don't see
9	THE WITNESS: Hard for me to say, but I will	9	it here and I don't recall it here in this declaration.
10	say that Jun Rekimoto has been around for a long time,	10	I could well have offered that opinion in my original
11	and his papers and all of his work, I think, is very	11	opening declaration, but I don't remember offhand here.
12	well known. He's a pretty famous researcher in this	12	I really focused on these declarations in preparing for
13	area, so I think people would generally be familiar	13	today.
14	with his name, probably, and his work.	14	Q. By these declarations, you mean the supplemental
15	BY MR. GILBERTSON:	15	declarations?
16	Q. Could you turn to in the 00396 supplemental	16	A. That's correct. Thank you. Yes.
17	declaration, to paragraph 6, please.	17	Q. Makes sense. Well, okay, then, let's go back to
18	A. Okay.	18	the question I asked, and feel free to take what time
19	Q. You've got that in front of you?	19	you need with the Ishihara reference that's in front of
20	A. I do.	20	you. But do you believe that there's any explicit
21	Q. And this paragraph refers in part, as do some	21	teaching in Ishihara of multitouch capability?
22	other paragraphs here, to multitouch capability; is that	22	MR. KEAN: Same objection.
23	right?	23	THE WITNESS: My memory of this, of Ishihara,
24	A. In this paragraph in particular, it's multitouch	24	is that it does teach that; but just glancing through
25	gestures, but the phrase multitouch or term multitouch	25	here, I can't remember I believe I offered an
	Page 10		Page 12
1	is there and in other places, yes.	1	opinion about that, but I'm really not sure, or I
2	Q. And paragraph 6 and some of the other paragraphs	2	might have offered an opinion about that in my opening
3	of your 00396 supplemental declaration discuss that	3	declaration on the '313. So any of the 3 '313 IPR
4	issue in the context of the Ishihara reference; is that	4	matters, but I really don't recall; and just glancing
5	right?	5	through it right here, I don't see it. So I wouldn't
6	A. Certainly, that appears to be the case in	6	want to speculate at this point about whether it does
7	paragraph 6. From memory, I don't have the rest of my	7	or does not because I really don't remember.
8	declaration memorized, so it would be whatever it is I	8	BY MR. GILBERTSON:
9	said, but I'm sorry, I don't remember beyond that.	9	Q. As of now, having heard my question and looked at
10	Q. Sure. That's fine. Let me hand you a copy of	10	Ishihara, there's nothing you can point to brief in
11	the Ishihara reference Exhibit 1007 in the 00396 matter.	11	Ishihara, I take it, that explicitly teaches multitouch
12	A. Okay. I have it. Thank you.	12	capability; is that right?
13	Q. Is it your opinion that there is any explicit	13	A. Sitting here right now, just having really just
14	teaching of multitouch capability in Ishihara?	14	glanced through it, I mean, in the 90 seconds or so I
15	A. I don't recall, sitting here right now,	15	took to just look through it, I didn't find the thing
16	whether how or where it is disclosed, and it being	16	that I thought I was looking for, but I wouldn't call my
17	the ability to sense multiple touches simultaneously,	17	reading through. Again, I think I opined about that, or
18	but I believe it is. I don't recall whether I opined	18	if it does, I probably opined about it or would have
19	about that in this document or not, and I don't recall	19	opined about it in my opening declaration for any of the
20	where or how it's described in Ishihara, but I believe	20	IPRs related to the '313 patent.
21	it is. It, again, being the ability to sense multiple	21	Q. Well, I don't want you to feel constrained to
22	touches simultaneously on the same surface.	22	90 seconds, so go ahead and take whatever time you need
23	Q. Well, take your time, if you want to look at	23	to look through Ishihara to answer my question about
24	Ishihara; but if you think that there's someplace in	24	whether you can point to any explicit teaching in
1 - 1		- -	

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Page 3

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	Page 13		Page 15
1	A. I will look here for a moment, but I don't want	1	A. Explicit words, yes, explicit words related to
2	to limit any of my opinions at this moment about	2	that.
3	explicit or not explicit in terms of the teachings. I	3	Q. Okay.
4	just don't recall, again, what I said about Ishihara in	4	A. Again, the words as I've said before, the
5	my opening declaration, whether I said it may teach it	5	words of the patent are there for everyone to look at;
6	in one way, shape, or form, whether it's explicit or	6	but the teachings, of course, are, in my mind, what
7	not. But I can certainly take some time here and try	7	really matters, what the patent itself teaches or allows
8	and reread the entire patent and see if I spot anything	8	to a person of ordinary skill who's looking at it. So,
9	at this moment, sitting here.	9	for example, paragraphs 40 and 51 in the Exhibit 1007,
10	Q. So just for clarity, let me say, I certainly	10	the Ishihara exhibit, both describe very basic
11	understand your point that you may have said things in	11	resistive, I believe, touch sensing technology that is
12	your initial declarations that you don't remember off	12	very very common, very well known at that time, and
13	the top of your head right now; that makes perfect	13	it's very inherently supports multiple touches. And
14	sense. My question for you now is, can you point to	14	certainly, Ishihara doesn't say anything about it not
15	anything in Ishihara itself explicitly teaching	15	supporting multiple touches. And as I think I or as
16	multitouch capability or functionality? And take	16	I did offer opinions through paragraphs 6 through 10, at
17	whatever time you need to answer that.	17	least in my declaration, all of that would have been
18	A. Sure. And I will look, but can you tell me, is	18	well known to a person of ordinary skill, including, as
19	there something in my declaration now that leads you to	19	I said, to someone like me, as an undergraduate at
20	ask that question so that I can look and see whether I	20	Purdue, a junior, who, you know, knew that that same
21	cited anything in Ishihara at that point, because I	21	technology could detect multiple touches.
22	don't recall that?	22	So I don't know if the words exactly are in here.
23	Q. Oh, that's actually the whole point. I'm glad	23	I don't remember. I believe I discussed this in my
24	you asked that. I didn't see anything about that in	24	original declaration, but the technical descriptions at
25	your testimony. That's why I'm following up now, just	25	40 and 51 in Ishihara, to me, clearly describe
	Page 14		Page 16
1	to ask whether there's anything that you can point to in	1	technology that would support multiple touches.
2	the reference that explicitly teaches multitouch	2	Q. Do you believe that in 2003, all touch screens
3	capability or functionality.	3	supported multitouch functionality?
4	A. Okay. That makes sense, because just looking at	4	A. Again, it depends what we mean, to be very
5	it, and, of course, from memory and my general sense of	5	careful by multitouch. And so when I say multitouch, I
6	my supplemental declarations is that they're solely	6	mean literally detecting simultaneously multiple
7	about responding to things that Dr. MacLean or Mr. Lim	7	touches. And I would say that I'd be very surprised if
8	said, not offering opinions about the prior art itself,	8	there was a technology that did not support the
9	which I would have already done. But I will look there	9	detection of multiple touches. It's possible.
10	for a few minutes and see if I can spot anything.	10	The most common ones that I'm aware of, including
11	Q. Thank you.	11	the one that I developed, which actually looks a lot
12	A. (Examining documents.)	12	like some other ones I've seen looking at in this case,
13	So in looking at Ishihara a little more	13	would naturally support detecting of multiple touches.
14	carefully, I still haven't found any any words that	14	Whether an application chooses to make use of those
15	explicitly say that. That doesn't mean that they're not	15	multiples touches or not is a different issue. The
16	there. I just didn't find them. I'm not very good at	16	question in my mind is whether the underlying technology
17	doing a linear visual search through documents, looking	17	supports that. And the ones that I'm aware of
18	for words. I usually use a find function in an editor	18	universally all do, but I wouldn't say that it's a
19	of some sort to help me find those topics, look for key	19	certainty that all would. I really couldn't say.
20	words. I can't do that here, so just reading it top to	20	Q. Let me ask you to turn, please, to paragraph 10
21	bottom as carefully as I can, which is not perfect,	21	of your 00396 supplemental declaration.
22	nothing those explicit words don't come to mind, but	22	A. Okay. I'm there.
23	the things that	23	Q. In that paragraph, one of the things you refer to
24	Q. Excuse me. The explicit words, teaching	24	is an Exhibit 1028, a patent issue to Itaya, I-T-A-Y-A,
	multitouch capability? That's what you're referring to?	25	et al.; is that right?
		, ,	

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1 A. That's current, yea: 2 0. Let us show you that Twhibit 1023. To you have 3 0. To you think, or do you? 4 A. Tas, I G. Thank you. 5 0. To you think, or do you? 6 To think the you. 7 0. To you could please go to the third paragraph of the you could please go to the third paragraph of the you could please go to the third paragraph of the you could please go to the you could you you could please go to the you could you you could please go to you could you you could you you you do you you could you		12/17/20		15 Page: 5
2 0. Let me show you that Kambit 1028, to you have 2 A. Ted. 3 Unit in front of you? A. Ted. C. The you could please go to the third paragraph of the sentence of the ting arragraph of the sentence the ting arragraph of the sentence the sentence of the ting arragraph of the sentence the sentence of the ting arragraph of the sentence the sentence of the ting arragraph of the sentence the ting arragraph of the sentence the sentence the sentence of the ting arragraph of the sentence t		Page 17		Page 19
3 that in front of you? 9 0. If you could please go to the third paragraph of the first or you find, er do you believe that itays. 4 A. Yee, I do. Thank you. 9 0. If you could please go to the third paragraph of the first paragraph of	1	A. That's correct, yes.	1	see a section called general description?
a N Yee, I do. Thank you. a b 0. Do you find, or do you believe that itays. and, for the Deneiff of the record, read the first semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the third paragraph of the denergy of the semence of the seme	2	Q. Let me show you that Exhibit 1028. Do you have	2	A. I do.
50. Do you find, or do you believe that lates.6Pohlot 1028, contains any copilot disclosure7implementing multicouch in the secie of a hand-held8A. So, spain, just looking briefly at this,10because, of course, I don't have this assoriesd, but ay11assory of it, at least, which comports with a vary quick12but comevati through review of the first page, the13abstract and a little bit of the introduction, is that14it's about the general cosching are about the15beckling touch of multiple fingers simultaneoully. Not16detecting touch of multiple fingers simultaneoully. Not17abricous the general cosching are spontio to18between you	3	that in front of you?	3	Q. If you could please go to the third paragraph
6 Exhibit 1233, contains any exploit disclosure 6 7 implementing multiclusch on the scale of a handheld 6 8 devices 7 9 A. So, again, just looking briefly at this, 5 10 baccuss, of course, I don't have this amortised, but is FlandC400 and the ElandC40 and the Elan	4	A. Yes, I do. Thank you.	4	and, for the benefit of the record, read the first
 implementing multitouch on the scale of a hand-held decler? A. So, spain, just looking briefly at this, because, of course, I don't have this semorised, but ay memory of it, at least, which comports with a vary quit but somehat thorough review of the first page, the abstract and a little bit of the introduction, is that is schanism for developing resistance film mathed of detecting touch of multiple fingers similameously. Not detar a variety of scales and probably was. detar sub you via getting at. At least 1 detar to as anything in there right now looking at it, and delawation to paragraph 18. A. Kay. Q. in that paragraph, you atta Nahoti 1051; is that A. Kay. A. That's correct, yas. A. That's correct, yos. A. That's correct, yos. A. That's correct, yos. A. That's correct, yos	5	Q. Do you find, or do you believe that Itaya,	5	sentence of that paragraph out loud.
a device? Benafits of the x86 desktop computing environment, the b A. So, spain, just looking briefly at this, Benafits of the x86 desktop computing environment, the b because, of course, I don't have this memorized, but yuit Benafits of the x86 desktop computing environment, the b because, of course, I don't have this memorized, but yuit Benafits of the x86 desktop computing environment, the b because, of course, I don't have this memorized, but yuit Benafits of the x86 desktop computing environment, the b because, of course, I don't have this memorized, but yuit Benafits of the x86 desktop computing environment, the b bit somewhat thorough review of the first page, the Benafits of the x86 desktop computing environment, the b bit is a method of multiple first page, the Benafits of the x86 desktop computing environment, the b bit is a requirement shout some resist method the Benafits of the x86 desktop computing environment, the b bit is a requirement shout some resist method the Benafits of the x86 desktop computing environment, the b bit is a requirement shout some resist method the Benafits of the x86 desktop computing environment, the b bit is a requirement shout some resist method the Benafits of the x86 desktop computing environment, the b bit is a requirement shout some resist method the Benafits of the x86 desktop computing environment, the	6	Exhibit 1028, contains any explicit disclosure	6	A. The first sentence of the third paragraph of the
9 A. So, again, just looking briefly at this, 9 A. So, again, just looking briefly at this, 10 Decause, of course, I don't have this semorized, but my 11 Because, of course, I don't have this semorized, but my 12 Betreet and a thild bit of the introduction, is that 13 abstract and a bittle bit of the introduction, is that 14 ist about the general teachings are about the 15 mechanics for developing resistance film method of 16 detecting touch of multiple fingers simultaneously. Not 18 that is a requirement about size or scale or anything 18 that is a requirement about size or scale or anything 18 that is a requirement about size or scale or anything 19 of this the general teachings are agnore to 20 I don't recall anything in there right now looking at t, and 21 scale, si that's what yours quires getting in there right now looking at t, and 22 scale, si that's what your out the scale way that is a the least 24 1 don't recall anything that would be otherwise specific 25 of this' that's what yourse quires general is anything 24 0. Is that scale anything in	7	implementing multitouch on the scale of a hand-held	7	general description section reads, Leveraging the
10 because, of course, I don't have this memorised, but my 10 all of the common logic and T/O functionality associated with a PG/AT computing system into a single device, with a PG/AT computing system and probatin system into single device, with a PG/AT	8	device?	8	benefits of the x86 desktop computing environment, the
11 memory of it, at least, which comports with a very quick 11 12 but somewhat through review of the first page, the 11 13 abstract and a little bit of the introduction, is that 11 14 it's about the general teachings are about the 11 15 mechanism for developing resistance film method of 11 16 descting touch of antilizing ingress imminances/N. Not 11 17 obvious to se anywhere that it is infloating anything 11 18 method size and robitive everything taught in here could be 11 19 alse, and I believe everything taught and the size and probably was. 12 11 coll that's whang you're getting at. At least I 12 12 scale, if that's whang you're getting at. At least I 12 13 don't recall anything that would be otherwise specific 22 14 don't recall anything that would be otherwise specific 23 15 declaration to paragraph 19. 14 16 a. Okay. 9 17 o't read's any read'read's any read'read'read'read'read'read'read'read'	9	A. So, again, just looking briefly at this,	9	ElanSC400 and the ElanSC410 microcontrollers integrate
12 but somewhat thorough review of the first page, the 13 13 abstract and a little bit of the introduction, is that 14 but somewhat thorough review of the first page, the 15 abstract and a little bit of the introduction, is that 16 detecting touch of aultiple fingers simultaneously. Not 17 obvious to ma anywhere that it is indicating anything 18 that is a requirement about size or scale or anything 19 else, and I believe everything tanght in here could be 10 colle the anything to there right now looking at it. and 11 don't see anything it there right now looking at it. and 12 0. Let me ask you to turn in your 00366 aupplemental 12 0. Let me ask you to turn in your 00366 aupplemental 12 0. Let me ask you to dive the thet. 14 0. Let me ask you to dive way. 15 or first of you, could you you'we got scale. 12 0. Let me ask you to dive way. 13 0. Cast the oty on dive way. 14 14 15 n. That's correct, yes. 16 1. That's correct, yes. 17 0. Lon front of you, could you you'we got scale.	10	because, of course, I don't have this memorized, but my	10	all of the common logic and I/O functionality associated
13 abstract and a little bit of the introduction, is that 14 it's about the general teachings are about the 15 machanism for daveloping resistance film mathed of 16 detecting touch of multiple fingers simultaneously. Not 17 obvious to me anywhere that it is indicating anything 18 that is a requirement a beatout size or scale or anything 19 else, and I believe verything taught in here could be 20 realised at a variety of scales and probably was. 21 so I hink the general teachings are agnost to 22 so I hink the general teachings are agnost to 23 so I hink the general teachings are agnost to 24 other scale and probably was. 25 to fint '' coall anything that would be otherwise specific 26 for '' coall anything that would be otherwise specific 26 0. Let me ask you to turn in your 00396 supplemental 1 0. Let me ask you to turn in your 00396 supplemental 1 1. Coall for the back? 2 1. That''s coare, yes. 3 A. Oksy. 4 0. In front of you, could you '' oy u'w got some 6 schibit 1051, toward the back of that set.	11	memory of it, at least, which comports with a very quick	11	with a PC/AT computing system into a single device,
14 it's about the general teachings are about the 14 15 machanism for developing resistance film sethod of 15 16 detecting couch of multiple fingers simultaneously. Not 16 17 obvious to me anywhere that it is indicating anything 17 18 that is a requirement about size or scale or anything 18 19 escale, and I believe everything taught in here could be 10 10 obvious to me anywhere that it is indicating anything 17 19 so I think the general teachings are agnostic to 20 21 so I think the general teaching are agnostic to 21 22 don't recall anything that would be otherwise specific 22 24 don't recall anything that would be otherwise specific 23 25 to size or scale. 24 26 to size or scale. 28 27 0. Let me ask you to turn in your 0396 supplemental 1 28 1 1 1 29 0. In that paragraph, you cite Exhibit 1051; is that 1 3 A. Okay. 1 1 4 0. In front of you, could you turn to	12	but somewhat thorough review of the first page, the	12	eliminating the need for multiple peripheral chips.
15 mechanism for developing resistance film method of 16 detecting touch of multiple fingers simultaneously. Not 16 detecting touch of multiple fingers simultaneously. Not 17 A. T'm not sure. When you say this chip, in 19, T' 17 devicus to me anywhere that it is indicating any him 17 referring to the Intel/ADD X86 processor that I believe 19 else, and I believe everything taught in here could be 18 In referred to. I don't recall and J don't have a family of 20 so I think the general teachings are agnostic to so if any thing in there right now looking at it, and 20 21 don't see anything that would be othervice specific 0. Tair enough. And my use of the singular of the 25 to size or scale. Page 18 10 0. Let me ask you to turn in your 00396 supplemental 1 1 2 declaration to paragraph 19. 1 1 1 1 3 A. Okay. 1 1 1 1 1 1 4 0. I that paragraph, you cite Schibit 1051; is that 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 <td< td=""><td>13</td><td>abstract and a little bit of the introduction, is that</td><td>13</td><td>Q. Does that description comport with your</td></td<>	13	abstract and a little bit of the introduction, is that	13	Q. Does that description comport with your
16 A. I'm not sure. When you say this chip, in 19, I'm 17 Obvious to be anywhere that is indicating anything 18 18 that is a requirement about size or scale or anything 18 19 else, and I believe everything taught in here could be 18 20 realized at a variety of scales and probably wes. 20 21 So I think the general teachings are agnostic to 20 22 scale, if that's what you're getting at. At least I 23 23 don't see anything in there right now looking at it, and 24 24 24 I don't recall anything that would be otherwise specific 25 term is probably to limited. 24 0. Let me ask you to turn in your 00396 supplemental 1 1 In the sentence that you just read from, the 1 0. Let me ask you to turn in your 00396 supplemental 1 1 In the sentence that you just read from, the 2 a. Okay. 1 In the sentence that you just read from, the 3 A. Okay. 1 In the sentence that you just read from, the 4 0. In front of you, could you urn to 3 anything in there that you 's trikes you as inaccurated or 5 <	14	it's about the general teachings are about the	14	understanding of this chip that you're discussing in
17 obvious to me anywhere that it is indicating anything 17 referring to the Intel/AMD x86 processor that I believe 18 that is a requirement about size or cale or anything 18 Wr. Lim referred to. I don't recall and I don't have a 19 cites hare because I'm just reacting to his options. 20 21 so I think the general teachings are agnostic to 21 medded x86 processors. So I's not just one; it is a 22 scale, if that's what you're getting at. At least I 22 one exampling in there right now looking at it, and 24 I don't recall anything that would be otherwise specific 20 one exampling in there right now looking at it, and 25 to size or scale. Page 18 In the sentence that you just read from, the 26 Q. Let me ask you to turn in your 00396 supplemental Coldration to paragraph 19. In the sentence that you strikes you as inaccurate or 3 A. Okay. In front of you, could you you've got some In their there, if there was a mistuke somewhere 4 O. In that paragraph, you cite Exhibit 1051; is that A. Tat's cormet, yes. I don't kare any reason to 5 a. Stabit 1051; loward the back of that set. A. Stabit 1051; loward the back of the next. I don't kare any reason to	15	mechanism for developing resistance film method of	15	paragraph 19 of your 00396 supplemental declaration?
18 that is a requirement about size or scale or anything 18 Kr. Lin referred to. I don't recall and I don't have a 19 else, and I believe everything taught in here could be 19 Site here because I'm just reacting to his opinions. 20 realised at a variety of scales and probably was. 20 And, you know, as I state there, AKD offerd a family or model is a complete line or family of processors. So it's not just one; it is a complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and this is just complete line or family of processors, and the signed from that. 10 0. Let me ask you to turn in your 00396 supplemental delaration to paragraph 19. 1	16	detecting touch of multiple fingers simultaneously. Not	16	A. I'm not sure. When you say this chip, in 19, I'm
19 else, and I believe everything taught in here could be 10 cite here because I'm just reacting to his opinions. 21 So I think the general teachings are agnostic to 20 And, you know, as I state there, AND offered a family of 22 scale, if that's what you're getting at. At least I 20 complete line or family of processors. So it's not just one; it is a 23 don't see anything in there right now looking at it, and 22 complete line or family of processors, and this is just 24 I don't recall anything that would be otherwise specific 24 0. Fair enough. And my use of the singular of the 25 to size or scale. 25 term is probably too limited. 24 1. Let me ask you to turn in your 00396 supplemental 1 2 1. Che seak you cot turn in your 00396 supplemental 1 3 A. Okay. 3 A. Okay. 3 4 0. Th that paragraph 19. 1 1 1 1 3 A. Okay. 3 1 1 1 1 4 A. That's correct, yes. 1 1 1 1 1 1 1 1 9 1 1	17	obvious to me anywhere that it is indicating anything	17	referring to the Intel/AMD x86 processor that I believe
20 realized at a variety of scales and probably was. 20 and, you know, as I state there, AMD offered a family of scales, if that's what you're getting at. At least I 21 21 So I think the general teachings are agnostic to scale, if that's what you're getting at. At least I 22 complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is a complete line or family of processors, and this is just one, it is and accurate is a complete line or family of the singular of the declaration, it is an AND, which is a complete line or family of processors. 20 In the set lene of family of unit of the next. 1 In the set lene of family of th	18	that is a requirement about size or scale or anything	18	Mr. Lim referred to. I don't recall and I don't have a
21 So I think the general teachings are agnostic to 21 embedded x86 processors. So it's not just one; it is a 22 complete line or family of processors, and this is just one sample from that. 22 24 don't see anything in there right now looking at it, and 22 complete line or family of processors, and this is just 24 0. Test encugh. And my use of the singular of the 24 0. Fair encugh. And my use of the singular of the 25 to size or scale. 24 0. Fair encugh. And my use of the singular of the 24 0. Let me ask you to turn in your 00396 supplemental 1 <td>19</td> <td>else, and I believe everything taught in here could be</td> <td>19</td> <td>cite here because I'm just reacting to his opinions.</td>	19	else, and I believe everything taught in here could be	19	cite here because I'm just reacting to his opinions.
22 scale, if that's what you're getting at. At least I 22 complete line or family of processors, and this is just 23 don't see anything in there right now looking at it, and 23 one example from that. 24 i don't recall anything that would be otherwise specific 24 0. Fair enough. And my use of the singular of the term is probably too limited. 25 to size or scale. Page 18 0. Fair enough. And my use of the singular of the term is probably too limited. 24 0. Let me ask you to turn in your 00396 supplemental declaration to paragraph 19. 1 In the sentence that you just read from, the third paragraph of page 2 of Exhibit 1051, is there anything that 's oncreat. 1 3 A. Okay. 3 In the sentence that you strikes you as inaccurate 4 0. In front of you, could you you've got some exhibits in front of you, as well. Could you turn to festinist infort of you as well. Could you turn to festinist ins. 0. Let me ask you to turn, please, to exhibit or is couse me, your 00396 supplemental declaration, paragraph 21. 11 0. Can I have it back? 11 0. Let me ask you to turn, please, to exhibit or is couse me, your 00396 supplemental declaration, paragraph 21. 12 A. That's okay. 11 A. Okay. I'm there. 13 0. Sorry. I thought it was at the back of the oner I 15	20	realized at a variety of scales and probably was.	20	And, you know, as I state there, AMD offered a family of
23 don't see anything in there right now looking at it, and 23 one example from that. 24 I don't recall anything that would be otherwise specific 24 Q. Fair enough. And my use of the singular of the term is probably too limited. 25 to size or scale. Page 18 Page 2 1 Q. Let me ask you to turn in your 00396 supplemental 1 In the sentence that you just read from, the third paragraph of page 2 of Exhibit 1051, is there 2 Q. In that paragraph, you cite Exhibit 1051; is that 1 In the sentence that you just read from, the third paragraph of page 2 of Exhibit 1051, is there 3 A. Okay. Q. In that paragraph, you cite Exhibit 1051; is that 1 4 Q. In front of you, could you you've got some 3 A. Too't know the details at the level of the design, architecture, everything of the chip and the history to comment on that. I don't have any reason to disbelieve ampthing that is printed here, but it would not be the first time, if there was a mistake somewhere to a disbelieve ampthing that is printed here, but it would not be the first time, if there was a mistake somewhere to a patent in the distent of the next 10 D. Can I have it back? 11 11 Q. Can I have given you the wrong thing. 13 12 Q. Sorry. I thought it was at the back of the one I 15 16 had gi	21	So I think the general teachings are agnostic to	21	embedded x86 processors. So it's not just one; it is a
24 I don't recall anything that would be otherwise specific 24 Q. Fair enough. And my use of the singular of the 25 to size or scale. Page 18 Fair enough. And my use of the singular of the 1 Q. Let me ask you to turn in your 00396 supplemental Page 18 Page 2 1 Q. Let me ask you to turn in your 00396 supplemental Page 2 In the sentence that you just read from, the 2 declaration to paragraph 19. In the sentence that you strikes you as inaccurate anything in there that you strikes you as inaccurate or 3 A. Okay. 3 A. That's correct, yes. 3 A. Ton't foyou, could you you've got some 6 A. That's correct, yes. 7 G. In front of you as well. Could you turn to 8 disbelieve anything that is printed here, but it would 9 Exhibit 1051, toward the back of that set. 10 0. Let me ask you to turn, please, to exhibit or 10 C. an I have it back? 11 Q. In that paragraph you refer to a patent 11 B. That's okay. 12 A. Okay. I'm there. 13 11 C. Sorry. I thought it was at the back of the one I 15 Q. And what, generally, is Exhibit 1051. 12 A. That's oka	22	scale, if that's what you're getting at. At least I	22	complete line or family of processors, and this is just
25 to size or scale. 25 term is probably too limited. Page 18 . Page 18 Page 2 1 0. Let me ask you to turn in your 00396 supplemental In the sentence that you just read from, the 2 declaration to paragraph 19. In the sentence that you strikes you as inaccurate? 3 A. Okay. In that paragraph, you cite Exhibit 1051; is that 4 O. In that paragraph, you cite Exhibit 1051; is that A. Tocoldn't tell you whether it's inaccurate or accurate. I don't know the details at the level of the 6 6 A. That's correct, yes. 5 accurate. I don't know the details at the level of the 6 7 D. In front of you, could you you've got some 7 history to comment on that. I don't have any reason to 7 8 exhibit 1051, toward the back of that set. 9 not be the first time, if there was a mistake somewhere 10 C. Can I have it back? 10 Q. Let me ask you to turn, please, to exhibit or 12 A. That's okay. 11 A. Okay. I'm there. 12 13 Q. I might have given you the wrong thing. 13 Paragraph 21. A. Okay. I'm there. 13 Q. Sorry. I thought it was at the back of the one I 16	23	don't see anything in there right now looking at it, and	23	one example from that.
Page 18 Page 18 1 0. Let me ask you to turn in your 00396 supplemental 1 2 declaration to paragraph 19. 1 3 A. Okay. 3 4 0. In that paragraph, you cite Exhibit 1051; is that 3 5 right? 3 6 A. That's correct, yes. 5 0. In front of you, could you you've got some 6 8 exhibits in front of you, as well. Could you turn to 9 Exhibit 1051, toward the back of that set. 10 A. Tasee 50, but I don't see 51. 11 0. Can I have it back? 12 A. That's cokay. 13 Q. I might have given you the wrong thing. 14 A. That's okay. 15 0. Sorry. I thought it was at the back of the one I 16 had given you. It's actually at the front of the next 17 A. That's cokay. 18 A. That's cokay. 19 O. And what, generally, is Exhibit 1051? 19 O. And what, generally, is Exhibit 1051? 19 O. Could you turn to the second page of 21 Merpower PC/AT compatible microco	24	I don't recall anything that would be otherwise specific	24	Q. Fair enough. And my use of the singular of the
1Q. Let me ask you to turn in your 00396 supplemental1In the sentence that you just read from, the2declaration to paragraph 19.2third paragraph of page 2 of Exhibit 1051, is there3A. Okay.3anything in there that you strikes you as inaccurate4Q. In that paragraph, you cite Exhibit 1051; is that4A. I couldn't tell you whether it's inaccurate or5right?5accurate. I don't know the details at the level of the6A. That's correct, yes.667Q. In front of you, could you you've got some78exhibits in front of you as well. Could you turn to89Exhibit 1051, toward the back of that set.910A. Tase 50, but I don't sees109Exhibit 1051, toward the back of that set.1010C. an I have it back?1111Q. Can I have it back?1212A. That's okay.1313Q. I might have given you the wrong thing.1314A. That's okay.1415Q. Sorry. I thought it was at the back of the one I1516had given you. It's actually at the front of the next1616had given you. Ti's actually at the front of the next1617oe.171818A. That's okay. Okay. I have it. Exhibit 1051.1819Q. And what, generally, is Exhibit 1051?1919Q. And what, generally, is Exhibit 1051?1911I have one cory of	25	to size or scale.	25	term is probably too limited.
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