

1 UNITED STATES PATENT AND TRADEMARK OFFICE  
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD  
3  
4 SONY COMPUTER )  
5 ENTERTAINMENT AMERICA )  
6 LLC, )  
7 Petitioner, )  
8 v. ) CASE NO.: IPR2015-00396  
9 APLIX IP HOLDINGS ) IPR2015-00476  
10 CORPORATION, ) IPR2015-00533  
11 Patent Owner. )  
12 )  
13 ) DEPOSITION OF KARON  
14 ) MACLEAN, VANCOUVER BRITISH  
15 ) COLUMBIA NOVEMBER 20 & 21,  
16 ) 2015  
17  
18  
19  
20  
21  
22 The discovery deposition of KARON MACLEAN, taken in  
23 the above-entitled cause, before Spencer J. Charest, BCSRA  
24 No.429, Official reporter, on the 20th and 21st of  
25 November, 2015, at 1253 Johnston Street, Vancouver, B.C.

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7 BY: MR. ABRAN KEAN.

8 On behalf of the Petitioner;

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13 BY: ROBERT J. GILBERTSON,

14 On behalf of the Patent Owner.

15  
16 ALSO PRESENT: CALLIE PENDERGRASS,  
17 SENIOR TECHNICAL ADVISOR  
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I N D E X

INDEX OF EXAMINATIONS

EXAMINATION PAGE.

Examination of Karen MacLean by Mr. Kean 4  
Examination of Karon Maclean by Mr. Gilbertson 267

E X H I B I T S

NUMBER DESCRIPTION PAGE

Exhibit 1027 Photocopy of hand-drawn  
illustration by Ms. Maclean 188

Exhibit 1028 Itaya et al., patent of input  
system including resistance film  
touch panel and pushed position  
detecting device 222

Exhibit 1029 Press release for the FingerWorks  
iGesture Pad 236

Exhibit 1030 Article from the New York Times  
dated January 24th, 2002 246

Exhibit 1031 Document entitled "A Multi-Touch  
Three-Dimensional Touch Sensitive  
Tablet" 261

1 EXAMINATION BY

2 MR. KEAN:

3 Q. Will you state your name for the record, please.

4 A. Karen MacLean.

5 Q. And, Dr. MacLean, the same ground rules from the  
6 other day are going to apply on today's deposition. So  
7 verbal answers, please. I will try not to speak over you.  
8 If you want to break at any time just let me know and we  
9 can take a break.

10 A. Okay. Thanks.

11 Q. One thing that came up the other day is you  
12 mentioned at some point you were feeling kind of tired?

13 A. M'mm-hmm.

14 Q. If that happens today we can certainly take a  
15 break whenever you would like.

16 A. Yes.

17 Q. If you answer my questions I'm going to assume  
18 that you're able to answer them fully and honestly. Is  
19 that fair?

20 A. Yes, and I will be clear when I want a break.

21 Q. Okay. Very good. Today's deposition is going to  
22 cover opinions you offered in declarations in three  
23 proceedings. The first is IPR2015-00396, and I'm going to  
24 refer to that today as the 00396 proceeding. Would you  
25 understand what I'm talking about?

1 A. Yes.

2 MR. GILBERTSON: Can I interject on that.

3 MR. KEAN: Sure thing.

4 MR. GILBERTSON: Here on the record. One thing  
5 we did in an earlier deposition that I think was helpful  
6 is to ask that in the reporting of the deposition when 396  
7 is used as a shorthand that it be typed as 00396, and when  
8 533 is used, 00533, and when 476 is used, 00476. So that  
9 even if the words that come out of our mouth are 476 it  
10 will be helpful for the judges to have it say 00476. This  
11 is because we refer to patent numbers with just three  
12 digits very often but what we're referring to with 00396,  
13 00533 and 00476 is not patent numbers, but action numbers.  
14 So if the court reporter is amenable to that and if all  
15 the parties are I would like to make that request.

16 MR. KEAN: I think that's a good idea and a  
17 helpful way to structure this.

18 (DISCUSSION OFF THE RECORD)

19 MR. KEAN:

20 **Q. Okay. Dr. MacLean, I'm going to hand you what**  
21 **has previously been marked 2007 in the 00396 proceeding.**

22 A. Okay.

23 **Q. Please turn with me to the last page of that**  
24 **document and confirm that that's your signature?**

25 A. Yes, that's my signature.

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