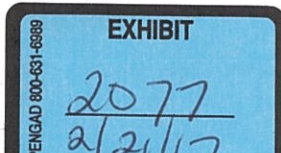


EXHIBIT B

Deposition Transcript of
William R. Michalson,
dated 11-9-2012

Defendant Garmin's Opposition
To Plaintiffs' Motion For Partial
Summary Judgment

Civil Action No. 2:10-cv-10578-PDB-MAR (E.D. Mich.)



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IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

VISTEON GLOBAL TECHNOLOGIES INC.,)
and VISTEON TECHNOLOGIES, LLC,)
Plaintiffs,)
v.) Case No.
GARMIN INTERNATIONAL, INC.,)
2:10-CV-10578-PDB-MAR)
Defendant.)
_____)

VIDEOTAPED DEPOSITION OF WILLIAM RYAN MICHALSON,
taken on behalf of Plaintiffs, at the
law offices OF Erise IP, 6201 College
Boulevard, Suite 300, Overland Park, Kansas,
beginning at 8:37 a.m. and ending at
4:10 p.m., on November 9, 2012, before me,
NAOLA C. VAUGHN, RPR, CRR, MO CCR No. 1052.

Page 2	<p>1 APPEARANCES OF COUNSEL</p> <p>2 For Plaintiffs:</p> <p>3 ALSTON & BIRD, LLP</p> <p>4 Bank of America Plaza</p> <p>5 101 South Tyron Street</p> <p>6 Suite 4000</p> <p>7 Charlotte, North Carolina 28280-4000</p> <p>8 (704)444-1000 - phone, (704)444-1695 - fax</p> <p>9 rick.mcdermott@alston.com</p> <p>10 jason.friday@alston.com</p> <p>11 jitty.malik@alston.com</p> <p>12 BY: JASON A. FRIDAY</p> <p>13 and</p> <p>14 BY: RICK McDERMOTT</p> <p>15 and</p> <p>16 BY: JITENDRA "JITTY" MALIK</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 3	<p>1 For Defendant:</p> <p>2 ERISE IP, P.A.</p> <p>3 6201 College Boulevard</p> <p>4 Suite 300</p> <p>5 Overland Park, Kansas 66211</p> <p>6 (913)777-5600 - phone, (913)777-5601 - fax</p> <p>7 eric.buresh@eriseIP.com</p> <p>8 paul.hart@eriseIP.com</p> <p>9 BY: ERIC A. BURESH</p> <p>10 and</p> <p>11 BY: PAUL R. HART</p> <p>12</p> <p>13</p> <p>14 Also Present: David Ayers, Garmin</p> <p>15 Kathleen Fitterling</p> <p>16 Jim Ross, videographer</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 4	<p>1 I N D E X</p> <p>2 WITNESS: WILLIAM RYAN MICHALSON</p> <p>3 Examination by Mr. Malik 7</p> <p>4</p> <p>5 EXHIBITS</p> <p>6 NUMBER DESCRIPTION PAGE</p> <p>7 Exhibit 1 - Expert Report of William Michalson 7</p> <p>8 Exhibit 2 - Exhibits to Michalson 7</p> <p>9 Exhibit 3 - 11/5/12 letter to Jitendra Malik 7</p> <p>10 from Jason Mudd identifying 102/103</p> <p>11 prior art invalidity positions</p> <p>12 Exhibit 4 - Special Master's Claims Construction 101</p> <p>13 Report to the Honorable Paul Borman</p> <p>14 Exhibit 5 - Garmin's Opening Markman Brief 102</p> <p>15 Exhibit 6 - Email string re: Claim Construction 103</p> <p>16 Briefs</p> <p>17 Exhibit 7 - Plaintiff's Final Infringement 109</p> <p>18 Contentions</p> <p>19 Exhibit 8 - Research in Vehicle Information 123</p> <p>20 Systems at General Motors</p> <p>21 GARMV-02-0024415 - 24419</p> <p>22 Exhibit 9 - Order to Modify The Fourth 136</p> <p>23 Amended Joint Rule 26(f) Report</p> <p>24 Exhibit 10 - AutoRoute Plus Reference Manual 139</p> <p>25 GARMV-02-00005061 - 5160</p>
Page 5	<p>1 EXHIBITS (Continued)</p> <p>2 NUMBER DESCRIPTION PAGE</p> <p>3 Exhibit 11 - US Patent 5,220,507 (Kirson) 151</p> <p>4 Exhibit 12 - US Patent 5,323,321 (Smith) 159</p> <p>5 Exhibit 13 - US Patent 5,243,528 (Lefebvre) 170</p> <p>6 Exhibit 14 - Integrating Business Listings 183</p> <p>7 with Digital Maps for Use in</p> <p>8 Vehicles</p> <p>9 GARMV-02-00016505 - 16511</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Page 6

1 (Exhibits 1 and 2 marked.)
 2 THE VIDEOGRAPHER: This is the
 3 beginning of the tape No. 1 in the deposition of
 4 William Michalson in the matter of Visteon v.
 5 Garmin. Case Number is 2:10-CV-1058-PDB-MAR.
 6 Today's date is November the 9th, 2012. The time
 7 is 8:37 a.m.
 8 My name is Jim Ross. I'm the
 9 videographer. The court reporter is Naola Vaughn.
 10 We're with Huseby Court Reporting.
 11 Counsel, will you please introduce
 12 yourselves, after which the court reporter will
 13 swear the witness.
 14 MR. MALIK: Good morning. This is
 15 Jitendra Malik of Alston & Byrd representing
 16 Plaintiff, Visteon. With me is Jason Friday and
 17 Rick McDermott, also of Alston Bird. And also
 18 Dr. Anatole Lokshin.
 19 MR. BURESH: Eric Buresh of Erise IP
 20 on behalf of Garmin. With me is Kathleen
 21 Fitterling, also with Erise IP. And joining us is
 22 David Ayers, in-house counsel at Garmin.
 23 WILLIAM RYAN MICHALSON,
 24 a witness, being first duly sworn, testified as
 25 follows:

Page 7

1 EXAMINATION
 2 BY MR. MALIK:
 3 Q. Good morning, Dr. Michalson.
 4 A. Good morning.
 5 Q. For the record would you please state
 6 your full name and address.
 7 A. William Ryan Michalson, and I live on
 8 Linden Street in Douglas, Massachusetts.
 9 Q. Okay. Let me hand you what I have
 10 marked as Michalson Exhibit 1 and Exhibit 2.
 11 Dr. Michalson, do you recognize
 12 Michalson Exhibit 1 and Exhibit 2?
 13 A. Exhibit 1 is my expert report and
 14 Exhibit 2 are exhibits to that report.
 15 Q. And if you turn to the last page of
 16 Exhibit 1, can you please confirm that that is
 17 your signature?
 18 A. Yes, it is.
 19 (Exhibit 3 marked.)
 20 Q. BY MR. MALIK: Okay. And let me also
 21 go ahead and hand you Michalson Exhibit 3.
 22 Have you seen Michalson Exhibit 3
 23 before?
 24 A. Yes.
 25 Q. Okay. It's mostly for reference

Page 8

1 purposes. Just it will make the conversation a
 2 little easier.
 3 Okay. And let me also hand you what
 4 is previously marked as Fosmoen Exhibit 10, which
 5 is the 375 patent. Have you seen the 375 patent
 6 before?
 7 A. Yes.
 8 Q. Okay. Let me hand you Peterman
 9 Exhibit 4, previously marked, which is the 408
 10 patent.
 11 Have you seen the 408 patent before?
 12 A. Yes.
 13 Q. Let me also hand you Fosmoen
 14 Exhibit 8, the 892 patent.
 15 Have you seen the 892 patent before?
 16 A. Yes, I have.
 17 Q. Let me also hand you Peterman
 18 Exhibit 3, which is the 060 patent.
 19 Have you seen Peterman Exhibit 3
 20 before?
 21 A. Yes.
 22 Q. Okay. Michalson Exhibit 1 opines on
 23 four patents. Are they the four patents that I
 24 just handed you?
 25 A. Yes.

Page 9

1 Q. Okay. And you understand that
 2 Michalson Exhibit 1 was supposed to be a complete
 3 statement of your opinions?
 4 A. That's correct.
 5 Q. Okay. Can you please state your
 6 educational background starting from college?
 7 A. Yes. I got my bachelor's degree from
 8 Syracuse University --
 9 Q. Okay.
 10 A. -- in, I believe it was, 1981. I got
 11 my master -- and that bachelor's degree was in
 12 electrical engineering.
 13 I got a master's degree in electrical
 14 engineering from Worcester Polytechnic Institute
 15 in Worcester, Massachusetts. I think that was
 16 '85. And then a PhD in electrical engineering
 17 also from Worcester Polytechnic Institute in 1989.
 18 Q. Okay. In your report you talk about
 19 your work with the Raytheon Company from 1981
 20 through 1991 on page 6.
 21 A. That's correct.
 22 Q. While with Raytheon -- and it said
 23 that on page 7 that you held several engineering
 24 positions at Raytheon Company.
 25 Can you describe to me what those

<p style="text-align: right;">Page 10</p> <p>1 engineering positions were and the kind of work 2 that you were involved with?</p> <p>3 A. Sure. Sure. I started working with 4 the computer and displays laboratory. That 5 computer displays laboratory was part of equipment 6 division, and we did a lot of work for, really, 7 all of the departments in -- within the domain of 8 equipment division.</p> <p>9 So I did work with communication 10 systems. I did work with navigation and tracking 11 systems, things like redesigns of Patriot missile 12 system guidance computer, Trident missile system 13 guidance computer, air traffic control systems, 14 primarily for military applications, but also some 15 of the computer and display systems for the 16 inflight air traffic control, the major -- the 17 hubs that interconnect major hubs.</p> <p>18 Computer design for some space-based 19 missile defense systems for tracking and 20 predicting points of impact for incoming ballistic 21 missiles, and a variety of communication systems, 22 Milstar Satellite System, which was a tri-service 23 communication system. Track 170 triple scatter 24 radio. Did some work with that system. That's a 25 terrestrial-based system that's used largely by</p>	<p style="text-align: right;">Page 12</p> <p>1 subsequent to Raytheon.</p> <p>2 With the Bose system at that point in 3 time, that was very early '90s, the writing was on 4 the wall that vehicle navigation systems would 5 start getting incorporated into automobiles.</p> <p>6 Bose had tremendous interest in 7 building systems to integrate their sound system 8 with vehicle navigation system. So for a couple 9 of years I got financing from Bose to develop some 10 prototypes of a system that is very similar to 11 what we see today. We had the Navitech map 12 database. We would get GPS-based positions. We'd 13 put the vehicle on the map. We'd, you know, do 14 the turn-by-turn directions, and, you know, we 15 were developing systems that were focused exactly 16 on that sort of application.</p> <p>17 Q. At the time you weren't employed by 18 Bose, were you?</p> <p>19 A. I was not employed by Bose. I was 20 employed by Worcester Polytechnic Institute, but 21 we had some graduate and undergraduate research 22 that was working on those areas.</p> <p>23 Q. And they financed those areas?</p> <p>24 A. They financed some of my work in that 25 area, yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 the Army.</p> <p>2 Q. Did you ever do any work with 3 developing any consumer GPS devices or were they 4 all military applications?</p> <p>5 A. When we're dealing with the consumer 6 GPS, I did a lot of work with consumer GPS 7 systems. Not anything that was productized at the 8 time, but I had built a differential GPS system 9 for the Department of Forestry. Built a GPS-based 10 collision avoidance system for Providence and 11 Worcester Railroad.</p> <p>12 Did some in-vehicle navigation system 13 work for Bose Corporation.</p> <p>14 So definitely a number of commercial 15 applications.</p> <p>16 Q. But anything directed to ordinary 17 consumer kind of GPS device that I would buy at 18 Best Buy?</p> <p>19 A. The Bose work would have been directed 20 at an in-vehicle navigation system.</p> <p>21 Q. Okay. With regard to the Bose work, 22 can you just expand on that a little bit? What 23 were you asked to do with Bose, and was this with 24 Raytheon?</p> <p>25 A. That was not with Raytheon. That was</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Okay. Was -- and you said the Bose 2 system was never commercialized, correct?</p> <p>3 A. I don't know what they ended up doing 4 with it. I know that we worked with them for a 5 couple of years. We had some prototype 6 demonstrations, and Bose then took the results of 7 our work, and I don't know where it might have 8 ended up. It may have ended up in some other OEM 9 equipment, or it may have ended up biasing other 10 system requirements that they passed on to others.</p> <p>11 Q. With respect to your work in Bose 12 during that two-year period -- and this was 1991, 13 '92?</p> <p>14 A. Probably starting around late '91 on 15 up to probably about '94, '95.</p> <p>16 Q. What percentage of your time was 17 dedicated to working on the Bose project?</p> <p>18 A. Boy, difficult to answer. I would say 19 probably the Bose project was probably about 10 or 20 15 percent of my time.</p> <p>21 Q. Okay.</p> <p>22 A. I had other related projects through 23 that time period that, you know, would have been 24 consuming some of my time. I had a lot of -- at 25 that point in time I had a lot of financing also</p>

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