UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

| | | |
|---|---|---|
| SPEX TECHNOLOGIES, INC., | ) | |
| Plaintiff, | ) | Case Nos. |
| vs. | ) | 8:16-CV-01790 (ARGX) |
| | ) | 8:16-CV-01799 (ARGX) |
| KINGSTON TECHNOLOGY, INC.; WESTERN DIGITAL CORPORATION; TOSHIBA AMERICA ELECTRONICS COMPONENTS, INC.; APRICORN, INC., | ) | 8:16-CV-01800 (ARGX) |
| | ) | 8:16-CV-07349 (ARGX) |
| Defendants. | ) | |

VIDEOTAPED DEPOSITION OF MIGUEL GOMEZ
Los Angeles, California
Wednesday, April 25, 2018
Volume I

Reported by:
KATHLEEN E. BARNEY
CSR No. 5698
Job No. 2865214
PAGES 1 - 309

Q Let's go to paragraph 202 of your report.

Now we're talking about Element 1F, which is:

"A means for mediating communications of data between the host computing device and the target means so as the communicated data must first pass through a security means."

Correct?

A Yes.

Q And under paragraph 202, you show a picture of Figure 9B. 05:20:28

A Yes.

Q Okay. And do you have an understanding of what is shown in that figure?

A Yes. 05:20:40

Q What is your understanding?
A That this is a diagram that identifies various components or functional hardware that is required as the structure.
Q And as shown on the left side of Figure 9B, it says "PCMCIA Interface," correct? 05:20:55
A Yes.
Q And that's something external to what is labeled as Element 910, the interface control device, correct? 05:21:13
A That's correct.
Q And do you have an understanding of how components that interact with a PCMCIA interface normally operate, what they normally contain?
A Yes. 05:21:28
Q And the PCMCIA IO controller, the PCMCIA address buffer, the PCMCIA data buffer, the ready/busy register, command detector, and state controller, are those all things that you would expect to find in any PCMCIA compliant circuitry that's going to interact with a PCMCIA interface? 05:21:47
MR. WANG: Objection. Vague. Incomplete hypothetical.
THE WITNESS: So you pointed specifically to the IO controller, the address buffer, the data 05:22:05

buffer, the ready/busy register and command detector --

BY MR. COTE:

Q And also the state controller.

A And also the state controller. 05:22:13

In some forms, those will be in -- did you point to the configuration registers as well?

Q You can add that as well, sure.

MR. WANG: Objection. Vague. Incomplete hypothetical. 05:22:27

THE WITNESS: Elements of each are likely to exist in a -- I haven't done an analysis to determine whether or not any one of these could be eliminated. And the implementation of these varies dramatically. But you certainly would need a data 05:22:49 buffer to move data in and out. And the ready/busy register is very important.

But I haven't done a complete analysis to know whether you could eliminate one of these and still may call it a PCMCIA controller or interface. 05:23:09

BY MR. COTE:

Q Okay. But as a person of ordinary skill in the art prior to 1997 -- I'm sorry.

As a person of ordinary skill in the art prior to 1997, such a person would understand that 05:23:22

these elements that we just discussed would either be there or substantially be there in any kind of PCMCIA interface, correct?

MR. WANG: Objection. Vague. Mischaracterizes prior testimony. 05:23:36

THE WITNESS: Again, I -- as I said, I would have to think about whether or not you could eliminate one or more of these. But generally, these are the components that are in a PCMCIA interface. 05:23:54

BY MR. COTE:

Q So down at the bottom of Figure 9B, there is a CompactFlash interface.

Do you see that?

A Yes. 05:24:05

Q Okay. And do you have an understanding of the circuitry that normally would interface with a CompactFlash interface?

A Yes.

Q And would you expect, back in the 1997 time frame, a CompactFlash interface circuitry to include the CompactFlash IO control, CompactFlash data buffer, card enabled coder and CompactFlash sector counter? 05:24:17

MR. WANG: Objection. Vague. Incomplete 05:24:39

DOCKET ALARM

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

**LAW FIRMS**
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

**FINANCIAL INSTITUTIONS**
Litigation and bankruptcy checks for companies and debtors.

**E-DISCOVERY AND LEGAL VENDORS**
Sync your system to PACER to automate legal marketing.