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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

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

05:20:17

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

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1 Q What is your understanding?

2 A That this is a diagram that identifies  
3 various components or functional hardware that is  
4 required as the structure.

5 Q And as shown on the left side of Figure 9B, 05:20:55  
6 it says "PCMCIA Interface," correct?

7 A Yes.

8 Q And that's something external to what is  
9 labeled as Element 910, the interface control  
10 device, correct? 05:21:13

11 A That's correct.

12 Q And do you have an understanding of how  
13 components that interact with a PCMCIA interface  
14 normally operate, what they normally contain?

15 A Yes. 05:21:28

16 Q And the PCMCIA IO controller, the PCMCIA  
17 address buffer, the PCMCIA data buffer, the  
18 ready/busy register, command detector, and state  
19 controller, are those all things that you would  
20 expect to find in any PCMCIA compliant circuitry 05:21:47  
21 that's going to interact with a PCMCIA interface?

22 MR. WANG: Objection. Vague. Incomplete  
23 hypothetical.

24 THE WITNESS: So you pointed specifically to  
25 the IO controller, the address buffer, the data 05:22:05

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

3 BY MR. COTE:

4 Q And also the state controller.

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

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

8 Q You can add that as well, sure.

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

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

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

21 BY MR. COTE:

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

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

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

4 MR. WANG: Objection. Vague.

5 Mischaracterizes prior testimony. 05:23:36

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

11 BY MR. COTE:

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

14 Do you see that?

15 A Yes. 05:24:05

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

19 A Yes.

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

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

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