



Planet Depos[®]
We Make It *Happen*[™]

**CONFIDENTIAL BUSINESS INFORMATION
SUBJECT TO PROTECTIVE ORDER**

Transcript of Yassir Abdul-Hafiz

Date: February 18, 2022

Case: Certain Light-Based Physiological Measurement Devices (337-TA-1276)

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

**DOCKET
ALARM**

Find authenticated court documents without watermarks at docketalarm.com.

CONFIDENTIAL BUSINESS INFORMATION

Transcript of Yassir Abdul-Hafiz

Conducted on February 18, 2022

99

1 Q. Could you explain to me what the difference is 11:41:36
2 between the measurement of a local temperature and the 11:41:40
3 measurement of a bulk temperature? 11:41:43

4 A. Local temperature is where you put the 11:41:47
5 thermostat. That's a local temperature. And, of 11:41:51
6 course, in this case, the bulk temperature means 11:41:53
7 that -- like you -- you know, like the mass here in 11:41:56
8 this case, we want to do the entire -- I call it the 11:42:01
9 representative temperature. 11:42:05

10 The representative temperature is very close 11:42:07
11 to the sum -- well, I don't want to say summation. I 11:42:11
12 want to call it average, because they do have 11:42:16
13 ingredient. But we need something that's related 11:42:19
14 between that spot that we are measuring, because what 11:42:21
15 you are measuring on the thermostat is a spot. 11:42:24

16 But if you have a thermal mass that is good 11:42:25
17 conductivity, you are getting a representative 11:42:31
18 temperature of the whole bulk, and that's what we call 11:42:32
19 bulk temperature. 11:42:35

20 Q. Do you use the phrases "bulk temperature" and 11:42:50
21 "representative temperature" interchangeably? 11:42:53

22 A. No. I call it representative, they call it 11:42:59
23 bulk. Okay? Bulk because it's the -- they treat as a 11:43:01
24 bulk, treat the whole emitter as a bulk. 11:43:06

25 I call it representative, that's my term, 11:43:09

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL BUSINESS INFORMATION

Transcript of Yassir Abdul-Hafiz

Conducted on February 18, 2022

100

1 because of the -- because it predict the shift. Might 11:43:12
2 not be accurately the exact temperature, but it is a 11:43:16
3 representative means, it changes with the change of the 11:43:19
4 temperature of the bulk. 11:43:23

5 Q. When you were developing the ideas for the 11:43:34
6 '127 patent, did you and your coinventors use the 11:43:38
7 phrase "bulk temperature" or "representative 11:43:43
8 temperature"? 11:43:45

9 A. No. They use the bulk. 11:43:46

10 Q. When did you begin to use the phrase 11:43:48
11 "representative temperature"? 11:43:52

12 A. When we start -- in fact, recently, when we 11:43:57
13 start looking at this for other stuff with -- and I 11:44:00
14 said, okay. The temperature is for other devices, not 11:44:05
15 even that. If you have something you want to see the 11:44:11
16 shift in it but you're not sure what is the ingredients 11:44:13
17 of the temperature between, we call it representative 11:44:16
18 temperature. But that's just, you know, my group term. 11:44:18

19 Q. And so the '127 patent was filed in 2006 and 11:44:23
20 then issued in 2010. Did your usage of the term 11:44:29
21 "representative temperature" come after -- 11:44:33

22 A. Way after. 11:44:36

23 Q. -- 2006 -- 11:44:36

24 A. Yeah, way after. 11:44:37

25 Q. -- and 2010? 11:44:38

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM