

1 O P E N S E S S I O N

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3 MR. MUELLER: Your Honor, as our next witness we  
4 call Dr. Ueyn Block, and Ms. Frazier will do the  
5 examination.

6 MS. FRAZIER: Dr. Mehra, assuming it's okay with  
7 Her Honor, you are free to go.

8 JUDGE BHATTACHARYYA: Yes. Thank you for your  
9 time.

10 THE WITNESS: Thanks. Sounds good.

11 JUDGE BHATTACHARYYA: Good morning, Dr. Block.

12 THE WITNESS: Good morning.

13 JUDGE BHATTACHARYYA: Do you understand that you  
14 have an obligation to tell the truth here today?

15 THE WITNESS: Yes.

16 UEYN BLOCK,  
17 having been first duly sworn and/or affirmed  
18 on his oath, was thereafter examined and testified as  
19 follows:

20 JUDGE BHATTACHARYYA: Thank you.

21 You may proceed.

22 DIRECT EXAMINATION

23 BY MS. FRAZIER:

24 Q. Good morning, Dr. Block.

25 A. Good morning.

1 Q. Could you please introduce yourself to Her Honor?

2 A. Absolutely. My name is Ueyn Block, and I work at  
3 Apple.

4 Q. What is your educational background?

5 A. I have a Bachelor's degree in physics and  
6 mathematics and then got a Master's and a Ph.D. degree in  
7 applied physics at Stanford University.

8 Q. What did you do after you defended your  
9 dissertation at Stanford?

10 A. I went from Stanford to a startup company working  
11 on noninvasive biomedical optics devices and stayed there  
12 for about six years.

13 Q. And after that what did you do?

14 A. I pursued a job at Apple and went directly from  
15 that company to Apple.

16 Q. When did you join Apple?

17 A. I joined Apple in March of 2013.

18 Q. Why were you interested in working at Apple?

19 A. Basically I've been a longtime appreciator of the  
20 company since using products dating back all the way to the  
21 '80s, and for me it was some kind of a dream job. I had  
22 actually tried to get a job there straight out of graduate  
23 school but didn't have the right qualifications at that  
24 time, so I eventually got there.

25 Q. Dr. Block, what products have you worked on

1 during your time at Apple?

2 A. Primarily the Apple Watch since I first joined.

3 Q. Which versions of Apple Watch have you worked on?

4 A. All of them.

5 Q. Starting with the first Apple Watch, if I refer  
6 to that as the Series 0, will you understand what I'm  
7 talking about?

8 A. Yes.

9 Q. What were your responsibilities with respect to  
10 the Series 0 Apple Watch?

11 A. When I started, we were at very early stages of  
12 doing R&D and prototyping, and I was primarily working on  
13 the overall optical architecture of the health sensors for  
14 the Series 0 Apple Watch.

15 Q. And at a high level, what are the components that  
16 are part of the optical sensors in Apple Watch Series 0?

17 A. Components such as the LEDs and photodiodes, the  
18 windows and apertures in the back crystal, how they are all  
19 arranged and how we create the overall optical architecture.

20 Q. Now, Dr. Block, next to you in the room is what  
21 has been marked as RPX-5.

22 Do you see that?

23 A. Yes.

24 Q. Could you tell us what RPX-5 is? And if you  
25 don't mind just holding it up.

1           A.    So it's an enclosed Series 0 Apple Watch.

2           Q.    And what -- excuse me.  Strike that.

3                    You referred to the back crystal a moment ago.

4   Using RPX-5, could you show Her Honor what the back crystal  
5   on the Series 0 is?

6           A.    Sure.  So on the back of the watch, the watch has  
7   this metal housing, the front has a display, on the rear  
8   side there's a circular protruding dome, I'm going to try to  
9   hold it close, that sticks out of the metal housing.  This  
10   circular dome is what we refer to as the back crystal on the  
11   Series 0.

12                   MS. FRAZIER:  Your Honor, at this point I'd like  
13   to go on the Apple confidential record.

14                   (Whereupon, the hearing proceeded in confidential  
15   session.)

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1                   C O N F I D E N T I A L   S E S S I O N

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3                   JUDGE BHATTACHARYYA: We're moving to the Apple  
4 confidential record.

5 BY MS. FRAZIER:

6           Q.   Dr. Block, do you know why that dome shape was  
7 chosen for the back crystal in Series 0?

8                   JUDGE BHATTACHARYYA: Could you hold for a  
9 minute, Ms. Frazier. I see there's somebody, Claire  
10 Stoneman that's not marked as either R or C.

11                  MS. FRAZIER: I believe Ms. Stoneman is a  
12 paralegal on Mr. Re's team.

13                  MR. RE: That's correct. She is with us.

14                  JUDGE BHATTACHARYYA: Okay. Could you please ask  
15 her to follow the designations and indicate that she is on  
16 the protective order and associated with Complainant.

17                  MR. RE: We'll take care of that immediately,  
18 Your Honor.

19                  JUDGE BHATTACHARYYA: Thank you.

20 BY MS. FRAZIER:

21           Q.   Dr. Block, do you know why the dome shape was  
22 chosen for the back crystal in the Series 0?

23           A.   When the Series 0 was under development, the  
24 overall product design included -- well, one of the goals  
25 was to make the product very, very thin from the side, and

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