

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

MAXELL, LTD.

)

DOCKET NO. 5:16cv179

-vs-

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Texarkana, Texas

)

1:18 p.m.

ZTE USA, INC.

June 28, 2018

TRANSCRIPT OF TRIAL
AFTERNOON SESSION
BEFORE THE HONORABLE ROBERT W. SCHROEDER III,
UNITED STATES DISTRICT JUDGE,
AND A JURY

A P P E A R A N C E S

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P R O C E E D I N G S

(Jury out.)

COURT SECURITY OFFICER: All rise.

THE COURT: Let's have the jury brought down.

COURT SECURITY OFFICER: Please rise for the jury.

(Jury in.)

THE COURT: Mr. Stephens, you may continue.

MR. STEPHENS: Thank you, your Honor.

BARMOOK MANSOORIAN, PH.D., DEFENDANT'S WITNESS,

PREVIOUSLY SWORN

DIRECT EXAMINATION (CONTINUED)

BY MR. STEPHENS:

Q. Welcome back, Dr. Mansoorian.

A. Thank you.

Q. I trust you had a good lunch?

A. I did. Thanks.

Q. Let's dive into the patent itself -- or the patents
itself.

The slide on the screen, Dr. Mansoorian, have you
seen this document before?

A. Yes. It's the so-called '493 patent camera patent in
this case.

Q. And this is Plaintiff's Exhibit 8?

A. Yes.

Q. And have you reviewed this document?

1 A. Yes. I've reviewed this in detail.

2 Q. And the next document on the screen, Dr. Mansoorian,
3 have you seen this document before?

4 A. Yes. It's the '729 patent, and it's a camera -- the
5 second camera patent in this case.

6 Q. This is Plaintiff's Exhibit 9?

7 Dr. --

8 A. Yes. I'm sorry, yes.

9 Q. Thank you.

10 If I mention the camera patents, can we agree that
11 I'm discussing the '493 and the '729 patents together?

12 A. Yes. We agree.

13 Q. Dr. Mansoorian, what is your understanding of what the
14 camera patents are generally about?

15 A. So the two camera patents have a similar background, but
16 they're addressing different functionality.

17 So the '493 patent is addressing trying to use an
18 electronic camera to take both a high resolution picture for
19 photographs and still pictures and also to use the same
20 camera in a lower resolution to take video. And also, to
21 monitor the still picture.

22 The '729 patent discusses the problem how to solve
23 the problem of a handheld camera that has movement and how to
24 use a specific method to correct for that method.

25 And each one of these patents describes a very

1 specific method of solving those problems.

2 Q. Thank you, Dr. Mansoorian.

3 Do these patents share a specification?

4 A. They do.

5 Q. What is your understanding of why that is?

6 A. It's because the '729 is a continuation of the '493
7 patent.

8 Q. What is the priority date of these patents?

9 A. I believe it's January 11, 2000.

10 Q. Thank you.

11 Now, what are the problems or challenges that, in
12 your view, the inventors were trying to address in these
13 patents?

14 A. So the inventors -- you know, you've got to think about
15 back in the '90s when this work was done, and 2000, the main
16 problem of electronic imaging was that there was only really
17 one successful product for elect -- consumer electronic
18 imaging, and that was the camcorder or the Handycam.

19 And, basically, the struggle for electronic imaging
20 was how to expand that market. The -- the still camera
21 market was still a film photography market.

22 And so the problem was that -- the problem was that
23 all these camcorders, the output would have to go to a
24 television and you have to -- again, you have to remember the
25 old days of the televisions we had in the '90s with the big

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