

EXHIBIT 14

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

MAXELL, LTD.,)
)
Plaintiff) Case No. 5:19-CV-
) 00036-RWS
vs.)
)
APPLE INC.,)
)
Defendant.)

-----x

DEPOSITION OF TIM A. WILLIAMS, PH.D.
Washington, D.C.
Friday, November 1, 2019

Reported by:
Lori J. Goodin, RPR, CLR, CRR,
RSA, California CSR #13959
JOB NO. 170305

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TIM A. WILLIAMS, PH.D.

November 1, 2019

9:41 a.m.

Deposition of TIM A. WILLIAMS, PH.D.,
held at the offices of

MAYER BROWN LLP
1999 K Street, Northwest
Washington, D.C. 20006

before Lori J. Goodin, RPR, CLR, CRR, RSA,
California CSR #13959, a Notary Public in and
for the District of Columbia.

1 TIM A. WILLIAMS, PH.D.

2 A P P E A R A N C E S:

3

4 MAYER BROWN

5 Attorneys for Plaintiff

6 1999 K Street, Northwest

7 Washington, D.C. 20006

8 BY: SAQIB SIDDIQUI, ESQUIRE

9

10

11

12

13 O'MELVENY & MYERS

14 Attorneys for Defendant

15 Two Embarcadero Center

16 San Francisco, California 94111

17 BY: LUANN SIMMONS, ESQUIRE

18

19

20

21

22

23 ALSO PRESENT:

24 Nathan Kane, videographer

25

1 TIM A. WILLIAMS, PH.D.

2 convey a specific structure to you? Or to a
3 person of skill in the art at the time?

4 A. Well it conveys, at that particular
5 point in time, it conveys a particular
6 functionality.

7 And it conveys a particular
8 structure from a list of structures that we
9 talked about earlier, for example.

10 Select one of the above and that
11 would be a way to understand the user's desires
12 in providing an input into the system.

13 Q. We talked about a few examples.

14 But, isn't it true that any
15 structure that would provide that functionality
16 would constitute an input unit under the plain
17 and ordinary meaning?

18 A. I don't understand the question.
19 Those structures we discussed before are
20 contemporaneous 2003 structures for implementing
21 an input device.

22 Q. We could have listed other examples,
23 though, right?

24 A. I can't think of any.

25 Q. Can you think of any structure that