

EXHIBIT J

In the Matter Of:

MAXELL vs
APPLE, INC.,

DANIEL MENASCE, PHD

November 01, 2019



Marjorie Peters
COURT REPORTING

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MAXELL vs APPLE, INC.,
Daniel Menasce, PhD on November 01, 2019

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

MAXELL, LTD.,)
)
Plaintiff,)
) Civil Action No.
vs.) 5:19-cv-00036-RWS
)
APPLE, INC.,)
)
Defendant.)

- - - - -

VIDEOTAPED DEPOSITION OF DANIEL A. MENASCE, PhD
Friday, November 1, 2019, 10:36 a.m.

O'Melveny & Myers LLP
1625 I Street, NW
Washington, DC

Reported By: Marjorie Peters, FAPR, RMR, CRR

Job No:

12:24:58 1 human being manually entering the content that's
12:25:03 2 going to be displayed at the electronic notice
12:25:05 3 board.

12:25:05 4 So I really don't know. There's
12:25:09 5 many different possibilities.

12:25:10 6 Q. Okay. As a person of ordinary skill in
12:25:19 7 the art, does the term input have a particular
12:25:22 8 meaning to you?

12:25:22 9 A. No, just input by itself. Input is a
12:25:25 10 very broad term. Just input doesn't have a very
12:25:28 11 well defined meaning.

12:25:30 12 Q. I'm asking if it means something. So in
12:25:34 13 electrical engineering/computer science context,
12:25:37 14 does input have a meaning?

12:25:38 15 A. So you're asking me outside of the
12:25:42 16 context of the '438 patent?

12:25:43 17 Q. Yes. So let's say we were talking
12:25:45 18 before you started working on this case and I said,
12:25:48 19 what is an input, based on your, you know, knowledge
12:25:52 20 and your studies and your work, and --

12:25:56 21 A. So outside the context of this patent,
12:25:59 22 input is a function, a function that allows some
12:26:03 23 information to be fed into a system. The very
12:26:08 24 general term. It's a function.

12:26:09 25 Q. So when you see the term input, you --

12:26:14 1 it has some special meaning to you?

12:26:16 2 A. Like I said, it's a very general term,
12:26:19 3 not in the context of the '438 patent, the meaning
12:26:24 4 would be a function. Input is a function. A
12:26:28 5 function that allows information to get into some
12:26:33 6 system. I mean, which is really very, very broad
12:26:38 7 definition; but if you just say input, that's all
12:26:42 8 that you would get.

12:26:43 9 Q. Right. So you said you have a mobile
12:26:53 10 phone?

12:26:53 11 A. I do.

12:26:54 12 Q. Is it a smartphone?

12:26:55 13 A. Smartphone.

12:26:56 14 Q. Does that have any type of input?

12:26:58 15 A. Yes.

12:26:59 16 MR. ZHOU: Objection to form.

12:27:01 17 Q. What type of phone is it, by the way?

12:27:02 18 A. iPhone.

12:27:03 19 Q. iPhone. What type of input does it
12:27:06 20 have?

12:27:06 21 A. It has a touch screen.

12:27:07 22 Q. So that's an example of a type of input?

12:27:10 23 A. That's an example of an input.

12:27:12 24 Q. And a person of ordinary skill in the

12:27:13 25 art would understand the touch screen is a type of

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