

# EXHIBIT L

**In The Matter Of:**

*Maxell v.  
Apple Inc.*

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*Joseph A. Paradiso, Ph.D.  
October 18, 2019*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION  
Case No. 5:19-cv-00036-RWS

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MAXELL, LTD.  
Plaintiff  
vs.  
APPLE INC.  
Defendant  
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VIDEOTAPED DEPOSITION OF JOSEPH A. PARADISO, Ph.D.  
Friday, October 18, 2019, 9:11 a.m.  
DLA Piper LLP (US)  
33 Arch Street  
Boston, Massachusetts

---Reporter: Joan M. Cassidy, CSR, RPR, RMR, CRR---  
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1 your declaration.

2 A. Sure.

3 Q. At the bottom of Paragraph 23, there's a  
4 statement that says "at least one year of experience  
5 working in the field of location- or sensor-based  
6 human-computer interaction"?

7 A. Yes.

8 Q. What is the difference between location-  
9 and sensor-based human-computer interaction?

10 A. So this is location-based human-computer  
11 interaction. I taught a whole course on that,  
12 actually, some years ago at MIT. So that's  
13 basically interacting with an electronic environment  
14 where location is a part of that interaction,  
15 location is fundamental in it.

16 Sensors, you know, are the way that  
17 information gets recorded, and, you know, the  
18 sensors can determine locations, we talked about  
19 before. And then, you know, basically, the sensors  
20 are used in moderating the interaction as well.

21 So this is essentially human-computer  
22 interaction, knowing something about location,  
23 knowing something about sensors, but location can  
24 follow that, so they're related that way.

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1 Q. Does location-based human-computer  
2 interaction, can it include sensor-based  
3 human-computer interaction?

4 A. Sensor-based human-computer interaction  
5 probably includes location. It's more than --

6 Q. Yeah, that's -- yes. Sorry. That's what I  
7 meant. So when you're using location-based  
8 human-computer interaction, there's a possibility  
9 you can include sensors to accomplish that goal?

10 A. Yes.

11 Q. If you could please go to Paragraph 27 of  
12 your declaration.

13 A. Sure.

14 Q. And I think this is what you had -- you  
15 were mentioning briefly earlier, too. You mentioned  
16 that "in my view, the terms do not connote any  
17 specific structure, and the device -- the word  
18 'device,' is no more specific to me than a generic  
19 term such as 'means.'"

20 A. Mm-hm.

21 Q. What do you mean by the fact that these  
22 terms do not connote any specific structure?

23 A. A device can be anything. It can be an  
24 abacus, it can be a palmtop computer or phone. It's

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