

# EXHIBIT F

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

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5	MAXELL, LTD.,	) Case No.
		) 5:19-cv-00036-RWS
6	Plaintiff	)
		)
7	vs.	)
		)
8	APPLE, INC.,	)
		)
9	Defendant	)

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Videotaped Deposition of Robert Maher, Ph.D.  
Washington, D.C.  
October 25, 2019  
11:07 a.m.

Reported by: Bonnie L. Russo  
Job No. 170303

1 ROBERT MAHER, PH.D.

2 generator.

3 When you point to that in the  
4 alleged infringing device, does what you point  
5 to have to have a speaker?

6 A. Well, if we look at Figure 15 of the  
7 patent, it's describing one of the possible  
8 ways in which this patent could be practiced,  
9 and in that case, the ringing sound generator  
10 box 1519 shows the loud speaker as a separate  
11 element 1520.

12 Q. Agreed. So I am trying to  
13 understand what you -- what your opinion is as  
14 to what structure falls within the ringing  
15 sound generator box 1519?

16 A. Yes.

17 Q. So what hardware structures are  
18 included within ringing sound generator box  
19 1519?

20 A. Those are the elements that would  
21 create the ringing sound.

22 Q. And what are those elements?

23 A. Well, for instance, we can look at  
24 Figure 1 and it is showing an example of one of  
25 the embodiments of this invention that includes

1 ROBERT MAHER, PH.D.

2 the different sound reproduction methods, that  
3 would be examples, and it doesn't -- it's not  
4 limited to these but that would be one example  
5 of that ringing sound generator.

6 Q. So any combination of hardware  
7 elements, so long as they generate the ringing  
8 sound, would constitute a ringing sound  
9 generator?

10 A. Well, the patent goes to some  
11 lengths to describe examples of how that would  
12 be accomplished in several different  
13 embodiments so it's not restricted to Figure 1.

14 Q. Understood. I am asking though, is  
15 it your opinion that any combination of  
16 hardware elements that generates a ringing  
17 sound, that meets the characteristics of the  
18 ringing sounds described in the patent, would  
19 that constitute a ringing sound generator?

20 MR. SIDDIQUI: Object to form.

21 THE WITNESS: I believe that is what  
22 I consider the plain and ordinary meaning of  
23 ringing sound generator, an element that  
24 creates a ringing sound.

25 BY MS. SIMMONS:

1 ROBERT MAHER, PH.D.

2 Q. Is the melody generator that we  
3 talked about earlier that is described in the  
4 prior art section of the patent, is that a  
5 ringing sound generator?

6 A. Well, we would have to look at a  
7 specific example of what is being described as  
8 the melody generator. My assumption would be  
9 that that is a -- an element capable of making  
10 a melody so a musical tone.

11 Q. Would it therefore constitute a  
12 ringing sound generator in your opinion?

13 A. It would -- if it were -- as part of  
14 a system that is being triggered by an incoming  
15 signal and creating an audible alert, that  
16 would meet the description of a ringing sound  
17 generator.

18 Q. Would the ringer on an analog phone  
19 constitute a ringing sound generator?

20 A. I think that would -- yes, I think  
21 it would. That would be an example. That is  
22 not what the inventor had in mind for this  
23 invention, which was to go beyond what the  
24 prior art had been, meaning telephones have had  
25 a ringer element essentially since they were