EXHIBIT G

Page 1

1   IN THE UNITED STATES DISTRICT COURT

          FOR THE EASTERN DISTRICT OF TEXAS

2   TEXARKANA DIVISION

3

   MAXELL, LTD.,   )

4   )

                    Plaintiff) Case No. 5:19-CV-

5   )   00036-RWS

             vs.   )

6   )

   APPLE INC.,   )

7   )

                    Defendant.   )

8   -------------------------x

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12   DEPOSITION OF TIM A. WILLIAMS, PH.D.

13   Washington, D.C.

14   Friday, November 1, 2019

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22   Reported by:

23   Lori J. Goodin, RPR, CLR, CRR,

24   RSA, California CSR #13959

25   JOB NO. 170305

1   TIM A. WILLIAMS, PH.D.

2   user?

3   A.   Can I have the question again,

4   please?

5   Q.   Sure.   Is it your opinion that the

6   input unit, as claimed in Claim 1, would be the

7   portion of this definition that we just looked

8   at in the specification that involves receiving

9   an input entered by the user.

10   A.   Basically.   And that is consistent

11   with my discussion in Paragraph 30 regarding

12   the IBM computing dictionary and its definition

13   of input unit as "A device in a data processing

14   system by means of which data can be entered

15   into the system."

16   Q.   Would it be fair to say then that

17   the input unit claimed in Claim 1 under your

18   understanding of the plain and ordinary meaning

19   is any component as long as the component is

20   capable of receiving an input entered by the

21   user?

22   A.   Well, there is a distinction between

23   the IBM definition which is data entered into

24   the system, and the words of the spec which is

25   restricted to the data being entered by the

1   TIM A. WILLIAMS, PH.D.

2   user.

3   But, I would say that as long as the

4   component is capable of receiving an input,

5   would be the more general understanding of a

6   POSITA.

7   Q.   Okay. So then is your understanding

8   of the plain and ordinary meaning of input unit

9   any component as long as the component is

10   capable of receiving an input?

11   A.   Basically, yes. Claim 1 restricts

12   that input unit to receiving an input entered

13   by a user in its language.

14   So, the user element is included

15   within Claim 1.

16   Q.   Would you include that in your plain

17   and ordinary meaning definition then? Or no.

18   A.   Well, I think it would be redundant

19   to say that the input unit is, so, the claim

20   would be read quite oddly, I guess.

21   The Claim 1 would be an information

22   processing terminal comprising a, any component

23   that is capable of receiving an input entered

24   by the user for receiving an input entered by a

25   user. That seems to be confusing and may

1   TIM A. WILLIAMS, PH.D.

2   confuse a jury.

3   Q.   Understood.   So, then the plain and

4   ordinary meaning under your opinion of the

5   input unit is any component as long as the

6   component is capable of receiving an input?

7   A.   At the highest level, in general,

8   yes.

9   Q.   And that is your opinion of what a

10   person of skill in the art would understand the

11   term input unit to mean, simply by looking at

12   that term in the claim.   Is that right?

13   A.   Simply by looking at the term in the

14   claim.   Well, we have to look to the spec in

15   the understanding of a POSITA.   I'm not sure

16   what you are asking.

17   Q.   Let me ask it this way.

18   Does the term input unit have a

19   plain and ordinary meaning just in the field at

20   the time of the '438 patent?

21   A.   Yes.

22   Q.   And what is that?

23   A.   The definition we have discussed.

24   Q.   The same definition that we have

25   just agreed to that was the definition for the

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