EXHIBIT H

Page 1

1

2   UNITED STATES DISTRICT COURT

3   EASTERN DISTRICT OF TEXAS

4   TEXARKANA DIVISION

5   --------------------------X

6   MAXELL, LTD.,   :

7   Plaintiff,   :   Case No.

8   v.   :   5:19-cv-00036-RWS

9   APPLE INC.,   :

10   Defendant.   :

11   --------------------------X

12   Videotaped deposition of VIJAY MADISETTI Ph.D.

13   Tuesday, October 22, 2019

14   Atlanta, GA

15   8:57 a.m.

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19

20

21   Job No.:   170439

22   Pages: 1 - 186

23   Reported by: Giselle Mitchell-Margerum, RPR, CRI,

24   CCR

25

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1   V. MADISETTI

2   Q.   Yes.   Understood.   I mean, an expert is

3   not expected to be able to list every single piece

4   of knowledge he has acquired over, you know, in

5   your case, your 30-plus years of working in the

6   field.   Right?

7   What I'm asking is, is, you know,

8   paragraph 32, complete as of the date you signed

9   your expert declaration, on October 4th 2019?

10   A.   I would say I would look at the entire

11 section four as being representative of what I've

12 considered.   Not just paragraph 32; but also

13 paragraphs 33 and 34, in informing my opinions and

14 providing the basis for those.

15   Q.   So, let me re-ask that question.   Is

16 section four, covering paragraphs 32 to 34,

17 complete as of the date of your declaration on

18 October 4th?

19   A.   Yes.

20   MR. ZHOU: Do you want to take a short

21 break?

22   MR. NESE: Sure.

23   MR. ZHOU: We've been going for about an

24 hour.

25   MR. NESE: Sure.   Sounds good.

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1   V. MADISETTI

2   THE VIDEOGRAPHER: 10:01.   We are off the

3   record.

4   (Short break)

5   THE VIDEOGRAPHER: 10:10.   We are back on

6   the record.

7   BY MR. ZHOU:

8   Q.   So, Dr. Madisetti, from paragraph 45

9   through paragraph 40 -- 61, you address what we

10   have been referring to as the "culling" claim term.

11   Is that right?

12   A.   Yes.   Starting on page 10, I have a

13   Section A, where I provide certain opinions with

14   respect to those claim terms that are in dispute.

15   These are some of the opinions that I offer with

16   respect to this term.

17   Q.   And this term is the "culling" or

18   "culled" term.   Right?

19   A.   Yes.

20   Q.   I refer you to page 11.   The footnote on

21   page 11.   So, in your declaration, you are not

22   offering an opinion on the "mixed" term.   Is that

23   right?

24   A.   I'm not.   I've not been asked to offer

25   such an opinion.

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1   V. MADISETTI

2   Q.   And you did not offer any opinion on the

3   "mixed" term in your expert declaration.   Right?

4   A.   I did not.

5   Q.   We've been talking about the culled, or

6   culling term, several times now.   I want to refer

7   you to Exhibit 2.   The 493 Patent.   Take a look at

8   column 16; claim one.   The very top of column 16 is

9   a limitation from claim one that reads in part:

10   "The signal processing unit generates the

11   image signals by mixing or culling signal charges

12   accumulated in the end number of vertically

13   arranged pixel lines."

14   Do you see that?

15   A.   I do.   You're referring to column 16,

16   lines one through six.   Right?

17   Q.   Yes.   Generally, around lines, from one

18   to four, is the part I read.

19   A.   Okay.

20   Q.   And this is where the culling term is

21   first used in the patent claims.   Right?

22   A.   Yes.   That appears in claim one.   And in

23   claim one, you are reading the limitation in column

24   16, lines one through six.

25   Q.   And this is where when we refer to the

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