

EXHIBIT 32

REDACTED VERSION

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

MAXELL, LTD.,

Plaintiff,

vs.

APPLE INC.,

Defendant.

Civil Action No. 5:19-cv-00036-RWS

**OPENING EXPERT REPORT OF DR. JOSEPH A. PARADISO REGARDING
INVALIDITY OF U.S. PATENT NOS. 6,748,317, 6,580,999, 6,430,498**

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these familiar elements, disclosed and/or embodied in the prior art listed above, to practice the asserted claims.

167. Below is a listing of combinations of references that would render obvious the Asserted Claims. I reserve the right to modify my identification of combinations to the extent that Maxell's opening expert report on infringement adopts claim interpretations that differ from those in Maxell's infringement contentions and in the Court's claim construction order.

- NavTalk, in view of Maruyama (all Asserted Claims)
- NavTalk, in view of Hayashida (all Asserted Claims)⁴⁰
- Hayashida, in view of Maruyama (all Asserted Claims)
- Cyberguide, in view of Hayashida (all Asserted Claims)⁴¹

168. Details of how these combinations would be formed and reasons for their combination are described below.

2. NavTalk, In View Of Maruyama

169. A PHOSITA would have found it obvious and been motivated to modify NavTalk with the teachings of Maruyama. As detailed below, both references are directed to portable navigation devices with GPS capability and date from the same time period. To the extent NavTalk does not disclose either (1) a compass, gyroscope, or other component that qualifies as a "device for getting a direction information denoting an orientation of said portable terminal" under the Court's construction of that term or (2) a PHS as required by the Court's constructions of "a device for getting a location information of another portable terminal" and "a device for

⁴⁰ This combination applies under Maxell's apparent and broad interpretation that any mobile device is an equivalent to a PHS.

⁴¹ This combination applies under Maxell's apparent and broad interpretation that any mobile device is an equivalent to a PHS.