

EXHIBIT A

In The Matter Of:

*Maxell v.
Apple Inc.*

*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

MAXELL, LTD.
Plaintiff
vs.
APPLE INC.
Defendant

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 patent has picked it up. So indoors, radio is
2 problematic, especially around that time, it
3 definitely was. GPS still is problematic indoors.
4 You have to fall back to another system, and the
5 patent has chosen IR, which is the choice we all
6 made in those days. The inventor probably knew
7 about the work that was going on with infrared and
8 indoor location.

9 Q. The patent was trying to overcome some of
10 the problems in the walking navigation systems in
11 indoor areas?

12 A. In general. I had a GPS phone back then,
13 and it was a Nokia phone. We use to work with
14 Nokia, and even outdoors in the city -- now, it's
15 not completely solved. It's better. But back then,
16 if I just walked on these streets, GPS was very
17 limited use. It was very hard to get a fix. So
18 even then you had to think of other things to use.
19 And infrared, of course, it's -- you don't -- it's a
20 bit harder maybe to use outside, but you could use
21 and people have, where you just have a brighter
22 source, it's plugged into the wall, it doesn't
23 matter, and that can give you an indication you're
24 there. And those things are so easy to implement.

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1 It's straightforward, so it's why we all used them.
2 This was essentially our first choice back in those
3 days.

4 Q. So is it your opinion that the patent was
5 trying to overcome these challenges by implementing
6 IR sensors?

7 A. If you're going to make a device that can
8 locate a user while walking -- and of course, when
9 you're walking, you know, you walk indoors, spend a
10 lot of time indoors, you walk outdoors, as well as
11 walking in GPS-restrictive environments as we've
12 seen in the city, especially in those days, yeah,
13 you had to pay attention to that. And seeing the
14 patents not just, say, GPS, GPS and infrared, it's
15 clear that that was a consideration.

16 Q. And you said that the system that you were
17 designing at that time also you were implementing to
18 overcome these challenges in the technology?

19 A. Yes, because GPS was not an option indoors,
20 you could not use it. Radio location --
21 ultra-wideband was in its infancy and still very
22 flaky, and even now it's not established, really.
23 It's more common. Phase determination with radio
24 was hard to do. You didn't see as much of it, CDMA

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