

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

MAXELL, LTD.,

Plaintiff

v.

APPLE INC.,

Defendant.

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

**JURY TRIAL DEMANDED**

**DECLARATION OF XIN-YI ZHOU IN SUPPORT OF APPLE INC.'S OPPOSITION TO  
MAXELL, LTD.'S MOTION FOR PARTIAL SUMMARY JUDGMENT OF NO  
INVALIDITY OF U.S. PATENT NO. 8,339,493 IN VIEW OF THE SONY MVC-FD83  
AND MVC-FD88 CAMERAS**

I, Xin-Yi Zhou, declare as follows:

1. I am an attorney at the law firm of O'Melveny & Myers LLP, counsel for Defendant Apple Inc. ("Apple") in this matter instituted by Plaintiff Maxell, Ltd. ("Maxell"). I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. The statements below are based on personal knowledge and/or investigation of the facts stated herein and if called to testify could competently testify to their substance.

2. Attached as **Exhibit A** is a true and correct copy of excerpts from the Opening Expert Report of Dr. Alan C. Bovik Regarding Invalidity of U.S. Patent No. 8,339,493, dated May 7, 2020.

3. Attached as **Exhibit B** is a true and correct copy of correspondence to Mayer Brown LLP from Vincent Zhou, dated February 26, 2020.

4. Attached as **Exhibit C** is a true and correct copy of excerpts from the document with production numbers APL-MAXELL\_00716451 to APL-MAXELL\_00716582, which was produced by Apple.

5. Attached as **Exhibit D** is a true and correct copy of excerpts from the document with production numbers APL-MAXELL\_01147532 to APL-MAXELL\_01147644, which was produced by Apple.

6. Attached as **Exhibit E** is a true and correct copy of a document with production number APL-MAXELL\_00717723, which was produced by Apple.

7. Attached as **Exhibit F** is a true and correct copy of excerpts from the document with production numbers APL-MAXELL\_01463585 to APL-MAXELL\_01463601, which was produced by Apple.

8. Attached as **Exhibit G** is a true and correct copy of a document with production numbers APL-MAXELL\_01509141 - APL-MAXELL\_01509159, which was produced by

Apple.

9. Attached as **Exhibit H** is a true and correct copy of a document with production number SCA0003618, which was produced by Sony Corporation of America.

10. Attached as **Exhibit I** is a true and correct copy of excerpts from the Expert Report of Robert L. Stoll, dated June 4, 2020.

11. Attached as **Exhibit J** is a true and correct copy of excerpts from the transcript from the deposition of Maxell's expert witness, Robert L. Stoll, taken on June 18, 2020.

12. Attached as **Exhibit K** is a true and correct copy of excerpts from Apple's Invalidity Contentions Pursuant to Patent Local Rules 3-3 and 3-4, served on August 14, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed July 22, 2020, in Los Angeles, California.

/s/ Xin-Yi Zhou  
Xin-Yi Zhou