

PUBLIC VERSION

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

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

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**MAXELL, LTD.'S SUR-REPLY TO DEFENDANT APPLE INC.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT OF NON-INFRINGEMENT OF U.S. PATENT
NOS. 10,084,991 AND 8,339,493**

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TABLE OF ABBREVIATIONS

Abbreviation	Description
'493 Patent	U.S. Patent No. 8,339,493 (attached as Ex. 1)
'991 Patent	U.S. Patent No. 10,084,991 (attached as Ex. 2)
"all N number" limitation	"all signal charges accumulated in all N number of vertically arranged pixel lines," as recited by claim 5 of the '493 Patent
Apple	Defendant Apple Inc.
Bederson Reb. Rep.	Rebuttal Expert Report of Dr. Benjamin J. Bederson Regarding Non-Infringement of U.S. Patent Nos. 6,928,306 and 10,084,991 (excerpts attached to Opposition as Ex. 9)
Bovik Reb. Rpt.	Rebuttal Expert Report of Dr. Alan C. Bovik Regarding Non-Infringement of U.S. Patent No. 8,339,493, served June 4, 2020 (excerpts attached to Opposition as Ex. 5)
Bystrom Inf. Rep.	Initial Expert Report of Maja Bystrom, Ph.D. Concerning Apple's Infringement of U.S. Patent No. 10,084,991, served May 7, 2020 (excerpts attached to Opposition as Ex. 8)
Madiseti Dep.	Deposition of Vijay Madiseti, Ph.D., taken June 26, 2020 (excerpts attached to Opposition as Ex. 3)
Madiseti Inf. Rep.	Initial Expert Report of Vijay Madiseti, Ph.D. Concerning Apple's Infringement of U.S. Patent No. 8,339,493, served May 7, 2020 (excerpts attached to Opposition as Ex. 4)
Maxell	Plaintiff Maxell, Ltd.
Mot.	Apple's Motion for Partial Summary Judgment of Non-Infringement of U.S. Patent Nos. 10,084,991 and 8,339,493, served June 30, 2020 (Dkt. 372)
Opposition	Maxell's Opposition to Apple's Motion for Partial Summary Judgment of Non-Infringement of U.S. Patent Nos. 10,084,991 and 8,339,493 (Dkt. 422)
Reply	Defendant Apple's Reply in Support of Its Motion for Partial Summary Judgment of Non-Infringement of U.S. Patent Nos. 10,084,991 and 8,339,493 (Dkt. 425)

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TABLE OF EXHIBITS

Exhibit No.¹	Description
1	U.S. Patent No. 8,339,493
2	U.S. Patent No. 10,084,991
3	Excerpts from the Deposition of Vijay Madiseti, Ph.D., taken June 26, 2020
4	Excerpts from the Initial Expert Report of Vijay Madiseti, Ph.D. Concerning Apple's Infringement of U.S. Patent No. 8,339,493, served May 7, 2020
5	Excerpts from the Rebuttal Expert Report of Dr. Alan C. Bovik Regarding Non-Infringement of U.S. Patent No. 8,339,493, served June 4, 2020
6	Excerpts from Day 1 of the Deposition of Maja Bystrom, Ph.D., taken June 17, 2020
7	Excerpts from the Deposition of Benjamin J. Bederson, Ph.D., taken June 18, 2020
8	Excerpts from the Initial Expert Report of Maja Bystrom, Ph.D. Concerning Apple's Infringement of U.S. Patent No. 10,084,991, served May 7, 2020
9	Excerpts from the Rebuttal Expert Report of Dr. Benjamin J. Bederson Regarding Non-Infringement of U.S. Patent Nos. 6,928,306 and 10,084,991, served June 4, 2020
10	Excerpts from the Declaration of Dr. Jeffery J. Rodriguez, submitted by Petitioner Apple Inc. in IPR2020-00597

¹ "Opp., Ex. __" in this brief refers to the exhibits to the Declaration of Bryan Nese, filed with Maxell's Opposition (Dkt. 422).

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