

EXHIBIT C

**MAXELL, LTD. DEPOSITION
DESIGNATIONS WITH APPLE INC.
COUNTER-DESIGNATIONS AND MAXELL
REPLY DESIGNATIONS**

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

PLAINTIFF MAXELL, LTD.'S DEPOSITION DESIGNATIONS (INCLUDING COUNTER-DESIGNATIONS AND REPLY
DESIGNATIONS)¹
REVISED 2.16.2021

¹Maxell incorporates into its reply designations any portion of Apple's counter-designations that Apple chooses not to present to the jury.

Maxell, Ltd.'s Deposition Designations
(Revised 2.16.2021)

Deponent	Plaintiff's Initial Designation	Defendants' Counter-Designation	Plaintiff's Reply Designation
Borges, Daniel March 11, 2020	5: 15-19	26:14-15	
	6: 12-14	37:18-20	
	7: 23 - 8: 3	37:22-38:1	
	9: 20-25	47:5-8	47:23-25, 48:2-3
	11: 5-20	47:10-21	47:23-25, 48:2-4
	12: 5-19	53:9-10	53:15, 15:17, 15:19-23, 53:25, 54:1-13
	22: 9 - 23: 8	53:12-13	53:15, 15:17, 15:19-23, 53:25, 54:1-13
	26: 1-3	77:10-78:1	84:10-12, 84:17-18
	26: 5-8	78:7-78:25	84:10-12, 84:17-18
	26:10-13	79:23-80:11	51:19-23
	26:20-22		
	26:24		
	34: 1-17		
	36: 22-23		
	37: 2-9		
	37: 11-13		
	37: 15-16		
	40: 1-17		
	41: 2-3		
	41: 6-14		
	42: 14-18		
	43:17-20		
	44: 13 - 47: 4		
	49: 21 - 50: 18		
	50: 20		
	51: 7-9		
	51: 11-23		
	52: 24 - 53: 5		
	53: 7		
	56: 16-21		
	56: 23 - 57: 5		
	63: 19 - 64: 18		
81: 3-13			
84: 10-12			
84: 17-18			

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Maxell, Ltd.'s Deposition Designations
(Revised 2.16.2021)

Deponent	Plaintiff's Initial Designation	Defendants' Counter-Designation
Broddle, L. Kent April 17, 2020	8: 19 - 9: 4	
	10: 17-21	
	24: 14 - 25: 7	
	27: 2-7	
	27: 20 - 28: 22	
	31: 24 - 32: 2	
	32: 4-13	
	36: 14-15	
	36: 17-19	
	36: 21 - 37: 4	
	37: 6-8	
	37: 10	
	41: 12-16	
	43: 19-21	
	44: 21-24	
	51: 15 - 52: 2	52:3-7
	55: 18-20	
	55: 22 - 56: 6	
	78: 16-19	
	78: 21 - 79: 13	
	102: 12-17	
	109: 18 - 110: 13	
	113: 14-16	
	113: 18-25	
	121: 14 - 122: 2	
	122: 12-16	
	149: 6-9	
	149: 11-18	
	154:3-6	
	155: 15-18	
	155: 20	
	162: 5-21	
	163: 5-9	
	163: 21 - 164: 2	165:14-22
166: 13-24	166:25-167:4	
167: 5-8	167:9-15	
167: 18-21	185:3-4	
170: 5-16	186:2-3	
170: 18-25		
173: 18-19		
173: 21-25		
174: 2		
181: 13-18		

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Maxell, Ltd.'s Deposition Designations
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181: 20-23	
184: 20 - 185: 2	
185: 17-23	
185: 25 - 186: 1	
186: 23 - 187: 2	
187: 15 - 188: 5	188:7-12
193: 25 - 194: 1	
194: 3-7	195:2-6
194: 22-25	
199: 11-14	
199: 16-19	
201: 4-8	
201: 10 - 202: 5	
202: 7-13	
202: 15-17	
202: 22 - 203: 1	
210: 14 - 211: 1	
214: 24 - 215: 25	
218: 13 - 219: 1	
228: 2-4	
228: 6-11	
242: 8-19	
242: 21	
242: 23 - 243: 10	
243: 12-15	
243: 17	
243: 22 - 244: 1	
246: 14 - 247: 7	
247: 9-13	247:17-19
249: 6-16	247:21-23
249: 18-20	247:25-248:2
250: 1-3	248:4-11
250: 5	
250: 8-11	
250: 13-14	
252: 18-20	
252: 22	
257: 2 - 259: 3	
264: 20 - 265: 9	
265: 13-17	
269: 12-19	
272: 19-22	

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