

## **EXHIBIT B**

# **MAXELL, LTD. OBJECTIONS TO APPLE INC.'S DEPOSITION 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**

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**MAXELL LTD.'S OBJECTIONS TO APPLE INC.'S NARROWED DEPOSITION DESIGNATIONS**

## OBJECTION KEY

Objection Code	Objection
AA	Asked and Answered
AC	Improper Attorney Commentary
AR	Argumentative
BS	Beyond the Scope of the 30(b)(6)
BSD	Beyond the Scope of Direct
C	Compound/Contains multiple documents
CC	Compromise & Offers to Compromise (Rule 408)
CE	Calls for Expert Testimony
CV	Cumulative
DOC	Requirement of Original (Rule 1002)
DUP	Duplicate Exhibit
E, EXP	Testimony By Expert (Rule 702)
FO	Foundation, Assumes Facts Not in Evidence
H	Hearsay (Rule 80, Rule 802)
HH	Hearsay within Hearsay (Rule 805)
ID, I	Incomplete
IN	Incomplete Designation (Rule 106)
LC	Legal Conclusion
LIT	Other Litigation
LQ, L	Leading Question
MPT	Misrepresents prior testimony
NA	Authentication
NE	Not Evidence
NRS	Evidence not restricted to its proper scope (105)
OP, O	Opinion Testimony By Lay Witness (Rule 701)
PK	Lacks Personal Knowledge (Rule 602)
PRE, P	Overly Prejudicial (Rule 403)
PR	Privileged
REL, R	Relevance (Rule 401, Rule 402)
SP	Calls for Speculation
SUM	The proponent may use a summary, chart, or calculation to prove the content of voluminous writings, recordings, or photographs that cannot be conveniently examined in court. The proponent must make the originals or duplicates available for examination or copying, or both, by other parties at a reasonable time and place. And the court may order the proponent to produce them in court
UE	Unclear what exhibit refers to
UN	Unresponsive
V, VM	Vagueness/Misleading
WD	Withdrawn Issue
MOT	Subject to Pending Motion

## Maxell, Ltd.'s Objections and Counter Deposition Designations

DEPONENT	DESIGNATION (Apple)	OBJS TO DESIGNATION (Maxell)	COUNTER DESIGNATIONS <sup>1</sup> (Maxell)	OBJS TO COUNTER DESIGNATIONS (Apple)
Broddle, L. Kent April 17, 2020	5:22-25	ID, I; C, VM	9:22-25; 10:17-11:9	
	14:10-16:17			
	18:17-19:1			
	20:10-21:3	FO; LQ, L; OP, P; SP; V, VM		
	21:8-22:2	FO; LQ, L; OP, P; SP; V, VM		
	24:4-15	SP; V, VM		
	24:17-25:7			
	26:20-23	FO; LQ, L; SP; V, VM		
	26:25-27:1	LQ, L; SP; V, VM; LC		
	32:14-18	ID, I; LQ, L; SP; V, VM; LC; MPT	31:24-32:2; 32:4-13	
	32:20-33:4	ID, I; LQ, L; SP; V, VM; LC; MPT	31:24-32:2; 32:4-13	
	34:11-3	Assume 34:11-13 ID, I; LQ, L; SP; V, VM; LC; MPT	31:24-32:2; 32:4-13	
	34:15-17	ID, I; LQ, L; SP; V, VM; LC; MPT	31:24-32:2; 32:4-13	
	36:14-37:4	ID, I; LQ, L; V, VM; LC		
	37:6-8	ID, I; LQ, L; V, VM; LC		
	37:10-15	ID, I; LQ, L; V, VM; LC		
	37:17-24	ID, I; LQ, L; V, VM; LC		
	38:7-13	LQ, L; SP; V, VM; LC; CE		
	38:15-19	LQ, L; SP; V, VM; LC; CE		
	38:21-40:14	LQ, L; SP; V, VM; LC; CE; REL, R		
	41:5-9	LQ, L; SP; V, VM		
	41:12-42:8	LQ, L; SP; V, VM		
	42:10-15	LQ, L; SP; V, VM; LC; CE;		
	42:22-25	LQ, L; SP; V, VM; LC; CE;		
	43:2-6	LQ, L; SP; V, VM; LC; CE;		
	43:14-45:3	LQ, L; SP; V, VM; REL, R		
	45:5-12	LQ, L; SP; V, VM; LC		
	47:1-9	LQ, L; SP; V, VM; LC; CE		
	47:11-15	LQ, L; SP; V, VM; LC; CE		
	47:17-48:1	LQ, L; SP; V, VM; LC; CE		
	49:15-51:14	ID, I; LQ, L; SP; V, VM; LC; CE	51:15-52:2	
	56:4-25	ID, I; LQ, L; SP; V, VM; LC	55:18-20; 55:22-56:3; 166:13-22; 167:5-8	
	57:1-16	LQ, L; SP; V, VM		

## Maxell, Ltd.'s Objections and Counter Deposition Designations

59:3-6	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O		
59:8-12	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O		
60:10-61:21	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	51:15-52:2	
62:21-63:6	LQ, L; SP; V, VM		
71:2-4	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
71:6-8	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O		
72:10-20	LQ, L; SP; V, VM		
72:22	LQ, L; SP; V, VM		
74:21-75:10	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
75:12-76:4	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
76:6-9	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
76:11-77:13	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
77:15-23	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	154:3-6; 162:5-11; 162:17-21	
78:16-19	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	154:3-6; 162:5-11; 162:17-21	
78:21-79:13	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	154:3-6; 162:5-11; 162:17-21	
79:14-80:1	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	154:3-6; 162:5-11; 162:17-21	
81:5-13	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
82:17-24	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
83:8-85:20	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
92:16-21	LQ, L; SP; V, VM		
93:20-94:3	LQ, L; SP; V, VM		
96:8-21	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	78:16-19; 78:21-79:13; 154:3-6; 162:5-11; 162:17-21	
100:5-102:22	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	201:4-8; 201:10-202:5	
105:6-106:2	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O		
106:3-107:16	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O		
107:18	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O		
110:14-24	ID, I; LQ, L; SP; V, VM; LC; CE; OP, O	78:16-19; 78:21-79:13; 154:3-6; 162:5-11; 162:17-21	
113:14-16	LQ, L; SP; V, VM; LC; CE; OP, O		

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