

EXHIBIT B

1 KENJI NAKAMURA

2 A Oh, and Shimizu-san.

3 Q When did they become involved -- first
4 involved with Apple?

5 A Apple meeting?

6 Q Yes.

7 A At -- sometime in 2013, toward the end. I
8 don't remember specific date, but the first contact was
9 in June of 2013. And after that -- after July, Maxell
10 team started the meeting in -- happened sometime later
11 in 2013.

12 Q So can you go back to Exhibit 71 again?
13 That's a deposition topic.

14 A Yes.

15 Q Turn to Page 24.

16 A 24? Yes.

17 Q Can you look at Topic No. 57?

18 A Yes.

19 Q So this is one of your -- the topics you're
20 testifying about.

21 A Yes.

22 Q You understand that, right?

23 A Yes.

24 Q Communication with between Apple and Maxell?

25 A Yes.

1 KENJI NAKAMURA

2 MR. LEVY: Subject to our responses and
3 objections and the meet and confer on Wednesday.

4 MR. ZHOU: Understood.

5 Q (BY MR. ZHOU) My understanding is that part
6 of the pre-sue communication occurred between only
7 Hitachi and Apple, and then Maxell came in at some point
8 later and joined the communication; is that right?

9 MR. LEVY: Objection, form.

10 A Yes. So the first contact was in June 2013 --
11 June 25th, maybe. And later in 2013, yes, Maxell team
12 started the meetings with Apple.

13 Q (BY MR. ZHOU) And then you became involved
14 around June of 2014?

15 A Yes.

16 Q So what portion of this timeline are you going
17 to testify about today?

18 MR. LEVY: Objection, form.

19 A You mean between -- before I became --
20 attended the meeting, you mean?

21 Q You're testifying as a representative of
22 Maxell.

23 A Uh-huh.

24 Q So I just want to know, are you're going to
25 testify all the way back to June 2013, or are you going

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2 to testify to a particular time cutoff?

3 A Oh.

4 MR. LEVY: Objection, form.

5 A Up to the June 2013.

6 Q (BY MR. ZHOU) And even though, in June 2013,
7 Maxell was not yet involved in negotiating with Apple,
8 right?

9 MR. LEVY: Objection, form.

10 A Yes.

11 Q (BY MR. ZHOU) I think you mentioned earlier
12 as well, in this case, Maxell contends that Apple was
13 notified of certain patents in June of 2013; is that
14 right?

15 A Yes.

16 Q And I believe four -- Maxell's position is
17 that four patents were -- were identified to Apple in
18 June of 2013; is that right?

19 A Yes.

20 Q Does Maxell contend that Apple received notice
21 of infringement for any of the patents in this case
22 before June of 2013?

23 A Before? No.

24 Q So June 2013 is -- strike that.

25 What happened in June of 2013?

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2 MR. LEVY: Objection, form.

3 Q (BY MR. ZHOU) Let me strike that. That's a bad
4 question.

5 MR. LEVY: Yeah.

6 Q (BY MR. ZHOU) What -- what do you contend to be
7 the event that caused Apple to receive notice of some of
8 the asserted patents in June of 2013?

9 A So Matsuo-san visited Apple in Cupertino and
10 handed out the letter showing the -- the patents.

11 Q That occurred around June 25th, 2013, right?

12 A 25th, I believe, yes.

13 Q There was an in-person meeting --

14 A Yes.

15 Q -- between Matsuo-san --

16 A And Patrick Murphy.

17 Q Other than Mr. Matsuo and Mr. Murphy, did
18 anybody else attend the meeting?

19 A Possibly, Takae-san, but I -- I don't remember
20 that well.

21 Q Where did this meeting take place?

22 A Cupertino.

23 Q Where in Cupertino?

24 A Oh, in Apple office.

25 Q Apple's office.