

Exhibit C

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS - WACO DIVISION

STRATOSAUDIO, INC.,)

)
Plaintiff,)

)
vs.)

No. 6:20-CV-01125-ADA

)
HYUNDAI MOTOR AMERICA,)

)
Defendant.)

)

AND RELATED CROSS-ACTIONS.)
_____)

REMOTE DEPOSITION OF BARRY P. MEDOFF, PH.D.
Deponent testifying from Palo Alto, California
Monday, August 30, 2021
Volume I

Stenographically Reported By:
Melissa M. Villagran, RPR
CSR No. 12543
Job No. 4783332
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1 don't know.

2 Q If you go to paragraph 15 of your
3 declaration.

4 A Okay.

5 Q You were informed that Claim language guides
6 the Court's construction of Claim terms, true?

7 A Well, I'm informed of what it says there,
8 yes.

9 Q And you're also informed that other claims
10 asserted and unasserted can provide additional
11 instruction, because terms are normally used
12 consistently throughout the patent, right?

13 A Yes.

14 Q And differences among claims, such as
15 additional limitations and dependent claims can
16 provide further guidance, right?

17 A As stated in paragraph 15. That's how I've
18 been informed, yes.

19 Q Okay.

20 Could you tell me which claims you looked at
21 when you were analyzing the responder identifier
22 limitation?

23 A Well, I looked at all the claims.

24 Q Okay.

25 And did you specifically consider Claim 3 of

1 the '833 Patent?

2 A Well, I think in the declaration there is a
3 discussion of Claim 3 amongst the other claims.

4 Q And where is that?

5 A I'll have to find it.

6 Q All right.

7 Could you direct me to it please. Your
8 declaration is Exhibit 1.

9 A It is.

10 Q So can you direct me to where Claim 3 is
11 discussed?

12 A Well, I'd have to find it.

13 Q Can you do that please.

14 A Yeah, I'm trying. Now which term precisely
15 are you asking about? Discussing what? What do we
16 want to find discussed?

17 Q Responder identifier.

18 A Okay.

19 So we are talking about responder
20 identifier.

21 Q Yes.

22 A So I think the answer to your question is I
23 did look at Claim 3. I see Claim 3 references
24 responder identifier in much the same way that the
25 other claims do. A user associated and so on.

1 I'm not finding a specific reference to
2 Claim 3 in the deposition. But I did for sure
3 analyze it, am familiar with it, and the use of
4 responder identifier in Claim 3 in the comments
5 regarding it is no different from those broadly
6 speaking regarding the use of responder identifier
7 elsewhere in that Claim.

8 Q Why don't we take a look at Claim 3 of the
9 '833 Patent. That Claim says, (as read):

10 The responder identifier can
11 enable identification of at least one
12 of the following.

13 Do you see that?

14 MR. HUDNELL: Objection; form.

15 I don't think you read that right, Jonathan.

16 BY MR. LAMBERSON:

17 Q I didn't read the whole thing. So let me --

18 MR. HUDNELL: I don't think the part you read
19 was right.

20 BY MR. LAMBERSON:

21 Q Okay. I'll try again.

22 Let me just ask this: Do you have Claim 3 in
23 front of you?

24 A Yes.

25 Q And do you see that it says, (as read):