

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA

3 _____
4 SILICON IMAGE, INC., *

5 Plaintiff *

6 *

7 v. * Case No. 3:01CV266

8 *

9 GENESIS MICROCHIP, INC., *

10 Defendant *

11 _____
12

13 Videotaped Deposition of SHAZIA McGEEHAN

14 Arlington, Virginia

15 Friday, September 27, 2002

16 10:14 a.m.

17
18 Job No: 1-5903

19 Pages 1 - 91

20 Reported by: Rebecca King

21

22

1 Q. Okay. Thank you.

2 During any of the working group meetings
3 that you attended, did you ever hear any
4 representatives of Silicon Image make the other
5 members present aware of any patents that Silicon
6 Image claimed would impact or claim intellectual
7 property rights as it relates to the 861A or B
8 specifications?

9 MR. LARSON: Objection. Compound.

10 A. No.

11 BY MR. FAIN:

12 Q. Did you ever hear Silicon Image ever
13 reveal that it owned a patent or claimed to own a
14 patent identified as the 464 patent?

15 A. No.

16 Q. Did you ever hear Silicon Image in any
17 meetings you attended claim to own the 769 patent?

18 A. No.

19 Q. As a part of standards-setting body
20 procedures that you've been aware of in your work
21 here at the CEA, is it a usual practice that
22 working group members reveal patents that they

1 claim impact the specification that's being
2 promulgated by the standard-setting body?

3 A. Only if the patent has to do with the
4 actual standard, not to do with the reference
5 standards.

6 Q. And that is a standard practice if the
7 patent does have to do with the actual standard
8 being promulgated?

9 A. Yes.

10 MR. LARSON: Objection. Vague and
11 ambiguous.

12 BY MR. FAIN:

13 Q. And your answer, ma'am?

14 A. Yes, if it's part of the actual standard.

15 Q. All right. During any meetings that you
16 attended, Ms. McGeehan, of the working group that
17 worked on the 861A or 861B, did you ever hear any
18 representative of Silicon Image state a position
19 that the DVI 1.0 specification was not available
20 for use as it relates to interfaces for DTV's?

21 A. No.

22 Q. Did you ever hear any representative of

1 EXAMINATION BY COUNSEL FOR PLAINTIFF

2 BY MR. LARSON:

3 Q. Ms. McGeehan, as I said at the outset of
4 the deposition, I represent Silicon Image, which is
5 the plaintiff in the case that we're here for.

6 Ms. McGeehan, did you ever tell Silicon
7 Image that Silicon Image had violated any of CEA's
8 policies regarding intellectual property?

9 A. No.

10 Q. Why not?

11 A. They hadn't. Our policy requires people
12 to provide letters if their patent is actually in
13 the standard that we are writing. Reference
14 standards do not apply.

15 Q. And by reference standards, are you
16 referring in this particular case to the DVI 1.0 --

17 A. Yes.

18 Q. -- specification?

19 A. That and others.

20 Q. And that, in your view, is a reference
21 standard within the meaning that you just
22 described?

1 A. Yes.

2 Q. And that is a reference standard in the
3 861 specification -- sorry. I'm using imprecise
4 terminology there.

5 The DVI 1.0 is a reference standard in the
6 CEA 861 standard. Is that right?

7 A. Yes.

8 Q. And also in the 861A and 861B standards?

9 A. Yes.

10 Q. Did Genesis tell you that it believed that
11 CEA had violated -- excuse me. Withdraw that.

12 Did Genesis tell you that it believed that
13 Silicon Image had violated any of CEA's policies
14 regarding intellectual property?

15 A. Yes.

16 Q. Who from Genesis told you that?

17 A. Allen Kobayashi and Rob, last name begins
18 with a B. I can't pronounce or spell it.

19 Q. Bicevskis, perhaps?

20 A. Yeah, something like that.

21 Q. We'll work on that spelling later.

22 And what do you recall Messrs. Kobayashi

1 and Mr. Bicevskis telling you?

2 A. Allen Kobayashi e-mailed me asking about
3 the status of a Silicon Image patent. When I asked
4 for more details, I discovered that it had to do
5 with DVI 1.0, and I explained our policy to Allen
6 at that point. And that policy was also explained
7 to Allen by the chairman of Work Group 7, Tom
8 Stahl.

9 Q. And what do you recall explaining to
10 Mr. Kobayashi in response to his e-mail inquiry?

11 A. I told him that if the patent had to do
12 with DVI 1.0 and not anything new in the standard
13 itself, that we did not require letters from
14 Silicon Image or anyone else who had patents in
15 DVI 1.0. Because our policy states that reference
16 standards do not apply, and we do not need letters
17 on reference standards. Those reference standards
18 are the responsibility of the organization that
19 created them, not CEA.

20 Q. And how do you know that Mr. Stahl also
21 responded to Mr. Kobayashi?

22 A. Either I or Allen copied Tom Stahl on our