

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF DELAWARE

3
4 BECKMAN COULTER, INC.,

5 Plaintiff,

6 vs.

Case No. 1:24-CV-00945-CFC

7 CYTEK BIOSCIENCES, INC.,

8 Defendant.

9 -----/

10
11
12 HIGHLY CONFIDENTIAL

13 OUTSIDE ATTORNEYS' EYES ONLY

14
15 VIDEOTAPED DEPOSITION OF

16 JAMES LEARY, PhD,

17 Palo Alto, California

18 Friday, February 20, 2026

19 9:22 a.m.

20
21 Job No. 620829

22 Pages 1 - 296

23 Stenographically reported by:

24 JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC

25 CSR No. 3969

CYTEK V. BECKMAN
PGR2025-00084
BECKMAN 2062

1		10:51:36
2		10:51:38
3		10:51:39
4		10:51:41
5		10:51:43
6		10:51:46
7		10:53:11
8		10:53:15
9		10:53:17
10		10:53:20
11		10:53:24
12		10:53:25
13		10:53:27
14		10:53:28
15		10:53:30
16	Q. Okay. So, in your opinion, "a POSA would	10:53:31
17	understand that a wavelength division multiplexer,	10:53:33
18	as recited in the claim, refers to an optical	10:53:37
19	component that brings together rather than separates	10:53:40
20	different wavelengths of light."	10:53:42
21	Did I read that right?	10:53:45
22	A. Yes, you did.	10:53:45
23	Q. And is that still your opinion, sitting	10:53:46
24	here today?	10:53:49
25	A. Yes. My opinion remains unchanged.	10:53:50

1 [REDACTED] 15:19:22

2 [REDACTED] 15:19:25

3 [REDACTED] 15:19:43

4 [REDACTED] 15:19:44

5 [REDACTED] 15:19:57

6 Q. Okay. Here, you say: 15:19:58

7 "In my opinion, based on the plain 15:20:00

8 language of the claim, a POSA would 15:20:03

9 understand that the fiber must receive 15:20:04

10 light directly from the flow cell, and 15:20:06

11 that light that has passed through (and 15:20:10

12 is manipulated by) any intervening 15:20:14

13 optical element, such as an objective 15:20:19

14 lens in the case of the accused 15:20:22

15 products is not considered 'light from 15:20:24

16 the flow cell,' but rather 'light from 15:20:27

17 the objective lens.'" 15:20:32

18 "Do you see that? 15:20:33

19 A. Yes. Yes, I wrote that. 15:20:35

20 Q. Okay. So, in your view, a person of skill 15:20:39

21 in the art would interpret an optical fiber 15:20:42

22 configured to receive light from the flow cell to 15:20:47

23 require the fiber to receive light directly from the 15:20:51

24 flow cell; is that right? 15:20:54

25 A. You can't just stick a fiber up next to a 15:21:04

1 flow cell; you have to have some intervening optics. 15:21:07

2 And Beckman Coulter and Cytex do it very 15:21:13

3 differently. But you can't just stick it up to -- 15:21:16

4 next to the flow cell and expect to get any kind of 15:21:18

5 a real signal. 15:21:22

6 Q. That wouldn't make any sense? 15:21:25

7 A. It wouldn't make any sense. It's, again, 15:21:26

8 poorly worded. 15:21:32

9 [REDACTED] 15:21:43

10 [REDACTED] 15:21:47

11 [REDACTED] 15:21:52

12 [REDACTED] 15:21:54

13 [REDACTED] 15:21:59

14 [REDACTED] 15:21:59

15 [REDACTED] 15:22:02

16 [REDACTED] 15:22:05

17 [REDACTED] 15:22:08

18 [REDACTED] 15:22:10

19 [REDACTED] 15:22:13

20 [REDACTED] 15:22:16

21 [REDACTED] 15:22:16

22 [REDACTED] 15:22:22

23 [REDACTED] 15:22:23

24 [REDACTED] 15:22:28

25 [REDACTED] 15:22:28

1 [REDACTED] 18:26:25

2 You've interpreted the claimed flow cell to 18:26:25

3 be limited to a flow cell with a concave mirror and 18:26:29

4 an aberration corrector plate in performing your 18:26:34

5 noninfringement analysis; right? 18:26:36

6 A. That's the only one described in the -- in 18:26:38

7 the patent. 18:26:42

8 [REDACTED] 18:26:53

9 [REDACTED] 18:27:01

10 [REDACTED] 18:27:02

11 [REDACTED] 18:27:34

12 [REDACTED] 18:27:35

13 [REDACTED] 18:27:35

14 [REDACTED] 18:27:43

15 [REDACTED] 18:27:47

16 [REDACTED] 18:27:49

17 [REDACTED] 18:27:50

18 [REDACTED] 18:27:52

19 [REDACTED] 18:27:53

20 [REDACTED] 18:27:54

21 [REDACTED] 18:27:57

22 [REDACTED] 18:27:59

23 [REDACTED] 18:28:01

24 [REDACTED] 18:28:14

25 [REDACTED] 18:28:17