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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

WESTERNGECO LLC \* 09-CV-1827  
\* Houston, Texas  
VS. \*  
\*  
ION GEOPHYSICAL \* 12:11 p.m.  
CORPORATION, FUGRO \*  
GEOTEAM, INC., ET AL \* July 24, 2012

JURY TRIAL

Volume 2  
Afternoon Session

BEFORE THE HONORABLE KEITH P. ELLISON  
UNITED STATES DISTRICT JUDGE

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I N D E X

WITNESS

PAGE

**THOMAS SCOULIOS**

CROSS-EXAMINATION BY MR. THOMPSON.....	457
REDIRECT EXAMINATION BY MR. LOCASCIO.....	479

**SIMON BITTLESTON**

DIRECT EXAMINATION BY MR. GILMAN .....	495
CROSS-EXAMINATION BY MR. BURGERT.....	570

*Cross-Bittleston/By Mr. Burgert*

1 making solid streamers and things like that. So we looked  
2 at the number of different areas. This was one of them.

3 **Q.** And I think you told Mr. Gilman that others before  
4 you had looked at ways to move streamers laterally; is  
5 that right?

03:08:58

6 **A.** Of course, because the streamers are moved laterally  
7 by monowings, They existed before. In fact, the first  
8 time people started to move cables sideways like this was  
9 the second world war for minesweepers. So you know, the  
10 history of devices that pull cables sideways is a very  
11 long history.

03:09:15

12 **Q.** So any statement that you invented lateral steering  
13 is just wrong?

14 **A.** Yes. I am not the inventor of laterally steering.  
15 I'm an inventor of a global control system.

03:09:28

16 **Q.** And the global control system is software in a  
17 computer, isn't it?

18 **A.** It's rather more than that. There's many components  
19 of what I call an overall control system. It's the  
20 methods by which you're going to do it. It's the  
21 measurements you're going to need to do it and the other  
22 devices. But it depends on your terminology, I think, and  
23 how you -- what you encompass in that statement.

03:09:44

24 **Q.** All right. Well, one of the -- and the reason I  
25 asked that is because, in response to one of Mr. Gilman's

03:09:59

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