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2 UNITED STATES DISTRICT COURT  
3 EASTERN DISTRICT OF TEXAS  
4 MARSHALL DIVISION

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5 SOLOCRON MEDIA, LLC,

PLAINTIFF,

6 -against-

7 VERIZON, et al., CELLCO PARTNERSHIP d.b.a.  
8 VERIZON WIRELESS, AT&T, INC., AT&T MOBILITY,  
9 LLC, SPRINT CORPORATION, SPRINT  
10 COMMUNICATIONS COMPANY, L.P., SPRINT  
11 SOLUTIONS, INC., and T-MOBILE USA, INC.,

DEFENDANTS.  
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12 \*\*\*HIGHLY CONFIDENTIAL  
13 ATTORNEYS' EYES ONLY\*\*\*

14 DEPOSITION OF KEITH LAMP RON  
15 Basking Ridge, New Jersey  
16 Thursday, March 19, 2015

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18 Reported by:  
19 Rebecca Schaumloffel, RPR, CLR  
20 Job No: 91584  
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March 19, 2015  
9:06 a.m.

Deposition of KEITH LAMPRON, held at  
the DOLCE BASKING RIDGE HOTEL, 300 N. Maple  
Avenue, Basking Ridge, New Jersey, before  
Rebecca Schaumloffel, a Registered  
Professional Reporter, Certified Livenote  
Reporter and Notary Public of the State of  
New York and the State of New Jersey.

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A P P E A R A N C E S :

TENSEGRITY LAW GROUP

Attorneys for the Plaintiff  
555 Twin Dolphin Drive  
Redwood Shores, California 94065  
BY: ANNAKA NAVA, ESQ.

WILEY REIN

Attorneys for the Defendant  
Cellco Partnership  
1776 K Street, N.W.  
Washington, D.C. 20006  
BY: KARIN HESSLER, ESQ.  
KEVIN ANDERSON, ESQ.

ALSO PRESENT:

Norman Minnear, Esq., Verizon

Dale Swindell, videographer

\* \* \*

1 K. LAMPRON

2 THE VIDEOGRAPHER: This is the 09:06AM  
3 start of media labeled number 1 of the 09:06AM  
4 videotaped deposition of Keith Lampron 09:06AM  
5 in the matter Solocron Media versus 09:07AM  
6 Verizon, et al. This deposition is 09:07AM  
7 being held at 300 North Maple Avenue, 09:07AM  
8 Basking Ridge, New Jersey on March 19, 09:07AM  
9 2015, at approximately 9:06 a.m. 09:07AM

10 My name is Dale Swindell from 09:07AM  
11 TSG Reporting, Incorporated. I am the 09:07AM  
12 certified legal specialist. The Court 09:07AM  
13 Reporter is Rebecca Schaumloffel in 09:07AM  
14 association with TSG Reporting. 09:07AM

15 Will counsel please introduce 09:07AM  
16 yourselves. 09:07AM

17 MS. NAVA: Annaka Nava from 09:07AM  
18 Tensegrity Law Group for plaintiff 09:07AM  
19 Solocron Media, LLC. 09:07AM

20 MS. HESSLER: Karin Hessler from 09:07AM  
21 Wiley Rein for Verizon, and with me I 09:07AM  
22 have Kevin Anderson from the same firm 09:07AM  
23 and Jack Minnear who is in-house 09:07AM  
24 counsel with Verizon. 09:07AM

25 THE VIDEOGRAPHER: Will the 09:07AM

1 K. LAMPRON

2 Court Reporter please swear in the 09:07AM

3 witness. 09:07AM

4 K E I T H L A M P R O N, called as a  
5 witness, having been first duly sworn by a  
6 Notary Public of the State of New York, was  
7 examined and testified as follows:

8 EXAMINATION BY

9 MS. NAVA:

10 Q. Good morning, Mr. Lampron. How 09:07AM

11 are you? 09:07AM

12 A. Good. How are you? 09:07AM

13 Q. Very well, thank you. Could you 09:07AM

14 please state your name and address for the 09:08AM

15 record? 09:08AM

16 A. Sure. It is Keith Lampron, 09:08AM

17 1 Verizon Way, Basking Ridge, New Jersey. 09:08AM

18 Q. And are you currently employed? 09:08AM

19 A. Yes. 09:08AM

20 Q. By whom? 09:08AM

21 A. Verizon. 09:08AM

22 Q. Do you know which entity 09:08AM

23 employs you? 09:08AM

24 A. Yes, it is the product and new 09:08AM

25 business innovation department. 09:08AM

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