

**In The Matter Of:**

***THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF  
NEW YORK***

*v.*

***SYMANTEC CORPORATION***

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***PEREIRA, SHANE, 30(B)(6) - Vol. 1***  
***September 24, 2014***

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***CONFIDENTIAL - OUTSIDE COUNSEL ONLY***

**MERRILL CORPORATION**

**LegalLink, Inc.**

20750 Ventura Boulevard  
Suite 205  
Woodland Hills, CA 91364  
Phone: 818.593.2300  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

THE TRUSTEES OF COLUMBIA )  
UNIVERSITY IN THE CITY OF )  
NEW YORK, )  
Plaintiff, ) Case No.  
vs. ) 3:13-cv-00808  
SYMANTEC CORPORATION, ) JRS  
Defendant. )  
)

CONFIDENTIAL - OUTSIDE COUNSEL ONLY

30(B)(6) DEPOSITION OF SHANE PEREIRA

TAKEN ON

WEDNESDAY, SEPTEMBER 24, 2014

Reported by: PHILIP D. NORRIS

CSR NO. 4980

1           30 (b)(6) Deposition of Shane Pereira,  
2 taken on behalf of Plaintiff, at 1800 Avenue of the  
3 Stars, Los Angeles, California, on Wednesday,  
4 September 24, 2014, at 9:13 a.m., before Philip D.  
5 Norris, CSR No. 4980, pursuant to Notice.

6

7 APPEARANCES:

8 FOR THE PLAINTIFF:

9

IRELL & MANELLA

10

BY: JASON SHEASBY, ESQ.

11

1800 Avenue of the Stars

12

Suite 900

13

Los Angeles, California 90067-4276

14

(310) 277-1010

15

FOR THE DEFENDANT:

16

QUINN EMANUEL

17

BY: NATHAN HAMSTRA, ESQ.

18

500 West Madison Street

19

Suite 2450

20

Chicago, Illinois 60661

21

(312) 705-7400

22

ALSO PRESENT:

23

THOMAS W. BARR

24

STEPHEN SMITH (Videographer)

25

DAVID MAJORS, ESQ.

|    |  |          |
|----|--|----------|
| 1  | LOS ANGELES, CALIFORNIA; WEDS, SEPTEMBER 24, 2014    | 08:50:51 |
| 2  | 9:13 A.M.  | 08:50:59 |
| 3  |  | 08:50:59 |
| 4  |  | 09:12:52 |
| 5  | THE VIDEOGRAPHER: Here begins Volume I,              | 09:12:52 |
| 6  | Videotape No. 1, in the deposition of Shane Pereira, | 09:13:03 |
| 7  | in the matter of The Trustees of Columbia University | 09:13:06 |
| 8  | in the City of New York versus Symantec, in the      | 09:13:11 |
| 9  | United States District Court for the Eastern         | 09:13:15 |
| 10 | District of Virginia, Richmond Division. Case        | 09:13:17 |
| 11 | number is 1313-cv-00808-JRS (sic).                   | 09:13:21 |
| 12 | Today's date is September 24, 2014. Time             | 09:13:26 |
| 13 | on the video monitor is 9:13. The video operator     | 09:13:32 |
| 14 | today is Stephen Smith, contracted by Merrill        | 09:13:36 |
| 15 | Deposition Services at 20750 Ventura Boulevard,      | 09:13:41 |
| 16 | Suite 205, Woodland Hills, California 91364.         | 09:13:43 |
| 17 | This video deposition is taking place at             | 09:13:48 |
| 18 | Irell & Manella LLP, 1800 Avenue of the Stars, Suite | 09:13:52 |
| 19 | 900, Los Angeles, California 90067, and was noticed  | 09:13:57 |
| 20 | by Jason Sheasby of Irell & Manella.                 | 09:14:03 |
| 21 | Counsel, please voice identify yourselves            | 09:14:05 |
| 22 | and state whom you represent.                        | 09:14:07 |
| 23 | MR. SHEASBY: Jason Sheasby for Columbia.             | 09:14:08 |
| 24 | With me is Thomas Barr.                              | 09:14:11 |
| 25 | MR. HAMSTRA: Nathan Hamstra, Quinn                   | 09:14:13 |

1 Emanuel, for Symantec and the witness. 09:14:19

2 MR. MAJORS: David Majors, Symantec 09:14:19

3 in-house counsel. 09:14:19

4 THE VIDEOGRAPHER: Court reporter today is 09:14:20

5 Philip Norris, Merrill Deposition Services. 09:14:23

6 Would the reporter please swear in the 09:14:25

7 witness. 09:14:27

8

9 SHANE PEREIRA,

10 having been first duly sworn, was

11 examined and testified as follows:

12

13 EXAMINATION

14

09:14:39

15 BY MR. SHEASBY: 09:14:39

16 Q. Good morning, sir. 09:14:40

17 A. Morning. 09:14:41

18 Q. I'm handing you what I've marked as Pereira 09:14:41

19 Exhibit 1. 09:14:45

20 (The document referred to was marked by the 09:14:46

21 reporter as Exhibit 1 for identification and is

22 attached hereto.)

23 BY MR. SHEASBY: 09:14:47

24 Q. Sir, this is a 30 (b)(6) notice which was 09:14:47

25 served by Columbia University on Symantec, and 09:14:51

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