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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

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SOLOCRON MEDIA, LLC,  
PLAINTIFF,

-against-

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

DEFENDANTS.

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\*\*\*HIGHLY CONFIDENTIAL\*\*\*

DEPOSITION OF MATTHEW ALDERSON  
Basking Ridge, New Jersey  
Wednesday, March 18, 2015

Reported by:  
Rebecca Schaumloffel, RPR, CLR  
Job No: 91583

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March 18, 2015  
12:59 p.m.

Deposition of MATTHEW ALDERSON, 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 NW  
Washington, DC 20006  
BY: KEVIN ANDERSON, ESQ.

ALSO PRESENT:

Jack Minnear, Esq., Verizon  
Dale Swindell, videographer

\* \* \*

1 M. ALDERSON

2 THE VIDEOGRAPHER: This is the  
3 start of media labeled number 1 of the  
4 videotaped deposition of Matt Alderson  
5 in the matter Solocron Media versus  
6 Verizon, et al. This deposition is  
7 being held at 300 N. Maple Avenue,  
8 Basking Ridge, New Jersey on March 18,  
9 2015, at approximately 12:59 p.m.

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

15 Will counsel please introduce  
16 yourselves.

17 MS. NAVA: Annaka Nava from  
18 Tensegrity law firm for plaintiff  
19 Solocron Media, LLC.

20 MR. ANDERSON: Kevin Anderson  
21 from Wiley Rein for defendant, Cellco  
22 and with me, I have in-house counsel,  
23 Jack Minnear.

24 THE VIDEOGRAPHER: Will the  
25 Court Reporter please swear in

1 M. ALDERSON

2 the witness.

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

7 EXAMINATION BY

8 MS. NAVA:

9 Q. Good afternoon, Mr. Alderson.

10 A. Hello.

11 Q. Can you please state your name  
12 and address for the record?

13 A. Matt Alderson, 32 Manor Drive,  
14 Byram, New Jersey, 07821.

15 Q. Are you currently employed?

16 A. Yes.

17 Q. By whom?

18 A. With Verizon.

19 Q. And are you aware of the specific  
20 Verizon entity which employs you?

21 A. Verizon Wireless.

22 Q. What is your current position at  
23 Verizon Wireless?

24 A. I am a product manager.

25 Q. How long have you --

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