1   IN THE UNITED STATES DISTRICT COURT
                   FOR THE NORTHERN DISTRICT OF TEXAS
2   DALLAS DIVISION

3   SUMMIT 6 LLC,   )   3:11-CV-367-O
          Plaintiff,   )
4   v.   )   Jury Trial Volume 2
     RESEARCH IN MOTION CORP.,   )
5   Defendants.   )   April 2, 2013

6   **BEFORE THE HONORABLE REED C. O'CONNOR**
                      United States District Judge
7   *In Dallas, Texas*

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1   (Afternoon of April 2, 2013.)

2   MR. CALDWELL: May it please the Court.

3   BY MR. CALDWELL:

4   Q. Mr. Wright, I would like to follow up on something we

5   talked about earlier. We talked about different ways of

6   getting a picture to point 2. When was the option to send a

7   CD to Point2 first available?

8   A. I think that was made available before I joined the

9   company.

10   Q. What is your best recollection of when you joined the

11   company?

12   A. In May or June.

13   Q. Of 97?

14   A. Of 97, yeah.

15   Q. You joined in May, June, 97, just to help keep your time

16   frames straight, okay? Fair enough?

17   A. Yes.

18   Q. And now you think the extended CD model, that was

19   available before you joined?

20   A. I think so.

21   Q. Did it go back into 96, or do you know?

22   A. I'm afraid I don't know.

23   Q. What I've added to the CD, you can mail a CD to Point2

24   since before June 1997. When was the functionality of sending

25   a picture to Point2 via FTP, file transfer protocol, first

1 added to Point2?

2 A. I don't think I ever saw those capabilities in -- in --

3 there were I think two forms of it and I think that one form

4 was available before and that was something to the effect of,

5 you know, Barry would give you access to a FTP server and you

6 would send the file that way. You can kind of think of that

7 as being akin to sending a CD or even a scan and any of those

8 techniques. And then later, sometime after the PUF was

9 introduced, that's when we introduced the so-called Trivial

10 file upload and that's not FTP based, that would be an http

11 upload.

12 Q. I'm not sure that answered my question. What I want to

13 know is when was it first available that you could FTP a

14 picture to Point2? It varied to give you the credentials you

15 need for a FTP site for example?

16 A. That was something that Barry did before my time but I

17 never really saw that occur.

18 Q. My handwritten faux pas. But FTP to Point2 is available

19 before June 97, that's fair; correct?

20 A. Yes.

21 Q. As to the so called trivial upload, the http upload, we

22 saw in your deposition you told us you believed that that

23 might have been available before the photo upload facility;

24 correct?

25 A. In my deposition I said it may be available but in

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