

1 - ROUGH - JOHN HAWES -
2 REALTIME AND ROUGH DRAFT DISCLAIMER

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4 For the parties working with real time and rough
5 draft transcripts, understand that if you choose
6 to use the real time rough draft screen or the
7 printout, that you are doing so with the
8 understanding that the rough draft is a
9 noncertified copy.

10

11 Case: Palo Alto Networks v Finjan, Inc.
12 and Symantec Corp, Blue Coat
Systems, Inc. v Finjan, Inc.

13 Witness: John Hawes

14 Date: 11-30-16

15 REPORTER'S NOTE:

16 The rough draft transcript should not be cited at
17 any time since this deposition has been real time
18 and is in rough draft form. There will be a
19 discrepancy regarding page and line number when
20 comparing the real time screen, the rough draft,
21 rough draft disk, and the final transcript.

22

23 Also please be aware that the real time screen and
24 the noncertified rough draft transcript may
25 contain untranslated steno, reporter notes,

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2 misspelled proper names, incorrect or missing Q/A
3 symbols or punctuation, and/or nonsensical English
4 word combinations. All such entries will be
5 correct on the final, certified transcript.

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JOHN HAWES, called as a witness,

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having been duly sworn on November 30, 2016,
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5 by a Notary Public, was examined and
6 testified as follows:

7 Virus Bulletin Limited
8 The Pentagon
9 Abingdon Science Park
10 Abingdon Oxon UK
11 (Business)

12

13 EXAMINATION BY MS. HEDVAT:

14 Q. Good morning

15 A. Hi.

16 Q. May I ask you to state your name for
17 the record, please.

18 A. My name is John Hawes.

19 Q. Thank you, Mr. Hawes.

20 Do you understand why you're here
21 today?

22 A. I think so.

23 Q. Have you been deposed before?

24 A. I have.

25 Q. And how many times?

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2 A. Once.

3 Q. In what context?

4 A. The first piece of evidence that I
5 provided for this case, the scan of the paper, the
6 Morton Swimmer's 1995 paper in the various
7 bulletin conference.

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- 8 Q. So as you know from your first
9 deposition, I'll be asking you some questions.
10 If there's anything that you need
11 clarity on, I ask that you ask for clarification
12 and if not, I'll -- the mutual understanding would
13 be that you have no questions about what my
14 question is asking you.
15 A. Okay.
16 Q. Is there any reason you feel that you
17 cannot give your best and most accurate testimony
18 today?
19 A. No.
20 Q. When were you first contacted about
21 having to give this deposition today?
22 A. I guess it was mid-October I think.
23 Q. Of this year?
24 A. Yes.
25 Q. Who contacted you?

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2 A. Brian.
3 Q. What did he tell you about this
4 deposition?
5 A. That I might be required to give
6 another deposition.
7 Q. And when you were contacted initially
8 to work on these cases, who contacted you?
9 A. Brian.
10 Q. And what did he tell you your

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11 assignment was?

12 A. I was asked to provide a scan of the
13 Morton Swimmer paper. That was the initial thing,
14 the first thing I was asked to do.

15 Q. When did he contact you about that?

16 A. Early this year I think.

17 Q. Did you meet with anyone to prepare
18 for your deposition today?

19 A. Not really. We had a brief
20 conversation while we were waiting for you guys to
21 arrive.

22 Q. For clarification, who is "we"?

23 A. Myself, Brian, and I'm sorry -- Alex.
24 (Whereupon, Exhibit 1 was marked at
25 this time.)

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2 Q. You have been handed what's been
3 marked as Exhibit 1. Do you recognize this
4 document?

5 A. Yes.

6 Q. And what is this document?

7 A. I think this is the second -- yes,
8 this is a piece of paper that I signed in Denver
9 declaring that some of the documents that I
10 provided were what they claim to be.

11 Q. If I could direct your attention to
12 the third page of this document. Is that your
13 signature?

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