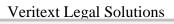
	Page 1
1	UNITED STATES PATENT AND TRADEMARK OFFICE
2	BEFORE THE PATENT TRIAL AND APPEAL BOARD
3	
4	
5	MICROSOFT CORPORATION
6	Petitioner
7	v.
8	BRADIUM TECHNOLOGIES LLC
9	Patent Owner
10	
11	Case IPR2016-00448
12	Case IPR2016-00449
13	
	Patent No. 7,908,343
14	Patent No. 8,924,507
	<del></del>
15	
16	Oral Deposition of PEGGY ARGOUIS, Ph.D,
17	taken at the Law Offices Andrews Kurth Kenyon
18	LLP, 1350 I Street, NW, Suite 1100, Washington,
19	D.C., beginning at 9:25 a.m., on Friday, January
20	13, 2017 before Ryan K. Black, a Registered
21	Professional Reporter, Certified Livenote Reporter
22	and Notary Public in and for the District of Columbia.
23	
24	Job No. 2513060
25	Pages 1 - 220



## 2513060-1

			i
1	APPEARANCES:	1	Whereupon,
2		2	PEGGY ARGOURIS, Ph.D.,
3	Representing - Microsoft Corporation	3	called to testify, having been first duly sworn
4	PERKINS COIE LLP	4	or affirmed, was examined and testified as
5	BY: EVAN S. DAY, ESQUIRE	5	follows:
6	MATTHEW BERNSTEIN, ESQUIRE	6	MR. DAY: I'm Evan Day, from Perkins
7	11988 El Camino Real	7	Coie, representing the petitioner, Microsoft, in
8	Suite 350	8	this proceeding, along with Matt Bernstein, also
9	San Diego, California 92130	9	from Perkins Coie.
10	858.720.5721	10	And, Chris, if you want to introduce
11	eday@perkinscoie.com	11	yourself for the record?
12	mbernstein@perkinscoie.com	12	MR. COULSON: My name is Chris
13	moernstem@perkmscole.com	13	· · · · · · · · · · · · · · · · · · ·
	Description Description Testing Line LLC		Coulson, with Andrews Kurth Kenyon, representing
14	Representing - Bradium Technologies LLC	14	patent owner, Bradium.
15	ANDREWS KURTH KENYON LLP	15	EXAMINATION
16	BY: CHRISTOPHER J. COULSON, ESQUIR		BY MR. DAY:
17	One Broadway	17	Q. All right.
18	New York, New York 10004	18	Good morning, Dr. Argouis.
19	212.425.7200	19	A. Good morning.
20	ccoulson@kenyon.com	20	Q. I'm going to go through a few of the
21		21	standard instructions for a deposition. Now,
22		22	some of this you may have heard before. I
23		23	understand you've been deposed before, but,
24		24	you know, these instructions are helpful for
25		25	us to get through these proceedings and avoid
	Page 2	2	Page 4
1	INDEX	1	confusion in the record.
2		AGE 2	Since we are recording this
3	By Mr. Day4, 217	3	
4	By Mr. Coulson192	4	deposition, it's being transcribed by the court
5	By Wif. Courson192		reporter, but we don't have a videographer or
6		5	anything like that here, I want to make sure
		6	that your responses are reflected clearly in
7		7	the record. So if I ask you a question, try
8	EVILIDAMA	8	to verbalize the answer clearly, yes or no, as
9	EXHIBITS	9	opposed to uh-huh or nodding.
10	EXHIBIT DESCRIPTION PAGE	10	A. Like that? Yes.
11	Exhibit 1014 A Wikipedia article on	11	Q. Exactly.
12	IEEE 802.11(a)63	12	A. Not like that.
13		13	Q. Right. And note for the record you
14		14	were nodding,
15		15	A. Yes.
16		16	Q so that would be something that the
17		17	reporter wouldn't catch.
18		18	A. Yeah.
19		19	Q. I think both of us I'd like to ask
20		20	you to try and wait for me to finish my question
21		21	before you respond, and, at the same time, I
22		22	will do my best to avoid talking over you so
23		23	that our so that, you know, my questions and
24		24	your answers are again, that they're clear
		1	,
25		25	in in the transcript.
	Page (		in in the transcript.  Page 5

Pages 2 to 5





1	A. Okay.	1	based on imagery that existed which would
2	Q. And if there's any uncertainty that	2	give information about the conditions that
3	you have, if you don't understand a question	3	the conditions that existed during the
4	that I've asked, I'd ask you to ask me to	4	accident.
5	clarify the question and tell me what it	5	That was not in a patent case. The
6	is that's unclear about the question.	6	other two were.
7	A. Okay.	7	Q. All right. And in the Polaroid versus
8	MR. COULSON: Objection; form.	8	HP case, which party were you retained by in
9	BY MR. DAY:	9	that case?
10	Q. Additionally, you know, we'll probably	10	A. Polaroid.
11	take a few breaks during this deposition. And	11	Q. And were they the plaintiff in that
12	if you need to take a break at any time, just,	12	case?
13	you know, let let your your counsel and	13	A. Yes.
14	myself and the court reporter know. The only	14	Q. They were alleging the patent
15	things that I would ask are that we not take any	15	infringement against someone else?
16	break while there's a question pending, and that	16	A. Against Hewlett Packard.
17	you not discuss the substance of your testimony	17	Q. Okay. And in that Polaroid case, was
18	with counsel during the breaks.	18	your role in regard to infringement or validity
19	A. Okay.	19	or both or some other issue?
20	Q. Are you understand those those	20	A. Well, all I remember, and I'll tell
21	instructions?	21	you all I remember, I was an expert in my field
22	A. I do.	22	and I rendered an opinion. And I don't remember
23	Q. And are you able to follow those	23	it's been years, I don't remember exactly
24	instructions?	24	what it was in terms of the legal aspect of it.
25	A. I will.	25	Q. And do you recall what law firm
	Page 6		Page 8
1		1	
	O. Now, have voll been deposed before?	1	retained you in that case?
1 2	Q. Now, have you been deposed before?  A. Yes, I have.	1 2	retained you in that case?  A. Yes. Kirkland & Ellis.
2	A. Yes, I have.	2	A. Yes. Kirkland & Ellis.
	A. Yes, I have. Q. How many times?		<ul><li>A. Yes. Kirkland &amp; Ellis.</li><li>Q. Okay. And in that second case, the</li></ul>
2	<ul><li>A. Yes, I have.</li><li>Q. How many times?</li><li>A. I want to say two. I think it's been</li></ul>	2	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the  Canon case, do you recall who the the the
2 3 4 5	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was	2 3 4	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?
2 3 4 5 6	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.	2 3 4 5 6	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?
2 3 4 5 6 7	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to	2 3 4 5 6 7	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.
2 3 4 5 6 7 8	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.	2 3 4 5 6	<ul> <li>A. Yes. Kirkland &amp; Ellis.</li> <li>Q. Okay. And in that second case, the</li> <li>Canon case, do you recall who the the the adverse party was?</li> <li>A. By adverse party you mean?</li> <li>Q. Sorry. I'm using a legal term again.</li> <li>A. Yeah. It's okay.</li> </ul>
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2 3 4 5 6 7 8 9	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?	2 3 4 5 6 7 8 9	<ul> <li>A. Yes. Kirkland &amp; Ellis.</li> <li>Q. Okay. And in that second case, the</li> <li>Canon case, do you recall who the the the adverse party was?</li> <li>A. By adverse party you mean?</li> <li>Q. Sorry. I'm using a legal term again.</li> <li>A. Yeah. It's okay.</li> <li>Q. Who was against Canon in that case?</li> <li>A. Image Processing Corporation, I think,</li> </ul>
2 3 4 5 6 7 8 9 10	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.	2 3 4 5 6 7 8 9	<ul> <li>A. Yes. Kirkland &amp; Ellis.</li> <li>Q. Okay. And in that second case, the</li> <li>Canon case, do you recall who the the the adverse party was?</li> <li>A. By adverse party you mean?</li> <li>Q. Sorry. I'm using a legal term again.</li> <li>A. Yeah. It's okay.</li> <li>Q. Who was against Canon in that case?</li> <li>A. Image Processing Corporation, I think, was the name of entity.</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second	2 3 4 5 6 7 8 9 10 11 12	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett	2 3 4 5 6 7 8 9 10 11	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab, Q. Okay.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab, Q. Okay.  A yeah.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab,  Q. Okay.  A yeah.  Q. Okay. So in both of those cases,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.  Q the camera company?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab,  Q. Okay.  A yeah.  Q. Okay. So in both of those cases, you were retained by the plaintiff?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.  Q the camera company?  A. Yeah.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab, Q. Okay.  A yeah.  Q. Okay. So in both of those cases, you were retained by the plaintiff?  A. Mm-hmm. Sorry.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.  Q the camera company?  A. Yeah.  Q. Were all those patent infringement	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab, Q. Okay.  A yeah. Q. Okay. So in both of those cases, you were retained by the plaintiff?  A. Mm-hmm. Sorry.  Q. And how many years ago was that Image
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.  Q the camera company?  A. Yeah.  Q. Were all those patent infringement matters or some other type of case?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab,  Q. Okay.  A yeah.  Q. Okay. So in both of those cases, you were retained by the plaintiff?  A. Mm-hmm. Sorry.  Q. And how many years ago was that Image Processing case?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.  Q the camera company?  A. Yeah.  Q. Were all those patent infringement matters or some other type of case?  A. Well, the first one, I think it was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab, Q. Okay.  A yeah. Q. Okay. So in both of those cases, you were retained by the plaintiff?  A. Mm-hmm. Sorry.  Q. And how many years ago was that Image Processing case?  A. I'm not sure. Several years ago.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes, I have.  Q. How many times?  A. I want to say two. I think it's been two no, three, actually. Because there was one a while ago. Yeah, I think three.  Q. And were those in regard to litigation?  A. Yes.  Q. What were the names of the cases?  A. That's a good question. Let me think.  The first one was a case against the railroad. That was years ago. And the second one was a case of Polaroid versus Hewlett Packard. And the third one was Image Processing against Canon.  Q. Canon,  A. Yeah.  Q the camera company?  A. Yeah.  Q. Were all those patent infringement matters or some other type of case?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Kirkland & Ellis.  Q. Okay. And in that second case, the Canon case, do you recall who the the the adverse party was?  A. By adverse party you mean?  Q. Sorry. I'm using a legal term again.  A. Yeah. It's okay.  Q. Who was against Canon in that case?  A. Image Processing Corporation, I think, was the name of entity.  Q. And were you retained by the attorneys representing the plaintiff or the defendant in that case?  A. Image Processing Lab,  Q. Okay.  A yeah.  Q. Okay. So in both of those cases, you were retained by the plaintiff?  A. Mm-hmm. Sorry.  Q. And how many years ago was that Image Processing case?

Pages 6 to 9



1	that case?	1	would that be more than a year?
2	A. Was it Kenyon Kenyon & Kenyon, or	2	A. I'm not sure.
3	something, I think.	3	Q. Were you retained before do
4	Q. Was Mr. Coulson involved in that case?	4	you know if you were retained before or after
5	A. Yes, he was.	5	Bradium let me restart that question.
6	Q. Okay. And what subject matter did you	6	At the time you were retained, were
7	testify on in the Image Processing case?	7	there already proceedings pending at the Patent
8	A. In my area of expertise, which is	8	Office to invalidate the Bradium patents?
9	image processing,	9	A. I don't know. I don't remember.
10	Q. Okay.	10	Q. When did you first start performing
11	A and related topics, yes.	11	work for Bradium on this matter?
12	Q. Okay. So you'd characterize your area	12	A. I think it was a few months ago, but
13	of expertise as image processing?	13	I'm not sure.
14	A. No. My area of expertise is wider	14	You have to understand, this is
15	than that, but in that particular case, because	15	not my regular job. My job is really
16	the topic was in that area, that was the	16	very demanding, so I don't remember exactly.
17	expertise that I offered.	17	Q. Okay. Would that have before this
18	Q. Have you ever provided trial	18	summer?
19	testimony?	19	MR. COULSON: Objection; form.
20	A. No, I have not.	20	THE WITNESS: I'm not sure.
21	Q. And have you ever been retained and	21	BY MR. DAY:
22	provided expert opinions in any other litigation	22	Q. Now, did you start working on this
23	matters?	23	case immediately after you were retained, or
24	A. No. To the best of my recollection,	24	was there some was there some lag time
25	no.	25	between when you I assume you signed some
	Page 10		Page 12
1	O So those three cases that	1	sort of agreement and then you started working
1 2	Q. So those three cases that	1 2	sort of agreement and then you started working
2	we talked about earlier, the the railroad	2	on the case?
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Pages 10 to 13



1	performed any work for Bradium other than those	1	that company name?
2	matters?	2	A. Nope.
3	MR. COULSON: Objection. In that form	3	Q. Okay. So even now, as you're sitting
4	it calls for work product. And in its current	4	in your deposition, you're not aware of what
5	form, I'd instruct the witness not to answer	5	the names 3DVU Limited or 3DVU, Inc., are not
6	that question.	6	something you're familiar with?
7	BY MR. DAY:	7	A. No. You asked 3DVU, and 3DVU could
8	Q. Are you going to follow that	8	be a technical term. That was my my
9	instruction?	9	sorry, I have my answer my question.
10	A. Yes, I will.	10	Q. Okay. And just to clarify that, 3DVU
11	Q. You mentioned in both of your	11	would be spelled out three, and then the letters
12	declarations that you're being compensated	12	D-V-U. And there would be one company named
13	at your customary rate. What is that rate?	13	3DVU Limited and a 3DVU, Inc. And is it your
14	A. \$500 an hour.	14	testimony that you're not familiar with either
15	Q. Do you have any is there any	15	of those entities?
16	additional compensation that you're receiving	16	A. I don't remember. Have I included
17	in addition to hourly compensation?	17	something like this in my report?
18	A. No.	18	Q. I mean, I would have to I'd have to
19	Q. How much time would you estimate that	19	do a search in your report, but as of right now
20	you've spent on this matter relating to Bradium?	20	the question is if you have any familiarity with
21	And when I say that, although there are separate	21	those?
22	Patent Office proceedings, I'm, you know,	22	MR. COULSON: Objection to form.
23	referring to your whole engagement with Bradium.	23	THE WITNESS: I don't remember.
24	How much time do you think you've spent on that?	24	BY MR. DAY:
25	A. I'm not sure.	25	Q. How about GA Central or Gacentral.com?
	Page 14		Page 16
1	Q. More than 50 hours?	1	A. I don't remember.
1 2	<ul><li>Q. More than 50 hours?</li><li>A. I'm not sure. I haven't even really</li></ul>	1 2	<ul><li>A. I don't remember.</li><li>Q. Flyover Technologies, do you have any</li></ul>
2	A. I'm not sure. I haven't even really	2	Q. Flyover Technologies, do you have any
2	A. I'm not sure. I haven't even really recorded some of these things yet.	2	Q. Flyover Technologies, do you have any familiarity with an entity by that name?
2 3 4	A. I'm not sure. I haven't even really recorded some of these things yet.  Q. What do you mean you haven't recorded	2 3 4	Q. Flyover Technologies, do you have any familiarity with an entity by that name?  A. I don't remember.
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