1                UNITED STATES DISTRICT COURT

2             FOR THE EASTERN DISTRICT OF TEXAS

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4

5     CHRIMAR SYSTEMS, INC.,
      et al.,

6
                Plaintiffs,
7
      v.                                    Civil Action No.

8                                            6:15-cv-00163

9     ALCATEL-LUCENT, S.A., et al.,

10              Defendants.
      _____

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14              DEPOSITION OF RICH SEIFERT

15               Menlo Park, California

16               Friday, June 10, 2016

17                     Volume I

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24    REPORTED BY:
      TAVIA MANNING, CSR No. 13294, CLR, CCRR

25    JOB NO. 108691

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3                          June 10, 2016

4                            9:06 a.m.

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7

8            Deposition of RICH SEIFERT, Volume I, held at

9   McDermott Will & Emery, 275 Middlefield Road, Suite 100,

10   Menlo Park, California, before Tavia Manning, Certified

11   Shorthand Reporter No. 13294, Certified LiveNote

12   Reporter, California Certified Realtime Reporter.

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1   A P P E A R A N C E S:

2

3           THOMPSON & KNIGHT

4           Counsel for Plaintiff

5                1722 Routh Street

6                Dallas, TX 75201

7           BY:   JUSTIN COHEN, ESQ.

8

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10

11

12          McDERMOTT WILL & EMERY

13          Counsel for AMS

14               227 West Monroe Street

15               Chicago, IL 60606

16          BY:   BRENT HAWKINS, ESQ.

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1            MENLO PARK, CALIFORNIA;

2        FRIDAY, JUNE 10, 2016; 9:06 A.M.

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4        (Deposition Exhibits 1 through 19 were

5        premarked for identification.)

6

7                    RICH SEIFERT,

8    having been first duly sworn by the court reporter,

9                testified as follows:

10

11                    EXAMINATION

12   BY MR. COHEN:

13        Q.   Good morning, Mr. Seifert.

14        A.   Good morning.

15        Q.   My name is Justin Cohen.  I am representing the

16   plaintiffs in this case, ChriMar Systems, Inc. and

17   ChriMar Holding Company.

18             Are you are familiar with them?

19        A.   I am.

20        Q.   Now, you've been deposed numerous times before;

21   correct?

22        A.   Yes.

23        Q.   Do you know about how many?

24        A.   Between 10 and 20.

25        Q.   So you generally understand the process and the

1    rules?

2         A.   Yes.

3         Q.   Any reason you can't offer full and truthful

4    testimony today?

5         A.   No.

6         Q.   Anything affecting your ability to understand

7    my questions today?

8         A.   No.

9              I do want to go on the record -- if you notice,

10   I've got -- we don't have video here, but if you notice,

11   I've got an earpiece on and I've got an iPod sitting in

12   front of me.   I suffer from tinnitus, ringing of the

13   ears.   And this helps mask it.   It makes me tolerate it

14   a little bit better.   It's actually a creation of my own

15   design.   So I just wanted to make sure you don't think

16   I'm getting messages from somewhere else or from

17   anywhere, so...

18        Q.   Thank you.

19        A.   And at some point, I may have to change

20   earpieces, because the batteries last a finite time.

21        Q.   Can you hear my questions okay?

22        A.   I can hear you fine.   It's not a hearing aid.

23   It's actually injecting a masking sound, which helps

24   relieve the ringing.

25        Q.   Okay.   Thank you for that.

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