IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

CHRIMAR SYSTEMS, INC., D/B/A CMS	§	
TECHNOLOGIES AND CHRIMAR HOLDING	§	Civil Action No. 6:15-CV-618-JRG-JDL
COMPANY, LLC,	8	LEAD CASE
Plaintiffs,	3 8	
Flaminis,	8	
V.	§	
	§	JURY TRIAL DEMANDED
ADTRAN, INC.,	§.	
Defendant.	8	
Derendunt.	3 8	
	8	
	8	
CHRIMAR SYSTEMS, INC., D/B/A CMS	§	
TECHNOLOGIES AND CHRIMAR HOLDING	ş	Civil Action No. 6:15-cv-00639-JRG-JDL
COMPANY, LLC,	8	CONSOLIDATED CASE
Plaintiffs,	8 8	
,	8	
V.	8	
	§	JURY TRIAL DEMANDED
DELL INC. AND AEROHIVE NETWORKS, INC.,	§	
Defendants.	§	
Derendants.	3 8	
	8	
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DEFENDANT DELL INC.'S DEPOSITION DESIGNATIONS

Pursuant to this Court's Docket Control Order, Defendant Dell Inc. ("Dell") respectfully submits the following deposition designations for witnesses who may not be called or available to offer live testimony at trial. Dell reserves the right to use other deposition testimony not currently designated for the purpose of impeachment or rebuttal. Dell also reserves the right to amend or supplement its deposition designations, as needed.

BRANIA, NICK 7/29/16						
Dell Initial DesignationsChrimar ObjectionsDell ObjectionsDell 						
15:2-17:8						
18:18-22						

BOENKE, CLYDE 1/29/15 Taken in Case No. 6:13cv880; <i>Chrimar v. Alcatel Lucent,. Inc., et al.</i> Case No. 6:13cv881; <i>Chrimar v. AMX, LLC</i>							
ED Tex., Tyler Division							
Dell Initial	Chrimar Chrimar Dell Dell Cross- Chrimar						
Designations	Objections	Counter- Designations	Objections to Counter- Designations	Designation	Objections		
9:20-21							
12:13-20							
12:25-13:3							
13:11-25							
14:11-25							
15:10-15							
15:18-25							
16:15-19:25							
20:3-22:3							
22:8-21							
22:24-23:7							
23:20-24							
26:23-27:1							
27:7-15							
28:4-31:3							
31:11-20							
32:4-11							
32:21-33:3							
33:9-18							
34:18-35:17							
36:12-24							
39:9-40:6							
40:17-41:9							
41:16-42:1							
43:19-44:7							
44:9							
45:17-46:5							
46:24-47:10							
48:2-8							

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BOENKE, CLYDE 1/29/15 Taken in Case No. 6:13cv880; <i>Chrimar v. Alcatel Lucent,. Inc., et al.</i> Case No. 6:13cv881; <i>Chrimar v. AMX, LLC</i> ED Tex., Tyler Division					
Dell Initial Designations	Chrimar Objections	Chrimar Counter- Designations	Dell Objections to Counter- Designations	Dell Cross- Designation	Chrimar Objections
48:14-25			0		
52:2-53:2					
53:22-54:13					
55:20-25					
56:4-25					
59:8-11					
59:20-60:2					
61:25-62:4					
62:15-18					
62:20					
62:22-63:2					
63:9-65:15					
65:17					
65:19-25					
66:25-67:1					
67:17-25					
68:6-69:4					
70:15-72:7					
72:24-75:4					
75:9-77:5					
79:9-24					
80:4-7					
80:10-23					
81:14-83:16					
84:2-21					
85:7-14					
85:16					
86:7-16					
86:21-87:12					
87:20-88:12					
88:17-89:2					
89:4					
89:6-8					
89:10					
89:12-15					
89:22 ("I've") - 90:7					
90:14-20					
91:5-92:19					
93:7-24					

BOENKE, CLYDE 1/29/15 Taken in Case No. 6:13cv880; <i>Chrimar v. Alcatel Lucent,. Inc., et al.</i> Case No. 6:13cv881; <i>Chrimar v. AMX, LLC</i>					
Dell Initial Designations	Chrimar Objections	ED Tex., Ty Chrimar Counter- Designations	Dell Objections to Counter- Designations	Dell Cross- Designation	Chrimar Objections
94:10-22					
95:5-20					
96:13-97:9					
97:16-98:1					
100:3-10					
100:12					
100:24-102:4					
102:10-20					
103:13-17					
105:11-106:4					
106:17-107:2					
107:4					
107:13-22					
108:3-109:4					
109:25-110:13					
113:25-114:5					
133:22-135:6					
135:14-21					
137:20-138:2					
140:1-18					
143:22-144:1					
144:3					
144:5-8					
144:10					
144:12-15					
145:1-7					
145:24-146:14					
147:13-19					
148:4-6					
148:8					
148:10-21					
149:10-14					
149:17-150:23					<u> </u>
150:25					
151:2-152:16					
152:18					
152:20-153:13					<u> </u>
154:3-13					
155:6-23					
156:9-16					

BOENKE, CLYDE 1/29/15 Taken in Case No. 6:13cv880; <i>Chrimar v. Alcatel Lucent,. Inc., et al.</i> Case No. 6:13cv881; <i>Chrimar v. AMX, LLC</i>						
		ED Tex., Ty				
Dell Initial Designations	Chrimar Objections	Chrimar Counter-	Dell Objections to	Dell Cross-	Chrimar Objections	
Designations	Objections	Designations	Counter-	Designation	Objections	
			Designations			
158:14-19						
159:4-19						
160:16-25						
162:21-163:6						
165:1-12						
165:14						
168:18-169:17						
170:24-171:1						
177:10-14						

BOENKE, CLYDE 12/18/15 Taken in Case No. 4:13cv1300; <i>Chrimar v. Cisco Systems, Inc.</i> ND Cal., Oakland Division							
Dell Initial	ChrimarDellDell Cross-Chrimar						
Designations	Objections	Counter-	Objections to	Designation	Objections		
		Designations	Counter- Designations				
5:18-6:9							
6:14-7:25							
14:8-20							
16:16-20							
20:2-15							
20:23-21:2							
21:10-13							
21:16-22:4							
28:10-29:10							
30:19-25							
31:15-32:5							
34:18-20							
34:22-35:2							
35:4-8							
37:6-20							
42:17-43:4							
45:14-25							
46:4-7							
46:23-47:7							
48:14-25							
49:22-50:7							

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