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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

LEGO SYSTEMS A/S :
 :
Plaintiff/Counterclaim- :
Defendant, :
 :
v. : Civil Action No.
 : 3:15-CV-00823-VLB
RUBICON COMMUNICATIONS, LP :
DBA SMALLWORKS AND :
SMALLWORKS, LLC :
 :
Defendant/Counterclaim- :
Plaintiff. :

ORAL DEPOSITION OF
JAMIE L. THOMPSON
DECEMBER 6, 2016

ORAL DEPOSITION OF JAMIE L. THOMPSON, produced
as a witness at the instance of the
Plaintiff/Counterclaim Defendant, and duly sworn, was
taken in the above-styled and numbered cause on the 6th
of December, 2016, from 10:05 a.m. to 1:09 p.m., before
Shelly M. Tucker, CSR in and for the State of Texas,
reported by machine shorthand at the offices of Jackson
Walker L.L.P., 100 Congress Avenue, Suite 1100, Austin,
Texas, pursuant to the Federal Rules of Civil Procedure
and/or the provisions stated on the record.

LEGO A/S
Ex. 2023
Rubicon Communications, LP v. LEGO
A/S
IPR2016-01187

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APPEARANCES

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ALSO PRESENT:

James Thompson

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1 JAMIE L. THOMPSON,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MS. ALQUIST:

10:04:55 5 Q. Good morning, Ms. Thompson.

6 A. Hi.

7 Q. My name is Beth Alquist. I represent LEGO in
8 the lawsuit between your companies, and I'm going to
9 ask you a series of questions today. I'm going to

10:05:08 10 start with one. Have you ever been deposed before?

11 A. Yes.

12 Q. How many times?

13 A. Once.

14 Q. When was that?

10:05:13 15 A. I don't recall at this time, but it was
16 probably within the last six years.

17 Q. What was the nature of the deposition?

18 A. It was a trademark dispute.

19 Q. Who was involved in the trademark dispute?

10:05:48 20 A. Rubicon Communications and AT&T. Technically
21 I guess it was one of their holding companies.

22 Q. When you said "one of their holding
23 companies," you mean AT&T?

24 A. Yes.

10:06:10 25 Q. Thank you.

1 Q. Rubicon Communications LP ceased to exist at
2 some point. Is that right?

3 A. No. We -- no.

4 Q. So is it your testimony that Rubicon
10:35:14 5 Communications LP exists today as an entity?

6 A. No. We converted it to an LLC.

7 Q. When was that?

8 A. I believe it was June of 2014.

9 Q. So while operating as Rubicon Communications
10:35:35 10 LP -- which is roughly 2004 to 2014. Is that right?

11 A. Yes.

12 Q. How many -- was there a time frame where
13 Rubicon Communications LP had its highest number of
14 employees?

10:35:51 15 A. That would be the day we converted to an LLC,
16 yeah.

17 Q. And how many employees in June of 2014 did
18 Rubicon Communications LP have?

19 A. Oh, boy. I would be totally guessing. And as
10:36:27 20 a complete guess, I would say somewhere between 20 and
21 25.

22 Q. And did all of those employees ultimately
23 report to you?

24 A. Yes.

10:36:44 25 Q. So what -- I know you're a co-owner, but what