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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION  
CASE NO. 2017-cv-00495-WCB-RSP

CYWEE GROUP LTD.,  
  
Plaintiff,

vs.

HUAWEI DEVICE CO. LTD.,  
HUAWEI DEVICE (DONGGUAN) CO.  
USA, INC.,  
  
Defendants.

\_\_\_\_\_ /

Veritext Reporting  
37 N. Orange Avenue  
Suite 500  
Orlando, Florida  
Tuesday, 9:15 a.m.-5:16 p.m.  
September 25, 2018

VIDEOTAPED DEPOSITION OF JOSEPH J. LAVIOLA, JR., Ph.D

Taken on Behalf of the Defendants before  
Lisa Gerlach, Court Reporter, Notary Public  
in and for the State of Florida at Large,  
pursuant to Defendants' Notice of Taking  
Deposition in the above cause.

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1 THE VIDEOGRAPHER: Good morning. We are  
2 going on the record at 9:15 a.m. on  
3 September 25th, 2018. Please note that the  
4 microphones are sensitive and may pick up  
5 whispering, private conversations, and  
6 cellular interference. Please turn off all  
7 cell phones or place them away from the  
8 microphones, as then can interfere with the  
9 deposition audio. Audio and video recording  
10 will continue unless all parties agree to go  
11 off the record.

12 This is media unit one of the  
13 video-recorded deposition of Joseph J.  
14 LaViola, Jr., Ph.D, taken by counsel for the  
15 defendants in the matter of CyWee Group Ltd.  
16 Vs. Huawei Device, Ltd., et al., filed in the  
17 United States District Court, Eastern  
18 District of Texas, Marshall Division.

19 This deposition is being held at Veritext  
20 Orlando, located at 37 North Orange Avenue,  
21 Orlando, Florida. My name is Bailey Gerlach.  
22 I'm from the firm Veritext Legal Solutions  
23 and I'm the videographer. The court reporter  
24 is Lisa Gerlach from the firm, Veritext  
25 Reporting.

1 Counsel will now state their appearances  
2 and affiliations for the record beginning  
3 with the noticing attorney.

4 MR. KLEINMAN: Ben Kleinman, with  
5 Kilpatrick Townsend, representing Huawei.

6 MR. RAFILSON: Ari Rafilson, on behalf of  
7 plaintiff, CyWee Group.

8 THE VIDEOGRAPHER: Will the court  
9 reporter, please, swear in the witness?

10 THEREUPON,

11 JOSEPH J. LAVIOLA, JR., Ph.D,  
12 a witness herein, acknowledged after having been duly  
13 sworn, testified upon his oath as follows:

14 THE WITNESS: I do.

15 DIRECT EXAMINATION

16 BY MR. KLEINMAN:

17 Q. Good morning.

18 A. Good morning.

19 Q. First things first. Is it Dr. LaViola,  
20 Professor LaViola? Do you have a preference?

21 A. You can call me Dr. LaViola, I guess.

22 Q. Thank you. You understand that you are under  
23 oath?

24 A. Uh-huh.

25 Q. Is there any reason this morning that you

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