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

BRIGHT DATA, LTD., (CAUSE NO. 2:19-CV-395-JRG)
Plaintiff, ()
vs. ()
TESO, LT UAB, et al (NOVEMBER 1, 2021)
Defendants, (MARSHALL, TEXAS)
(9:00 A.M.)

VOLUME 1

TRIAL ON THE MERITS
BEFORE THE HONORABLE RODNEY GILSTRAP
UNITED STATES CHIEF DISTRICT JUDGE
and a jury

SHAWN M. McROBERTS, RMR, CRR
100 E. HOUSTON STREET
MARSHALL, TEXAS 75670
(903) 237-7464
shawn_mcroberts@txed.uscourts.gov

1 project?

2 A. Yeah. Initially, I thought I can't -- you know, I can't
3 do it again, it's too tough, and I sort of -- I was at my
4 house, and -- and he started coming over, and we talked about
5 the internet, which we both love, and how, you know -- it was
6 his idea initially about how we -- the internet could be
7 completely in a different way, way more efficient, way faster,
8 way better, way cheaper, and what's called more elegant. A
9 more elegant solution, any thing which is more elegant means
10 it presents itself in different ways to be better.

11 Q. Okay. So you decided to go into business, and what was
12 that business? What did it end up being?

13 A. That's the business that we are talking about today.

14 Q. And the name of the company was -- is?

15 A. Well, the name is Bright Data.

16 Q. Okay.

17 A. We all seem to have changed the name over time.

18 Q. Okay. At that time, what was the name of the company?

19 A. I think when we started, we were calling it the Zone
20 Project. And then it changed to Hola, and at some point we
21 had different products.

22 Q. All right. So I want to talk to you about the company
23 Hola.

24 A. Yes.

25 Q. Okay? About what time period are we in with Hola?

1 A. I should say that it's all the same company.

2 Q. Okay.

3 A. So, you know, we're talking about -- when we started this
4 company, we are talking about 2008. Again, we are in my house
5 and discussing this idea of how the internet could be better.
6 And initially I was saying, no, you know, I'm not going to do
7 it, but it was just too good. Like we can really change the
8 way the internet works. And so I said, you know, let's do it.
9 And that's when we founded the company, which is today Bright
10 Data.

11 Q. Okay. So Hola, which is now Bright Data, started in
12 around 2008 with ideas from you and Mr. Shribman?

13 A. That's correct.

14 Q. All right. And what was the idea that relates to the
15 patents that we're here on today? How does that relate at
16 Hola and in that time period what we're here on today?

17 A. Right. So there needs to be distinction, at least there
18 is in my mind as an entrepreneur, between what your -- what
19 your idea is and then how you sell the idea. And typically
20 we're much less -- it sounds strange, but we are much less
21 concerned about how to sell it because the real problem in
22 business is how do you give value to people, selling it is
23 basically getting the value -- some of the value back.

24 And so what attracted me to the business was, here's a
25 new way to build the internet and it's elegant so it presents

1 itself in many different ways. Okay? And so we were
2 thinking, this is -- the technology we are going to develop,
3 it will make things much better, but which are the things that
4 we should sell first?

5 Q. Okay.

6 A. And so we thought that what would be most attractive to
7 people first is internet acceleration.

8 Q. Now you're talking about speed.

9 A. We thought that people would like to install this
10 technology because it would make their internet faster.

11 Q. All right. And how did that turn out?

12 A. Not so good.

13 Q. All right.

14 A. Well, technically good because it works, so we were very
15 excited, and after four years of working on this, day and
16 night, we launched the product. And, you know, we were
17 expecting everyone to, like, be super excited about it, and
18 people didn't like the product. I mean, it worked, but nobody
19 cared about the speed. And so people weren't installing it.
20 And so we had like, you know, I don't know 10, 20 installs a
21 day and that's it.

22 Q. Okay.

23 A. People didn't care.

24 Q. All right. So when you went back to Mr. Shribman to the
25 drawing board, let's call it, what did you decide to do with

1 the technology that --

2 A. Well, first of all, the feeling is -- is horrible because
3 you spent, you know, your life or your -- four years of your
4 life doing this, this is all we did day and night, weekend,
5 and nobody cared.

6 But because we were already more experienced, we had --
7 we had come quickly to the conclusion that we failed in what
8 we offered as the -- the benefit to the people, the speed.

9 But we said, look, this technology does a lot of things.
10 It's a more elegant internet. So what are the other things
11 that we can offer to people? And we made a list of eight
12 different things, if I remember correctly, that could be
13 interesting to people to use our technology for, the same
14 technology that we created.

15 Q. All right. And you're talking about the technology
16 created that was embodied in what are now the patents?

17 A. Yes.

18 Q. All right. And so you had that list of eight things
19 after you had went back to the drawing board with the
20 technology that's in the patents, and what did you come up
21 with that became a success?

22 A. Yeah. So we actually didn't go back to the drawing
23 boards physically because the drawing boards are for the
24 technology, it's the same technology. We just said, let's --
25 let's offer this -- present this differently to people.

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