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

3  BRIGHT DATA, LTD.,           (  CAUSE NO. 2:19-CV-395-JRG
                        )
4        Plaintiff,     (
                        )
5  vs.                  (
                        )
6  TESO, LT UAB, et al     (  NOVEMBER 3, 2021
                        )  MARSHALL, TEXAS
7        Defendants.    (  8:30 A.M.

8  _____

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10                        VOLUME 3

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13  _____

                   TRIAL ON THE MERITS
14
        BEFORE THE HONORABLE RODNEY GILSTRAP
15       UNITED STATES CHIEF DISTRICT JUDGE
                    and a jury
16  _____

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24

25

1    statement?

2    A.    Yes.

3    Q.    And Tesonet, founders of Oxylabs, please tell the jury

4    how you came up with the name Tesonet.

5    A.    So, you know, when I've -- with my business partner, we

6    met -- we knew each other when we were little, and we

7    came -- we had -- just a company, and we had some very fancy

8    name.  I don't remember, but it was very, very something about

9    group global, something like that.

10        And when we came to register it, it was a very rainy day

11   in Lithuania.  And we stand in the line, and they said this is

12   taken, you have to, you know, figure out or go back into the

13   line.

14        So we did, you know, the old-fashioned way, how we can

15   call it.  We came up with Tomas, Eimantas Sabaliauskas, which

16   is his last name, and my last name Okmanas, Teso, and net as

17   internet.  Tesonet.

18            MR. GOVETT:  Now, you can take that down, please?

19   Q.    (BY MR. GOVETT)  How did you meet Mr. Sabaliauskas?

20   A.    So I met him actually online in internet.  He was from a

21   small village in Lithuania, and I was from Vilnius.  And from

22   my early days, I was spending time online and we chatted.  I

23   think we chatted for the first six years.  We met in person

24   only after he came to Vilnius to study in Vilnius University

25   as well.

1    Q.    And did -- what did you do together?  Did you eventually

2    get work together?

3    A.    Yeah.  He -- his background is in computer science, so

4    his bachelor degree is in computer science.  But he is a

5    marketing guy.

6          And I, over the years in internet service provider,

7    taught myself.  And I was very passionate about computers.

8    And I taught myself about network, about servers, about

9    computers in general.

10         And we thought our, you know, strengths and weaknesses

11   cover each other and his marketing knowledge, even though with

12   computer science background, and my technical knowledge with

13   business would be a good and powerful combination.

14   Q.    And how many projects did the two of you end up working

15   on?

16   A.    So we did -- until we found the right one, we calculated

17   that it was 34 projects or products that we did until we found

18   the right one.

19   Q.    And in those 30-some-odd products or projects, did you

20   have any failures?

21   A.    We don't call it failures.  We never call anything a

22   failures.

23   Q.    What do you call it?

24   A.    We call it divots, because you fail when you stop, and we

25   never stopped.

1   Q.   Now, how did Teso start?

2   A.   So Teso started in my mom's and dad's apartment in

3   Vilnius.  And we've been doing those products.  But in 2012 or

4   early '13, a lot of things changed.

5   Q.   And what is Tesonet today?

6   A.   So currently we -- our -- the biggest tech employer in

7   Lithuania.  We are a company that has 2,000 people.  We are

8   one of the biggest taxpayers in the country.  We are a big

9   technology company.

10  Q.   Who owns Tesonet?

11  A.   From the start until today, the company is owned by a

12  Eimantas, myself, and all the employees are shareholders as

13  well.

14  Q.   Is there any other ownership other than Mr. Sabaliauskas,

15  yourself, and the employees?

16  A.   No.  It's just us.

17  Q.   Now, what products does Tesonet have?

18  A.   Currently we have two products.  One is in cyber security

19  space.  Another is Oxylabs.

20  Q.   And what companies does Tesonet have?

21  A.   We have in terms of legal entities or --

22  Q.   Yes, sir.

23  A.   So we have Teso LT, Metacluster, you know, Core Cigna,

24  and like Core 200 and many others.

25           THE COURT:  Be sure to speak up so our reporter can

1    hear you.

2              THE WITNESS:  I'm sorry.

3              THE COURT:  That's okay.

4    Q.   (BY MR. GOVETT)  How does Oxylabs relate to Teso?

5    A.   So Oxylabs is just a Tesonet product.

6    Q.   How does Metacluster relate to Teso?

7    A.   Metacluster is Oxylabs' legal entity's name.

8    Q.   Has Oxylabs grown in the last few years?

9    A.   Yes, it did.

10   Q.   Tell us what it's like to work at Oxylabs.

11   A.   You know, people say that to work to do -- at work we're

12   family, but we really mean it, because one of the first

13   employees, you know, team members that joined and still is, is

14   my wife.  She works at HR.

15        Eimantas' wife works in marketing.  All of my, you know,

16   best friends work at the company.  My classmates work at the

17   company.  Mr. Cerniauskas that you saw earlier who is the CEO

18   of Oxylabs, his sister works in the legal department of

19   Oxylabs, and she is -- actually she got married to the first

20   team member that joined, Jytautas.

21        So we are family.  And we -- you spend so much time at

22   work, you have to treat them as family.  So I'm not sure --

23   you know, we do a lot of things together, but at the company

24   we work only four days and a half.  Fridays we have off.

25        We have extra health insurance.  We have extra pension.

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