

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

----- :
GOTV STREAMING, LLC, :
 :
Plaintiff, :
 : Case No.
vs. : 2:22-CV-07556-RGK-SHK
 :
NETFLIX, INC., :
 :
Defendant. :
----- :

DEPOSITION OF BENJAMIN BEDERSON, PH.D.

DATE: Wednesday, January 10, 2024
TIME: 9:03 a.m.
LOCATION: Willkie Farr & Gallagher LLP
1875 K Street, N.W.
Washington, D.C. 20006

REPORTED BY: Erick M. Thacker
Reporter, Notary

Veritext Legal Solutions
1250 Eye Street, NW, Suite 901
Washington, D.C. 20005



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

A P P E A R A N C E S

On behalf of Plaintiff:

JOSHUA WYDE, ESQUIRE
Alavi Anaipakos, PLLC
609 Main Street
Suite 3200
Houston, Texas 77002
jwyde@atriallaw.com

On behalf of Defendant:

STEPHEN A. MARSHALL, ESQUIRE
Willkie Farr & Gallagher LLP
1875 K Street, Northwest
Washington, D.C. 20006
smarshall@willkie.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

C O N T E N T S

EXAMINATION BY:	PAGE
Counsel for Plaintiff	4

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

P R O C E E D I N G S

WHEREUPON,

BENJAMIN BEDERSON, PH.D.

called as a witness, and having been first duly sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFF

BY MR. WYDE

Q Good morning, Dr. Bederson. Have you been deposed before?

A Yes, I have.

Q How many times?

A I don't have an exact count, but somewhere around 50 times over the last 15 years.

Q So you're -- so a novice, then? That's a joke. I just ask because -- whether I should go through extensively what a deposition is or not. That's why I ask. So since you're obviously experienced in a deposition, I won't do that.

I would like to ask that you make an effort to let me complete my question before answering, and I will endeavor to do the same

1 when you're answering so that the court reporter,
2 Mr. Thacker, can accurately capture what we say.

3 Would you agree to this?

4 A Yes.

5 Q Okay. If you do not understand a
6 question, would you please let me know, and I
7 will do the best I can to clarify what it is that
8 I'm asking. Okay?

9 A I'll do my best.

10 Q If you need a break, please let me
11 know, and I will try to find a good stopping
12 point relatively quickly. Okay?

13 A Okay.

14 Q However, I'll note that the rules of
15 the testimony guidelines and the trial practice
16 guide say that we shouldn't take a break while a
17 question is pending, so if there's a question
18 pending, I just ask that you answer the question
19 before we go on break. Okay?

20 A Yes.

21 Q Do you understand that you are here
22 today to answer questions regarding your

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.