

EXHIBIT H

DR. NEIL G. SIEGEL - 11/14/2018

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

AGIS SOFTWARE DEVELOPMENT LLC,)	
)	Civil Action No.
Plaintiff,)	2:17-cv-513-JRG
)	(LEAD CASE)
vs.)	Civil Action No.
)	2:17-cv-516-JRG
APPLE, INC.,)	Pages 1 to 237
)	
Defendant.)	
)	

DEPOSITION OF DR. NEIL G. SIEGEL
TAKEN ON
WEDNESDAY, NOVEMBER 14, 2018

Reported by: PHILIP D. NORRIS
CSR NO. 4980

1 use the existing path to transmit the information
2 about changed paths. That's approximately how it
3 worked. But nobody had to be preprogrammed with a
4 set of IP addresses or anything like that.

5 Q. So from a software perspective, at least at
6 some point during this setup process, the devices
7 would discover each other's IP addresses at the
8 software level; correct?

9 MS. BI: Objection to form.

10 THE WITNESS: You would arrive at a state
11 where all the devices on the tactical Internet,
12 which is after all on IP net, where the software,
13 not the soldiers, the software knew IP address for
14 principal paths. That's a requirement of every IP
15 network on the planet.

16 BY MR. RUBINO:

17 Q. And so each FBCB2 device would become aware
18 at the software level of the IP address of the other
19 FBCB2 devices; correct?

20 MS. BI: Objection to form.

21 THE WITNESS: Of its server and its -- the
22 group identified in the unit task organization, but
23 not necessarily of all the individual FBCB2 devices.

24 BY MR. RUBINO:

25 Q. Each of the FBCB2 devices could become a

1 server; right?

2 | | | | MS. BI: Objection to form.

3 THE WITNESS: As you'll recall, I actually
4 said before that there was some technical
5 limitations and all the -- some significant fraction
6 of them could, but I believe I said that out of a
7 thousand FBCB2 devices in a prototypical brigade,
8 hundreds of them could become servers.

9 BY MR. RUBINO:

10 Q. At least with regard to the hundreds that
11 could become servers, those units could have access
12 in the software to the other unit's IP addresses;
13 correct?

14 MS. BI: Objection to form.

15 THE WITNESS: IP networking requires that
16 some knowledge of other recipients' IP addresses is
17 known. That's a requirement of any IP system.
18 There's nothing different in this system than any
19 other IP system in that particular regard.

20 BY MR. RUBINO:

21 Q. Well, with regard to other IP systems, you
22 could have a central static server and the devices
23 may only know the IP address of that server; right?
24 They don't need to know each other's IP addresses.

25 A. They don't need to know each other's