

EXHIBIT J

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 BY MR. RUBINO:

2 Q. And you used the word "dynamic" throughout
3 your report; right?

4 A. I did, correct.

5 Q. So the server could change frequently;
6 right?

7 A. Let me try and say it a little more
8 precisely. The FBCB2 units that are serving the
9 role of -- acting in the role of a server will
10 change over time.

11 Q. And so it's possible that an FBCB2 unit
12 could send out a message saying they want another
13 map like a picture behind a hill to a server; right?

14 A. (Witness nods head.)

15 Q. And then when they ultimately get the
16 picture, the picture doesn't necessarily have to
17 come through that same server; right?

18 MS. BI: Objection to form.

19 THE WITNESS: The system will accommodate
20 the battlefield dynamic. So if it's this
21 gentleman's unit that made the original request and
22 it's this lady's unit that is acting as the server
23 at the time of the request, it goes off, the picture
24 gets taken, but it might be because of the dynamics
25 of the battlefield that this lady unit is no longer

1 the server, it's this other lady's unit is acting as
2 the unit for this gentleman, but it would find its
3 way back.

4 BY MR. RUBINO:

5 Q. But it doesn't have to be the same server
6 that it actually passes through; right?

7 A. It doesn't have to be the same server.

8 Q. So with regard to this picture you've shown
9 after paragraph 103 in your report --

10 A. Uh-huh, I see it, at the top of page 50.

11 Q. -- do you have any way to know one way or
12 the other whether that request for the image and the
13 image itself being transmitted back passed through
14 that same server, passed through a single server?

15 MS. BI: Objection to form.

16 THE WITNESS: No, the FBCB2 user probably
17 would not have any way of knowing that.

18 BY MR. RUBINO:

19 Q. And do you know that? Do you have any
20 idea?

21 A. Me technically? Yes, I mean, there's
22 technical information that would -- that would be
23 available to an expert that would tell us the state
24 of the system at any time and at every time in the
25 past, and we would know which FBCB2 -- we would know

1 THE WITNESS: I would say it differently.
2 The purp -- the purpose of this capability we're
3 discussing was to allow for some reasonable
4 continuity of the server function in the crazy and
5 difficult environment of an actual combat
6 battlefield.

7 BY MR. RUBINO:

8 Q. Which would mean that you'd want multiple
9 devices to be able to act in the role of a server;
10 right?

11 A. That is -- that was the design decision we
12 came to. That is, having the opportunity of -- of
13 additional units being elected to replace a server
14 that had gone away for whatever reason. That was
15 the way that we elected to get continuity on the
16 battlefield. It was a design decision.

17 Q. And again, as part of that election and
18 discovery process, IP addresses are exchanged;
19 correct?

20 MS. BI: Objection to form.

21 THE WITNESS: The statement is way too
22 broad and misleading. The information about the --

23 MR. RUBINO: If it's misleading, then I'll
24 withdraw the question.

25 THE WITNESS: Okay.