

# EXHIBIT 7

**In the Matter of:**

*Uniloc USA, Inc., et al vs*

*Apple Inc.*

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*Kayla Christie*

*January 08, 2019*

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Uniloc USA, Inc., et al vs  
Apple Inc.

Attorneys Eyes Only

Kayla Christie  
January 08, 2019

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1 PROCEEDINGS

2 MR. ERCOLINI: Michael Ercolini for  
3 the plaintiff Uniloc.

4 MR. GUARAGNA: John Guaragna for  
5 Apple.

6 MR. BREVERMAN: Marc Breverman,  
7 in-house counsel for Apple.

8 THE WITNESS: Kayla Christie for  
9 Apple.

10 KAYLA CHRISTIE,  
11 called as a witness, having been duly sworn by a  
12 Notary Public, was examined and testified as  
13 follows:

14 EXAMINATION

15 BY MR. ERCOLINI:

16 Q. Morning. We'll get to that. My name is  
17 Mike Ercolini. I'm an attorney for Uniloc in these  
18 matters and I'm just here to ask you some questions  
19 about your -- about Apple's operations in and around  
20 Austin, Texas, and Texas generally.

21 First of all, can you state your full  
22 name for me.

23 A. Kayla Christie.

24 Q. Okay. Have you ever been deposed before,

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1 A. Yeah. I have -- I include that, sorry,  
2 in the Mac product line, with this team that I just  
3 mentioned.

4 Q. Okay. So the Mac Pro is manufactured in  
5 Texas?

6 A. We do have a vendor that does produce  
7 some manufacturing for our Mac.

8 Q. Okay. What's the name of that vendor?

9 A. Flextronics.

10 Q. Flextronics. And how long has  
11 Flextronics been manufacturing Mac Pros in Texas?

12 A. It would be a guess, but I would say less  
13 than four years.

14 MR. GUARAGNA: Counsel, just to  
15 clarify, I'm going to designate the transcript  
16 attorneys' eyes only, outside counsel.

17 MR. ERCOLINI: Sure.

18 BY MR. ERCOLINI:

19 Q. Do you know approximately how large the  
20 Flextronics facility is in terms of employees?

21 A. I do not know the answer to the  
22 Flextronics Apple Play account.

23 Q. Do you know approximately -- well, strike  
24 the question.

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1 A. It's part of what Apple would consider  
2 its Austin campuses.

3 Q. Its Austin campuses, which include how  
4 many locations?

5 A. Sorry. There are -- there's the Parmer  
6 Lane campus area, there's this one that is looked  
7 upon as a connection to the Parmer Lane campus and  
8 then there's Capital Ridge, which is 30 minutes  
9 away.

10 Q. Is it named -- informally within Apple,  
11 has a name been assigned to this campus yet?

12 A. No.

13 Q. It says in the third paragraph, "Jobs  
14 created at the new campus will include a broad range  
15 of functions including engineering, R&D, operations,  
16 finance, sales and customer support."

17 Do you see that?

18 A. Yes.

19 Q. Okay. Can you tell me of these broad --  
20 of this range of functions, which functions are  
21 currently performed at one or more locations --  
22 Apple locations within Austin already.

23 A. All of them.

24 Q. All of them?

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