

Ex. P

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

JOHN WARD, JR.,	*
	*
V.	* C.A. NO. 08-4022
	* JURY TRIAL DEMANDED
CISCO SYSTEMS, INC.	*

ORAL AND VIDEOTAPED DEPOSITION OF

NELL WARD

AUGUST 10, 2009

ORAL AND VIDEOTAPED DEPOSITION of NELL WARD, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and -numbered cause on the 10th day of August, 2009, from 9:00 a.m. to 9:33 a.m., before Stacy L. Jordan, CSR in and for the State of Texas, reported by machine shorthand, taken in the law offices of John Ward, Jr., 111 West Tyler Street, City of Longview, County of Gregg, State of Texas, pursuant to the Federal Rules of Civil Procedure.

1 A. It's a speedboat, a Cobalt.

2 Q. Okay. Do you -- do you and your husband own
3 any other real property besides the Huntington Circle
4 house and the boathouse -- or the lake house on Lake
5 Cherokee?

6 A. No.

7 Q. Okay. Does your family at this -- at this
8 time have any financial problems?

9 A. No.

10 Q. Okay. Has it had any financial problems since
11 2007?

12 A. No.

13 Q. As I understand it, you have an Internet
14 address at nellward@sbcglobal.net. Is that --

15 A. Uh-huh.

16 Q. -- correct?

17 A. Correct.

18 Q. Do you have any other Internet addresses other
19 than that?

20 A. I have nellward@mac.com.

21 Q. At either of these two Internet addresses,
22 have you ever received any communications regarding the
23 Patent Troll Tracker articles that are at issue in this
24 lawsuit?

25 A. No.

1 Q. To your knowledge, did your husband talk to
2 them about it?

3 A. No.

4 Q. To your knowledge, have they -- do they even
5 know about it?

6 A. No.

7 Q. You don't think they do?

8 A. No, I don't think they know about it.

9 Q. Okay. To your knowledge, has your husband
10 ever sought any sort of medical care as a result of
11 these articles?

12 A. No.

13 Q. Okay. At any point, did you think he needed
14 medical care?

15 A. No.

16 Q. Have we covered everything that you can recall
17 discussing with your husband on the evening of
18 October 18th about these two articles?

19 A. Yes.

20 Q. All right. When is the next time you talked
21 to him about it, about the articles?

22 MS. PEDEN: Objection. I just want to
23 make sure, other than any kind of communications you've
24 had with counsel.

25 Q. (BY MR. BABCOCK) Yeah --