

Exhibit G

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ERIC M. ALBRITTON,

Plaintiff,

-vs-

CASE NO. 6:08-CV-00089

CISCO SYSTEMS, INC.,
RICHARD FRENKEL,
MALLUN YEN and JOHN NOH,

Defendants.

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CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

DEPOSITION OF MARTA BECKWITH

Wednesday, November 19, 2008

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1 time before the outing in February of '08?

2 A. I was aware that others knew about it. I'm
3 not sure whether or not I communicated that to them.

4 Q. All right. Who were you aware of that knew
5 it?

6 A. I knew that Ms. Yen knew.

7 Q. Okay.

8 A. I knew that Mr. Noh knew.

9 Q. Okay.

10 A. At some stage I knew that other members of the
11 IP group knew, such as Michael Ritter. But I don't
12 recall with whether I knew that at the time.

13 Q. How did you know that these other people knew
14 who Mr. Frenkel -- or who the Troll Tracker was?

15 A. I certainly knew from Mr. Frenkel. I can't
16 remember when I had discussions with others that would
17 reflect their knowledge.

18 Q. All right. Forgetting the when, did you
19 discuss the fact that he was the Troll Tracker and the
20 Troll Tracker blog with these other people?

21 MS. PARKER: Objection. Form.

22 MR. McWILLIAMS: Same objection.

23 THE WITNESS: I had at least one conversation
24 with Ms. Yen about it, and I believe I had a
25 conversation with Mr. Noh, as well.

1 MR. PATTON: Q. What were those
2 conversations, as best you remember?

3 MS. PARKER: If they go into litigation
4 strategy, I will instruct you not to answer.

5 MR. PATTON: How could there have been
6 litigation strategy before he outed himself?

7 MS. PARKER: Would you read the question back,
8 please.

9 (Record read as follows:
10 Q. All right. Forgetting the when,
11 did you discuss the fact that he was
12 the Troll Tracker and the Troll
13 Tracker blog with these other
14 people?)

15 MS. PARKER: I think you can answer that,
16 unless you feel like it goes into some kind of
17 litigation strategy.

18 THE WITNESS: With Ms. Yen, I had at least one
19 discussion about what we were going to do when it became
20 public that Rick was the Troll Tracker blogger.

21 MR. PATTON: Q. What was the concern there?

22 A. That Mr. Frenkel had angered a lot of
23 plaintiffs' attorneys. For example, we all know that
24 Mr. Niro, who was another attorney, had offered \$15,000
25 to anyone who would identify who the Troll Tracker

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1 blogger was. And that, eventually, when it became
2 public, the anger would be turned toward Cisco.

3 Q. Were you aware that Mr. Frenkel received some
4 hostile e-mails?

5 MS. PARKER: Objection. Form.

6 MR. McWILLIAMS: Same objection.

7 MR. PATTON: Q. That Troll Tracker received
8 some hostile e-mails.

9 A. I was aware, from reading some of the entries
10 on the blog, that he had received some hostile e-mails.

11 Q. Okay. We asked him about those yesterday, and
12 I can't find them. Do you know where they might be?

13 MS. PARKER: Objection. Form.

14 MR. McWILLIAMS: Objection. Form.

15 THE WITNESS: I have no idea.

16 MR. PATTON: Q. Okay. What were you going to
17 do when -- your discussion with Ms. Yen, which was about
18 "What we are going to do when he becomes public." What
19 were you going to do?

20 A. I was informed that Mr. Frenkel and Mr. Noh
21 had a plan.

22 Q. Okay. Mr. Frenkel and a PR guy had a plan?

23 A. To deal with the resultant publicity about it.

24 Q. Do you know what the plan was?

25 A. No.