

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

THOMAS JOHN WARD, JR.

AUGUST 10, 2009

ORAL AND VIDEOTAPED DEPOSITION of THOMAS JOHN WARD, JR., 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 9:44 a.m. to 1:21 p.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 going to have a trial.

2 Q. Okay. Great.

3 Your -- you just sat through the
4 deposition of your wife, correct?

5 A. I did.

6 Q. And she said that -- that after these Troll
7 Tracker articles that are at issue in this case, she
8 believed that your sleepless -- sleep problem -- or
9 inability to sleep through the night increased from one
10 to two times a week to three to four times a week. Is
11 that true?

12 A. I had more sleepless nights, I believe, after
13 this --

14 Q. Okay.

15 A. -- these articles were published, yes.

16 Q. Okay. And do you relate your sleep problems
17 to the articles?

18 A. The increase in sleepless nights initially,
19 yes.

20 Q. Okay. And -- and is that because you'd be
21 lying in bed asleep and then you'd wake up thinking
22 about the Patent Troll Tracker?

23 A. During the four months that we were trying to
24 find out who the Patent Troll Tracker was, yes, because
25 I knew these articles were out there; I knew people were