

EXHIBIT 1-11

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,)
Plaintiff,)
vs.) No. CV 10-03561
GOOGLE, INC.,)
Defendant.)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped Deposition of Jeet Kaul, taken at
755 Page Mill Road, Palo Alto, California,
commencing at 9:28 a.m., Friday, August 5, 2011,
before Ashley Soevyn, CSR 12019.

1 **Q. -- the Sun IP?**
 2 A. You know, I do not know of direct facts of
 3 whether that stuff was communicated to Google or
 4 not.
 5 **Q. Regardless of what was communicated to**
 6 **Google, are you aware of any facts that demonstrate**
 7 **that Google knew it was infringing Sun's Java IP? 11:58:29**
 8 A. You know, my fundamental perception is that
 9 Google was an active participant of JCP. Many of
 10 Google employees were ex-Sun employees. All of them
 11 knew how we did licensing, what the core of it was,
 12 how we built the platform, what files were involved.
 13 And so I jumped to conclusion that they knew that 11:58:55
 14 this is happening, that this is the core business,
 15 so that's how I kind of jump to the conclusion, you
 16 know. I knew many of these former Sun employees,
 17 so --
 18 **Q. Do you know whether any of the former Sun**
 19 **employees that you're referring to, who went to**
 20 **Google, worked on the Android project?**
 21 A. At least one.
 22 **Q. Who is that?**
 23 A. It's Eric Chu.
 24 **Q. Do you know what Mr. Chu did on the Android**
 25 **project, once he went to Google?**

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1 rest of the day. And if anything comes to mind, let
 2 me know, but we can -- we can move on.
 3 A. Yeah.
 4 **Q. We don't have to just --**
 5 A. Right.
 6 **Q. -- have you, you know, sit on the record 12:00:59**
 7 **thinking.**
 8 **Prior to Oracle acquiring Sun, do you know**
 9 **whether anyone from Sun ever told anyone at Google**
 10 **that Sun believed Google was infringing Sun's**
 11 **intellectual property with Android?**
 12 MS. RUTHERFORD: Objection to form.
 13 THE WITNESS: So I categorically do not 12:01:36
 14 know that, but I was aware that -- I was made aware
 15 that there was some conversation like that that had
 16 happened.
 17 BY MR. PURCELL:
 18 **Q. When you were made aware of some**
 19 **conversation like that that had happened, what**
 20 **conversation were you made aware of?**
 21 A. I don't know this for a fact. So I just 12:02:01
 22 want to make sure you know that. I -- I don't
 23 remember who mentioned it to me, but I was told that
 24 there are people who had some conversation raised to
 25 people at Google.

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1 A. I was told that he was responsible for the 11:59:30
 2 open handset lines, formation of.
 3 **Q. Do you know whether Mr. Chu did any work in**
 4 **developing the Android platform after he went to**
 5 **Google?**
 6 A. I don't know. And that's not my
 7 perception, but I don't know. 11:59:59
 8 **Q. Have you told me every fact that you're**
 9 **aware of that contributed to your belief that Google**
 10 **knew it was infringing Sun's Java IP?**
 11 MS. RUTHERFORD: What he means is facts
 12 that you didn't learn from counsel.
 13 THE WITNESS: Oh.
 14 MR. PURCELL: No, if he learned a fact from
 15 counsel, he can testify to that. He can't testify
 16 to what counsel told him.
 17 THE WITNESS: So, you know, there are 12:00:30
 18 things that I'm kind of not right now jump in my
 19 mind. Maybe, you know, if over time today they come
 20 to mind, I can share, but right now --
 21 BY MR. PURCELL:
 22 **Q. Right now, nothing comes to mind?**
 23 A. No, no. I can spend some time thinking, if
 24 you would like me to, but --
 25 **Q. Well, it's fine to think throughout the**

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1 **Q. Do you recall roughly what timeframe this**
 2 **conversation between Sun and Google took place?**
 3 A. I don't remember right now, I'm sorry.
 4 **Q. And you don't know who the participants 12:02:30**
 5 **were for Sun or for Google in this conversation?**
 6 A. Absolutely, I, unfortunately, do not
 7 know.
 8 **Q. During this conversation -- strike that.**
 9 **Is this one conversation that you were**
 10 **informed about the only conversation you're aware of**
 11 **that took place between Sun and Google, prior to the**
 12 **Oracle acquisition, regarding whether Android was**
 13 **infringing Sun intellectual property? 12:02:58**
 14 A. This was the only conversation that I'm
 15 aware of, you know, other than, you know, the one
 16 meeting that I had personally, yes.
 17 **Q. Well, let's hold off on the one meeting.**
 18 **We'll get back to that.**
 19 **During this conversation that you were**
 20 **informed of, do you know whether anyone from Sun**
 21 **identified any specific patents to Google that they**
 22 **claim were being infringed by Android? 12:03:23**
 23 A. Okay. It's, again, kind of hard. No, I
 24 don't know if they list it, but, you know, my
 25 perception was that they probably, you know, talked

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