

# EXHIBIT F

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA,  
a California Public Corporation,  
Plaintiff,

vs.

Case No. C04 00634 PJH

MONSANTO COMPANY,  
a Delaware corporation,  
Defendant,

ORIGINAL

DEPOSITION OF VISHWANATH LINGAPPA

TUESDAY, JULY 26, 2005

PAGES 1 to 199

REPORTED BY: LOUISE MARIE SOUSOURES, CSR NO. 3575



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A P P E A R A N C E S ( C O N T I N U E D )

THE VIDEOGRAPHER:

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DEPOSITION OF VISHWANATH LINGAPPA - JULY 26, 2005

1 for and got. 11:14:25  
2 So -- 11:14:27  
3 Q. You were -- 11:14:27  
4 A. I was here ostensibly for my medical 11:14:28  
5 training initially. 11:14:32  
6 Q. What year was that? 11:14:33  
7 A. So that would be in 1980, I guess June of 11:14:34  
8 1980 that I would have started as an intern in the 11:14:38  
9 department of medicine at UCSF. 11:14:43  
10 Q. Did you know John Baxter prior to 1980, June 11:14:45  
11 1980? 11:14:50  
12 A. So I had met him at a research conference 11:14:50  
13 in -- I think in '79 and, in fact, he was the person 11:14:56  
14 who said to me, after hearing about my research, 11:15:04  
15 would you be -- he had heard that I was a medical 11:15:10  
16 student, he said would you be interested in coming to 11:15:13  
17 UCSF, you know, for your residency. 11:15:16  
18 Q. What was the medical conference about? 11:15:20  
19 A. This was the Laurentian Hormone Conference 11:15:21  
20 at which my thesis mentor, Gunter Blobel, had been 11:15:25  
21 invited to give a talk and had sent me in his place. 11:15:32  
22 Q. So it was a conference on hormones? 11:15:38  
23 A. Yeah. I mean hormones broadly, I mean my 11:15:41  
24 talk was on the signal hypothesis and protein 11:15:44  
25 biogenesis, but -- which is obviously of relevance to 11:15:48

1 a broad conference on hormones. 11:15:53

2 Q. And your specific hormone was work dealing 11:15:55

3 with bovine growth hormone? 11:16:00

4 A. Well, I -- the talk that I'm sure I 11:16:02

5 presented although -- again, that was in '79 so I 11:16:05

6 don't remember the specifics of the talk, but the 11:16:09

7 talks that I gave at the time were broader talks. 11:16:11

8 I surely mentioned the growth hormone and 11:16:16

9 prolactin work, but most likely only in passing as 11:16:19

10 see, pituitary hormones also follow the signal 11:16:25

11 hypothesis. 11:16:28

12 Q. And when you mentioned prolactin and growth 11:16:29

13 hormone, you're talking about bovine growth hormone? 11:16:33

14 A. Yes. 11:16:36

15 Q. And bovine prolactin? 11:16:37

16 A. Yes, as examples of hormones that follow the 11:16:38

17 signal hypothesis. 11:16:41

18 Q. Okay. So as early as 1980, you were at 11:16:43

19 U.C.? 11:16:50

20 A. As a medical resident. 11:16:53

21 Q. Okay. 11:16:56

22 (Exhibit No. 655 was marked.) 11:17:17

23 BY MR. GARTEISER: 11:17:17

24 Q. I'm handing you what has been marked as 11:17:19

25 Exhibit 655. It has production numbers UCM 93608 and 11:17:20

DEPOSITION OF VISHWANATH LINGAPPA - JULY 26, 2005

1 talks that year on behalf of Gunter Blobel who didn't 12:09:17  
2 like to go to these talks, was quite happy to send 12:09:23  
3 me, I was quite happy to go. 12:09:27  
4 Q. And at that time -- at those talks, would 12:09:30  
5 you discuss the paper that you co-authored with 12:09:33  
6 Gunter, among other things? 12:09:37  
7 A. Sure. I would present my work on the signal 12:09:39  
8 hypothesis which would start with the prolactin and 12:09:42  
9 growth hormone work and then would -- but -- but then 12:09:46  
10 would focus on the more current stuff. 12:09:49  
11 Q. Do you recall Walter Miller or Joseph 12:09:52  
12 Martial or John Baxter attending any of your talks? 12:09:56  
13 A. The only one they would have attended that 12:09:59  
14 I'm aware of would have been John Baxter attending 12:10:01  
15 that Laurentian Hormone Conference in '79, I think in 12:10:05  
16 '79. 12:10:10  
17 I don't think -- I'm not aware of either of 12:10:12  
18 them having come to any of my talks, you know. 12:10:15  
19 Q. And that talk in 1979 with Baxter, you 12:10:20  
20 discussed the paper that you co-authored in 1977 with 12:10:24  
21 Gunter? 12:10:29  
22 A. You mean that particular paper, I -- it is 12:10:30  
23 likely -- again, I don't remember the specific, you 12:10:35  
24 know, slides that I would have used. It is likely 12:10:38  
25 that I, in 30 seconds, made reference to it. It's 12:10:41

1 highly unlikely I wouldn't have, but it is certainly 12:10:45  
2 not what most of the talk was on, just because that 12:10:48  
3 was old news, you know, from my point of view at the 12:10:52  
4 time. It wasn't the exciting work I was doing, it 12:10:56  
5 was more to lay the foundation of what the signal 12:10:59  
6 hypothesis -- sort of much as we spoke earlier, what 12:11:02  
7 is the signal hypothesis, how does it work. 12:11:05  
8 I would illustrate that point with the 12:11:08  
9 proteins I worked on rather than the proteins that 12:11:10  
10 somebody else in the lab would work on. 12:11:12  
11 Q. Do you have any copies of the slides that 12:11:15  
12 you gave for that presentation? 12:11:17  
13 A. Unfortunately I don't have any of that. 12:11:21  
14 Again, that was almost 30 years ago. I don't have 12:11:25  
15 any of that. 12:11:27  
16 Q. Have you produced any documents in 12:11:30  
17 relationship to the lawsuit between the university -- 12:11:33  
18 I'm sorry, the Regents of the University of 12:11:37  
19 California versus Monsanto? 12:11:38  
20 A. Have I produced any documents? 12:11:40  
21 Q. Have you been asked to produce any 12:11:42  
22 documents? 12:11:44  
23 A. No, no one has -- I mean I -- I've not 12:11:44  
24 produced any documents or -- produce documents, you 12:11:49  
25 mean -- 12:11:53

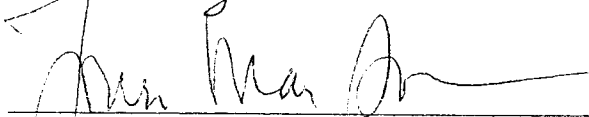


1 I, LOUISE MARIE SOUSOURES, duly authorized to  
2 administer oaths pursuant to Section 2093(b) of the  
3 California Code of Civil Procedure, do hereby  
4 certify: That the witness in the foregoing deposition  
5 was by me duly sworn to testify the truth in the  
6 within-entitled cause; that said deposition was taken  
7 at the time and place therein cited; that the  
8 testimony of the said witness was reported by me and  
9 was hereafter transcribed under my direction into  
10 typewriting; that the foregoing is a complete and  
11 accurate record of said testimony; and that the  
12 witness was given an opportunity to read and correct  
13 said deposition and to subscribe the same.

14 Should the signature of the witness not be  
15 affixed to the deposition, the witness shall not have  
16 availed himself of herself of the opportunity to sign  
17 or the signature has been waived.

18 I further certify that I am not of counsel,  
19 nor attorney for any of the parties in the foregoing  
20 deposition and caption named, nor in any way  
21 interested in the outcome of the cause named in said  
22 caption.

23 DATED: August 4, 2005

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25 \_\_\_\_\_  
LOUISE MARIE SOUSOURES, CSR NO. 3575