

10/21/2008 HAGAN. ROSE

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

STELOR PRODUCTIONS, LLC,)	Case No.:	05-80387 CIV
)		
Plaintiff,)		
)		
v.)		
)		
GOOGLE INC., a Delaware)		
corporation,)		
)		
Defendants.)		
_____)		

C O N F I D E N T I A L
VIDEOTAPED DEPOSITION OF ROSE ANNE HAGAN
SAN FRANCISCO, CALIFORNIA
OCTOBER 21, 2008

REPORTED BY: MICHAEL CUNDY, CSR 12271

EXHIBIT 1

1 A I met with counsel yesterday.

2 Q How long did you spend meeting with counsel?

3 A About five hours.

4 Q Who was at that meeting other than Mr. Al-Salam, I
5 assume?

6 A Mr. Al-Salam and Mr. Barea were there.

7 Q Had you met with -- with counsel prior to
8 yesterday to prepare for your deposition?

9 A No.

10 Q Did you speak directly to Ms. Ramaswany or
11 exchange e-mails?

12 A I chatted with her via instant messaging.

13 Q Okay. And what was the subject of the chat?
14 Describe what was said or written.

15 A I was checking with her as to when she was
16 responsible for the Google store and also whether, while
17 she was responsible, she sold -- she knows if we sold books
18 at the Google store.

19 Q And what did she say?

20 A That she was responsible from about June '06 to
21 June '07, and she did not recall ever selling books.

22 Q Were you able to confirm whether books were ever
23 sold through the Google store?

24 A During that time frame or ever?

25 Q Ever?

1 A Yes. Books have been sold at the Google store.

2 Q During what time frame?

3 A We have sold notebooks on and off from probably
4 2001 to the present day. We also in 2002 sold a book
5 called G is for Googol, G-o-o-g-o-l, and at some time -- I
6 can't remember the exact date -- we sold a Dummies book,
7 one of those Something for Dummies, and I can't remember
8 what it was -- what the topic of it was.

9 Q Any other books?

10 A Not to my knowledge.

11 Q Was the Google logo or mark on any of those books?

12 A It was on the notebooks.

13 Q The notebooks, okay. Any other content of your
14 discussion or messaging with Mr. Ramaswamy?

15 A Miss.

16 Q Miss, sorry.

17 A She would not be happy. No, that was it. It was
18 a very short chat.

19 Q Okay. And then what about the e-mail
20 correspondence with Mr. Brin and Mr. Page, what was the
21 subject of that?

22 A I checked with them regarding their memory, if
23 any, of the Google's trademark application that was
24 evidenced in the Thompson & Thompson search that Wilson
25 Sonsini conducted in September of 1998 and also the

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1 STATE OF CALIFORNIA)
) SS:
2 CITY AND COUNTY OF SAN FRANCISCO)
3

4 I, Michael Cundy, CSR NO. 12271, a
5 Certified Shorthand Reporter of the State of California, do
6 hereby certify:

7 That the foregoing proceedings were taken
8 before me at the time and place herein set forth; that any
9 witnesses in the foregoing proceedings, prior to
10 testifying, were placed under oath; that a verbatim record
11 of the proceedings was made by me using machine shorthand
12 which was thereafter transcribed under my direction;
13 further, that the foregoing is an accurate transcription
14 thereof.

15 I further certify that I am neither
16 financially interested in the action nor a relative or
17 employee of any attorney or any of the parties.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20
21 Dated: _____

22
23 _____
Michael Cundy, CSR NO. 12271

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