

EXHIBIT C

THE COURT: Hold on.

(Discussion had off the record.)

THE COURT: Okay. Let's give it a try, thank you.

BY MS. CRISWELL:

Q. Okay one more time I was asking what is your position at integrated label?

A. My position is I'm a consultant to my wife.

Q. Mr. McKillip, what is an integrated card?

A. An integrated card is a card that is made out of a substrate, which laminates are put on the back and die cut on the front, or an integrated card is a substrate with a perforation around it, or an integrated card can have a laminate on the back with different configurations with what they're referred to as universal coupon stock, zero could you upon stock, or clean release.

Q. So are you saying there's various types of interrogated cards?

A. Yes, there's many types.

Q. And did you invent a process for making integrated cards?

A. Yes, I did.

Q. How did you obtain the technical knowledge about fabricating integrated cards to do that?

A. Just experience being around printing presses for many, many years.

Q. How many years have you been around printing presses?

A. I don't recall, ma'am.

Q. I'm showing you what's been marked Defendant's Exhibit 2.

Do you recognize this integrated card?

A. Yes, ma'am, I do.

Q. Did Specialty Tape make this integrated card for Integrated Label Corp.?

A. Yes, ma'am.

Q. Is this integrated card made pursuant to the '488 patent process (c-o-r-p-period)?

A. Yes, ma'am, it is.

MR. SCHROER: May the record reflect that the witness disassembled the exhibit in order to answer the question.

THE COURT: Yes, it may, or it will.

BY MS. CRISWELL:

Q. So tell me about how this card came about.

A. A customer called me and said they wanted to do an integrated card and also wanted to take and have two integrated labels as well, and if this could possibly be done. Okay. I thought about it, figured out how to do it, went to Specialty Tape and Label, asked them, told them how I thought it could be done, and this -- this is the end results of that thought process.

Q. And do you know when this integrated card was made by --

A. No, ma'am, I don't.

Q. -- Specialty Tape?

A. Yes.

Q. Why didn't you of the earlier ones?

A. Didn't have them.

Q. Okay. Because it's been such a long time?

A. I would think so, or else I didn't receive them.

Q. When you received these magazines and the buyers' guides, did you look at the exhibit or product directories?

A. No.

Q. Why not?

A. Just didn't look at them.

Q. Was there a reason?

A. I -- I -- I don't read very well.

Q. Did you -- is the reason because you just weren't interested in them?

A. They're a struggle for me to read, just ...

Q. Okay. I'm referring to your exhibit -- I mean, your deposition, page 128, starting at line 20.

Question: Have you ever reviewed the exhibit or product director or index in those publications.

Answer: I might have looked at it, but I mean -- I -- I don't -- I think I don't wait by the mailbox for this magazine to get there, if it does, and it's just not my type of reading. I don't read the sports page, you know. I just -- it's not -- it's not interesting to me. I'm sorry.

Are you saying that you're unable to read well?

Q. What about 2004?

A. I don't know.

Q. When you attended these industry trade shows, you chose not to look at other companies' booths and displays, correct?

A. Correct.

Q. Okay. And why was this?

A. Because they're manufacturers. They're the same -- same as me. You know, I -- I don't buy any of their products, okay, I just basically would walk around and, you know, if I saw somebody I knew, a distributor, I would say hi, how are you doing, that's ...

Q. When you walked around, what did you look at?

A. Just the people.

Q. Did you look at the other booths?

A. No, not really. I walked by them, I would glance at them, but they -- they had nothing I would buy. I didn't buy business forms.

Q. When you attended these trade shows, did these other companies sell integrated labels?

A. I don't know.

Q. Because you didn't look at them?

A. I didn't -- I didn't see anything that jumped out at me, you know.

Q. Do you know whether they sold integrated cards?

A. No, I don't. Depends on who you're talking -- who you're