

Exhibit A

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TIMELINES, INC.,)
)
Plaintiff,)
)
vs.) No. 11-CV-06867
)
FACEBOOK, INC.,)
) Judge John W. Darrah
Defendant.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY

VIDEOTAPED DEPOSITION OF BRIAN HAND
Chicago, Illinois
Thursday, September 20, 2012

Reported by:
PAULA CAMPBELL, CSR, RDR, CRR, CCP
JOB NO. 53018

1 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY - B. HAND
2 any knowledge of that as we sit here, or his
3 knowledge would be work product.

4 Aside from the report we are going to
5 give --

6 A. I don't know.

7 MR. ALBRITTON: -- I'm free to let Mr. Hand
8 testify to what he knows personally.

9 A. I don't know.

10 Q. So is it correct to say you are relying on
11 an expert witness to come up with a purported
12 damages --

13 A. Yes.

14 Q. -- figure?

15 And broadly speaking, has the company done
16 anything to mitigate its damages resulting from
17 Facebook's use of the term timeline?

18 MR. ALBRITTON: Object to the extent it
19 calls for a legal conclusion, but to any --
20 whatever you know about personally.

21 A. I don't have anything to add that we
22 haven't discussed already today.

23 MR. WILLSEY: Okay. Let's go off the
24 record for just a second.

25 VIDEOGRAPHER: It is 5:06 P.M. We are off