

# **EXHIBIT J**

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14 large as Sprint it's got to be a much larger device  
15 than what we were working with at the time so we got  
16 money and we went into doing the production.

17 Q. Okay. Let's talk about the Prototype again do you  
18 have an understanding as to how much money it cost to  
19 build that thing?

20 A. Somewhere around between four and 5 million I think  
21 was in the -- you know,.

22 Q. In the ballpark?

23 A. In the ballpark.

24 Q. Fair enough let's talk about the larger platform did  
25 that ultimately have a name?

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1 A. It pended up being call the the JCS2000.

2 Q. I want to talk your work on the interworking unit on  
3 the JCS2000 platform, okay?

4 A. Okay.

5 Q. what type of cell what type of packets did that  
6 device work on?

7 A. That one was working on ATM.

8 Q. Could that device be used on other types of packets?

9 A. It could have been reprogrammed to do that.

10 Q. what's your basis for that statement?

11 A. well, I was the one that was writing the  
12 specifications and we didn't want any forklift  
13 upgrades let me explain that maybe. In the network  
14 you put in a component, and if you have to go back  
15 and take that whole thing out of the network that's a  
16 forklift you gotta take the box out and replace it  
17 with a completely different box well our goal was to  
18 have a box that could be reprogrammed to do other  
19 protocols so we wouldn't have to do that it's very

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20 expensive if you end up doing that so the goal of  
21 this project one of the goals of this project was  
22 that interworking unit was capable of being  
23 upobligated to some other protocol because in the  
24 real world nothing ever stays the same it's a  
25 constant evolution of things.

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1 Q. Now, what protocols could that have been converted  
2 to?

3 A. Obviously it could have gone to IP and it could have  
4 gone to frame relay if we wanted to or to X25 if we  
5 wanted to, and there could have been another protocol  
6 come along the way the device was built was so that  
7 we could easily adapt it to it mainly by being able  
8 to reprogram the packettization card the one that  
9 actually took the calls that were coming in from the  
10 plain old telephone side and went out on the packet  
11 side and we also knew that we were going to have to  
12 change an interface card but that was minor you  
13 change an interface card on the broadband side,  
14 change whatever broadband, you know, protocol that  
15 we're using.

16 Q. If I wanted to change that card physically how would  
17 I go about to do it?

18 A. Well it would be -- it's an awful lot of detail  
19 basically you have a maintenance window and you  
20 wanted to change that what happens is we had to come  
21 up with a system to be able to take parts of the  
22 system out of use while it's actually running calls  
23 for you and doing calls across it you take that out  
24 you change that piece when you bring it back up now  
25 it's doing the new load the new protocol that you

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1 would have put in it so we would have done it little  
2 pieces TA time across that until we had a complete  
3 unit that was back up and running again.

4 Q. And that's something you envisioned at the time?

5 A. Yes.

6 A. He was the goal of the project to make sure that that  
7 indeed was going to happen when we rolled it out we  
8 couldn't have put it out on the network if we  
9 couldn't do that.

10 Q. Mr. Duree when did you leave Sprint?

11 A. I left in June of 99 I retired in June of '99.

12 Q. By the time you left was JCS2000 up and running?

13 A. Yes, we had a production model of it in the labs at  
14 the time I left and it was doing what the specks said  
15 it should do and that was, you know, doing the Legacy  
16 I keep using that word maybe, the plain telephone  
17 service to a packet telephone service voice calls we  
18 had a very robust testing between here and Kansas  
19 City and Burlingame that we were, you know, we were  
20 confident that we were getting to the point where it  
21 was -- what you would call production grade machine  
22 had the quality of service that you needed to be able  
23 to use it so that -- the goal was you're not  
24 supposed -- you as users you're not supposed to know  
25 that we have done all this we had to be able to do

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1 that or Sprint wouldn't let us put it into the  
2 network and when I left --

3 THE COURT: Pardon me Mr. Duree I think you  
4 have fully answered the question.

5 THE WITNESS: Okay I'm sorry. Engineer.

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6 THE COURT: No problem.

7 Q. (By Mr. Webb) One last question Mr. Duree when you  
8 left had JCS2000 been terminated?

9 A. No.

10 Q. Okay. That's my final question?

11 THE COURT: Very well. We will take our  
12 often recess before we commence cross examination.  
13 Members of the jury, I'll remind you of the  
14 admonitions we will take a 15-minute break Ms.  
15 Scheurer, please take charge of the jury Mr. Duree  
16 you may step down counsel, remain here for just a  
17 minute and we will talk about scheduling.

18 (The following proceedings were had outside  
19 the presence of the jury:)

20 THE COURT: As I understand what you  
21 indicated Mr. Webb is that when we're completed with  
22 the examination of Mr. Duree you're going to do  
23 videotaped depositions.

24 MR. WEBB: Yes, your Honor.

25 THE COURT: Which deposition are you going  
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1 to to?

2 MR. WEBB: This is the same old problem we  
3 had last time we were in front of you. We have not  
4 been able to reach a stipulation on what their system  
5 looks like despite the fact they have represented at  
6 least eight times there's no dispute how it works so  
7 we are left to play engineers video depositions  
8 cumulative total of about four hours we can get hour  
9 and a half to two hours done today it's not going to  
10 be any fun I frankly think it's pointless but we have  
11 no choice we have to do it that's what our plan is.