

EXHIBIT F

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1 A. Yes, it did. They had a demonstration out in
2 Burlingame I did not attend with upper management to
3 show the Prototype how it separated call and will
4 bear and produced calls -- or switch calls going
5 through that network. As I said, upper management
6 was there they approved of the Prototype and approved
7 of the funding to go ahead and -- for development of
8 a production system.

9 Q. Okay. Do you recall when Mr. Christie passed away?

10 A. Yes, I do.

11 Q. How did that impact the project?

12 A. It was a real blow to the project. We had not header
13 from Joe for a few days even though he traveled quite
14 a bit during the year going to either Kansas City,
15 Chicago, Dallas, talking to venders things such as
16 that he was the main dine mow for the product itself,
17 or the Prototype and then the BBIN capability. Well
18 during this time we had tried to call Joe a few
19 times, and couldn't get holding of him thinking he
20 was on a trip some place we didn't think too much
21 about it until two or three days later we kept trying
22 to get in touch with him he wouldn't call in or we
23 couldn't get him at the office so at that time we
24 started getting worried and we called one of the
25 coworkers out there he found Joe dead in his home.

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1 Q. Okay. Mr. Wiley my question was how did his passing
2 affect the project itself?

3 A. I'm sorry.

4 Q.

5 Q. That's okay it's perfectly fine how did his passing

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12 for the larger platform the commercialization part?

13 A. Yes.

14 Q. And JCS2000 was --

15 A. The name of the platform the commercial platform to
16 be built.

17 Q. Thank you when did you leave Sprint I left Sprint in
18 October of 1998.

19 Q. was the JCS2000 platform still being developed when
20 you left?

21 A. Yes, it was.

22 Q. It had not been completed?

23 A. It had not been completedYet.

24 Q. Did you ever return back to Sprint?

25 A. Yes, I did after trying it make a nor opportunity in
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1 the internet boom of the late nineties I came back to
2 Sprint in 2002 and worked at Sprint local division
3 building -- or helping to engineer a project that
4 they were working on called C to P.

5 Q. Tell the jury what the C to P project was?

6 A. C to P project was a platform developed by Nortel,
7 which used to be Northern Telecom, that provided TDM
8 to ATM conversion with access of TDM going out to the
9 PSTN and to subscribers and a backbone network of ATM
10 capabilities, usually AAL1.

11 Q. And is that circuit-to-packet technology being used?

12 A. Yes, it is at the present time we have over a million
13 lines using the circuit to packet with thousands of
14 interconnecting PSTN trunks.

15 THE COURT: Mr. Webb, I don't mean to
16 interrupt but I think I detect from the jury some --
17 I think they are wondering what some of those

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2 that question would be yes, no, or I can't answer the
3 question please don't go ahead and then give the sort
4 of substantive part of the answer because that
5 deprives the other side of the opportunity to object
6 if they think you shouldn't be asked to tell the rest
7 of the story.

8 THE WITNESS: Oh, okay.

9 Q. (By Mr. Webb) So that's the Ken we have here just as
10 a matter of procedure?

11 THE COURT: So let's ask the question one
12 more time.

13 THE WITNESS: Let's try this again.

14 MR. WEBB: It's okay you haven't seen all
15 the fun we have been having already.

16 THE COURT: This is where we get back at
17 you for using all those acronyms.

18 THE COURT: Go ahead.

19 Q. (By Mr. Webb) Do you have an understanding as to
20 whether or not this idea was limited only to ATM?

21 A. Yes.

22 Q. Was it limited only to ATM?

23 A. No.

24 Q. What's your basis for that?

25 A. I guess now I --

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1 THE COURT: You can go ahead, please.

2 MR. MCPHAIL: I renew the hearsay
3 objection.

4 THE COURT: Why don't you lay a little more
5 foundation than just the about their statement,
6 please.

7 Q. (By Mr. Webb) I understand Mr. Duree you worked on
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8 this project for some time?

9 A. Yes, I did.

10 Q. And you worked specifically with the AVM?

11 A. Yes, I did.

12 Q. What again did the AVM do?

13 A. The AVM was the interworking unit.

14 Q. And what precisely -- what was the function of the
15 interworking unit?

16 A. To take the TDM call traffic that was coming in on --

17 Q. One second the jury doesn't know what TDM means you
18 mean the regular phone calls?

19 A. The regular phone calls that were coming in on one
20 side and put them out on packet phone calls on the
21 other.

22 Q. And the AVM you put it into what type of packet?

23 A. We put it into ATM packets.

24 Q. Based on your work on that component and your
25 understanding of this larger system was it limited
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1 only for use on ATM?

2 THE COURT: Let me ask you to clarify what
3 you mean by it.

4 Q. (By Mr. Webb) The device the device you worked on?

5 A. The device that I worked on was specifically on that
6 was on ATM it wasn't limited to that but it was --
7 that's the box that we were building.

8 Q. Sure. And let's move forward the Prototype is now
9 done what happened next?

10 A. After the Prototype was several, then Sprint gave our
11 development group more money because we needed to go
12 out and build a production model the Prototype was a
13 small unit when you put something into a network as

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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