

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND,
INC., a Michigan
corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756

Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS,
INC., a Delaware
corporation; BASIC FUSION,
INC., a Delaware
corporation; CONNEXUS CORP.,
a Delaware corporation; and
FIRSTLOOK, INC., a Delaware
corporation,

Defendants.

ORIGINAL

The Confidential Deposition of JEFFREY MASTERS, Ph.D.,
Taken at 126 South Main Street,
Ann Arbor, Michigan,
Commencing at 9:42 a.m.,
Tuesday, August 3, 2010,
Before Kathy Adkins, CSR-4697, RMR, RPR, B.A.

1 Q. Are you aware of any non-functioning entities other
2 than the '60s radical group?

3 A. No.

4 Q. When did you first hear of the Weather Underground
5 group of Hong Kong?

6 A. I believe it was in 1992 when a fellow named Clarence
7 Fong E-mailed me and asked if he could have a copy of
8 my UN-weather software, and I supplied it to him for
9 free, and at that point he wrote back and said I'm
10 going to name this -- I'm going to run the software
11 and call it the Weather Underground of Hong Kong.

12 So when he informed me that he was calling
13 it the Weather Underground of Hong Kong, that's when I
14 first became aware of the usage of Weather
15 Underground.

16 Q. Okay. What was your response to Mr. Fong?

17 A. I was flattered.

18 Q. They're still in operation today as best as you know?

19 A. Yes. I should qualify that. I'm not sure they're
20 still running my old code from 1991. I would be
21 surprised.

22 Q. Are you familiar with any other entity that uses the
23 phrase wunder with a U in it as part of their name?

24 A. No.

25 Q. In your position at Weather Underground, do you have

1 any people that report directly to you?

2 A. Yes.

3 Q. Who are those?

4 A. I have our two customer support people, Christine
5 S-T-O-W-E, and L-O-R-I, K-I-L-B-U-R-G. They are both
6 part-time employees.

7 Q. Are they both here in Ann Arbor?

8 A. They live in Highland.

9 Q. Michigan?

10 A. Yes.

11 Q. Starting with Ms. Stowe, what is her job title if you
12 know?

13 A. She is director of customer support.

14 Q. And what does that mean? What does she do?

15 A. She handles E-mail requests for help from the general
16 public and coordinates the responses.

17 Q. Anything else that she does?

18 A. She is responsible for constructing help files of
19 frequently asked questions.

20 Q. And that's available through the website?

21 A. Yes.

22 Q. Does she do anything else?

23 A. No.

24 Q. Ms. Kilburg, what is her job title if you know it?

25 A. I don't know it but she does customer support. I

1 think customer support representative would be good
2 enough.

3 Q. Does she report up to Ms. Stowe?

4 A. Yes.

5 Q. And does she do the same types of things as Ms. Stowe?

6 A. Yes.

7 Q. Other than Ms. Stowe and Ms. Kilburg, does anybody
8 else report to you?

9 A. No.

10 Q. As the director of meteorology, what does your job
11 entail at Weather Underground?

12 A. My primary duties are to serve as the media face of
13 the company and to generate weather content for the
14 website.

15 Q. When you say weather content, can you be a little more
16 specific?

17 A. I write a daily blog and I also generate articles
18 talking about, for instance, severe weather, air
19 pollution, historical weather events.

20 Q. How many meteorologists do you have on staff at
21 Weather Underground?

22 A. Let's see, at least six. I'm not sure of the exact
23 number.

24 Q. Does that include yourself?

25 A. Yes.

1 Q. And other than yourself, the other meteorologists are
2 in San Francisco?

3 A. Yes.

4 Q. Prior to this lawsuit that we're in now, had you ever
5 heard of a company called Navigation Catalyst Systems?

6 A. No.

7 Q. Prior to the lawsuit had you ever heard of a company
8 called Connexus Corporation?

9 A. No.

10 Q. Prior to the lawsuit had you ever heard of a company
11 called FirstLook?

12 A. No.

13 Q. Prior to the lawsuit had you ever heard of a company
14 called Basic Fusion?

15 A. No.

16 Q. Prior to the lawsuit had you ever heard of a company
17 called Traffic Marketplace?

18 A. Yes.

19 Q. And how is it that you had heard of Traffic
20 Marketplace prior to the lawsuit?

21 A. Yeah. It was mentioned in a board of directors
22 meeting, I believe, but I don't know what they do and
23 I'm not sure if that is correct or not.

24 Q. What do you mean you're not sure if that is correct or
25 not?

1 Q. Prior to that conversation with Mr. Schwerzler, when
2 was the I guess the second most recent conversation
3 you had with one of your business partners about the
4 lawsuit outside of a board of directors meeting?

5 A. Jeff Ferguson and I share an office, so I would say on
6 average once a month we discuss the latest information
7 from Enrico.

8 Q. Where's that office?

9 A. It's 300 North Fifth Avenue, number 240, Ann Arbor.

10 Q. Are you the only two employees for Weather Underground
11 in that office?

12 A. No, we have an accountant part time that also works
13 there.

14 Q. What is that person's name?

15 A. Kelly L-U-C-K. And once a month our two customer
16 support people come in the office and work.

17 Q. Otherwise they work remotely?

18 A. Yes.

19 Q. Have you ever had any communications with any person
20 who works at one of the companies that was named as a
21 defendant in the lawsuit?

22 A. No.

23 Q. To the best of your knowledge were any of the domain
24 names that are the subject of the lawsuit ever offered
25 to Weather Underground for sale?

1 BY MR. DELGADO:

2 Q. Do you still keep in touch with Perry Sampson?

3 A. Yes.

4 Q. He's still a shareholder in Weather Underground,
5 correct?

6 A. Yes.

7 Q. Is he still with the University of Michigan?

8 A. Yes.

9 Q. Does he play any role with the company at all?

10 A. He attends the annual shareholders' meeting, either
11 remotely or in person, every year.

12 Q. Where does that take place?

13 A. San Francisco.

14 Q. Other than attending the shareholder meeting, does he
15 do any kind of work for the company?

16 A. No. He did some work for us I believe four or five
17 years ago, but has not done any since.

18 Q. Do you recall what it is that he did four or five
19 years ago for the company?

20 A. He wrote our interactive tornado software.

21 Q. Does Michael McDonald still do any work for the
22 company?

23 A. No.

24 Q. What about Dave Brooks?

25 A. No.

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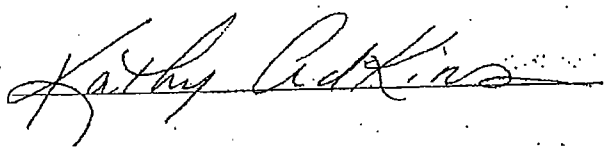
CERTIFICATE OF NOTARY

STATE OF MICHIGAN)

) SS

COUNTY OF OAKLAND)

I, KATHRYN E. ADKINS, certify that this deposition was taken before me on the date hereinbefore set forth; that the foregoing questions and answers were recorded by me stenographically and reduced to computer transcription; that this is a true, full and correct transcript of my stenographic notes so taken; and that I am not related to, nor of counsel to, either party nor interested in the event of this cause.



KATHRYN E. ADKINS, CSR-4697

Notary Public,

Oakland County, Michigan

My Commission expires: April 10, 2013

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THE WEATHER UNDERGROUND, INC.,

Plaintiff,

vs.

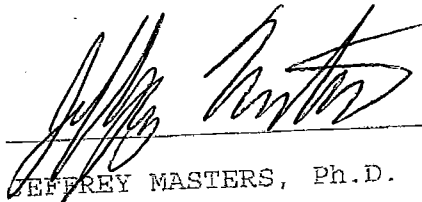
Case No. 2:09-CV-10756

NAVIGATION CATALYST SYSTEMS, INC., et al.,

Defendants.

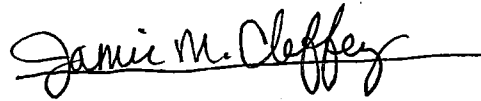
VERIFICATION OF DEPONENT

I, having read the foregoing deposition consisting of my testimony at the aforementioned time and place, do hereby attest to the correctness and truthfulness of the transcript.

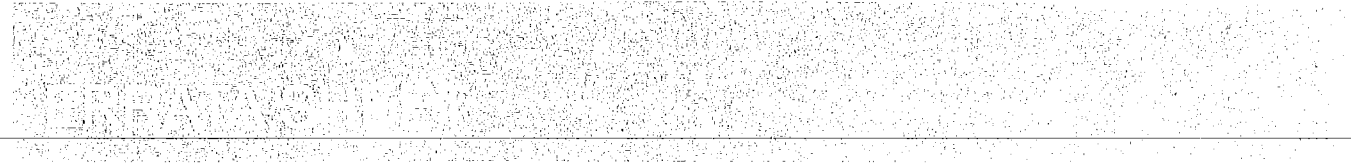

JEFFREY MASTERS, Ph.D.

Dated: 8/30/10

Subscribed to before me on 8/30/2010.



JAMIE M. CLAFFEY
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Mar. 23, 2015
Acting in the County of Washtenaw



Westlaw Deposition Services

Deposition of: Jeffrey Masters PhD

I wish to make the following changes for the following reasons:

Page	Line	Change	Reason
9	17	"Sterenburg" should be "Sterenberg"	All Misspelled
16	9	"Sampson" should be "Samson"	
16	16	" " " "	
16	24	" " " "	
18	3	"Sterenburg" should be "Sterenberg"	
18	13	"Sampson" misspelled	
20	9	"UN" should be "UM"	
41	2	"Sampson" misspelled	

Witness Signature/Date

Notary Stamp and Signature
(As may be required in certain jurisdictions)