

# EXHIBIT B

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4

5 CAPITOL RECORDS, LLC, )  
 )  
6 Plaintiff, ) 12 Civ. 0095 (RJS)  
 )  
7 vs. )  
 )  
8 REDIGI INC., )  
 )  
9 Defendant. )  
-----)

10  
11  
12 \* CONFIDENTIAL - ATTORNEYS' EYES ONLY \*

13  
14 \* CONTAINS OUTSIDE COUNSEL ONLY PORTIONS \*  
15

16  
17 DEPOSITION OF JOHN MARK OSSENMACHER  
18 New York, New York  
19 Tuesday, June 19, 2012  
20

21  
22  
23 Reported by: KRISTIN KOCH, RPR, RMR, CRR, CLR

24  
25 JOB NO. 50450

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CAPITOL RECORDS, LLC,  
Plaintiff,  
vs. 12 Civ 0095 (RJS)  
REDIGI INC.,  
Defendant.

-----X  
\*\* CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*

DEPOSITION OF JOHN MARK OSSENMACHER  
New York, New York  
July 11, 2013

Reported by:  
Bonnie Pruszynski, RMR  
JOB NO. 63341

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CAPITOL RECORDS, LLC

Plaintiff,

v. No. 12 Civ. 0095 (RJS)

REDIGI INC.,

Defendant.

-----X

RULE 30(b)(6)  
DEPOSITION OF LAWRENCE S. RUDOLPH ROGEL  
New York, New York  
Monday, June 18, 2012

Reported by:  
ANNETTE ARLEQUIN, CCR, RPR  
JOB NO. 50449

1 L. Rudolph

2 I don't know what level you want me  
3 to answer that question.

4 Q. That's sufficient. We may return to  
5 it.

6 A. I can talk about it for hours,  
7 years.

8 Q. How long were you at VMware?  
9 Is it V-N --

10 A. V-M, virtual machine. VMware.

11 Q. Okay.

12 A. Two-and-a-half years.

13 Q. Okay. What was your next step?

14 A. After that I went and I formed  
15 ReDigi. I left VMware and John and I started a  
16 company.

17 Q. Okay. And that would be ReDigi, the  
18 defendant in this lawsuit?

19 A. ReDigi was formed a bit later. Two  
20 years ago?

21 Q. Okay.

22 A. Something like that.

23 Q. So when you say you met John and you  
24 formed a company, did you form a company before  
25 ReDigi?

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CAPITOL RECORDS, LLC,  
Plaintiff,  
vs. 12 Civ 0095 (RJS)  
REDIGI INC.,  
Defendant.

-----X  
\*\* CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*

DEPOSITION OF LARRY RUDOLPH  
New York, New York  
July 12, 2013

Reported by:  
Bonnie Pruszynski, RMR  
JOB NO. 63342

1 L. Rudolph

2

3

4

5

6 Q Did you participate in that  
7 decision to continue with the service after  
8 the RAA letter?

9 MR. ADELMAN: Objection to form.

10 You can answer.

11 A Yes.

12 Q Who else made that decision? Was  
13 it just you?

14 MR. ADELMAN: Objection.

15 A No.

16 Q Who else participated in it?

17 A John.

18 Q So, it was you and John?

19 A Yes.

20 Q Okay. And then after Capitol  
21 Records brought this lawsuit, ReDigi,  
22 notwithstanding the claims in the lawsuit,  
23 made a determination to continue with the  
24 service; correct?

25 MR. ADELMAN: Objection to form.

1 L. Rudolph

2 A Yes.

3 Q And was it, again, you and Mr.

4 Ossenmacher who made that decision?

5 A Yes.

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25