

EXHIBIT R

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION
BRIGHT RESPONSE, LLC,
Plaintiff,
vs.
GOOGLE INC., et al.,
Defendants.
No. 2:07-cv-371-CE
VIDEOTAPED DEPOSITION OF JAMES CHARLES WILLIAMS
Taken on behalf of the Plaintiff Bright
Response, LLC, at Ralph Rosenberg Court Reporters,
Inc., 75-170 Hualalai Road, Number D, Suite 212,
Kailua-Kona, Hawaii, commencing at 9:34 a.m., on
Thursday, July 15, 2010, pursuant to Notice.
BEFORE: SHARON H. COSKEY, CSR NO. 359
Certified Shorthand Reporter

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09:34
KAILUA-KONA, HAWAII
THURSDAY, JULY 15, 2010
9:34 A.M.
THE VIDEOGRAPHER: This is the
deposition of Chuck Williams in the matter of Bright
Response versus Google.
We are located at Ralph Rosenberg Court
Reporters, 75-170 Hualalai Road, Number D, Suite 212,
Kailua-Kona, Hawaii.
My name is Derek Bryant, certified legal
video specialist. Will counsel please state your
names.
MR. THOMPSON: Stanley Thompson for
the plaintiff Bright Response, LLC.
MR. SMITH: Brian Smith from Howrey,
representing Yahoo!.
MR. KENNEDY: Todd Kennedy from Quinn
Emanuel, representing Google.
THE VIDEOGRAPHER: Today is July 15,
2010. We are now on the record. It is 9:34 a.m.
Will the court reporter please swear in the deponent.
THE REPORTER: Sir, raise your right
hand for me, please. Do you swear the testimony
you're about to offer will be the truth, the whole
truth, and nothing but the truth?

10:31-10:32 Page 42

1 Q. Do you have an under-- do you have an
2 understanding of during the development process
3 whether or not there's a point at which EZ Reader was
4 being tested? First of all, just I'll end the
5 question there.
6 Do you have an understanding that there was
7 a point at which it was just being tested and not
8 being utilized for actual responses to customers?
9 **A. Yes, I do recall that.**
10 Q. And is it your understanding that there was
11 a time when it was, during its testing period, that
12 it was utilized to create answers to customer emails
13 but not actually send them back to the customer that
14 sent them?
15 **A. I don't specifically recall that, but it**
16 **was our normal practice. So I certainly expect that**
17 **that is true.**
18 Q. And can you elaborate on that a bit? Is
19 it -- you're saying it was Brightware's normal
20 practice to, to test the system by -- I guess is
21 it -- would you consider it being as close to a
22 real-world case as possible without actually taking
23 the last step of providing the final output to the
24 original --
25 **A. Yes, that is correct. And that, that dates**

10:33-10:34 Page 43

1 **back to Inference in 1985. It was whenever we build**
2 **AI applications, we would generally run them in a way**
3 **where people could just see what they were doing**
4 **before the companies trusted them to act autonomously**
5 **and actually make decisions or communicate with**
6 **customers as, as a part of the testing. That was our**
7 **standard methodology to do that.**
8 Q. And do you have a recollection about when
9 EZ Reader was deployed to act autonomously, excuse
10 me, autonomously and interact with customers of
11 Chase?
12 **A. I have reason to believe it was near the**
13 **end of March of 1996.**
14 Q. And do you recall the basis for that, that
15 recollection?
16 **A. It was various emails that were sent to me**
17 **by people on the project.**
18 **MR. THOMPSON:** Mark this as two,
19 please.
20 (Deposition [Exhibit 2](#) marked.)
21 **BY MR. THOMPSON:**
22 Q. Mr. Williams, I will represent to you that
23 this was a document that was produced from the
24 electronic documents you gathered in response to the
25 subpoena. I want to first ask you whether or not you

10:34-10:36 Page 44

1 recognize this, this document?
2 **MR. SMITH:** Mr. Thompson, is it your
3 representation this is from Mr. Williams' documents?
4 **MR. THOMPSON:** That was my --
5 **MR. SMITH:** -- got --
6 **MR. THOMPSON:** Wait. It's got a Rice,
7 sorry, it's got a Rice Bates number on it. Just a
8 second, please.
9 **MR. SMITH:** Has this document even
10 been produced in the litigation?
11 **MR. THOMPSON:** It's my understanding
12 that it has.
13 **MR. SMITH:** Okay.
14 **BY MR. THOMPSON:**
15 Q. Let me ask you this, Mr. Williams. Are you
16 -- do you have an understanding of who Michael Mazza
17 is?
18 **A. Not specifically, no.**
19 Q. Do you recognize the name Rosanna Piccolo?
20 **A. I do, yes.**
21 Q. What is your understanding of who she is?
22 **A. She was one of the people associated with**
23 **this project at Chase. I think -- I can't remember**
24 **if she was under Anthony Angotti or if she was**
25 **representing a different Chase organization. But I**

10:36-10:38 Page 45

1 **associate her name with Anthony Angotti's name.**
2 Q. Do you recognize Thomas Keely?
3 **A. I do not.**
4 Q. How about the person that it appears that
5 this email is from, rice@brightware.com or Amy Rice?
6 **A. Yes, I do.**
7 Q. I believe you mentioned her name earlier?
8 **A. I did.**
9 Q. I'd like to refer you to the first sentence
10 of this document after the salutation "Rosanna, Tom
11 and Mike."
12 It states, "As your strategic
13 knowledge-based technology partners, Brightware is
14 pleased that EZ Reader is now approved for production
15 installation at Chase."
16 Let me ask you if around this time frame,
17 March 29, 1996, you recall having any communications
18 with anyone at Brightware regarding the, the product
19 production installation of EZ Reader?
20 **A. Yes, I do.**
21 Q. Is it your understanding that the approval
22 for the production installation occurred around that
23 time, excuse me, occurred around March 29, 2000 --
24 1996?
25 **A. That is my understanding, yes.**

10:38-10:39 Page 46

1 Q. What is it -- what is your understanding,
2 if you have one, of what "production installation"
3 means?
4 **A. My understanding is around that time at the**
5 **end of March, as I stated previously, they actually**
6 **turned it on to process live Chase emails.**
7 Q. Do you recall a specific communication from
8 anyone at Brightware that, that informed you that it
9 had gone live; that Bright -- that EZ Reader was
10 being used to respond to outside customers?
11 **A. I do not require (sic) a specific**
12 **communication after it had gone live. I do recall a**
13 **specific communication informing me that it was going**
14 **to go live within a day or two.**
15 Q. And do you recall when that communication
16 was?
17 **A. Right around the same time frame as the**
18 **message you handed me. It was right around the end**
19 **of March. I do not recall the specific date.**
20 Q. Do you believe it was before March 29,
21 1996?
22 **A. Possibly. My recollection is that it was**
23 **going to go live on a weekend. So if you could tell**
24 **me the day of the week that March 29, 1996 was, I**
25 **could probably refresh my recollection.**

10:39-10:40 Page 47

1 Q. I, I haven't looked it up to verify, but
2 the, this [Exhibit 1](#) appears to indicate that
3 March 29, 1996 was a Friday.
4 **A. So my understanding is it probably then**
5 **went to production on March 30th, 1996.**
6 Q. That's based on your recollection of a
7 communication that it was going live around that time
8 frame?
9 **A. Correct.**
10 Q. And also based on your recollection that it
11 was going to go live on a weekend?
12 **A. Correct.**
13 Q. Do you recall any, receiving any
14 confirmation that it had gone live?
15 **A. I do not.**
16 Q. Do you know whether or not it had gone live
17 the following weekend after March 30 instead, as
18 opposed to the first Saturday in April?
19 **A. I'm sorry, I don't think your question**
20 **was -- I don't understand the "opposed to."**
21 Q. Sure. Do you have any -- do you have -- if
22 I understand correctly, you have a belief that it
23 was, that the release of EZ Reader or the activation
24 of it to respond to live customers occurred on a
25 weekend around March 29.

10:41-10:42 Page 48

1 But what I'm trying to understand is
2 whether you have a specific memory of whether it was
3 on March 30 or March 31 of 1996 or whether it was the
4 following weekend or the weekend after that?
5 **MR. KENNEDY:** Objection to form.
6 **A. I have a specific recollection, refreshed**
7 **by reviewing recent emails from the time, that I was**
8 **informed on either the 28th or 29th, maybe the**
9 **27th, 28th or 29th, probably one of those three**
10 **days towards the end of that week, taking your**
11 **representation that the 29th was a Friday.**
12 **I was, I was informed on the, one of those**
13 **days that it would go live on that coming weekend.**
14 **Not a later weekend, but that weekend.**
15 **BY MR. THOMPSON:**
16 Q. But you don't recall receiving any
17 confirmation that that actually happened as was
18 predicted?
19 **A. I don't recall receiving a confirmation**
20 **that it precisely happened on that day. I also do**
21 **not recall receiving anything that it didn't. And I**
22 **know that both I did and others in Brightware did,**
23 **referred to it after that date as a deployed**
24 **application.**
25 **THE REPORTER:** As a what application?

10:42-10:44 Page 49

1 **THE WITNESS:** A deployed application.
2 **BY MR. THOMPSON:**
3 Q. Do you recall the first time after
4 March 29, 1996, that you referred to EZ Reader as a
5 deployed application?
6 **A. Not specifically, no.**
7 Q. Is it your recollection that as of the
8 point you received the communication that you
9 referred to in which it was communicated to you that
10 EZ Reader was about to go live within a couple of
11 days, the next weekend following that communication
12 -- sorry.
13 I think you indicated that you believed
14 that a communication was on March, around March 27 or
15 March 28, 1996?
16 **A. Correct.**
17 Q. So it is also your understanding that the,
18 that EZ Reader did not go live prior to that
19 communication?
20 **A. Based on that communication, that is**
21 **correct. I should, I should qualify that a little**
22 **bit, depending on I, you know, exactly what you mean**
23 **by "go live."**
24 Q. Let's refer -- by "going live" we're
25 referring to deploying the application to interact

<p>13:34-13:36 Page 98</p> <p>1 ART-IM include a case-based reasoning engine? 2 A. I don't believe the case-based reasoning 3 engine was added until 1989, as I recall. 4 Q. Was the case-based reasoning module that 5 was added to ART-IM in 1989 the same case-based 6 reasoning engine that was later used in 7 ART*Enterprise? 8 A. The same in the, in the sense I used that 9 term earlier. It was the continuous line of code. 10 There was ongoing development to it, but, yes, it was 11 the same code line. 12 And I guess I should say by "line of code" 13 there I mean line of code development, not a single 14 line of -- 15 Q. Yeah, I was -- 16 A. -- source code, just to be, just to be 17 clear. 18 Q. Right. And -- 19 A. In other words, we developed a code base 20 for ART-IM that was a CBR kernel and then we 21 continued making various enhancements to that over 22 time, but it was that same code base that went into 23 ART*Enterprise and to CBR Express. 24 Q. And at that point development had, the 25 development language had switched over to a</p>	<p>13:38-13:39 Page 100</p> <p>1 A. -- for this, for this purpose. So for this 2 purpose then, yes, it's my understanding that the 3 primary difference between CBR Express and Casepoint, 4 one of the primary differences, excuse me, there were 5 several, one of the primary differences was that CBR 6 Express contained an authoring environment for 7 creating cases, whereas Casepoint was simply a 8 platform for using case bases after they were created 9 and, and retrieving those cases. 10 Q. And Casepoint could not actually create 11 cases? 12 A. Casepoint did not have an authoring 13 environment in it to create cases. It did, I 14 believe, have some facilities to create rules, but it 15 did not have the case-based authoring environment. 16 Q. What were the other differences that you, 17 you noted or you mentioned? 18 A. One of the big differences at the time was 19 that the user interface for CBR Express was written 20 using a third-party, high-level tool. 21 It was originally written in response to 22 some customer requests and it was written pretty 23 quickly, and the developers of the CBR technology 24 didn't like that tool, and so when they -- one of the 25 reasons they created Casepoint as a separate product</p>
<p>13:36-13:38 Page 99</p> <p>1 C-environment as opposed to a Lisp environment, 2 correct? 3 A. Correct. 4 Q. Did CBR Express include a functionality to 5 allow for the searching of cases? 6 A. Yes, it did. 7 Q. Is it your understanding that the 8 difference between Casepoint and CBR Express is that 9 Casepoint could solely search for cases? 10 MR. KENNEDY: Objection to form. 11 A. Let me answer the question, but I also want 12 to, want to backtrack a little bit, because I'm not 13 quite sure how you're using the term "search" here. 14 Case -- CBR Express and Casepoint contained 15 technology to do what I described earlier, was in a 16 CBR technology engine, where it would present 17 features and use a partial matching process to find 18 the best matching cases and, and present them. 19 And, and I'm not sure I would call that 20 search, so that's the -- but, so. 21 BY MR. THOMPSON: 22 Q. What's another shorthand we can use to 23 refer to that? 24 A. Just say retrieving cases -- 25 Q. Okay.</p>	<p>13:39-13:41 Page 101</p> <p>1 was because they wrote in native C-based user 2 interface, and that enabled it to be much smaller and 3 faster. And if you look at some of our literature at 4 the time talking about Casepoint, you'll see a lot of 5 references to it being a small, fast, lightweight 6 case-retrieval engine. 7 And CBR Express was a much heftier and, on 8 the hardware of the day, more sluggish kind of 9 product. So there was significant performance and 10 size differences between the two. 11 Q. Would you describe Casepoint as a runtime 12 version of CBR Express? 13 A. I think that's a fair general 14 characterization. 15 Q. Besides the fact that Casepoint could not, 16 did not have an authoring capability to create new 17 cases and that it was, also had the, developed with a 18 language that allowed it to be, I guess allowed it to 19 run faster on the technology at the time, are there 20 any other differences between CBR Express and 21 Casepoint that you recall? 22 A. I believe there were over time, and there 23 were for the reasons I stated earlier, that the 24 development team strongly preferred the Casepoint 25 product over the CBR Express product.</p>

14:06-14:07 Page 118

1 then ask you questions to confirm, to try to confirm
2 a single final answer for you.
3 The customer -- a lot of times the question
4 that the customer asked already had the answers to
5 many of those questions in it, and so Casepoint had a
6 rule engine that would allow it to recognize certain,
7 certain elements of the natural language text and
8 automatically answer questions for you.
9 So you wouldn't say something like, you
10 know, my, my, my printer is putting out pages that
11 are covered with white streaks and then have it come
12 back and ask you are there white streaks on your
13 page? Right? So it's trying to avoid that kind of
14 thing; automatically answer questions for you. So
15 that -- even Casepoint had a rule engine for that
16 specific purpose.
17 There were other applications of
18 ART*Enterprise where both rules and cases were used.
19 I, I believe examples of those were a couple that I
20 cited earlier, Canon SAMS and the Nippon Steel custom
21 steel process planning application. It was an
22 application Nippon Steel used to respond to customer
23 requests for specialized steel products and, and, you
24 know, come up with a way in which they could deliver
25 those products.

14:08-14:10 Page 119

1 And then, of course, there were, there was
2 the other, the Brightware products I referred to
3 earlier, like Brightware Answer Agent, Brightware
4 Advice Agent, and Brightware Context Center. Those
5 all used both cases and rules. Those are all
6 deployed applications.
7 Q. In the context of a case retrieval process,
8 is, is normalization a necessary component in case
9 retrieval?
10 MR. SMITH: Object to form.
11 A. I guess there's a question about what
12 specifically you mean by "normalization."
13 The -- certainly some form of normalization
14 was a common process in case retrieval applications.
15 Whether or not it is strictly necessary, I guess I
16 would say probably not.
17 BY MR. THOMPSON:
18 Q. I think I forgot to ask when you were
19 discussing the ART*Enterprise applications that, that
20 utilized both a rule-based and a case-based knowledge
21 engine, whether you recalled when the applications
22 you mentioned were deployed?
23 A. Well, there were ART-IM applications.
24 Q. I'm sorry, ART-IM.
25 A. Well, ART-IM and ART*Enterprise. I mean,

14:10-14:11 Page 120

1 it's kind of -- at one point in time we stopped
2 calling it ART-IM and started calling it
3 ART*Enterprise. It was all one line, code-based
4 development line. So, you know, it gets a little
5 fuzzy.
6 Like if you ask me exactly when did we
7 announce ART*Enterprise as the successor product to
8 ART-IM, I couldn't probably tell you the exact day,
9 although I might be able to get close.
10 But I know applications that date all the
11 way back to -- when would it have been? Well,
12 certainly the original AT&T application, I believe it
13 was AT&T where we built the first call center
14 application for, that utilized case-based reasoning
15 technology. That was when we built case-based
16 reasoning for the first time. That was kind of the
17 predecessor of CBR Express and Casepoint. It was an
18 ART-IM application, if I, as I recall, and it used
19 case-based reasoning technology and I believe it also
20 used rule-based reasoning technology.
21 And then there were ART*Enterprise, ART-IM
22 and ART*Enterprise applications, you know, all
23 throughout the early '90s.
24 There were lots -- there were many
25 applications of those products, and the case-based

14:11-14:14 Page 121

1 reasoning and rule-based reasoning kernels were
2 available to all of those applications.
3 Exactly which ones used which features, I
4 can't tell you specifically, but I believe there were
5 numerous applications of ART-IM and ART*Enterprise
6 that used both the case-based reasoning and the
7 rule-based engines.
8 I do hope we're not going through each and
9 every one of those documents.
10 Q. Not page by page.
11 A. Oh, thanks.
12 MR. THOMPSON: This is number five, I
13 believe.
14 (Deposition [Exhibit 5](#) marked.)
15 BY MR. THOMPSON:
16 Q. Mr. Williams, you've been handed what has
17 been marked as [Exhibit 5](#). Do you have an
18 understanding of what [Exhibit 5](#) is?
19 A. I do.
20 Q. And what is your understanding?
21 A. Well, as it says on the cover page, it's
22 the User's Guide to CBR Express 2.0 for Windows, and
23 I suspect -- I'm not sure if that's, if there's not
24 more behind it, but it's at least that.
25 I've not had a chance to look through all

14:14-14:15 Page 122

1 the pages here. It looks like it's dominantly the
 2 User's Guide for CBR, excuse me, CBR Express Version
 3 2.0 for Windows.
 4 Q. Is it also your understanding that this was
 5 an Inference product, as indicated on the --
 6 A. Yes, it is.
 7 Q. -- first page? Now, you refer to it being
 8 a, the User Guide for CBR Express Version 2.0. What
 9 was the basis for that, for that understanding?
 10 A. Well, it says right on here. You see this
 11 looks like, you know, a copied, an optically-copied
 12 version of the physical manual.
 13 The title page says CBR Express 2.0 for
 14 Windows. The notices, rights, notices and such on
 15 the inside talk about CBR 2, which was our general
 16 name for that, for the family of products that would
 17 have included CBR Express 2.0 and Casepoint, and
 18 Casepoint 2.0.
 19 It, it, it, you know, everything I'm
 20 looking at, I'm just skimming pages quickly,
 21 everything I'm looking at is, is consistent with,
 22 with it being what it says it is.
 23 Q. And I believe you're referring to the
 24 reference to CBR Express 2.0 on the second page of
 25 the document which bears the production number

14:16-14:18 Page 124

1 the new version of the product.
 2 Q. Are there any other differences that you
 3 can recall?
 4 A. I, I would need more time and more
 5 prompting, I think, but those are the salient ones
 6 that come to my mind right now.
 7 Q. Were there any differences -- I believe you
 8 said there was a difference relating to matching
 9 features? Were you referring to retrieval?
 10 A. A difference related to matching features?
 11 Can you read back what I said?
 12 Q. Actually, if it's not too far back, maybe
 13 our reporter can read back what you said.
 14 A. And what, the difference between what and
 15 what?
 16 Q. Between CBR 2 and CBR 1, because I asked
 17 you whether --
 18 A. Oh, oh, yes. I, I -- okay. Now I recall
 19 what I said and, and I recall what I meant.
 20 I believe there were differences in the
 21 kinds of case-based matching features you could use,
 22 the kinds of questions and such that you could use
 23 that would have come from normal enhancements.
 24 We work, we work in -- this was a major
 25 product line for the company. We were continuing to

14:15-14:16 Page 123

1 YAH0021146 --
 2 A. Correct.
 3 Q. -- is that correct?
 4 Mr. Williams, was there a previous version
 5 of CBR Express before 2.0?
 6 A. I believe there was, yes.
 7 Q. And were you familiar with that previous
 8 version?
 9 A. Yes.
 10 Q. Do you have any understanding about whether
 11 there were differences between -- can we call it CBR
 12 Version 1 and CBR 2.0?
 13 A. I'm sure there were differences. I mean,
 14 we were continuing to develop the product.
 15 I think, but it's not a specific
 16 recollection, I think CBR 2 family, when we came out
 17 with CBR Express 2.0, was probably the same time we
 18 came out with Casepoint. That's probably -- probably
 19 the addition of Casepoint was one of the major
 20 reasons it went from 1.0 to 2.0.
 21 And along with that would have come some
 22 new authoring features and various new case matching
 23 features from feedback we had received from customers
 24 and based on applications to that, up to that point,
 25 where we would have included normal enhancements in

14:18-14:33 Page 125

1 develop and improve it through new versions.
 2 So each version would have had enhancements
 3 throughout most of the functions, and a major release
 4 change like CBR 1 to CBR 2 probably would have had a
 5 major new function like, for example, the
 6 introduction of Casepoint.
 7 Q. And other than what you've already
 8 testified to, do you recall the details of any other
 9 differences between CBR 2 and CBR 1?
 10 A. Not at the level of these specific details
 11 that we're talking about now. I would have to refer
 12 to the materials to, to, to get those details.
 13 MR. THOMPSON: Okay. Would you like
 14 to take a break?
 15 THE WITNESS: Love to. Love to stand
 16 up. Thank you.
 17 THE VIDEOGRAPHER: Off the record.
 18 It's 2:19.
 19 (Break in proceedings from 2:19 p.m. to 2:33 p.m.)
 20 THE VIDEOGRAPHER: Back on the record.
 21 It is 2:33 p.m.
 22 BY MR. THOMPSON:
 23 Q. Mr. Williams, do you recall ever hearing of
 24 an article entitled "Compaq Quick Source Providing
 25 the Consumer with the Power of AI"?

14:34-14:35 Page 126

1 A. I, I believe I know what that title is
2 referring to. I, I couldn't tell you that was the
3 exact title, but I believe I know the application and
4 that there were articles written about it.
5 Q. What's your understanding of the
6 application that it related to?
7 A. An application that Inference did for
8 Compaq specifically related to, as I recall, I think
9 their, their -- which products was it? Oh, God, it's
10 coming back to me.
11 It was a, it was a, I think, a CBR Express
12 application, I could be wrong, but I believe it was a
13 CBR Express application and it pertained to
14 automating certain customer service inquiries for
15 Compaq.
16 I guess what I do recall, at one point in
17 time we had discussions with them about shipping a
18 version on board new Compaq computers, and I believe
19 for a while they did, but that may have been before
20 or after the article.
21 Q. And you referred to it as a CBR Express
22 application, so do you know whether it contained a
23 case-based reasoning engine?
24 A. I, I believe it did. It certainly did if
25 it was a CBR Express application. There's a

14:35-14:36 Page 127

1 possibility it was an ART-IM or ART*Enterprise
2 application, but I think it was CBR Express.
3 Q. But either way --
4 A. And it was, it was a case-based
5 application, yes.
6 Q. And, either way, it would be the same
7 case-based reasoning application, because I believe
8 you've testified that they were, they had them in
9 common?
10 A. It would be the same CBR kernel technology,
11 yes.
12 Q. Earlier I believe you referred to an
13 article in the San Francisco Chronicle that you
14 wrote?
15 A. Correct.
16 Q. Do you recall if you located it during your
17 search for documents in response to the subpoena in
18 this matter?
19 A. I believe we -- I believe I located a,
20 drafts of the article. I don't think there was any
21 published form of the article.
22 In other words, I, I believe I located
23 computer files that contained the article and
24 probably did not contain information about where it
25 was published.

14:36-14:37 Page 128

1 Q. Do you know if that's one of the documents
2 that you produced or turned over to counsel?
3 A. I believe so. I know it's a document I've
4 reviewed in connection with this matter, and I
5 believe it is a document I produced and turned over
6 to counsel.
7 Q. Similarly with regard to the Chief
8 Executive's magazine article that you referred to
9 earlier, was that a document that you located in
10 connection with reviewing documents in response to
11 the subpoena to you in this matter?
12 A. It was the same document, and I, I recall,
13 I don't believe it was on the document, I recall that
14 it was published in those two locations.
15 Q. So what you located was a draft of what
16 became the, an article published in both the San
17 Francisco Chronicle and Chief Executive's magazine?
18 A. Correct. I located a computer file
19 containing the text of the article. Whether or not
20 it was the final published form in either, in either
21 publication, I can't say for certain, but I believe
22 it was either the final published form or close to
23 the final published form.
24 Q. And do you recall what it was, what was
25 written in the computer file that you found that

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1 leads you to believe, to believe that the EZ Reader
2 application was deployed in, well, before March 31,
3 1996?
4 MR. SMITH: Object to form.
5 A. I don't believe that's quite what I said.
6 I said I, I, it was an article that I wrote after
7 March 31, 1996, that referred to it as a deployed
8 application. So that would tell me that it was
9 deployed prior to the article.
10 I don't remember the specific date of the
11 article, although I'm guessing it was maybe -- I'm
12 not certain. I think it was April or May of '96, but
13 I'm not certain.
14 And I don't believe the article
15 specifically referenced the deployment date of EZ
16 Reader. But if I saw the article, that would help my
17 recollection.
18 MR. THOMPSON: This is six.
19 (Deposition [Exhibit 6](#) marked.)
20 BY MR. THOMPSON:
21 Q. Mr. Williams, you've been handed what's
22 been marked as Exhibits 6?
23 A. Yes.
24 Q. And do you recognize this document?
25 A. I do.