

EXHIBIT B

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BRIGHT RESPONSE, LLC)
F/K/A POLARIS IP, LLC,)
Plaintiff,)
vs.) No. 2:07-CV-371-TJW-CE
GOOGLE, INC., et al.,)
Defendants.)
_____)

DEPOSITION OF PHIL KLAHR, taken
on behalf of the Plaintiff at 165 Throckmorton
Drive, Mill Valley, California, on Friday,
July 23, 2010, beginning at 12:57 p.m., before
Janis L. Jennings, Certified Shorthand Reporter
No. 3942, CLR, CRP

1 intelligence that had actually been deployed in the
2 field."

3 Is that correct?

4 A. Yes.

13:21 5 Q. Do you still believe that statement is
6 accurate?

7 A. For current IAAI conferences?

8 Q. No, no, no.

9 A. Or for the 1996 conference?

13:22 10 Q. For the -- I guess the statement is about
11 the 1996 and prior conferences.

12 A. If you're asking me if my declaration is
13 still accurate, the answer is yes.

14 Q. Okay. So in particular you agree that
13:22 15 your statement in paragraph 3 of your declaration
16 is accurate; correct?

17 A. That's correct.

18 Q. Okay. Do you have any personal knowledge
19 about the EZ Reader project?

13:23 20 A. No, other than what I've read in the Rice
21 paper.

22 Q. Were you involved at all with the
23 EZ Reader project during the 1995 or 1996 time
24 frame?

13:23 25 A. I don't have any recollection of being