

# EXHIBIT A

Certified  
Transcript

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

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PA ADVISORS, LLC,	:	NO.2:07-CV-480-DF
	:	
Plaintiff,	:	
	:	
VS.	:	
	:	
GOOGLE INC., et al.,	:	
	:	
Defendants.	:	
	:	

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DATE: August 19, 2009  
TIME: 9:47 a.m.

Deposition of ILYA GELLER, taken by and before JOYCE SILVER, a Certified Shorthand Reporter and Notary Public of the State of New York, and, PHILIP GLAUBERSON, Videographer, held at the office of STROOCK, STROOCK & LAVAN, 767 Third Avenue, New York, New York.

Job No.: 212395

1 ILYA GELLER

2 Q. Good afternoon, Mr. Geller. I'd like to  
3 ask you a few questions. I understand that it's  
4 getting later in the day and you mentioned that  
5 you're getting tired. Can you tell us how you're  
6 feeling?

7 A. Yes, I am tired a lot because, you see.

8 Q. Are -- are you okay to answer questions  
9 for a little bit?

10 A. Just a little, yes, a little bit, please.

11 Q. Where did you grow up?

12 A. Russia, Ulyanovsk, middle Russia.

13 Q. And when did you immigrate to the  
14 United States?

15 A. 12th of December, 1992.

16 Q. When were you born, Mr. Geller?

17 A. 4th of June, 1969.

18 Q. 1969?

19 A. Yes.

20 Q. So you're about 23 years old when you  
21 immigrated; is that right?

22 A. Yes, I am.

23 Q. Did you -- so you did your early  
24 education in -- in Russia?

25 A. Yes, I did.

1 ILYA GELLER

2 Q. What did you study in Russia?

3 A. Civil engineering and also I study  
4 mainframe computer. Mainframe. Mainframe and civil  
5 engineering. A little bit.

6 Q. Tell us a little bit about your  
7 education. I don't know how the education system  
8 works in Russia, so tell us a little bit about how  
9 the education system works from early school,  
10 elementary or grammar school on.

11 A. I studied a lot of science. I studied  
12 mathematics, physics. I studied civil engineering, I  
13 studied different kinds of mechanics, whatever,  
14 because it was required in high school, but it was  
15 not the one -- it wasn't the education -- the -- the  
16 education I looked for because I -- because it didn't  
17 give me what I looked for. And actually I was in  
18 college for only four years because usually five  
19 years are required. At the end of my fourth year, I  
20 left the college and actually I didn't study anything  
21 else in Russia. It was '90 -- '94, '93, I don't  
22 remember exactly.

23 Q. That was 1990 or 1991; is that right?

24 A. Yes, I believe so, but I'm not sure. I'm  
25 not sure.

1 ILYA GELLER

2 Q. Where did you go to college in Russia?

3 A. The same college in the same city  
4 Ulyanovsk Polytechnical Institute.

5 Q. And tell me a little bit about your  
6 family. Your -- did you come from a big family? How  
7 many brothers and sisters did you have?

8 A. I -- I have only one brother -- brother.  
9 The family is in Russian at the time. We are not big  
10 and my parents had only two children, me and my  
11 brother. My brother was a civil engineer and he --  
12 he continues the same career. He became estimator in  
13 the companies -- a company. I don't know which one.  
14 He became an estimator, he makes money, right.

15 And my father, he was also a civil  
16 engineer. Civil engineer and he build factories,  
17 whatever. My mother was a teacher. She taught  
18 economy in college. Right. But finally we  
19 immigrated to this country and my brother, like I  
20 told you, continued his career and my mother  
21 become -- she's old and she became -- she got SSI and  
22 now she retires. Father died in here.

23 Q. When did your father pass away?

24 A. '97, September of '97.

25 Q. And did your mother work when she came

1 ILYA GELLER

2 here?

3 A. Yes, she did.

4 Q. And what did she do?

5 A. She was a teacher in college.

6 Q. And tell me a little bit about your --  
7 your mother and father, if you can, sort of their  
8 background.

9 A. Nothing special. My father was just a  
10 manager, civil engineer. He managed something called  
11 factory. Factories. He built factories and my  
12 mother, she was just a teacher. Nothing -- nothing  
13 extraordinary. Nothing -- nothing that special.

14 Q. Were your parents survivors of the  
15 concentration camps?

16 A. Yes, my mother was in a concentration  
17 camp but, fortunately for her, she survived. She was  
18 two years old and -- when it began and actually she  
19 lost a lot in the concentration camp.

20 My father, he was more lucky than my  
21 mother. He was lucky -- luckier than my mother. He  
22 could escape Germans and spend what time in the part  
23 that wasn't occupied. So I was just -- my parents  
24 were lucky, yes, and -- but, actually, my parents'  
25 families were killed by Germans in concentration

1 ILYA GELLER

2 camps and during the war. Yes.

3 Q. What was it like for you growing up as a  
4 Jewish person in -- in Russia?

5 A. Not pleasant, not pleasant at all because  
6 all the -- of anti-Semitism. And also I grew up in a  
7 small provincial town and it was awful. Because you  
8 see I had nothing to do. I am a creator. I have a  
9 spirit of creator. I -- yes, and it wasn't -- could  
10 I ask the translator?

11 (Speaks Russian.)

12 MR. BERELEKHIS: It was a very stifling  
13 atmosphere I grew up.

14 A. Yes, definitely stifling atmosphere in  
15 this town. Right. And I decided -- finally I  
16 decided that I have nothing to find in Russia,  
17 especially after Perestroika, and I decided to escape  
18 to the United States because I had nothing in there.

19 Q. What did you want to do when you came --  
20 why did you decide to come to the United States?

21 A. I -- it's very strange, I know,  
22 especially it was strange for my parents and for all  
23 my relatives. I wanted to become a scientist and  
24 I -- I decided to start from philosophy because I  
25 studied precise sciences like math and physics for

1 ILYA GELLER

2 many years, and -- but they didn't give me  
3 satisfaction, and I decided to try philosophy. So  
4 when I came to America, I tried to go -- to go to  
5 college and to study philosophy.

6 Q. And did you go to college in America when  
7 you came here to study philosophy?

8 A. Yes, I came to Brooklyn College and I  
9 studied philosophy in Brooklyn College till I could.

10 Q. Until what?

11 A. Till I could, until I can do it -- could  
12 do it.

13 Q. And when did you start in college? You  
14 immigrated in 1992?

15 A. '94. '94. Before I started another  
16 college I start computer science, I don't remember  
17 mostly mainframe. I don't remember the name of the  
18 college. I can't give you the dates -- dates, but I  
19 studied computer science for half of the year goes  
20 something like this.

21 Q. Is it common or was it common in your  
22 experience for -- you mentioned that you studied  
23 precise sciences earlier?

24 A. Uh-huh.

25 Q. And that you spent many years doing that.



1 ILYA GELLER

2 Right?

3 A. Yes, right.

4 Q. And is it sort of a natural progression  
5 to study philosophy after that in your experience?

6 MR. CANNON: Objection, leading.

7 Q. Go ahead.

8 A. I think, yes. Yes, because I didn't find  
9 anything what I looked for, I didn't find it. I  
10 couldn't find it in precise sciences. In math or  
11 physics or whatever, I couldn't find what -- or  
12 chemistry, I studied a lot of things because in  
13 Russia in college we teach you everything. I knew  
14 chemistry. I knew physics. I knew mathematics. I  
15 knew many other disciplines. If you want, I can tell  
16 you.

17 Q. Did many of the other students or  
18 teachers of philosophy that you met and encountered  
19 during your study of philosophy, have such  
20 backgrounds in precise sciences?

21 A. None. None at all. Nobody.

22 Q. Do you have any understanding as to why  
23 that is?

24 A. Yes, I do. Because -- because  
25 humanities, humanities are dead for the past 60

1 ILYA GELLER

2 A. I wanted -- I told you, I saw that Google  
3 is very ambitious company -- actually, I liked -- I  
4 liked Google. I liked Google and I liked what they  
5 did and how they did and I put to communicate to  
6 incorporate in Google somehow. I thought we would  
7 buy license, we will combine our efforts because I  
8 saw what Ser- -- Sergey Brin went in my direction,  
9 went to personalization and went to all this stuff.  
10 I just saw that they are so bright, I knew I couldn't  
11 conduct Yahoo because Yahoo is not a company with --  
12 Yahoo is not a company with -- is very -- could I say  
13 to you in Russian?

14 (Speaks Russian.)

15 MR. BERELEKHIS: Yahoo is not a very  
16 prospective company, promising.

17 A. Promising. Promising. Promising company  
18 and I decided to -- I tried to conduct Google.  
19 Right. I -- I thought Sergey -- I told you, I --  
20 Sergey, he speaks Russian and at that time I afraid I  
21 couldn't speak English at all and even my memory was  
22 compromised -- was compromised and -- uh-huh.

23 MR. WHITE: Objection, non-responsive.

24 Q. Mr. Geller, you mentioned this morning  
25 and just now a few times that in maybe the early

1 ILYA GELLER

2 2000s you couldn't speak English?

3 A. Yes.

4 Q. Was your English less good than it is  
5 now?

6 MR. CANNON: Objection, form, leading.

7 A. A lot.

8 Q. Why?

9 A. MS, multiple sclerosis. It's one of --  
10 (Speaks Russian.)

11 MR. BERELEKHIS: Consequences.

12 A. Consequences of the multiple sclerosis.  
13 It's one of the strongest -- people can speak -- with  
14 multiple sclerosis we can speak foreign languages and  
15 you see if I could, it means that -- if not multiple  
16 sclerosis, English would be -- my English would be  
17 perfect.

18 Q. Was your English -- strike that.

19 Did your English deterio -- deteriorate  
20 as a result of MS?

21 MR. CANNON: Objection, leading, form.

22 A. (Speaks Russian.)

23 A lot.

24 MR. FENSTER: Let me ask the court  
25 reporter to mark Exhibit 24, a document that has been

1 ILYA GELLER

2 couldn't think about anything because you see before  
3 that I was in bad condition. It was awful. I --  
4 I -- I felt very bad. I could work only one or two  
5 hours per day. And after I went to Russia, it was  
6 like I came from prison, from prison for life. You  
7 see, I just began to breathe. I began to think.  
8 I -- sorry, I just couldn't think about anything at  
9 that time.

10 Q. Let me ask you to take a look quickly at  
11 the patent purchase agreement which was marked  
12 earlier as Exhibit 16.

13 A. Uh-huh.

14 Q. So in 2007, you sold your patent to PA  
15 Advisors; is that right?

16 A. Yes, I did.

17 Q. And why did you do that?

18 A. First of all, I saw people from PA  
19 Advisors. I saw -- I met Dave. I met Eric. I saw  
20 what these are very competent people and they  
21 understand the stuff. And I knew with my patent will  
22 be in good hands. It won't lie as a dead burden.

23 And secondly, I needed money to continue  
24 coming to Russia because at that time I didn't have  
25 any. I didn't have money.

1 ILYA GELLER

2 Q. What did you need the money for?

3 A. For Russian, because the treatment in  
4 Russia is astronomically expensive. It's  
5 outrageously expensive. Right. It's so expensive.

6 Q. And you didn't have money to pay for the  
7 treatment?

8 A. No, not at all. I had only Social  
9 Security and disability and my annual income from  
10 social security by disability is enough only for --  
11 for two -- my social security by disability for two  
12 years is enough to come to Russia once, so I didn't  
13 have any money. I didn't have any money. I couldn't  
14 get money from anywhere because I couldn't go even to  
15 work because, listen, I was -- I was a long time. So  
16 the patent was the only commodity what I could sell.

17 Q. And what do you think would have happened  
18 to you if you didn't get --

19 THE VIDEOGRAPHER: I'm sorry, we need to  
20 change tape. This will end videotape number three of  
21 the deposition of Ilya Geller. We are going off the  
22 record at approximately 3:37 p.m., August 19, 2009.

23 (A discussion is held off the record.)

24 THE VIDEOGRAPHER: We are now on the  
25 record, beginning approximately 3:45 p.m., August 19,

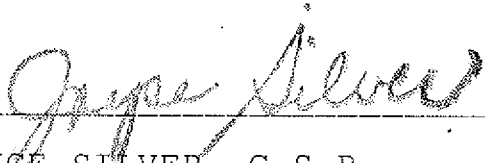
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C E R T I F I C A T I O N

STATE OF NEW YORK )  
 ) ss.:  
COUNTY OF NEW YORK )

I, JOYCE SILVER, a Certified Shorthand Reporter and Notary Public for the State of New York, do hereby certify the foregoing to be a true and accurate transcript of my original stenographic notes taken at the time and place hereinbefore set forth.

I further certify that I am not related, by blood or marriage, to any of the parties in this matter and that I am in no way interested in the outcome of this matter.

  
JOYCE SILVER, C.S.R.

Certified Shorthand Reporter  
Notary Public

DATED: 