

EXHIBIT B

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

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

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

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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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1 ILYA GELLER
2 2009. This will begin videotape number four of the
3 deposition of Ilya Geller.
4 BY MR. FENSTER:
5 Q. Mr. Geller, referring back to Exhibit 16,
6 the patent purchase agreement, Google's counsel
7 referred you to Section 2.2?
8 A. Uh-huh.
9 Q. Do you see that?
10 A. Uh-huh.
11 Q. What's your understanding of that
12 provision?
13 A. Actually, I rely on my legal counsel. He
14 did everything.
15 Q. Do you understand that you're entitled to
16 a portion of any proceeds that are generated, either
17 from this lawsuit or from your patents?
18 MR. CANNON: Objection, leading.
19 A. Yes, I do.
20 Q. Did you have any other way to monetize
21 your patents when you sold it?
22 MR. CANNON: Objection, leading.
23 A. No.
24 MR. FENSTER: Let me ask the court
25 reporter to mark as Exhibit 25, a collection of

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1 ILYA GELLER
2 documents bearing Bates Nos. PA 1419 through 1530
3 (Exhibit 25, Documents Bates Nos. PA
4 0001419-1530 is received and marked for
5 identification.)
6 Q. Mr. Geller, could you look through
7 Exhibit 25 and tell me if you recognize it.
8 A. I recognize page number one of one. It's
9 Unisearch my site before LexiClone came. It's
10 Unisearch.
11 Q. Are those printouts of the Unisearch --
12 do you recognize these as printouts of your website
13 unisearch.net at various points in time?
14 MR. CANNON: Objection, leading. Form.
15 A. Yes, these unisearch.net. Searched on
16 the Internet.
17 Q. And do you recognize this? Do they look
18 like accurate copies of your website?
19 MR. CANNON: Objection, form.
20 A. I'm not quite sure because a lot of time
21 passed away -- passed away but I think, yes, because
22 I have this Internet search. I remember. Search on
23 the Internet trial version. And also I remember this
24 presentation of the Unisearch, right. Yes. And I
25 remember this article. It's in Russian. Right.

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1 ILYA GELLER
2 It's my old Unisearch.
3 Q. I'll represent to you, Mr. Geller, that
4 these are printouts from the way back machine which
5 is an Internet archive. Looking, for example, at the
6 second page which is PA 1420, do you see that?
7 A. 1420, yes, I do.
8 Q. Does this look to be a copy of your
9 website as it existed on November 28, 1999? And I'm
10 referring to the date that's listed in the url at the
11 bottom of the page?
12 MR. CANNON: Objection, leading.
13 A. Excuse me, I'm confused. Which date,
14 this -- this one (indicating).
15 Q. I am referring you to the url at the
16 bottom which is http?
17 A. This one. Uh-huh. Yes, exactly. Yes,
18 it is. Yes.
19 MR. FENSTER: Brian, as I mentioned
20 during the break, the witness informed me that he's
21 not feeling well and would like to adjourn soon. So
22 I'm going to have to reserve my time. I had about
23 50 minutes by my count or so. But out of respect for
24 the -- the witness' request and your request to do
25 another five minutes, I'm going to adjourn now and