

# Exhibit 3

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

NORTHEASTERN )  
UNIVERSITY AND JARG )  
CORPORATION, )  
Plaintiffs, )  
VS. ) CA NUMBER 2:07CV486  
GOOGLE, INC., )  
Defendant. )

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ORAL AND VIDEOTAPED DEPOSITION OF  
MICHAEL BELANGER  
July 15, 2010  
VOLUME 1

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ANSWERS AND DEPOSITION OF MICHAEL  
BELANGER, produced as a witness at the instance of the  
Defendant, taken in the above-styled and -numbered cause  
on the 15th day of July, 2010, from 9:06 a.m. to  
4:56 p.m., before Jamie K. Israelow, a Certified  
Shorthand Reporter in and for the State of Texas,  
Registered Professional Reporter, Certified Realtime  
Reporter and Certified LiveNote Reporter, reported in  
machine shorthand at the offices of Vinson & Elkins,  
located at 2001 Ross Avenue, Suite 3800, in the City of  
Dallas, County of Dallas and State of Texas.

## P R O C E E D I N G S

(On the record at 9:06 a.m.)

THE VIDEOGRAPHER: My name is Daniel

Hayden of Metro Video. The date today is July 15th,

2010. The time is approximately 9:07 a.m. This is the

deposition -- this deposition is being held in the

office of Vinson & Elkins, LLP, located at 2001 Ross

Avenue, Dallas, Texas. The caption of this case is

Northeastern University and Jarg Corporation versus

Google, Incorporated. The name of the witness is

Michael Belanger.

At this time the attorneys will identify

themselves and the parties they represent, after which

our court reporter, Jamie Israelow, will swear in the

witness so we can proceed.

MS. HIRSCHMAN: Karen Hirschman with

Vinson & Elkins, for the plaintiff.

MR. VALEK: Michael Valek, also with

Vinson & Elkins, for the plaintiff.

MR. POLLACK: Howard Pollack, Fish &

Richardson, for Google.

MICHAEL BELANGER,

having been first duly sworn, testified as follows:

1 A. Yes. 09:15:48

2 Q. And over what time period were you employed by 09:15:49  
3 Jarg? 09:15:53

4 A. Just during the year 2000. 09:15:54

5 Q. And was it for part of the year 2000 or -- 09:16:04

6 A. Yes, part of the year 2000. 09:16:08

7 Q. And during 2000, what was your -- did you have 09:16:14  
8 a title at Jarg? 09:16:18

9 A. I was just the president of the company. 09:16:19

10 Q. What is your present position with regard to 09:16:32  
11 Jarg? 09:16:36

12 A. I'm a consultant to Jarg and president of the 09:16:37  
13 corporate structure. 09:16:41

14 Q. What do you mean by "president of the corporate 09:16:54  
15 structure"? 09:16:56

16 A. The corporation under Delaware law has 09:16:57  
17 officers, and I am the president. 09:17:02

18 Q. And what -- first of all, your role as 09:17:10  
19 consultant, is that pursuant to a written agreement with 09:17:14  
20 Jarg? 09:17:17

21 A. It has been. 09:17:17

22 Q. Are your current consulting duties subject to a 09:17:22  
23 written agreement? 09:17:25

24 A. They are not at the moment. 09:17:26

25 Q. What are your present responsibilities -- 09:17:48

1 what's the scope of your consulting work for Jarg 09:17:52

2 currently? 09:17:55

3 A. To be the president and acting CEO of the 09:17:55

4 company and as treasurer under the Delaware structure. 09:17:58

5 Q. Does Jarg have a board of directors? 09:18:26

6 A. At present -- well, it does have a board of 09:18:30

7 directors. At present, I'm on the board. 09:18:33

8 Q. Are there any other members of the board of 09:18:37

9 directors currently? 09:18:39

10 A. At the moment, I'm the sole member of the board 09:18:39

11 of directors. 09:18:43

12 Q. I take it the membership of the board has 09:18:51

13 changed over time; is that correct? 09:18:54

14 A. It has. 09:18:55

15 Q. Okay. When Jarg was first formed, who were the 09:18:55

16 directors? 09:18:58

17 A. Basically it was myself and Ken Baclawski, the 09:19:03

18 co-founder, Professor Ken Baclawski. And very early on, 09:19:07

19 James Belanger, our corporate attorney, was onboard. 09:19:17

20 Q. And so, at the initial outset, was there some 09:19:34

21 division of labor between yourself, Mr. -- 09:19:36

22 Dr. Baclawski, and -- and Mr. Belanger, with regard to 09:19:40

23 the board business? 09:19:44

24 A. There wasn't any particular division of labor, 09:19:52

25 no. 09:19:55

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REPORTER'S CERTIFICATION OF THE ORAL  
DEPOSITION OF MICHAEL BELANGER

July 15, 2010

I, Jamie K. Israelow, a Certified Shorthand  
Reporter duly commissioned and qualified in and for the  
State of Texas, Registered Professional Reporter,  
Certified Realtime Reporter and Certified LiveNote  
Reporter, do hereby certify to the following:

That the witness, MICHAEL BELANGER, was duly  
sworn by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness:

That the original transcript was delivered to  
Howard G. Pollack.

That a copy of the certificate was served on  
all parties and/or the witness shown herein on

\_\_\_\_\_.

I further certify that pursuant to FRCP

1 Rule 30(f)(1) that the signature of the deponent:

2           \_X\_ was requested by the deponent or a  
3 party before the completion of the deposition and that  
4 signature is to be before any notary public and returned  
5 within 30 days from date of receipt of the transcript.  
6 If returned, the attached Changes and Signature Page  
7 contains any changes and the reasons therefore:

8           \_\_\_ was not requested by the deponent or a  
9 party before the completion of the deposition.

10           I further certify that I am neither  
11 attorney or counsel for, nor related to or employed by  
12 any of the parties to the action in which this  
13 deposition is taken, and further that I am not a  
14 relative or employee of any attorney or counsel employed  
15 by the parties hereto, or financially interested in the  
16 action.

17           CERTIFIED TO BY ME on this 27<sup>th</sup> day  
18 of July, 2010.

19           *Jamie K. Israelow*  
20



21           Jamie K. Israelow, CSR, RPR, CRR, CTR

22           Texas CSR 3801

23           Expiration Date: 12/31/10

24           US Legal Support-Dallas

25           CRCB Registration No. 343

          100 Premier Place

          5910 North Central Expressway

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