EXHIBIT C

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 1              IN THE UNITED STATES DISTRICT COURT

                    EASTERN DISTRICT OF TEXAS

 2                       MARSHALL DIVISION

 3   NORTHEASTERN UNIVERSITY   *

     and JARG CORP.            *

 4                             *   Civil Action

     VS.                       *   No. 2:07-CV-486(TJW)

 5                             *

     GOOGLE INC.               *

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 7       *******************************************

 8            ORAL AND VIDEOTAPED DEPOSITION OF

 9                    KENNETH BACLAWSKI

10                     AUGUST 27, 2009

11       *******************************************

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13            ORAL AND VIDEOTAPED DEPOSITION OF KENNETH

14   BACLAWSKI, produced as a witness at the instance of the

15   Defendant and duly sworn, was taken in the above-styled

16   and numbered cause on the 27th day of August, 2009,

17   from 9:04 a.m. to 5:08 p.m., before MARSHA EVANS,

18   Certified Shorthand Reporter in and for the State of

19   Texas, reported by machine shorthand, at the offices of

20   Vinson & Elkins, 2801 Via Fortuna, Suite 100, Austin,

21   Texas, pursuant to the Federal Rules of Civil Procedure

22   and the provisions stated on the record or attached

23   hereto.

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25   Job No.: 213552
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1   content labels are represented using a data structure

2   called a KEYNET." What's the reference to content

3   label? What is that referring to?

4   A.   The term content is used to refer to the

5   collection of objects or documents that are being

6   indexed. The term label is a term for the annotation

7   that is actually indexed by the -- by this KEYNET --

8   KEYNET system.

9   Q.   So a content label is a -- is a representation

10 of some information in the corpus; is that right?

11   A.   No, not necessarily. It could have additional

12 annotations that are not actually in the content. It

13 could have information that is explicitly in the

14 content. It's -- it's really an independent annotation

15 in general, although as I say it could be very closely

16 linked to the content.

17   Q.   And what does it mean that both the queries

18 and the content labels are represented using the data

19 structure called a KEYNET?

20   A.   It means that the same data structure is used

21 for both of these.

22   Q.   And is that important for some reason that

23 they use the same data structure?

24   A.   Yes. It's necessary for them to have the same

25 data structure so that one can match the queries with

1   the objects or the -- or the documents that are in the

2   collection.

3   Q.   You referred earlier to a KEYNET being a

4   graphical structure, and this paper refers to it as a

5   directed graph. Is that the same -- same idea?

6   MR. RYAN: Objection, form.

7   THE WITNESS: Graphical structure

8   consists of vertices and edges. The edges are

9   typically directed, meaning it goes from one vertex to

10   another vertex, hence the name directed graph.

11   Although sometimes undirected edges are used.

12   Q.   (By Mr. Pollack) If you'll turn to page 2738,

13   Exhibit 17, in this range there's a paper entitled An

14   Abstract Model For Semantically Rich Information

15   Retrieval. It looks like it's dated March 31st, '94,

16   coauthored by yourself and someone named Dan Simovici.

17   See that?

18   A.   Yes.

19   Q.   Who is Dan Simovici?

20   A.   Dan Simovici is a professor at the University

21   of Massachusetts Boston. He was the coauthor of this

22   paper.

23   Q.   What was his role in the KEYNET project?

24   A.   He was not very much involved in it. The only

25   connection that he had was in this particular paper we

1 identified uniquely by an object identifier (OID) and

2 is described by a content label." Is that reference to

3 content label, is that the same content label that

4 we referred to earlier in our discussions associated

5 with the KEYNET papers?

6   A.   The context here is a little different. It

7 just says that it's written in a form of artificial

8 language specified by the ontology. But roughly

9 speaking it's a similar concept.

10   Q.   Okay. The second paragraph states that, "An

11 ontology can also specify weight information such as

12 the strength of a relationship or the degree of

13 prototypicality of an attribute value." Can you

14 explain that a little bit more to me what you

15 understand to mean that an ontology can specify weight

16 information?

17   A.   Weight information has to do with the kind of

18 fuzzy aspect of information retrieval, so that one can

19 distinguish between stronger and weaker matches to

20 concepts and relationships.

21   Q.   Okay. So the weight information could be, for

22 example, some added information contained within a

23 content label, for example?

24   A.   Yes. Weight information can be in a content

25 label.

1   Q.   The next paragraph starts talking about

2   queries.   The second sentence reads, "A fragment of a

3   content label or a query is a part of the content label

4   or query consisting of a limited number of attributes

5   and attribute values joined by relationships."   What

6   does it mean -- well, what are attributes and attribute

7   values, first of all?

8   A.   The attributes and attribute values there are

9   the vertices of this content label, and then you have

10   the attribute values joined by relationships.

11   Q.   So am I correct in understanding that, for

12   example, if a query complies with this structure that

13   we're talking about earlier about being a graphical

14   representation of vertices and edges, the fragment of

15   that query might be a subset of that -- a piece of that

16   graph? Would that be accurate?

17   A.   Yes. It's part of it.

18   Q.   And this breaking up of a query or a content

19   label into -- into fragments, that conceptually is

20   related to what we talked about earlier when we were

21   looking at the fragmentation algorithm in the KEYNET

22   papers. Is that the concept that's being referred to

23   here?

24   MR. RYAN: Objection, form.

25   THE WITNESS: The KEYNET paper is an

1   A.   I just recently reviewed a couple of papers

2   for a journal on -- I can't remember the title.

3   Knowledge and communities and cultures, something like

4   that. I don't remember the precise name.

5   Q.   I'm going to just refer you back to -- we used

6   the term earlier, but the term fuzzy query. What's

7   generally your understanding of what a fuzzy query is?

8   MR. RYAN: Objection, form.

9   THE WITNESS: Fuzzy -- a fuzzy query is

10   one for which the query itself and the results have

11   weights or degrees of importance, so that a result is

12   more or less -- you know, varying degrees of strength

13   with respect to the -- the query.

14   MR. POLLACK: Why don't we take five.

15   THE VIDEOGRAPHER: Off the record at

16   4:59 p.m.

17   (Recess from 5:00 to 5:07)

18   THE VIDEOGRAPHER: We're back on the

19   record at 5:06 p.m.

20   Q.   (By Mr. Pollack) Professor, I just want to

21   clear something up. I might have asked an ambiguous

22   question earlier. We talked about after resigning as a

23   board member that you haven't had any further -- done

24   any further work for Jarg. I just want to clarify,

25   have you had any additional consulting work that you've