

EXHIBIT 14

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

CIVIL ACTION NO. 6:08-CV-88 LED
- - - - -X

MIRROR WORLDS, LLC,

Plaintiff,

vs.

APPLE INC.,

Defendant.
- - - - -X

D E P O S I T I O N

The videotaped deposition of CHRISTOPHER HATCHELL was taken pursuant to Notice at the offices of Yale University Office of the Vice President and General Counsel, 2 Whitney Avenue, 6th Floor, New Haven, Connecticut, before Viktoria V. Stockmal, RMR, CRR, license #00251, a Notary Public in and for the State of Connecticut, on Thursday, February 5, 2009 at 9:10 a.m.

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1 Christopher Hatchell
2 office in the period of the late 1980s to the mid 1990s?
3 and they came to the business office, would there be
4 someone standing or sitting in the business office to
5 help them?
6 MR. AN: Objection. Form.
7 A As best I can recall, yes.
8 Q If someone came to the main -- I'm sorry. If
9 someone came to the business office during the late 1980s
10 to the mid 1990s? and talked to somebody who was staffed
11 in that office and asked to see what technical reports
12 had been published by the computer science department,
13 would they be given that information?
14 A I don't know.
15 Q Are you aware of any limitation on showing or
16 telling visitors about what technical reports have been
17 published by the computer science department during the
18 period of the late 1980s to the mid 1990s?
19 MR. AN: Objection. Form.
20 A What do you mean by limitation?
21 Q I'll ask it a different way.
22 Were there any restrictions on telling visitors
23 in the computer science department what technical reports
24 had been published as of the late 1980s or 1990s?
25 MR. AN: Same objection.

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1 Christopher Hatchell
2 A Not that I know of.
3 Q So you sitting here today, you're not aware of
4 any reason why a visitor to the computer science
5 department in the late 1980s to the mid 1990s? who
6 requested information about what technical reports had
7 been published wouldn't be told what technical reports
8 had been published?
9 MR. AN: Objection. Form.
10 A I'm sorry --
11 Q I'll ask it again.
12 A Can you make that a little bit more succinct?
13 Q That was a long question.
14 A Please.
15 Q And we have to be careful not to talk over each
16 other, too.
17 A I'm sorry.
18 Q It's all right. I do the same thing. But I'll
19 ask the question again.
20 Sitting here today, can you think of any reason
21 why a visitor to the computer science department from the
22 late 1980s to the mid 1990s? who is requesting
23 information about technical reports wouldn't be told what
24 technical reports had been published by the computer
25 science department?

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1 Christopher Hatchell
2 A I don't know.
3 Q But you can't think of a reason why they
4 wouldn't be?
5 MR. AN: Objection. Form.
6 A I really don't know the answer to that
7 question.
8 Q I'll ask it a slightly different way. I think
9 I get what the confusion is.
10 A Yes, yes.
11 Q Are you aware of any reason why somebody
12 visiting with the computer science department in the mid
13 1980s to the -- Strike that.
14 Are you aware of any reason why someone
15 visiting the computer science department in the late
16 1980s to the mid 1990s? wouldn't be told what technical
17 reports had been published by the department if they were
18 requesting that information?
19 MR. AN: Objection. Form.
20 A I'm not aware.
21 Q In fact it was true that in the mid -- in the
22 late 1980s to the mid 1990s? technical reports were
23 available to people who requested them, right?
24 MR. AN: Objection. Form.
25 A Yes.

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1 Christopher Hatchell
2 Q And so it would also be true that in that
3 period, if someone was requesting information about what
4 technical reports were available for request, they would
5 also be told that information?
6 MR. AN: Objection. Form.
7 A From -- I'm sorry, would you please repeat
8 that? Because --
9 Q Sure. Don't apologize. We have to get the
10 record clear.
11 A Right.
12 Q So if you ever need clarification. Don't
13 hesitate to ask. I'll restate the question.
14 You just said that it was true that in the late
15 1980s to the mid 1990s? technical reports were available
16 for distribution to people who requested them?
17 A Yes.
18 Q And as a corollary to that, it would also be
19 true that if someone was requesting information about
20 what technical reports were available, that that
21 information would also be made available to them?
22 MR. AN: Objection. Form.
23 A Well if it were addressed -- the question were
24 addressed to me about the technical reports that were
25 under my control, yes.

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1 Christopher Hatchell
2 bottom Yale University Department of Computer Science?
3 A Yes.
4 Q And there's a window above that that has the
5 title and the authors, the technical report number and
6 the date; correct?
7 A Yes.
8 Q Is this the binding that you were talking about
9 for technical reports during your testimony this morning?
10 MR. AN: Objection. Form.
11 A Yes.
12 Q So when you would submit a technical report for
13 copy to the Science Park copy center, it would come back
14 with a binding that appears as the first page of Hatchell
15 Exhibit 3?
16 MR. AN: Objection. Form.
17 A Yes.
18 Q Now you also mentioned this morning that the
19 title, authors, technical report number and date that
20 appear here through the window on the cover page are the
21 same as the information that would be marked in the
22 binder of technical report bibliography; is that right?
23 A Yes.
24 Q So the date that's listed here on the front
25 page of Hatchell Exhibit 3 would be the date that you

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1 Christopher Hatchell
2 assigned to the technical report in the binder; is that
3 correct?
4 A Yes.
5 Q And that would also be the date at which time
6 you were provided the technical report by the author?
7 A Yes.
8 Q And that would also be the date within a week
9 of which the technical report would be available for
10 distribution to someone who requested it; is that
11 correct?
12 MR. AN: Could I have that question read
13 back, please?
14 (Whereby, the pertinent question was
15 read.)
16 MR. AN: Objection. Form.
17 A Yes.
18 Q You mentioned earlier today, Mr. Hatchell, that
19 you had inside file cabinets outside of your office,
20 folders for each technical report relating to the Linda
21 Group where you maintained records of copies of technical
22 reports that were distributed; correct?
23 MR. AN: Objection. Form.
24 A Yes.
25 Q Did you search for those folders in conjunction

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1 Christopher Hatchell
2 with the subpoena issued to you in this case?
3 A Yes.
4 Q And did you provide any folders containing
5 distributions of technical reports relating to the
6 Lifestreams project to your counsel for production in
7 this case?
8 A Yes.
9 (Deposition Exhibit 4 was marked
10 for identification: Copies of requests for
11 Lifestreams technical reports, YALE 415 to
12 424.)
13 BY MS. MEHTA:
14 Q I'm going to hand you what's been marked as
15 Hatchell Exhibit 4.
16 If you could take a look at that and let me
17 know when you're ready.
18 A Okay.
19 Q Can you tell me what Exhibit 4 is?
20 A Yes.
21 These are copies of requests for Lifestreams
22 technical reports.
23 Q And on the front page it says Lifestreams
24 TR-1076; do you see that?
25 MR. AN: Objection. Form.

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1 Christopher Hatchell
2 A Yes. But I think that's 1096.
3 Q Ah, thank you for that clarification. It's a
4 little hard to read that.
5 Okay, so is this exhibit, Exhibit 4, records of
6 distributions of technical report 1096?
7 A Only to these three people on this page. This
8 is not a cover page for the rest of them.
9 Q Okay. And for the other document -- or the
10 e-mails that are identified here in Hatchell Exhibit 4,
11 those would be for different Lifestreams technical
12 reports?
13 A Yes.
14 Q You mentioned earlier that you maintain a
15 different folder for each of the technical reports for
16 your distribution records -- Let me restate that.
17 You mentioned earlier that you would maintain a
18 different folder for the distribution records for each
19 technical report; do you recall that?
20 A Yes.
21 Q How many folders do you have for technical
22 reports relating to Lifestreams?
23 A I don't know.
24 Q When you searched for documents in your two
25 file cabinets, how many folders did you find that

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1 Christopher Hatchell
2 MR. AN: Hold on a second. Just to speed
3 this along, I'll agree to let him answer that question if
4 you agree that it will not constitute a waiver of any
5 attorney-client privilege.
6 MS. MEHTA: That's fine. For that
7 question.
8 A Okay, may I have the question again, please?
9 (Whereby, the pertinent question was
10 read.)
11 A Not that I recall.
12 Q Now the next sentence says: The list
13 containing bibliographic information about the technical
14 report from which the technical report number was
15 determined is kept in a locked file in the Office of
16 Computer Science at Yale University. Do you see that?
17 A Yes.
18 Q What is the list containing bibliographic
19 information about the technical report that's referred to
20 in that sentence?
21 A I assume it's the binder that we were talking
22 about.
23 Q And it says -- Do you know for a fact that this
24 is referring to the binder?
25 A I don't know for a fact, no.

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1 Christopher Hatchell
2 Q But that's your assumption?
3 A That is my assumption.
4 Q Now the binder is not kept in a locked file in
5 the Office of Computer Science at Yale University, is it?
6 MR. AN: Objection. Form.
7 A No, it is not.
8 Q Are you aware of any list containing
9 bibliographic information about the technical report that
10 is kept in a locked file in the Office of Computer
11 Science at Yale University?
12 MR. AN: I'm sorry, can you repeat that
13 question?
14 (Whereby, the pertinent question was
15 read.)
16 A No, I'm not.
17 Q So as far as you know, the last sentence here:
18 Further, the list containing the bibliographic
19 information about the technical report from which the
20 technical report number was determined is kept in a
21 locked file in the Office of Computer Science at Yale
22 University.
23 As far as your knowledge goes, that statement
24 is not accurate?
25 MR. AN: Objection. Form.

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1 Christopher Hatchell
2 A Yes, it is not accurate.
3 Q And you never told anyone that they should tell
4 the patent office that the list containing bibliographic
5 information about the technical report was kept in a
6 locked file in the Office of Computer Science?
7 A To the best of my knowledge, I did not.
8 Q And it wasn't true?
9 MR. AN: Wait. Hold on. Objection.
10 Form.
11 Go ahead, you can answer the question.
12 A And --
13 Q The question was? And it's not true that the
14 list containing bibliographic information about the
15 technical report is kept in a locked file in the Office
16 of Computer Science?
17 A No. If they are referring to -- If this
18 references to the loose leaf binder, no.
19 Q When we were speaking before lunch about --
20 Actually let me ask you one more question about that last
21 exhibit which is Hatchell Exhibit No. 10.
22 Had you ever seen that before today?
23 A I don't believe so, no.
24 Q We were talking before lunch about
25 Dr. Gelernter.

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1 Christopher Hatchell
2 A Yes.
3 Q And you mentioned that he's on a leave of
4 absence right now.
5 A Yes.
6 Q Sabbatical. Do you know why he's on sabbatical
7 right now?
8 A I don't.
9 Q Do you know where he is?
10 A No.
11 Q You said that you spoke with him earlier this
12 year?
13 MR. AN: Objection. Form.
14 A Yes.
15 Q What did you talk about?
16 A He gave me -- He was in briefly to his office
17 and gave me some papers he had graded from his course
18 last term that the papers -- that the students from that
19 course would come by my office to pick up.
20 Q Did you talk about anything else?
21 A No.
22 Q Did you talk about his sabbatical?
23 A No.
24 Q You mentioned earlier today that one of your
25 responsibilities as senior administrative assistant, and

1
2 HATCHELL EXHIBITS FOR IDENTIFICATION
3 Exhibit Description Page Line
4 9 Assignment, YALE000001 163 18
5 10 Information disclosure statement, 190 22
6 227 CFH 384
7 11 Inventors agreement for 229 11
8 distribution of patent income,
9 YALE966
10
11 EXHIBITS RETAINED BY THE COURT REPORTER
12
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25

1
2 CERTIFICATE
3 STATE OF CONNECTICUT)
4) SS NEWTOWN
5 COUNTY OF FAIRFIELD)
6
7 I, VIKTORIA V. STOCKMAL, a Notary Public duly
8 commissioned and qualified in and for the county of New
9 Haven, State of Connecticut, do hereby certify that
10 pursuant to the notice of deposition, the said witness
11 came before me at the aforementioned time and place and
12 was duly sworn by me to testify to the truth and nothing
13 but the truth of his knowledge touching and concerning
14 the matters in controversy in this cause; and his
15 testimony reduced to writing under my supervision; and
16 that the deposition is a true record of the testimony
17 given by the witness.
18 I further certify that I am neither attorney of
19 nor counsel for, nor related to or employed by any of the
20 parties to the action in which this deposition is taken,
21 and further that I am not a relative or employee of any
22 attorney or counsel employed by the parties thereto, or
23 financially interested in the action.
24
25 IN WITNESS WHEREOF, I have hereunto set my hand
and affixed my notarial seal this 16th day of February,
2009.

VIKTORIA V. STOCKMAL, RMR, CRR
Notary Public
CSR License #00251
My commission expires October, 2010.