

# EXHIBIT L

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**From:** Josh Thane <jthane@haltomdoan.com>  
**Sent:** Saturday, February 04, 2012 6:15 PM  
**To:** Eolas (Eolas@McKoolSmith.com)  
**Cc:** Defendants-Eolas (Defendants-Eolas@ropesgray.com)  
**Subject:** Eolas - Deposition Designations  
**Attachments:** Martin\_Defendant\_2012-02-04-1753.pdf; McRae\_Defendants\_2012-02-04-1734.pdf; Rajdev\_Defendant\_2012-02-04-0953.pdf; Jacob\_Defendant\_2012-02-04-1053.pdf

Attached are Defendants' current deposition designations for Martin, McRae, Rajdev, and Jacob.

Regards,  
Josh

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**Josh Thane, J.D.**  
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**Radjev\_Sunita**

 **Rajdev, Sunita (Vol. 01) - 01/10/2012**

1 CLIP (RUNNING 00:03:52.901)

 Rajdev\_Defendants



SR01 27 SEGMENTS (RUNNING 00:03:52.901)

**1. PAGE 6:07 TO 6:09 (RUNNING 00:00:03.472)**

07 Q Will you please state your full name for  
08 the record?  
09 A Sunita Rajdev.

**2. PAGE 7:03 TO 7:05 (RUNNING 00:00:05.660)**

03 Q Dr. Rajdev, what is your position with the  
04 University of California?  
05 A I'm a senior licensing officer.

**3. PAGE 78:24 TO 79:04 (RUNNING 00:00:16.206)**

24 Q Have you ever spoken to the technical  
25 expert, David M. Martin, in this case?  
00079:01 A Not the inventor?  
02 Q There is two David Martins: One is  
03 David C. Martin and one is David M. Martin.  
04 A I have not spoken to David M. Martin.

**4. PAGE 80:11 TO 80:17 (RUNNING 00:00:16.187)**

11 Q Have you read the '985 patent?  
12 A I have not read. I know what it covers,  
13 but I have not read it.  
14 Q Same thing with respect to the '906  
15 patent. Have you actually read that patent or do  
16 you know what it covers?  
17 A I've looked at it.

**5. PAGE 81:02 TO 81:04 (RUNNING 00:00:04.547)**

02 Other than that, have you ever read the  
03 '906 patent?  
04 A No.

**6. PAGE 88:05 TO 88:20 (RUNNING 00:00:29.287)**

05 Q Do you know how many claims are included  
06 in the '906 patent?  
07 A I do not.  
08 Q Okay.  
09 Do you know how many claims are in the  
10 '985 patent?  
11 A No, I do not.  
12 Q Do you know what technologies are covered  
13 by the '985 patent?  
14 A It's the use of plug-ins.  
15 Q Okay.  
16 And what -- what about with respect to the  
17 use of plug-ins?  
18 A I do not know the details. It's the use  
19 of specific Ajax and plug-in, and I do not know the  
20 specific details.

**7. PAGE 89:22 TO 89:23 (RUNNING 00:00:02.474)**

22 Q Do you know how many claims are in the  
23 '985 patent?

**Radjev\_Sunita**

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**8. PAGE 89:25 TO 89:25 (RUNNING 00:00:01.792)**

25 THE WITNESS: I do not recall right now.

**9. PAGE 130:15 TO 130:17 (RUNNING 00:00:04.906)**

15 Do you know of any university or  
16 institution that is teaching with the AnatLab  
17 product?

**10. PAGE 130:19 TO 130:19 (RUNNING 00:00:01.189)**

19 THE WITNESS: I do not know.

**11. PAGE 140:01 TO 140:02 (RUNNING 00:00:11.296)**

00140:01 Do you know of any product that Eolas  
02 currently has on the market?

**12. PAGE 140:04 TO 140:07 (RUNNING 00:00:02.545)**

04 THE WITNESS: Actually on the market?  
05 BY MS. DOAN:  
06 Q Yes, ma'am.  
07 A No.

**13. PAGE 156:04 TO 156:09 (RUNNING 00:00:22.516)**

04 What date did Dr. Martin and Dr. Cheong  
05 [sic] and Michael Doyle tell the University of  
06 California that they first conceived of the  
07 invention which later became the '906 patent?  
08 A I think it was sometime in 1994, but I  
09 can't recall the exact date.

**14. PAGE 175:05 TO 175:08 (RUNNING 00:00:15.806)**

05 Q What documents is the University aware of  
06 that Pei Wei provided to Dr. Doyle prior to the  
07 University of California applying for the '906  
08 patent?

**15. PAGE 175:10 TO 175:14 (RUNNING 00:00:04.270)**

10 THE WITNESS: Prior to the University  
11 applying?  
12 BY MS. DOAN:  
13 Q Yes, ma'am.  
14 A I do not know.

**16. PAGE 187:22 TO 187:25 (RUNNING 00:00:10.127)**

22 Q Do you know if the Viola browser or any  
23 information about Pei Wei was sent to the -- the  
24 patent -- patent office during the patent  
25 prosecution of the '906 patent?

**17. PAGE 188:02 TO 188:08 (RUNNING 00:00:15.270)**

02 THE WITNESS: I do not know.  
03 BY MS. DOAN:  
04 Q Have you ever seen any documents that the  
05 University of California submitted to the patent  
06 office during the patent prosecution of the '906  
07 patent that would reflect disclosure of Pei Wei's  
08 invention or the Viola browser?

**18. PAGE 188:11 TO 188:11 (RUNNING 00:00:01.648)**

11 THE WITNESS: I do not know.

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**19. PAGE 189:24 TO 190:01 (RUNNING 00:00:08.256)**

24 Q And did the University of California  
25 submit any documents with respect to the '906 patent  
00190:01 prosecution with respect to the Viola browser?

**20. PAGE 190:03 TO 190:03 (RUNNING 00:00:01.632)**

03 THE WITNESS: I do not know.

**21. PAGE 191:02 TO 191:06 (RUNNING 00:00:14.204)**

02 Did the University of California ever tell  
03 the United States Patent Office that Pei Wei claimed  
04 to have invented the technology that Michael Doyle  
05 is claiming is in the '906 patent during the patent  
06 prosecution of the '906 patent?

**22. PAGE 191:09 TO 191:14 (RUNNING 00:00:20.975)**

09 THE WITNESS: I do not know.  
10 BY MS. DOAN:  
11 Q Have the University of California Regents  
12 ever conducted a review or analysis as to whether  
13 Pei Wei invented the Viola browser before Michael  
14 Doyle applied for the '906 patent?

**23. PAGE 191:16 TO 191:16 (RUNNING 00:00:01.341)**

16 THE WITNESS: Not that I know of.

**24. PAGE 210:02 TO 210:04 (RUNNING 00:00:05.498)**

02 What steps did the University of  
03 California engage in to look for prior art when it  
04 applied for the '906 patent?

**25. PAGE 210:07 TO 210:07 (RUNNING 00:00:01.380)**

07 THE WITNESS: I do not know.

**26. PAGE 240:15 TO 240:18 (RUNNING 00:00:09.201)**

15 Do you know who at the University of  
16 California, separate and apart from its counsel, has  
17 reviewed the prior art that's been produced by the  
18 Defendants in this litigation?

**27. PAGE 240:21 TO 240:21 (RUNNING 00:00:01.216)**

21 THE WITNESS: I do not know.

**TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:03:52.901)**