

# EXHIBIT F

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

EOLAS TECHNOLOGIES, §  
INCORPORATED §

Plaintiff §

VS. §

No. 6:09-cv-446

ADOBE SYSTEMS, INC., §  
AMAZON.COM, INC., APPLE, §  
INC., BLOCKBUSTER, INC., §  
CDW CORP., CITIGROUP, INC. §  
EBAY, INC., FRITO-LAY, §  
INC., THE GO DADDY GROUP, §  
INC., GOOGLE, INC., §  
JPMORGAN CHASE & CO., NEW §  
FRONTIER MEDIA, INC., §  
OFFICE DEPOT, INC., PEROT §  
SYSTEMS CORP., PLAYBOY §  
ENTERPRISES INTERNATIONAL, §  
INC., RENT-A-CAR, INC., §  
STAPLES, INC., SUN §  
MICROSYSTEMS, INC., TEXAS §  
INSTRUMENTS, INC., YAHOO! §  
INC., AND YOUTUBE, LLC §

Defendants §

\*\*\* HIGHLY CONFIDENTIAL \*\*\*

VIDEOTAPED DEPOSITION OF CHEONG S. ANG  
Austin, Texas  
Friday, July 22, 2011  
Volume 2

Reported by:  
MICHEAL A. JOHNSON, CRR  
JOB NO. 40572

1           A.     Column 6, around 66. And notice  
2     that is mentioning using of a hypermedia  
3     format. So the patent and the invention is  
4     not restricted to using other specific  
5     hypermedia format and a specific embed text  
6     format. So I hope that satisfies the  
7     question -- the answer of the question.

05:02PM

8           Q.     Other than an HTML tag format, from  
9     what you've read do you see any description of  
10    what other formats would constitute an embed  
11    text format?

05:03PM

12           MR. BUDWIN: Objection, form.

13           A.     Again, my answer is HTML format was  
14    provided as an example of when the embodiment  
15    that was described in this patent description,  
16    and the patent description did not provide  
17    another example tag format that's not HTML.

05:03PM

18           BY MR. BATCHELDER:

19           Q.     Why not?

20           A.     Because in Table II the example --  
21    embed text format was provided as an example  
22    of the example embodiment. And in this  
23    particular patent description, I would think  
24    at this point sitting here right now that the  
25    person who draft the patent believed that one

05:03PM

05:04PM

1 example would be provided to go with the  
2 patent application.

3 Q. What is an embed tag in the context  
4 of your work?

5 MR. BUDWIN: Objection, form. 05:04PM

6 A. So an example of the embed tag was  
7 provided in Table II, column 12, line  
8 approximately 60.

9 BY MR. BATCHELDER:

10 Q. I'm asking for a definition of that 05:04PM  
11 term, "embed tag."

12 MR. BUDWIN: Objection, form.

13 BY MR. BATCHELDER:

14 Q. What do you understand it to mean?

15 MR. BUDWIN: Same objection. 05:05PM

16 A. So without trying to interpret what  
17 the claim means, if you look at column 17 as  
18 part of claim No. 1, it is mentioned in here  
19 that -- approximately line No. 13, in terms of  
20 the distributed hypermedia document that was 05:05PM  
21 used in this invention, there was an embed  
22 text format.

23 And so now getting out of the  
24 patent claim language here, what that means is  
25 there's a sequence of characters, right, that 05:06PM