

Beaty

DESIGNATION	SOURCE	DURATION	ID
	89:12 Google provides that OCV doesn't pay		
	89:13 anything for; is that accurate?		
	89:14 A. Yes.		
89:18 - 89:22	Beaty, Robert 2022-09-22	00:00:13	Beaty.39
	89:18 I think you also testified		
	89:19 that OCV does pay Google for a number		
	89:20 of things in the course of developing		
	89:21 and distributing apps, right?		
	89:22 A. Several paid APIs, yes.		
90:05 - 90:19	Beaty, Robert 2022-09-22	00:00:35	Beaty.40
	90:05 Q. And one of the things that		
	90:06 OCV's clients pay to Google in		
	90:07 connection with OCV developing and		
	90:08 distributing apps on Google Play is the		
	90:09 developer fee, right?		
	90:10 A. Correct.		
	90:11 Q. And another item that OCV		
	90:12 pays to Google is in connection with		
	90:13 cloud services, right?		
	90:14 A. Yes.		
	90:15 Q. And another thing that OCV		
	90:16 pays to Google are certain fees related		
	90:17 to Google Maps, right?		
	90:18 A. Yes. Again, same cloud		
	90:19 services.		
91:05 - 91:11	Beaty, Robert 2022-09-22	00:00:15	Beaty.41
	91:05 Q. Just to complete the list,		
	91:06 YouTube would be another example of a		
	91:07 service where OCV pays Google in		
	91:08 connection with developing and		
	91:09 distributing its apps?		
	91:10 A. Yes. That's part of the		
	91:11 Google Cloud Compute API asset.		
162:21 - 163:14	Beaty, Robert 2022-09-22	00:00:43	Beaty.42
	162:21 Q. Were you contacted by Google		
	162:22 prior to receiving the deposition		
	162:23 subpoena?		
	162:24 A. Yes.		
	162:25 Q. And what was the substance of		

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	163:01		
	163:02 that communication?		
	163:03 A. We had previously been in		
	163:04 contact with Google on working on		
	163:05 expediting our government app reviews,		
	163:06 and that individual asked if this would		
	163:07 be something based on our business		
	163:08 model we would be willing to testify		
	163:09 on.		
	163:10 Q. And when you say "this would		
	163:11 be something that you would be willing		
	163:12 to testify on," what are you referring		
	163:13 to?		
	163:14 A. This particular case.		
163:22 - 163:24	Beaty, Robert 2022-09-22	00:00:07	Beaty.43
	163:22 Q. Did Google ask you what you		
	163:23 plan to say as part of your testimony?		
	163:24 A. No.		
163:25 - 164:04	Beaty, Robert 2022-09-22	00:00:07	Beaty.44
	163:25 Q. Were you contacted by Google		
	164:01		
	164:02 or its representatives after receiving		
	164:03 the subpoena?		
	164:04 A. No.		
164:07 - 164:10	Beaty, Robert 2022-09-22	00:00:07	Beaty.45
	164:07 Did Google provide any		
	164:08 information about this litigation as		
	164:09 part of its request for your testimony?		
	164:10 A. No.		
164:20 - 164:22	Beaty, Robert 2022-09-22	00:00:05	Beaty.46
	164:20 Q. Do you personally own Google		
	164:21 stock?		
	164:22 A. I do not.		
205:13 - 206:08	Beaty, Robert 2022-09-22	00:00:47	Beaty.47
	205:13 You mentioned the initial		
	205:14 conversation you had with someone named		
	205:15 Ben at Google related to your testimony		
	205:16 here today; is that right?		
	205:17 A. Yes.		

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DESIGNATION	SOURCE	DURATION	ID
	205:18 Q. And who is Ben?		
	205:19 A. Assuming I am remembering his		
	205:20 name correctly, he reached out		
	205:21 specifically in relation to government		
	205:22 apps; our apps for government entities.		
	205:23 I believe he had -- I don't		
	205:24 remember if he said it was him		
	205:25 specifically or someone else at Google		
	206:01		
	206:02 kind of had seen the clients we work		
	206:03 with, and reached out to help us in		
	206:04 regards to a particular situation we		
	206:05 had with an SDK needing to be removed		
	206:06 from all of our apps and had quite a		
	206:07 lot -- a large number of updates pushed		
	206:08 through.		
206:11 - 207:17	Beaty, Robert 2022-09-22	00:01:12	Beaty.48
	206:11 Q. So Mr. Ben reached out to you		
	206:12 in the context of OCV needing technical		
	206:13 support from Google related to app		
	206:14 removals; is that correct?		
	206:15 A. So the -- it was a situation		
	206:16 where the apps would be removed, if		
	206:17 they couldn't get an update with that		
	206:18 SDK removed.		
	206:19 And given how many we had, I		
	206:20 believe we had been reaching out,		
	206:21 asking if we could get any extensions		
	206:22 on that time line that they had set,		
	206:23 something of that nature, because we		
	206:24 had so many to get through.		
	206:25 Q. And did you receive that		
	207:01		
	207:02 extension?		
	207:03 A. Yes. I believe we provided a		
	207:04 list of apps. And by the large		
	207:05 numbers, ours were extended so that we		
	207:06 wouldn't -- or expedited and reviewed		
	207:07 so that they could get through faster		
	207:08 and not be removed.		

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	207:09 Q. I see. And so you mentioned		
	207:10 the outreach was in the context of OCV		
	207:11 asking for expedited review; is that		
	207:12 right?		
	207:13 A. Yes.		
	207:14 Q. And OCV did, in fact, get		
	207:15 expedited review for those apps,		
	207:16 correct?		
	207:17 A. Yes, I believe so.		
210:19 - 210:22	Beaty, Robert 2022-09-22	00:00:12	Beaty.49
	210:19 Q. Did they -- did Google ask		
	210:20 you about any potential answers you		
	210:21 would provide in a deposition?		
	210:22 A. No, they did not.		
219:08 - 219:11	Beaty, Robert 2022-09-22	00:00:08	Beaty.50
	219:08 Q. Mr. Beaty, did Google offer		
	219:09 OCV any special benefit or service in		
	219:10 exchange for providing testimony in		
	219:11 this matter?		
219:13 - 219:13	Beaty, Robert 2022-09-22	00:00:02	Beaty.51
	219:13 A. No.		
	<u>Designation</u>	00:18:30	
	TOTAL RUN TIME	00:18:30	