

Exhibit 47

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN RE MICROSOFT CORP.
ANTITRUST LITIGATION

This Document Relates to:
Novell, Inc. v. Microsoft Corporation

Civil Action
No. JFM-05-1087

DEPOSITION OF:
DALE CHRISTENSEN

February 5, 2009

9:00 a.m.

VIDEOTAPED DEPOSITION BEFORE ANNAMARIE C.
SPANGRUD, at K & L Gates, 925 Fourth Avenue,
Suite 2900, Seattle, Washington, on February 5,
2009, commencing at 9:00 in the morning, pursuant
to notice.

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9
10 Also Present:

11 DOUGLAS PATTERSON, VIDEOGRAPHER

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1 would have been making OEM sales of Office at
2 this time.

3 Q How did your work on OEM sales
4 relate, if at all, with Mr. Kempin's actual sales
5 of Office to OEMs?

6 A I wasn't involved in the actual sales to
7 OEMs.

8 Q At the time that you were reporting
9 up to Ms. Schoenfeld [sic], who reported up to
10 Hank Vigil, was he in turn reporting up to
11 Mr. Kempin in any way?

12 A No.

13 Q Do you know how it is that your
14 group, and you specifically, came to have some
15 responsibility for doing this early analysis and
16 strategy with respect to selling --

17 A I had --

18 Q -- Office?

19 A I had OEM experience.

20 Q Okay. Do you know, did your work
21 get reported back to Mr. Kempin?

22 A What does that mean?

23 Q Well, you did some analysis of the
24 possibility of selling Office in the OEM channel,
25 correct?

1 A Oh. I don't remember.

2 Q Okay. Just so I'm clear as to what
3 you don't remember, you don't remember whether
4 your work had --

5 A Was reported back to Kempin.

6 Q Okay. But ultimately neither you
7 nor Ms. Schoenfeld [sic] nor Mr. Vigil had
8 responsibility to decide whether to begin selling
9 Office in the OEM channel?

10 A Definitely not.

11 Q Okay. Do you know what kind of
12 volume of sales of Office Microsoft was making in
13 the OEM channel during this time?

14 MS. BRADLEY: Objection, lacks
15 foundation.

16 A Yeah, I -- I -- I don't know how to answer
17 that.

18 Q [By Mr. Engelhardt] Okay. You
19 don't know?

20 A Well, I mean, that's -- you're not giving
21 me a metric. I mean, do you want big or small,
22 or do you want specific numbers or --

23 Q Do you have a dollar volume --

24 A No.

25 Q -- that you can recall? Okay.

1 In your own estimation, was the
2 sale of Office in the OEM channel a significant
3 portion of the overall sales of Office?

4 A No. That was my question.

5 Q Okay, fair enough.

6 A That's as close as I can get. It wasn't a
7 big deal.

8 Q Okay. Do you have any
9 understanding as to why it was not a big deal?

10 MS. BRADLEY: Objection, vague.

11 A No.

12 Q [By Mr. Engelhardt] Okay. Do you
13 know whether other Office application suites were
14 being sold by your competitors through the OEM
15 channel during that time?

16 A I -- I -- I was not aware of any others.

17 Q Okay.

18 A I was -- I wasn't aware that there was a
19 competitive process.

20 Q During this period of time when you
21 were reporting to Ms. Schoenfeld [sic], you were
22 not aware of there being competitors in the OEM
23 channel?

24 A For Office suites?

25 Q Yes.

1 A No.

2 Q Were you aware that there were
3 competitors in other sales channel out there in
4 the world?

5 A Yes.

6 Q Okay. You mentioned that during
7 this same period of time you did some analysis of
8 encrypted CDs.

9 A Yes.

10 Q Tell me first, please, what is an
11 encrypted CD?

12 A It's a CD that has versions of retail
13 product and in some cases documentation in a form
14 where an end-user can try the software for a
15 limited period of time or under limited
16 constraints, and then purchase a key to unlock
17 the software and have it installed on their hard
18 drive.

19 Q Okay. What, if anything, did you
20 determine through your analysis of encrypted CDs?

21 A That it wasn't a viable channel.

22 Q Why did you conclude that?

23 A We did -- we did some statistical testing.
24 We did some tests with different types and price
25 ranges of software, and people were willing to

1 try it and buy \$50 copies of Flight Simulator.
2 People didn't seem to be motivated to purchase
3 more expensive products that way. Sales were
4 very small.

5 Q And how did you run these tests?

6 A We worked with a -- a third-party company
7 to put an encrypted CD together and distributed
8 it through a couple of OEMs.

9 Q Okay. During this period when you
10 were reporting to Ms. Schoenfeld [sic], what was
11 your title, if you recall?

12 A Probably product marketing manager.

13 Q Okay. And do you recall what her
14 title was?

15 A No.

16 Q Do you recall what Mr. Vigil's
17 title was?

18 A No.

19 Q Okay. And what group or department
20 were you in at this time?

21 A It was the applications group. I don't
22 know if it was called Office at the time. It was
23 the applications group.

24 Q Was Mr. Higgins heading the
25 applications group at the time?