

# **EXHIBIT 1-11**

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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ORACLE AMERICA, INC., )  
Plaintiff, )  
vs. ) No. CV 10-03561  
GOOGLE, INC., )  
Defendant. )  
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Videotaped Deposition of Jeet Kaul, taken at  
755 Page Mill Road, Palo Alto, California,  
commencing at 9:28 a.m., Friday, August 5, 2011,  
before Ashley Soevyn, CSR 12019.

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1 **Q. -- the Sun IP?**  
 2 A. You know, I do not know of direct facts of  
 3 whether that stuff was communicated to Google or  
 4 not.  
 5 **Q. Regardless of what was communicated to**  
 6 **Google, are you aware of any facts that demonstrate**  
 7 **that Google knew it was infringing Sun's Java IP? 11:58:29**  
 8 A. You know, my fundamental perception is that  
 9 Google was an active participant of JCP. Many of  
 10 Google employees were ex-Sun employees. All of them  
 11 knew how we did licensing, what the core of it was,  
 12 how we built the platform, what files were involved.  
 13 And so I jumped to conclusion that they knew that 11:58:55  
 14 this is happening, that this is the core business,  
 15 so that's how I kind of jump to the conclusion, you  
 16 know. I knew many of these former Sun employees,  
 17 so --  
 18 **Q. Do you know whether any of the former Sun**  
 19 **employees that you're referring to, who went to**  
 20 **Google, worked on the Android project?**  
 21 A. At least one.  
 22 **Q. Who is that?**  
 23 A. It's Eric Chu.  
 24 **Q. Do you know what Mr. Chu did on the Android**  
 25 **project, once he went to Google?**

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1 rest of the day. And if anything comes to mind, let  
 2 me know, but we can -- we can move on.  
 3 A. Yeah.  
 4 **Q. We don't have to just --**  
 5 A. Right.  
 6 **Q. -- have you, you know, sit on the record 12:00:59**  
 7 **thinking.**  
 8 **Prior to Oracle acquiring Sun, do you know**  
 9 **whether anyone from Sun ever told anyone at Google**  
 10 **that Sun believed Google was infringing Sun's**  
 11 **intellectual property with Android?**  
 12 MS. RUTHERFORD: Objection to form.  
 13 THE WITNESS: So I categorically do not 12:01:36  
 14 know that, but I was aware that -- I was made aware  
 15 that there was some conversation like that that had  
 16 happened.  
 17 BY MR. PURCELL:  
 18 **Q. When you were made aware of some**  
 19 **conversation like that that had happened, what**  
 20 **conversation were you made aware of?**  
 21 A. I don't know this for a fact. So I just 12:02:01  
 22 want to make sure you know that. I -- I don't  
 23 remember who mentioned it to me, but I was told that  
 24 there are people who had some conversation raised to  
 25 people at Google.

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1 A. I was told that he was responsible for the 11:59:30  
 2 open handset lines, formation of.  
 3 **Q. Do you know whether Mr. Chu did any work in**  
 4 **developing the Android platform after he went to**  
 5 **Google?**  
 6 A. I don't know. And that's not my  
 7 perception, but I don't know. 11:59:59  
 8 **Q. Have you told me every fact that you're**  
 9 **aware of that contributed to your belief that Google**  
 10 **knew it was infringing Sun's Java IP?**  
 11 MS. RUTHERFORD: What he means is facts  
 12 that you didn't learn from counsel.  
 13 THE WITNESS: Oh.  
 14 MR. PURCELL: No, if he learned a fact from  
 15 counsel, he can testify to that. He can't testify  
 16 to what counsel told him.  
 17 THE WITNESS: So, you know, there are 12:00:30  
 18 things that I'm kind of not right now jump in my  
 19 mind. Maybe, you know, if over time today they come  
 20 to mind, I can share, but right now --  
 21 BY MR. PURCELL:  
 22 **Q. Right now, nothing comes to mind?**  
 23 A. No, no. I can spend some time thinking, if  
 24 you would like me to, but --  
 25 **Q. Well, it's fine to think throughout the**

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1 **Q. Do you recall roughly what timeframe this**  
 2 **conversation between Sun and Google took place?**  
 3 A. I don't remember right now, I'm sorry.  
 4 **Q. And you don't know who the participants 12:02:30**  
 5 **were for Sun or for Google in this conversation?**  
 6 A. Absolutely, I, unfortunately, do not  
 7 know.  
 8 **Q. During this conversation -- strike that.**  
 9 **Is this one conversation that you were**  
 10 **informed about the only conversation you're aware of**  
 11 **that took place between Sun and Google, prior to the**  
 12 **Oracle acquisition, regarding whether Android was**  
 13 **infringing Sun intellectual property? 12:02:58**  
 14 A. This was the only conversation that I'm  
 15 aware of, you know, other than, you know, the one  
 16 meeting that I had personally, yes.  
 17 **Q. Well, let's hold off on the one meeting.**  
 18 **We'll get back to that.**  
 19 **During this conversation that you were**  
 20 **informed of, do you know whether anyone from Sun**  
 21 **identified any specific patents to Google that they**  
 22 **claim were being infringed by Android? 12:03:23**  
 23 A. Okay. It's, again, kind of hard. No, I  
 24 don't know if they list it, but, you know, my  
 25 perception was that they probably, you know, talked

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