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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

_____)	
IO GROUP, INC., a)	
California Corporation,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. C-06-3926(HRL)
)	
VEOH NETWORKS, INC., a)	
California Corporation,)	
)	
Defendant.)	
_____)	

DEPOSITION OF JOHN STYN
SAN DIEGO, CALIFORNIA
MAY 31, 2007

REPORTED BY REGINA L. GARRISON, CSR NO. 12921

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
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IO GROUP, INC., a)
California Corporation,)
Plaintiff,)
vs.) CASE NO. C-06-3926(HRL)
VEOH NETWORKS, INC., a)
California Corporation,)
Defendant.)
_____)

DEPOSITION OF JOHN STYN, taken on behalf of
the Plaintiff, at 530 B Street, Suite 350, San Diego,
California, on Thursday, May 31, 2007, at 9:57 a.m.,
before Regina L. Garrison, Certified Shorthand
Reporter, in and for the County of San Diego, State of
California.

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A P P E A R A N C E S

FOR THE PLAINTIFF:

THE LAW OFFICES OF GILL SPERLEIN
BY GILL SPERLEIN
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San Francisco, California 94103
(415) 487-1211, Ext. 32

FOR THE DEFENDANT:

WINSTON & STRAWN LLP
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101 California Street
San Francisco, California 94111-5894
(415) 591-1506

1 know, maybe you have an additional recollection or you
2 want to clarify something, feel free to bring that to
3 our attention. We'll take the time to stop and let you
4 correct your previous statements.

5 A. Okay.

6 Q. That's relatively common.

7 A. Okay.

8 Q. Earlier, you said that part of your
9 consultant service was helping do beta tests, new
10 projects; is that accurate?

11 A. Yes.

12 Q. Did you, as an individual, help VEOH to beta
13 test its product while it was in development?

14 A. I'm not sure what "in development" means.

15 Q. Are you aware of a period of time when VEOH
16 had what was called their "beta model" operating at
17 VEOH.com?

18 A. I don't know if I ever used it when it wasn't
19 public.

20 Q. Okay.

21 A. But I used it very early on, as soon as it
22 was available.

23 Q. Okay. And when you say "available," is that
24 available through VEOH.com?

25 A. I don't remember.

1 Q. Do you know if, at one time, in order to use
2 the VEOH product, you were required to download a VEOH
3 client in order to use it as opposed to being able to
4 simply look at video at the website VEOH.com?

5 A. Yes.

6 Q. Did you download VEOH client to your personal
7 computer prior to the ability for people to watch
8 videos at VEOH.com?

9 A. Yes.

10 Q. And did you look at videos through the VEOH
11 client at that time?

12 A. Yes.

13 Q. So at that time, did you engage in any of the
14 activities that you would usually associate with beta
15 testing?

16 A. Yes.

17 Q. Did you use the product and then give
18 feedback to VEOH as to how the product worked for you?

19 A. Yes.

20 Q. Were there other types of things that are
21 associated with beta testing that you did at that time?

22 A. No.

23 Q. That's the main idea, just using the product
24 and giving the company feedback?

25 A. Correct.

1 STATE OF CALIFORNIA
2 COUNTY OF SAN DIEGO

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4 I, REGINA L. GARRISON, a Certified Shorthand
5 Reporter for the State of California, CSR No. 12921, do
6 hereby certify: That the proceedings were taken before
7 me at the time and place herein named; that the said
8 proceedings were reported by me in shorthand and
9 transcribed through computer-aided transcription, under
10 my direction; and that the foregoing is a true record
11 of the testimony elicited at proceedings had at said
12 proceedings to the best of my ability.

13 I do further certify that I am a disinterested
14 person and am in no way interested in the outcome of
15 this action or connected with or related to any of the
16 parties in this action or to their respective counsel.

17 In witness whereof, I have hereunto set my hand
18 this 21st day of June, 2007.

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Regina L. Garrison
REGINA L. GARRISON, CSR NO. 12921