# Exhibit X

# Exhibit 13

# UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

HIGHLY CONFIDENTIAL BUSINESS INFORMATION
CONTAINING SOURCE CODE

Page 1

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA


Koninklijke Philips N.V., U.S.)
Philips Corporation,          )
                              )
              Plaintiffs,     )
                              )
   vs.                        )NO. 18-CV-1885-HSG
                              )
HTC Corporation, HTC America, )
Inc.,                         )
                              )
              Defendants.     )
_____)



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Videotaped Deposition of MATT DOUCLEFF

South San Francisco, California

Wednesday, November 28, 2018 - 2:26 p.m.




Reported by:

Ashley Soevyn,

Job No. 23751

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1           THE WITNESS:  Yes, there's scenarios

2    where the estimate exists, and there are scenarios

3    where is does not exist.

4           MR.  SHARRET:  Okay.  Let's take a brief

5    break.

6           THE VIDEOGRAPHER:  We're going off the

7    record.  The time is 1:58 p.m.

8                    (Recess taken.)

9           THE VIDEOGRAPHER:  We are back on the

10   record.  The time is 2:16 p.m.

11          MR.  SHARRET:  So let's mark as Doucleff

12   1.  This is a document bearing Bates Nos.

13   GOOGPHILIPS 9470 and 9471.

14        (Exhibit 1 marked for identification.)

15          THE REPORTER:  There you go.  Exhibit 1.

16   BY MR. SHARRET:

17      Q    So this document was produced to us last

18   night.  Have you seen it before?

19      A    Yes, I have seen this document.

20      Q    In what context have you seen this

21   document before?

22      A    I've seen this document as part of my

23   preparation for this deposition.

24      ■    ■■■    ■■■■■■■■■■■■■■■■
■  ■■■■■■■■■■■■■■    ■■■■■■■■■■■■■■■■

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1 ████████

2      A    ████████████████████████

3      Q    ████████████████████████

█   ████████████████  ████████████████████

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9           MR. WARREN:  So, objection.  I'll remind

10  you that in answering the question you can't reveal

11  the contents of any communications that you had with

12  counsel.  You may certainly answer in terms of your

13  understanding of what you are here to prepare for.

14  But in the process of answering in that context, do

15  not reveal the contents of any communications you

16  had with lawyers for Google.  Does that make sense?

17           THE WITNESS:  Yes.

18           MR. WARREN:  Okay.

19           THE WITNESS:  So the question is?

20  BY MR. SHARRET:

21      Q    ██████  ████████████████████

█   ██████  ████████████████████████

█   ████████████████████████  ████████████

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18            MR. WARREN:  Objection.  Incomplete

19   hypothetical.

20            ████████████   █████████████████

▮   ██████████████████████   ████████████████

▮   ████████████

23   BY MR. SHARRET:

24        Q   ████████████████████████

▮            ████████████████████████

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8         MR. WARREN:  Objection.  Vague.

9         ██████████  █████████████████

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13              MR. SHARRET:  I have no further

14      questions.

15              MR. WARREN:  I have no questions.

16              MR. STARK:  No questions.

17              THE VIDEOGRAPHER:  This concludes today's

18      videotaped deposition of Matt Doucleff.  The number

19      of media used was two.  We're going off the record

20      at 2:26 p.m.

21

22              (TIME NOTED:  2:26 p.m.)

23

24

25

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1           I, MATT DOUCLEFF, do hereby declare under

2    penalty of perjury that I have read the foregoing

3    transcript; that I have made any corrections as

4    appear noted, in ink, initialed by me, or attached

5    hereto; that my testimony as contained herein, as

6    corrected, is true and correct.

7           EXECUTED this_____ day

8    of_____,

9    20____, at_____, _____.

10                   (City)                    (State)

11

12

13

14   _____

15   MATT DOUCLEFF

16

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 1

 2

 3          I, the undersigned, a Certified Shorthand

 4    Reporter of the State of California, do hereby

 5    certify:

 6          That the foregoing proceedings were taken

 7    before me at the time and place herein set forth;

 8    that any witnesses in the foregoing proceedings,

 9    prior to testifying, were duly sworn; that a record

10    of the proceedings was made by me using machine

11    shorthand, which was thereafter transcribed under my

12    direction; further, that the foregoing is a true

13    record of the testimony given.

14          I further certify I am neither financially

15    interested in the action nor a relative or employee

16    of any attorney or party to this action.

17          IN WITNESS WHEREOF, I have this December

18    10, 2018 subscribed my name.

19

20

21

22

23    _____

24    ASHLEY SOEVYN

25    CSR No. 12019

**Errata Sheet for the Deposition Transcript of Matthew Doucleff**
In re Koninklijke Philips N.V.
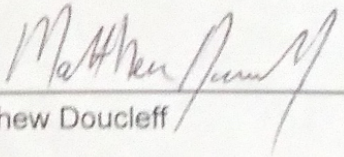Case No. 18-1885 (N.D. California)
November 28, 2018

| Page | Line | Now Reads | Should Read | Reason for Change |
|---|---|---|---|---|
| 11 | 21 | software limitation | software implementation | Transcription error |
| 14 | 3-4 | This code does a lot of things. | I mean this code does a lot of things. | Transcription error |
| 17 | 21-22 | pointer D reference | pointer dereference | Transcription error |
| 19 | 2 | I'd have to see more | I would have to see more | Transcription error |
| 28 | 13-14 | MR. STARK: Objection. Asked and answered. Argumentative. | MR. WARREN: Objection. Asked and answered. Argumentative. | Transcription error |
| 29 | 25 | So that's a method that takes no | So that's a method. It takes no | Transcription error |
| 42 | 4-5 | The type is determined by the sequence factory provider. | The type is determined by the sequencer factory provider. | Transcription error |

| 46 | 19 | git | get | Transcription error |
|---|---|---|---|---|
| 58 to 59 | 4 1 | ███████ | ███████ | Transcription error |
| 60 | 17-20 | ███████ | ███████ | I misspoke. This method cannot be overridden, so "will" is correct here. |
| 60 | 21-22 | Q.  Why do you say may?<br><br>A.  Because virtual methods. | [Delete] | I misspoke. This answer was incorrect. See above.  In addition, this question and answer would not have occurred except for my misstatement above. |
| 60 to 61 | 23 1 | Q.  Again, if there was not a virtual method here, this would be the one that's invoked, on Line 1192?<br><br>A.  Yes. Yes. | [Delete] | Although this answer is correct, this question and answer would not have occurred except for my misstatement above. |

| 64 | 8 | is a logic of type | Is a object of type | Transcription error |
|----|----|----|----|----|
| 70 | 7 | formal | format | Transcription error |
| 70 | 25 | AVR | ABR | Transcription error |
| 76 | 8 | cash | cache | Transcription error |
| 78 | 22 | list | less | Transcription error |
| 79 | 5 | | MR. WARREN:  Objection. Vague. | Not recorded |
| 83 | 7 | a less | OS | Transcription error |
| 87 | 8 | That is in virtual method. | That is a virtual method. | Transcription error |
| 103 | 20 | frickin | franken | Transcription error |
| 106 | 2 | particle | protocol | Transcription error |

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| 110 | 12 | content for free network | content delivery network | Transcription error |
|-----|----|--------------------------|--------------------------|---------------------|
|     |    |                          |                          |                     |

_Matthew Doucleff_

Matthew Doucleff

25 Jan 2019

Date