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Vol. XXI, Tab 58 - Ex. 5 - Deposition of Rose Hagan (former Google Managing Counsel - Trademarks, Jewelry Maker)

Rose Hagan
Google

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSETTA STONE, LTD.,
Plaintiff,

vs. CASE NO.

1:09-cv-00736 (GBL/TCB)

GOOGLE, INC.,
Defendant.

HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

DEPOSITION OF
30(b)(6) GOOGLE, INC. and ROSE HAGAN
PALO ALTO, CALIFORNIA
MARCH 5, 2010

Reported by Katherine E. Lauster, CSR No. 1894

1 could say I had seven and a half years of
2 preparation for this deposition, but nothing
3 specific to preparing for today.

4 Q. Since leaving Google in January 2010, have
5 you reviewed any documents that relate to the
6 subject matter of today's deposition?

7 A. No, I have not, with the exception of
8 yesterday.

9 Q. Right. Miss Hagan, you were previously
10 deposed in a matter between Google and GEICO; is
11 that correct?

12 A. Yes, that is correct.

13 Q. And that deposition took place on
14 December 30th, 2004?

15 A. Approximately.

16 Q. When you testified at deposition in the
17 GEICO case, were you testifying under oath as you
18 are today?

19 A. Yes.

20 Q. Did you testify truthfully and accurately
21 in that deposition?

22 A. Yes, I did.

23 Q. Following the deposition in the GEICO
24 case, did you make any changes or corrections to
25 your deposition transcript?

1 A. I believe I made minor corrections of
2 typos and that nature of thing.

3 Q. Do you recall making any more substantive
4 changes other than typos and -- and minor
5 corrections of that sort.

6 A. I don't recall.

7 Q. You were also deposed in a matter between
8 Google and American Blind and Wallpaper Factory,
9 Inc.; is that correct?

10 A. Yes, that's correct.

11 Q. And that took place in August of 2006; is
12 that right?

13 A. That sounds about right.

14 Q. And when you were deposed in that case,
15 you were testifying under oath as you are today?

16 A. Yes, I was.

17 Q. Did you testify truthfully and accurately
18 in that case?

19 A. Yes, I did.

20 Q. Following your deposition in the American
21 Blind Case did you make any changes or corrections
22 to your deposition transcript.

23 A. I remember reviewing the transcript, and I
24 believe I made minor corrections, once again, of
25 typos.

1 Q. Nothing substantive that you can recall?

2 A. I don't recall.

3 Q. You were also deposed in a matter between
4 CNG Financial Corporation and Google; is that
5 correct?

6 A. Yes.

7 Q. And that occurred in November 2006; is
8 that right?

9 A. That sounds about right.

10 Q. When you were testifying in deposition in
11 that case you were testifying under oath as you are
12 today; correct?

13 A. Yes.

14 Q. Did you testify truthfully and accurately
15 in that case?

16 A. Yes, I did.

17 Q. Following that deposition, did you make
18 any changes or corrections to your deposition
19 transcript?

20 A. I can't recall exactly. I think I made
21 small corrections as to typos.

22 Q. But no substantive changes that you can
23 recall?

24 A. Not that I recall.

25 Q. Other than the three cases that we just