




2-23-2010

# Vol. XXI, Tab 58 - Ex. 3 - Deposition of Terri Chen (Google Trademark Counsel)

Terri Chen  
*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.

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HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER  
ATTORNEYS' EYES ONLY

DEPOSITION OF  
TERRI CHEN  
VOLUME I

FEBRUARY 23, 2010  
9:13 a.m.

525 University Avenue, 11th Floor  
Palo Alto, California

Reported by Quyen N. Do, RPR, CSR No. 12447

1 as a 30(b)(6) witness or in your individual capacity?

2 A No. Just reviewing -- I -- I did review some  
3 deposition transcripts.

4 Q When did you review those deposition  
5 transcripts?

6 A Yesterday.

7 Q What case or cases were those deposition  
8 transcripts from?

9 A Geico vs. Google and CNG vs. Google.

10 Q Any other cases?

11 A No.

12 Q Okay. American Blinds?

13 A I don't believe so. There -- I may have  
14 reviewed a couple of pages from it here and there, but  
15 I -- I don't believe I reviewed the actual -- the full  
16 transcript on that one.

17 Q What about American Airlines?

18 A No.

19 Q Do you remember how many deposition  
20 transcripts you reviewed either in total or in part?

21 A Yes.

22 Q How many?

23 A I believe three. So the -- yeah.

24 Q So, from the Geico case, do you remember how  
25 many you reviewed?

1 A Yes. One.

2 Q Whose deposition was that?

3 A Rose Hagan.

4 Q From the CNG case, how many depositions did  
5 you review?

6 A One.

7 Q And whose deposition was that?

8 A Rose Hagan.

9 Q And from the American Blind case, you said you  
10 may have reviewed pages --

11 A I -- I may have. I'm -- I'm not sure.

12 Q Do you have a recollection as to what  
13 deposition you may have reviewed?

14 A Yes. Rose Hagan.

15 Q Other than Rose Hagan's depositions, did you  
16 review depositions of any other witnesses?

17 A No.

18 Q Did you review the deposition of Larry Page  
19 from the American Blinds case?

20 A No.

21 Q And you reviewed those transcripts yesterday?

22 A Yes.

23 Q Okay. Is that the same for the other  
24 documents that you identified? Did you review those all  
25 yesterday?