

Ex. PGS 1009

(EXCERPTED)

1 **UNITED STATES DISTRICT COURT**
2 **SOUTHERN DISTRICT OF TEXAS**
3 **HOUSTON DIVISION**

4 WESTERNGECO LLC * 09-CV-1827
 * Houston, Texas
5 VS. *
 *
6 ION GEOPHYSICAL * 7:38 a.m.
CORPORATION, FUGRO *
7 GEOTEAM, INC., ET AL * August 7, 2012

8 **JURY TRIAL**

9 **Volume 11**

10 **Morning Session**

11 **BEFORE THE HONORABLE KEITH P. ELLISON**
12 **UNITED STATES DISTRICT JUDGE**

13
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VIDEO DEPOSITION OF OYVIND HILLESUND

1 this was mainly my work, but that I wanted Simon Bittleston
2 to be included because he was my superior, but also because
3 he was the one that originally proposed this at the outset
4 of this project.

09:45:32

5 Having said that, I believe that most of the
6 ideas came from me.

09:46:06

7 **Q.** In the discoveries that are memorialized in your
8 patents, was it your intent that you explain in the
9 patents how to control a streamer both vertically and
10 horizontally in the water?

11 **A.** If I understand the question correctly, this means
12 whether our desire was to steer a streamer both vertically
13 and laterally, then -- laterally, then the answer is yes.

09:46:37

14 **Q.** All right. And was it your belief and your intent
15 when you described that invention that one device or one
16 steering device be able to accomplish both those goals?

17 **A.** Absolutely.

09:46:58

18 **Q.** We've shown you Exhibit 5 which is another patent
19 that WesternGeco has sued ION concerning, and this is what
20 we call the '038 patent. It's issued to Mark Zajac.

21 Have you looked at this patent before?
22 How long -- when did you first know of the existence of
23 this patent?

09:47:22

24 **A.** I don't know, but that must have been after I started
25 with PGS.