

1  
2 UNITED STATES PATENT AND TRADEMARK OFFICE

3 -----  
4 BEFORE THE PATENT TRIAL AND APPEAL BOARD

5 -----  
6 COX COMMUNICATIONS, INC.

7 Petitioner

8 vs.

9 AT&T INTELLECTUAL PROPERTY I, L.P.

10 Patent Owner  
11 -----

12  
13 Case: IPR2015-01227

14 Patent 7,907,714  
15 -----

16 Title: PROFILE MANAGEMENT SYSTEM INCLUDING USER  
17 INTERFACE FOR ACCESSING AND MAINTAINING PROFILE  
DATA OF USER SUBSCRIBED TELEPHONY SERVICES  
18 -----

19 DEPOSITION OF MICHELLE WATSON-WILLIAMS

20 Dallas, Texas

21 June 21, 2016  
22  
23

24 Reported by: Susan S. Klinger, RMR-CRR, CSR

25 Job No. 109310

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

June 21, 2016  
11:55 a.m.

Deposition of MICHELLE WATSON-WILLIAMS,  
held at the offices of Haynes & Boone, 2323  
Victory Avenue, Dallas, Texas, before Susan S.  
Klinger, a Registered Merit Reporter and  
Certified Realtime Reporter of the State of  
Texas.

A P P E A R A N C E S:

Attorneys for Petitioners:

Scott Bertulli, Esq.

PROSKAUER ROSE

One International Place

Boston, Massachusetts 02110

Attorneys for Patent Owner:

Jamie McDole, Esq.

Rajhav Bajaj, Esq.

Haynes and Boone

2323 Victory Avenue

Dallas, Texas 75219

Phillip Aurentz, Esq.

McKOOL SMITH

300 Crescent Court

Dallas, Texas 75201

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## I N D E X

WITNESS

PAGE

MICHELLE WATSON-WILLIAMS

EXAMINATION BY MR. BERTULLI

5

(Exhibits not attached.)

## E X H I B I T S

No.

Description

Page

Exhibit ATT-2044

"Requirements document,  
PC user interface,"

18

Exhibit ATT-2045

Declaration

8

1 WATSON-WILLIAMS - 6/21/16

2 MICHELLE WATSON-WILLIAMS,  
3 having been first duly sworn testified as  
4 follows:

5 EXAMINATION

6 BY MR. BERTULLI:

7 Q. Good afternoon. Could you please  
8 state and spell your full name for the record?

9 A. My name is Michelle Watson-Williams,  
10 M-I-C-H-E-L-L-E, Watson-Williams, W-A-T-S-O-N  
11 W-I-L-L-I-A-M-S.

12 Q. Great. And could you state your  
13 home address for the record?

14 A. My home address is 2231 Alisa Lane,  
15 A-L-I-S-A, Lane, Trophy Club, Texas 76262.

16 Q. I appreciate your joining us today.  
17 Is this your first deposition?

18 A. Yes.

19 Q. Okay. So let me go over just a  
20 couple of ground rules before we get started.  
21 Today I'm going to ask a bunch of questions and  
22 you will answer a bunch of questions.  
23 Hopefully we will enjoy ourselves and we will  
24 try not to run too long. I understand you have  
25 some commitments.

1 WATSON-WILLIAMS - 6/21/16

2 What I ask of you is that you please  
3 let me finish a question entirely before you  
4 try to answer. And in turn I will do  
5 everything I can to make sure I don't step on  
6 your answers and let you finish before I ask  
7 anything else. If at any time you think I've  
8 interrupted you, please let me know so you can  
9 finish.

10 Otherwise, today is your day. So if  
11 you feel that you need a break at any time feel  
12 free to let me know and we can take a break for  
13 whatever you need. All I ask is that if a  
14 question is pending, that you need to answer,  
15 please go ahead and finish your answer before  
16 we take a break. Is that okay?

17 A. Yes, it is okay.

18 Q. Great. And you understand that  
19 today you are testifying under oath?

20 A. Yes, I do.

21 Q. Is there any reason that you don't  
22 feel that you can testify truthfully today?

23 A. There is no reason why I can't  
24 testify truthfully.

25 Q. No drugs, illness, alcohol, any sort

1 WATSON-WILLIAMS - 6/21/16

2 of thing like that?

3 A. Yeah, no drugs, alcohol or illness,  
4 nothing like that --

5 Q. Perfect.

6 A. -- affecting my ability to testify.

7 Q. Excellent, thank you. I would like  
8 to start with just a little bit of your  
9 background if we could. Do you have an  
10 undergraduate degree?

11 A. Yes I do.

12 Q. And from where did earn your  
13 undergraduate degree?

14 A. St. Louis University in St. Louis,  
15 Missouri.

16 Q. Do you recall in what field your  
17 degree is in?

18 A. My field is business administration,  
19 finance concentration.

20 Q. And do you recall what year you  
21 earned that degree?

22 A. 1984. You really want to date me,  
23 but okay.

24 Q. It is just us here.

25 A. Okay.

1 WATSON-WILLIAMS - 6/21/16

2 Q. Do you have any other degrees?

3 A. No.

4 Q. You have worked at AT&T Services or  
5 its predecessor companies since 1984; is that  
6 correct?

7 A. Yes, it is correct that I've been at  
8 AT&T since 1984.

9 Q. I see that you brought a document  
10 with you today. Can you identify that  
11 document?

12 A. It is the -- it is my declaration,  
13 the declaration that I made and provided on  
14 behalf of myself for input into this  
15 proceeding.

16 Q. Okay. And is that marked.  
17 Exhibit ATT-2045 in the bottom  
18 corner?

19 A. Yes, it is.

20 Q. Have you made any notes or markings  
21 in that copy that you have?

22 A. No, I have not made any markings in  
23 this document.

24 Q. Great. Today for AT&T Services you  
25 are a senior quality assurance product manager;



1 WATSON-WILLIAMS - 6/21/16

2 is that correct?

3 A. I was a senior quality assurance  
4 product manager at the time I made this  
5 declaration. I have since changed positions,  
6 still in the technology development department,  
7 just a different title.

8 Q. What is your title today?

9 A. That is a good question. Senior  
10 lead product manager.

11 Q. And when you prepared this  
12 declaration and were a senior quality assurance  
13 product manager, what were your day-to-day  
14 responsibilities?

15 A. Day-to-day. As a quality assurance  
16 manager I performed quality tests for AT&T's TV  
17 service U-verse.

18 Q. So we just referred to it but let me  
19 just confirm that you indeed prepared a  
20 declaration in this matter; is that correct?

21 A. Yes, I prepare a declaration that we  
22 just called 2045.

23 Q. Who first reached out to you to  
24 prepare this declaration?

25 A. I was approached by an attorney, not

1 WATSON-WILLIAMS - 6/21/16

2 about the declaration, but about my knowledge  
3 of Positive ID service.

4 Q. Do you recall who that attorney was?

5 A. Not exactly, no.

6 Q. Was it an attorney for Haynes and  
7 Boone?

8 A. The initial contact was not an  
9 attorney at Haynes and Boone.

10 Q. Could it have been an AT&T attorney?

11 A. It could have been, yes, it could  
12 have been.

13 Q. While you were preparing the content  
14 of your declaration, did you discuss the  
15 content of your declaration with anyone else?

16 A. Say that question again.

17 Q. Sure. While you were preparing your  
18 declaration, did you discuss the content of the  
19 declaration with anyone else?

20 A. Well, in preparing the declaration,  
21 I provided input into my attorney about the  
22 conversation that led to the creation of the  
23 document.

24 Q. And when you say "my attorney," to  
25 whom do you refer?

1 WATSON-WILLIAMS - 6/21/16

2 A. Raj.

3 Q. Mr. Bajaj in the room?

4 A. Uh-huh.

5 Q. Okay, great. Did you discuss the  
6 content of your declaration with anyone at AT&T  
7 while preparing it?

8 A. No, not while preparing it, no.

9 Q. Have you discussed your declaration  
10 between the day you signed it and today with  
11 anyone at AT&T?

12 A. Say that again.

13 Q. Have you discussed your declaration  
14 between the day you signed it and today with  
15 anyone at AT&T?

16 A. Yes, I discussed the --

17 MR. McDOLLE: I want to caution you  
18 that to the extent you had a conversation  
19 with attorneys, you can answer the question  
20 yes or no. To the extent it is with  
21 someone besides an attorney, you can feel  
22 free to answer the question.

23 A. Yes.

24 Q. With whom did you discuss your  
25 declaration with between the day you signed it

1 WATSON-WILLIAMS - 6/21/16

2 and today?

3 A. I discussed it with my attorneys, I  
4 discussed the knowledge of it with my husband,  
5 and I discussed it with my boss just to let  
6 them know that I would be here.

7 Q. And again, when you say your  
8 attorneys, do you still mean Mr. Bajaj?

9 A. Yes.

10 Q. And anyone else?

11 A. Is the timeframe we're talking about  
12 from the day I signed it to today?

13 Q. Yes.

14 A. Then that would include Phil and  
15 Jamie.

16 Q. Did you prepare for today's  
17 deposition?

18 A. When you say "prepare," I did review  
19 my declaration before today.

20 Q. Did you prepare for today's  
21 deposition with anyone else?

22 A. When you ask if I prepared with  
23 anyone else, outside of my attorneys and my  
24 husband and my boss, no.

25 Q. So did you prepare for today's

1 WATSON-WILLIAMS - 6/21/16

2 deposition with your attorneys?

3 MR. McDOLE: You can answer that  
4 question yes or no, otherwise it would be  
5 privileged.

6 A. Yes.

7 Q. Are they the same attorneys you have  
8 identified who are also in the room with us  
9 right now?

10 A. Yes.

11 Q. And you were not offered any  
12 payment, incentive or inducement to provide  
13 your declaration; is that correct?

14 A. It is correct that I have not been  
15 provided any inducement or payment or anything  
16 like that.

17 Q. Are you being provided any payment,  
18 incentive or inducement to appear here today?

19 A. No, I'm not being provided any  
20 payment or inducement to be here today.

21 Q. When you were preparing your  
22 declaration, did you review any documents?

23 A. When I was preparing my declaration  
24 was I reviewing any documents. Most of the  
25 information contained in the beginning of this

1 WATSON-WILLIAMS - 6/21/16

2 document is just a chronology of my history,  
3 my, my professional history at AT&T. To  
4 clarify dates, I might have referenced  
5 something to get the dates correct. Beyond  
6 that, you know, I reviewed the materials that  
7 were associated with the details that are  
8 written here that I was provided by  
9 intellectual properties from AT&T.

10 Q. Can you identify the materials that  
11 were associated with the details that you  
12 reviewed?

13 A. I was provided the patent number  
14 7,907,714 as referenced in paragraph 1. I was  
15 provided the document entitled, "Requirements  
16 document, PC user interface," dated July 17th,  
17 1996 and thereby saying that this is Exhibit  
18 2044.

19 Q. Did you review any other documents  
20 in preparing your declaration other than Patent  
21 Number 7,907,714 and the requirements document  
22 that is marked as Exhibit 2044?

23 A. Say that again.

24 Q. Let me step back first.

25 A. Yes.

1 WATSON-WILLIAMS - 6/21/16

2 Q. So you identified U.S. Patent  
3 7,907,714?

4 A. Yes.

5 Q. If I refer to that for the rest of  
6 the afternoon as the '714 patent, can we agree  
7 that is the patent we referred to?

8 A. Okay.

9 Q. So it sounds like you reviewed the  
10 '714 patent and the requirements document that  
11 is marked as Exhibit 2044 in preparing your  
12 declaration. Do I have that right?

13 A. Yes, you have it right that I  
14 reviewed those two documents in preparing my  
15 declaration, yes.

16 Q. And so did you review any other  
17 documents in preparing your declaration?

18 A. No, not to, to prepare my  
19 declaration.

20 Q. A few answers ago you said to  
21 clarify dates you might have referenced  
22 something to get the dates correct. What do  
23 you mean by that?

24 A. Maybe my resume.

25 Q. So I see that you already have a

1 WATSON-WILLIAMS - 6/21/16

2 copy of your declaration, so I don't need to  
3 hand it to you, but now we're going to follow  
4 along with your declaration that is marked as  
5 Exhibit 2045.

6 A. Okay.

7 Q. And just to confirm, the exhibit  
8 that is marked 2045 is your declaration that  
9 you provided in this matter?

10 A. Yes, this is the declaration that I  
11 did provide.

12 Q. In paragraph 5 of your declaration  
13 approximately in the middle I will read, "From  
14 1984 through 1988 I was a manager of  
15 forecasting in marketing and sales;" is that  
16 correct?

17 A. Yes, in 1984 I was a manager in  
18 marketing and sales.

19 Q. In that title is the word  
20 forecasting; is that correct?

21 A. Yes.

22 Q. Can you describe what forecasting  
23 means in that context?

24 A. In this context, forecasting means I  
25 was assigned the responsibility of assessing



1 WATSON-WILLIAMS - 6/21/16

2 the results as it were whether they were  
3 revenues or widgets for products and services  
4 that I was managing for the state of Missouri.

5 Q. When you say that you had the  
6 responsibility of assessing the results in the  
7 context of revenues or widgets, what kind of  
8 results are you referring to?

9 A. I forecasted what the results would  
10 be, and then I made an assessment of how well I  
11 did as the months rolled by. So if I said it  
12 was going to be two when January got there it  
13 was two, so I assessed the relative performance  
14 of that product or service.

15 Q. And you use an example of if you  
16 said it was going to be two when January got  
17 there, what does the number two represent?

18 A. Two in that instance was a widget.

19 Q. So does that mean that two widgets  
20 would be produced?

21 A. Two widgets would be sold.

22 Q. Two widgets would be sold, thank  
23 you. So these were sales results that you were  
24 forecasting?

25 A. Uh-huh.

1 WATSON-WILLIAMS - 6/21/16

2 Q. Further down in paragraph 5 of your  
3 declaration you say that, "Among other tasks, I  
4 was responsible for preparing and maintaining  
5 forecasting models for end user common line  
6 demand;" is that correct?

7 A. Yes.

8 Q. What is end user common line demand?

9 A. End user common line is what we  
10 would have called a product that I was  
11 responsible for assessing during that time  
12 period. That was one of products, yes. So I  
13 had to project the revenues and the number of,  
14 for a time period whether that was one year,  
15 two years, three years, five years.

16 Q. In that sentence does demand mean  
17 sales?

18 A. Demand means counts, widgets.

19 Q. Are those produced widgets or sold  
20 widgets?

21 A. Sold widgets.

22 Q. In paragraph 6 of your declaration,  
23 marked 2045 I read, "From 1988 through 1989  
24 while still at Southwestern Bell Telephone  
25 Company I was area manager for forecasting

1 WATSON-WILLIAMS - 6/21/16

2 computer and data support in marketing and  
3 sales;" is that correct?

4 A. Yes, it is correct that I was the  
5 forecasting computer and data support manager.

6 Q. Were your duties in that role any  
7 different than the duties you had in your  
8 previous role as a manager of forecasting and  
9 marketing and sales?

10 A. Yes, my responsibilities were  
11 different in this role than they were in the  
12 initial role from 1984 to 1988.

13 Q. And how did your responsibilities  
14 differ in this role?

15 A. In this role I was managing about, I  
16 don't know, upwards of more than five employees  
17 and we were required to manage the overall  
18 budget for the district, which included people  
19 in different cities in the state of Missouri as  
20 well.

21 Q. So towards the end of paragraph 6  
22 you say expense budget information for the  
23 district. Is that district Missouri?

24 A. Yes, it was for the state of  
25 Missouri.

1 WATSON-WILLIAMS - 6/21/16

2 Q. In paragraph 7 of your declaration  
3 from 1989 through 1995 it looks like your role  
4 changed again to area manager for marketing  
5 information systems in set marketing and sales;  
6 is that correct?

7 A. Yes, my title changed. I was the  
8 area manager for marketing information systems  
9 and marketing sales during that time period.

10 Q. And when your title changed at that  
11 time, did your duties also change?

12 A. Yes, my duties changed when I moved  
13 positions.

14 Q. How did your duties change?

15 A. Primarily my duties changed because  
16 I was no longer just managing or coordinating  
17 responsibilities for the state of Missouri. It  
18 moved to what we called all of Southwestern  
19 Bell, which is all five states that were  
20 included in that medium at that time. It also  
21 required me to participate with other team  
22 members to move us from, you know, one type of  
23 database reporting system to a new reporting  
24 system and that was going to be in support of  
25 all of Southwestern Bell.

1 WATSON-WILLIAMS - 6/21/16

2 Q. You say that there were five states  
3 included in that medium at that time; is that  
4 correct?

5 A. Yes. There were five states  
6 included in Southwestern Bell at that time.

7 Q. Do you know what those five states  
8 were?

9 A. Arkansas, Texas, Oklahoma, Missouri  
10 and Kansas.

11 Q. Still in paragraph 7 in referring to  
12 your responsibilities you include managing the  
13 Revenue Accounting Process in marketing; is  
14 that correct?

15 A. Yes, it does include that as a  
16 responsibility.

17 Q. And so the first letters of Revenue  
18 Accounting Process are capitalized; is that  
19 correct?

20 A. Yes, they were capitalized.

21 Q. And so what was the Revenue  
22 Accounting Process?

23 A. It was a database.

24 Q. What do you mean by database?

25 A. It was a repository that stored the

1 WATSON-WILLIAMS - 6/21/16

2 revenues or the results from sales for what we  
3 would have called products and services in  
4 those five states I previously mentioned.

5 Q. And how did you manage the Revenue  
6 Accounting Process database?

7 A. You manage the Revenue Accounting  
8 Process by defining what made up product. So  
9 you may have a sea of Xs and Os, and you define  
10 which Xs and which Os make-up the revenue for a  
11 given product and service, and so it changes  
12 over time. And by managing, you are  
13 coordinating with the appropriate organizations  
14 that own, you know, the data streams to define  
15 it to say when you see this X and this O this  
16 is this product.

17 Q. In paragraph 8 of your declaration  
18 marked Exhibit 2045 it looks like you have  
19 another title change to marketing manager and  
20 associate director for product management in  
21 consumer and marketing divisions; is that  
22 correct?

23 A. Yes. During that time period, I did  
24 change positions and my title correspondingly  
25 changed.

1 WATSON-WILLIAMS - 6/21/16

2 Q. And did your responsibilities also  
3 change with that title?

4 A. Yes, my title changed as well as my  
5 responsibilities. I no longer managed the  
6 Revenue Accounting Process and marketing.

7 Q. And in this new role, what were some  
8 of your responsibilities?

9 A. It was my role to work on the  
10 development of a service called Positive ID and  
11 also work to manage the PC interface  
12 application, but which allowed Positive ID's  
13 customers to interact with Southwestern Bell  
14 telephone as stated in that paragraph.

15 Q. You said that it was your role to  
16 work on the development of a service called  
17 Positive ID; is that correct?

18 A. Uh-huh.

19 Q. What do you mean by work on the  
20 development?

21 A. AIN was a new infrastructure. And  
22 we worked with various organizations in AT&T to  
23 identify and capture, you know, what was needed  
24 in order to create that product and service.

25 Q. You said AIN. What is that?

1 WATSON-WILLIAMS - 6/21/16

2 A. Advanced intelligent network.

3 Q. What is an advanced intelligent  
4 network?

5 A. In this particular case, the  
6 advanced intelligent network was giving us the  
7 capability of, the capability of interacting  
8 with customers and AT&T's infrastructure to  
9 allow us to provide what we called a security  
10 service.

11 Q. Was the advanced intelligent network  
12 made up of hardware components?

13 A. Well, it is probably not fair for me  
14 to talk about what was involved, because I'm  
15 not familiar with the, you know, back end  
16 infrastructure of what was actually going on in  
17 the network for AT&T. So I'm not, I don't know  
18 that I should be the person answering that  
19 particular question.

20 Q. In your understanding, what was the  
21 advanced intelligent network made up of?

22 MR. McDOLE: Objection, form.

23 A. I don't know.

24 Q. In paragraph 8 of your declaration  
25 the second sentence begins, "In that role, my



1 WATSON-WILLIAMS - 6/21/16

2 responsibilities included product management  
3 for a new advanced intelligent network security  
4 service called Positive ID;" is that correct?

5 A. Yes, it does state that. My role  
6 was to be responsible for product managing  
7 Positive ID.

8 Q. So what does product management  
9 entail?

10 A. Product management basically entails  
11 ensuring that all aspects of marketing and  
12 selling a service is developed. Whether that  
13 is advertising or ensuring that the back end,  
14 you know, order flow works when a customer  
15 purchases the service. So in everything in  
16 between you kind of own that service and you  
17 are responsible for ensuring that you have good  
18 seamless customer experience once they purchase  
19 it.

20 Q. As a product manager, are you  
21 involved in any of the technical aspects of the  
22 product?

23 A. No. As product manager I'm not  
24 really involved in the technical aspects of  
25 product.

1 WATSON-WILLIAMS - 6/21/16

2 Q. So as a product manager, you're not  
3 involved in any of the design of product; is  
4 that correct?

5 A. I'm not involved in the design of  
6 the product. My input would be just on how it  
7 interfaced with the customer, not the design.

8 Q. What do you mean by interfaced with  
9 the customer?

10 A. How the customer received the  
11 product, the customer's perception of the  
12 product.

13 Q. Does the customer's perception of  
14 the product include any of the particular  
15 functionality of the product?

16 A. Does the customer -- say that again.

17 Q. Does the customer's perception of  
18 the product include any of the particular  
19 functionality of the product?

20 A. I think that the customer's  
21 perception could include the functionality. If  
22 it were difficult for them to use it that would  
23 make it -- the customer's, the input would be  
24 important.

25 Q. So as a product manager providing

1 WATSON-WILLIAMS - 6/21/16

2 input on how product interfaced with the  
3 customer, if the customer was having a  
4 difficult time with certain functionality, how  
5 would you provide input on that?

6 MR. McDOLE: Objection, form.

7 A. So let's talk about Positive ID.  
8 The initial aspect of it where a customer could  
9 just type it in on the telephone the PC  
10 interface would allow for the customer to be  
11 able to access it easier and put the telephone  
12 numbers in easier. So my input would be create  
13 the PC interface to make it easier for the  
14 customer.

15 Q. Would you provide any input on how  
16 that PC interface would look to the customer?

17 A. No, I would just say what the  
18 customer needed.

19 Q. And would you provide any input on  
20 how the PC interface would behave when used by  
21 the customer?

22 A. I wouldn't provide input on how the  
23 PC interface would behave, but I would provide  
24 input on whether I thought it was kludgy or  
25 hard for them to manage.

1 WATSON-WILLIAMS - 6/21/16

2 Q. What do you mean by kludgy?

3 A. If it were difficult for a person to  
4 use it I would provide input, but I wouldn't  
5 tell them how to fix it.

6 Q. And I'm still looking at the  
7 language in paragraph 8 of your declaration.  
8 What is a security service?

9 A. Positive ID as a service allowed  
10 customers to identify a list of telephone  
11 numbers for people that could access a  
12 particular computer or system. And if your  
13 name or number wasn't on it, you would be  
14 blocked. So it would allow for some control  
15 for the customer making their, whatever they're  
16 trying to protect a little more secure.

17 Q. So I think you just told me a little  
18 bit about Positive ID in particular, but  
19 generally what is a security service?

20 A. I think security service as a whole  
21 is a very broad statement, you know, because if  
22 you take it out of context security service  
23 could be any kind of security service. I mean  
24 like protecting your house, so I don't know  
25 that I can answer that question without putting

1 WATSON-WILLIAMS - 6/21/16

2 it in the context of Positive ID.

3 Q. Well, in the context of your  
4 declaration in paragraph 8, would it be more  
5 appropriate for me to ask you what an advanced  
6 intelligent network security service is?

7 MR. McDOLE: Object to form.

8 A. I don't know, I think we're  
9 splitting hairs. I can only tell you what  
10 Positive ID does and how it provides security.  
11 AIN is just the infrastructure that was used to  
12 get us there.

13 Q. Maybe I can clarify a little. So  
14 your sentence says, "A security service called  
15 Positive ID." So Positive ID is a security  
16 service; is that correct?

17 A. Uh-huh.

18 Q. Can there be other security services  
19 that are not Positive ID?

20 A. Oh, I don't know whether or not  
21 there is other security services that are not  
22 Positive ID as it relates to AT&T. I don't  
23 know anything about anything outside of that  
24 arena.

25 Q. That sentence goes on to say, "which

1 WATSON-WILLIAMS - 6/21/16

2 was targeted to medium to large businesses;" is  
3 that correct?

4 A. Yes, that's correct. It does say  
5 that it was the target group of customers were  
6 medium to large businesses for Positive ID.

7 Q. What is a medium to large business?

8 A. Anyone with five or more lines.  
9 That is identified as a medium business.

10 Q. When you say "lines," is that a  
11 telephone line?

12 A. Telephone lines, yes.

13 Q. Is a telephone line associated with  
14 a telephone number?

15 A. In this context, yes. It was  
16 defined based on medium versus large business  
17 was defined based on the number of access lines  
18 a customer had.

19 Q. Why was Positive ID targeted to  
20 medium to large businesses?

21 A. I would -- medium to large  
22 businesses could benefit best from the  
23 additional security that Positive ID had to  
24 offer. The more lines you had, the more open  
25 you are to invasion, so that was the target

1 WATSON-WILLIAMS - 6/21/16

2 group.

3 Q. Was Positive ID available to any  
4 other groups besides medium to large  
5 businesses?

6 A. I think Positive ID could be  
7 available to anyone. I have no control over  
8 what sales would have done. I was targeting a  
9 certain group of customers, but of course you  
10 know, sales forces can go out and look at other  
11 ways of positioning a product to make it more  
12 available to a broader group of customers.

13 Q. So do you know if Positive ID was  
14 available to anyone?

15 A. I don't know if Positive ID was made  
16 available to everyone, every business.

17 Q. Paragraph 8 of your declaration also  
18 says, "I also managed the associated PC  
19 interface application;" is that correct?

20 A. Yes, I also managed the PC interface  
21 application.

22 Q. What was the associated PC interface  
23 application?

24 A. In general, it is software.

25 Q. Was that software developed by AT&T?

1 WATSON-WILLIAMS - 6/21/16

2 A. Yes, the software was developed by  
3 AT&T to meet the needs we saw for our customer.

4 Q. And what do you mean when you say  
5 that you managed that associated PC interface  
6 application?

7 A. Again, in relation to what my  
8 responsibilities are it is to ensure that the  
9 customer's experience would be palpable. That  
10 it would be easy for the customer to use it,  
11 and to provide input to the teams that  
12 physically did the programming to ensure that  
13 you know, things would be sellable,  
14 positionable, deliverable.

15 Q. Looking to the last sentence of  
16 paragraph 8 of your declaration, what does it  
17 mean for a customer to interact directly with  
18 Southwestern Bell Telephone?

19 A. In the context of Positive ID, a  
20 customer being able to interact directly with  
21 Southwestern Bell was they would have a  
22 software on their own, in their own  
23 environment. They could maintain that list of  
24 customers who were authorized to gain access on  
25 their own and we did not have to specifically



1 WATSON-WILLIAMS - 6/21/16

2 type those numbers in ourselves.

3 So they had the control to manage  
4 that process for themselves or at least  
5 identify the telephone numbers. And AT&T's  
6 process with Positive ID allowed us to just run  
7 the service and bounce that against whatever  
8 the customer identified as, you know, their  
9 logical list for control.

10 Q. Could a customer control or manage  
11 that process before they had Positive ID?

12 A. Not to my knowledge, no, not with  
13 AT&T.

14 Q. So we've been talking about business  
15 customers primarily; is that correct?

16 A. Yes. We are talking about business  
17 customers primarily with respect to Positive  
18 ID, but as I mentioned before, you know, sales  
19 has full latitude to, you know, position a  
20 product, you know, the way they see fit. You  
21 know, they're commissioned, so you know, all we  
22 can do is put the service out there and sales  
23 has autonomy to, you know, market or really to  
24 push it to whoever they feel is best, you know.  
25 Corporate kind of designs things and when it

1 WATSON-WILLIAMS - 6/21/16

2 gets out in the field, the salespeople do have  
3 some control over who they position and try to  
4 place products with.

5 Q. Did the salespeople ever try to  
6 place the Positive ID product with residential  
7 customers?

8 A. I don't know.

9 Q. Do you know if a residential  
10 customer could have used Positive ID?

11 MR. McDOLE: Objection, form.

12 A. I don't know.

13 Q. Looking at paragraph 9 of your  
14 declaration, you mentioned that Southwestern  
15 Bell Telephone Company was rebranded as SBC  
16 Communications; is that correct?

17 A. Yes, Southwestern Bell Telephone  
18 Company was rebranded as SBC Communications.

19 Q. Do you know what SBC stands for?

20 A. Well, in the beginning it was  
21 Southwestern Bell Telephone Company. And as we  
22 merged with other companies, we just became a  
23 larger enterprise holding on to some aspect of  
24 the name. Outside of that, I don't know.

25 Q. As paragraph 9 makes its way over to

1 WATSON-WILLIAMS - 6/21/16

2 page 4, you note that they were later -- strike  
3 that.

4 As paragraph 9 makes it way over to  
5 page 4, you note that SBC Communications later  
6 purchased AT&T; is that correct?

7 A. Yes.

8 Q. Do you recall what year that was?

9 A. No, I don't know exactly when.

10 Q. You have been handed a document that  
11 is marked Exhibit ATT-2044; is that correct?

12 A. Yes, I see that at the bottom right  
13 hand corner ATT-2044.

14 Q. And can you tell me what this  
15 document is?

16 A. It is the requirements document for  
17 the PC interface that was used in conjunction  
18 with delivering Positive ID service.

19 Q. And is this the same Exhibit 2044  
20 that you referenced at the beginning of  
21 paragraph 10 in your declaration?

22 A. Yes, this is the same exhibit that  
23 is called a requirements document for PC user  
24 interface mentioned in paragraph 10.

25 Q. If for the rest of the afternoon if

1 WATSON-WILLIAMS - 6/21/16

2 we refer to the requirements document for the  
3 PC user interface as either the requirements  
4 document or as Exhibit 2044, can we understand  
5 that those are all the same document?

6 A. Absolutely, we can do that.

7 Q. Excellent. When was the last time  
8 that you looked at this requirements document  
9 of Exhibit 2044 before you started working on  
10 your declaration?

11 A. I think the, the last time I looked  
12 at this document before I started working on  
13 the declaration was January of 2016 when it was  
14 provided to me.

15 Q. Do you recall who provided this  
16 document to you in January of 2016?

17 A. I think my attorney did.

18 Q. When you say your attorney, you mean  
19 someone in the room today?

20 A. I mean someone in the room today  
21 provided it to me.

22 Q. Can you point --

23 A. Oh, point.

24 Q. Mr. Bajaj; is that correct?

25 A. Yes.

1 WATSON-WILLIAMS - 6/21/16

2 Q. Do you know why Mr. Bajaj provided  
3 this document to you in January of 2016?

4 MR. McDOLE: I will object as  
5 calling for privilege. You can answer that  
6 yes or no as to whether you know why.

7 A. Yes.

8 Q. Was the document provided to you so  
9 that you could prepare your declaration?

10 MR. McDOLE: Objection, calls for  
11 privileged information. Ms.  
12 Watson-Williams, I instruct you not to  
13 answer that question.

14 MR. BERTULLI: So counsel, you will  
15 not let the witness answer yes or no to my  
16 question?

17 MR. McDOLE: No, not when you  
18 presume a reason as to why counsel may have  
19 given it to her and go through a laundry  
20 list of reasons of why they may have given  
21 it to her and have her confirm or deny,  
22 confirm or reject your speculation as to  
23 why they may have given it to her.  
24 Eventually you are going to try to tie it  
25 into privileged information.

1 WATSON-WILLIAMS - 6/21/16

2 MR. BERTULLI: It is a very short  
3 laundry list right now, it is one question.

4 MR. McDOLLE: I understand, but  
5 you're presuming, you're presuming the  
6 privilege and trying to have her confirm  
7 privileged information for you. So within  
8 the presumption of your question is calling  
9 for privileged information, so I'm going to  
10 instruct her not to answer.

11 Q. We can move on from that. In  
12 paragraph 10 of your declaration you say that  
13 you were a contributing author and approver for  
14 this document; is that correct?

15 A. Yes, I am familiar with the document  
16 and I was a contributor and additionally an  
17 approver of the document.

18 Q. What does it mean to be an approver  
19 of the document?

20 A. The document was developed in  
21 collaboration of all of the teams involved with  
22 the delivery of product Positive ID. And  
23 everyone who owned the development in any  
24 aspect had to approve its -- approve the  
25 statements therein just to ensure that everyone

1 WATSON-WILLIAMS - 6/21/16

2 was in alignment with it representing what  
3 Positive ID was and what the PC, PC interface  
4 could do or would do.

5 Q. When you say that the document was  
6 developed in collaboration with all of the  
7 teams involved with the delivery, can you  
8 identify what teams were involved with the  
9 delivery of Positive ID?

10 A. I can identify some teams that were  
11 involved in the delivery of this document.

12 Q. Please go ahead.

13 MR. McDOLE: Objection, form.

14 Q. Could you please go ahead and  
15 identify some of the teams that were involved  
16 in the delivery of this document?

17 A. Product development, Kristin  
18 Chambers, myself as the product manager, anyone  
19 that managed the service order flow that took  
20 orders in the systems to make sure that that  
21 process worked. The group that actually did  
22 the programming of the PC interface itself.  
23 Anybody that was involved in trying to capture  
24 information once we, you know, sold the  
25 service.

1 WATSON-WILLIAMS - 6/21/16

2 So it was a collaborative effort to  
3 make sure that once you got a customer you  
4 understood exactly what was going to happen as  
5 you entered that customer in the system and how  
6 we could track that customer back through  
7 process. So all of those teams had to be  
8 involved to provide buy in to make sure it  
9 delivered what we were stating for the service.

10 Q. And as an approver, did you approve  
11 of this document?

12 A. As an approver, I approved of this  
13 document.

14 Q. Did the manager of the service order  
15 flow approve of this document?

16 A. It is my experience that every team  
17 member had to approve the document before it  
18 became final.

19 Q. Was there a formal process for  
20 providing approval on a document?

21 A. At the time of my involvement there  
22 was a formal process to get approval for the  
23 document.

24 Q. As an approver yourself, can you  
25 describe what the formal process to get



1 WATSON-WILLIAMS - 6/21/16

2 approval for a document was?

3 A. In 1996 it is not as fancy as it is  
4 today. You are all sitting in the same room  
5 and you physically got a yes or a no and a  
6 signature on a piece of paper.

7 Q. And when you say signature on a  
8 piece of paper, does that refer to a single  
9 signature page for all approvers?

10 A. I think at the outset that would  
11 have been a necessary requirement.

12 Q. And after a document is approved,  
13 where is the signature page recorded?

14 A. I don't know.

15 Q. Is the signature page attached to  
16 the document?

17 A. I don't -- in my experience it is  
18 not attached to the document. The signature  
19 page is required so that each organization's  
20 leadership knows that their representative as a  
21 part of this team concurred. So how the  
22 developer, you know, stored that, I don't know.

23 MR. McDOLLE: Counsel, we have been  
24 going about an hour, when you find a good  
25 stopping point.

1 WATSON-WILLIAMS - 6/21/16

2 MR. BERTULLI: Sure. Let me ask one  
3 more question on this and then we will wrap  
4 up.

5 MR. McDOLE: Okay.

6 Q. So looking only at Exhibit 2044, you  
7 cannot confirm that this document was fully  
8 approved by all the parties that would need to  
9 approve it?

10 MR. McDOLE: Objection, form.

11 A. I would like to state that a  
12 different way.

13 Q. Please.

14 A. You know, in my experience, it is a  
15 process that a document stated as final and the  
16 final revision date entered was our indication  
17 that this document was final, which means it  
18 was approved by all members that participated  
19 in the team.

20 Q. Is the word final printed on the  
21 cover of this document before the signature  
22 page is completed?

23 A. No.

24 Q. The word final is printed on the  
25 cover of this document only after the signature

1 WATSON-WILLIAMS - 6/21/16

2 page is completed?

3 A. Final is the indication that this  
4 document has been approved and placed as  
5 complete by the members that participated in  
6 the development of this document.

7 Q. And you base that on your experience  
8 as an approver at AT&T?

9 A. Yes.

10 MR. BERTULLI: Let's take a break.

11 (Recess, 12:52 to 1:00 p.m.)

12 Q. Back to paragraph 10 of your  
13 declaration marked Exhibit 2045. You also  
14 indicate that you were a contributing author to  
15 the requirements document; is that correct?

16 A. Yes, it is correct that I was a  
17 contributing author.

18 Q. And what do you mean by  
19 "contributing author"?

20 A. What I mean by contributing author  
21 is one of my key roles as the product manager  
22 was to ensure that the requirements document,  
23 you know, identified as 2044 is, is clear. And  
24 that when I'm no longer involved in the process  
25 or anyone that is on that collaborative team is

1 WATSON-WILLIAMS - 6/21/16

2 not involved in the process, that anyone else  
3 can pick up the document and understand the  
4 nature and function of the PC user interface.

5 So in that process, you know, one of  
6 my roles was to ensure that we had the  
7 appropriate, you know, language or terminology  
8 included in the document to ensure clarity.

9 Q. So did you personally draft language  
10 that appears in this requirements document?

11 A. Oh, yeah, I'm sure I did, yes.

12 Q. And did you personally edit any  
13 language that was drafted by someone else in  
14 this document?

15 A. I'm sure I did.

16 Q. If I asked you to identify language  
17 that you drafted in the requirements document,  
18 would you be able to do that?

19 A. No, I don't think I can do that.

20 Q. In paragraph 10 of your declaration  
21 approximately in the middle it says that  
22 documents like Exhibit 2044 were intended as  
23 handoff documents prepared at the completion of  
24 a product after the product was fully tested  
25 and after verification that the product

1 WATSON-WILLIAMS - 6/21/16

2 achieved its intended goals; is that correct?

3 A. Yes, it is stated in the document  
4 that I said that.

5 Q. What is verification?

6 A. In this context in the context for  
7 Positive ID we were able to ensure that the  
8 service worked, that you know, that we could  
9 place a customer on line and that things would  
10 flow. So we were able to validate that that is  
11 the case for Positive ID and the PC user  
12 interface process.

13 Q. And what steps did you take to  
14 ensure that the Positive ID service worked?

15 A. Regarding the physical steps, what I  
16 know we did was we physically had, you know,  
17 like a small community of testers which are  
18 also identified in the document. I think that  
19 you know, attempted to use it to verify that it  
20 worked. At the same time, we had like human  
21 factors which basically kind of, you know,  
22 looks at the touchy feely and kind of tells you  
23 whether or not you're on or off point, have  
24 them look at the document, I mean look at the  
25 service as well to make sure or at least to

1 WATSON-WILLIAMS - 6/21/16

2 ensure that not only the service worked but  
3 that it would have a positive response from the  
4 user community once it was deployed.

5 Q. When human factors looks at the  
6 product, would they look at the user interface,  
7 a Positive ID in this example?

8 A. In this physical example that didn't  
9 -- I don't know, hold on for a sec. I know  
10 that they looked at the aspect of Positive ID  
11 to make sure that the service functioned. They  
12 looked at Positive ID and in November and then  
13 did formal tests in January for Positive ID.  
14 And they did not physically look at the  
15 application manager software itself. And by  
16 that I mean they didn't look at how the  
17 software loads. You know, what I mean loading  
18 process. They just looked at the interface on  
19 what the reporting, what the screens looked  
20 like. They did not look at the loading  
21 process.

22 Q. So during verification it is right  
23 that human factors would look at the user  
24 interface of Positive ID?

25 A. No, I think that if it were

1 WATSON-WILLIAMS - 6/21/16

2 necessary for human factors to have looked at  
3 that component I think they would have looked  
4 at it.

5 Q. Is there a particular group that  
6 would have looked at the user interface of  
7 Positive ID during verification?

8 A. I can only state what group actually  
9 did look at it. And that is in the usability  
10 test for Positive ID that is stated in 2044  
11 where the tests were conducted.

12 Q. And does that section say which  
13 group?

14 A. It is not a group. It just says  
15 that the usability tests were performed by  
16 human factors in Austin and that they did not  
17 identify any, any substantial problems or bugs  
18 were uncovered and it appears that the software  
19 is usable and friendly.

20 Q. In the section of paragraph 10 of  
21 your declaration that I read a few moments ago  
22 it says that such requirement documents would  
23 be prepared at the completion of a product; is  
24 that correct?

25 A. Yes, that is my experience, that the

1 WATSON-WILLIAMS - 6/21/16

2 document is finalized at the completion of a  
3 project.

4 Q. So in your last answer you just said  
5 that the document would be finalized at the  
6 completion of a project but my question is are  
7 they only prepared at the completion of a  
8 project?

9 A. The interface document, requirements  
10 document it is not prepared as in -- it isn't  
11 started until at the end if that is what you  
12 are saying. The document itself, the  
13 preparation began sooner than when the product  
14 was available. This is just the completion  
15 timeline of having, you know, the service out  
16 and available.

17 It is not, it didn't start at that  
18 point, this is the end of that process. Of  
19 course because of the nature of what is  
20 involved because the testing is included, other  
21 aspects are included, the creation of the  
22 document started before the completion or  
23 before the product was prepared.

24 Q. You also say in paragraph 10 that  
25 such documents were prepared with the intention



1 WATSON-WILLIAMS - 6/21/16

2 that once a product manager departs a later  
3 reader could understand; is that correct?

4 A. Yes, that is correct. It is the  
5 design and the desire that anyone could product  
6 manage the service, you know, when I'm not  
7 around to do it, that is the intent.

8 Q. Was the requirements document of  
9 Exhibit 2044 prepared in anticipation of your  
10 departure?

11 A. I hope not. I don't know, but that  
12 is not the design. The desire is to have the  
13 document represent the requirements for the  
14 service and it is always to be done  
15 irrespective of the actual person physically  
16 participating in process.

17 Q. Can a product manager depart from  
18 the team before a product is fully tested and  
19 verified?

20 A. Well, did you say can or has?

21 Q. Can?

22 A. Well, I don't, I don't know -- well,  
23 yes.

24 Q. In your experience has a product  
25 manager departed from the team before -- strike

1 WATSON-WILLIAMS - 6/21/16

2 that.

3 In your experience, has a product  
4 manager departed from a team before the product  
5 is fully tested and verified?

6 MR. McDOLE: Objection, form.

7 A. Not in my experience I haven't seen  
8 a product manager leave before the requirement  
9 document is completed.

10 Q. If a product manager were departing  
11 from their team before the related product was  
12 fully tested and verified, would a document  
13 like Exhibit 2044 be created?

14 MR. McDOLE: Objection, form.

15 A. The creation of the document is for  
16 product and service and would be developed  
17 irrespective of any one individual. It is  
18 about the product, not about the people.

19 Q. In paragraph 10 of your declaration  
20 in the section that I previously read it also  
21 reads after the product was fully tested; is  
22 that correct?

23 A. I have to get there, hold on. After  
24 the product is fully tested, it says that in  
25 the middle of the page on 2045, yes.

1 WATSON-WILLIAMS - 6/21/16

2 Q. What do you mean by "fully tested"?

3 A. Tested to the extent that the  
4 product can be purchased, installed, flows  
5 through the process, generates the desired  
6 security. At the same time we are able to  
7 capture the revenue and count how many are sold  
8 would be a flow through to verify that the flow  
9 all the way from having a customer to being  
10 able to see that it is working at the tail end.

11 Q. And later in that sentence I think  
12 it is in the context of verification it says,  
13 "And after verification that the product  
14 achieved its intended goals;" is that correct?

15 A. Yes, it does state that it is after  
16 the product was fully tested and after  
17 verification that the product achieved its  
18 intended goals.

19 Q. What do you mean by "intended  
20 goals"?

21 A. What do I mean by intended goals.  
22 The intended purpose of Positive ID is to allow  
23 for a layer of defense or security to block  
24 unwanted people from accessing whatever it is  
25 the customer doesn't want people to access. So

1 WATSON-WILLIAMS - 6/21/16

2 the intended goal is to provide that security  
3 and that is what the service did.

4 Q. Did Positive ID have any other  
5 intended goals?

6 A. Not that I'm aware of.

7 Q. Who is Kristin Chambers?

8 A. She was the product developer on  
9 Positive ID at the time.

10 Q. What are the responsibilities of a  
11 product developer?

12 A. It is the product developer's job to  
13 assemble a team of people that would allow for  
14 a particular product or service offering to be  
15 developed, designed and/or enhanced for AT&T.  
16 And they do that in collaboration with all of  
17 the people who would play a role in delivering  
18 that product or service. So they work like,  
19 you know, a meeting lead, you know what I mean  
20 to make sure everybody comes to the table and  
21 does what is required supporting their  
22 organization so that the offering is able to be  
23 put on line.

24 Q. With that description, is it  
25 appropriate to think of a product developer as

1 WATSON-WILLIAMS - 6/21/16

2 a team manager?

3 A. No, because it is also -- no, I  
4 don't think it is appropriate to call a product  
5 developer a team manager, because they're just  
6 not managing people. It is not their job  
7 really to manage the people. It is to make  
8 sure that the timeline is achieved and they're  
9 managing the timeline.

10 So you know, they do whatever it  
11 takes to make sure that happens. So I don't  
12 think they're tied to Michelle or tied to  
13 Scott. They're tied to their timeline, to that  
14 organization. They're responsible for making  
15 sure that organization meets their goals, meets  
16 their part of the team. They're not managing  
17 the people, they're managing the timeline to  
18 get the product up.

19 Q. Does the product developer on a  
20 project participate in the development of  
21 product?

22 A. I mean I think everyone that is a  
23 part of the team has input based on their  
24 collective experiences and everybody brings  
25 that to the table.

1 WATSON-WILLIAMS - 6/21/16

2 Q. Does the product developer on a  
3 project participate in the design of the  
4 product?

5 A. I don't know.

6 Q. In paragraph 10 of your declaration  
7 you say that you collaborated on the  
8 requirements document of Exhibit 2044 with  
9 Kristin Chambers; is that correct?

10 A. Yes, I collaborated with 2044 with  
11 Kristin Chambers.

12 Q. When you say "collaborated," does  
13 that mean that you drafted and reviewed  
14 language as we discussed earlier?

15 A. Yes, it means that I participated in  
16 all activities associated with the, the  
17 compilation of a document including Kristin and  
18 all other team members that were a part of the  
19 team.

20 Q. Do you recall about how many team  
21 members were part of the Positive ID team?

22 A. No, I don't have a count.

23 Q. At the end of paragraph 10 of your  
24 declaration it starts on page 4 and goes on to  
25 page 5. I read, "The contents of the document

1 WATSON-WILLIAMS - 6/21/16

2 are accurate and describe the operation of the  
3 Positive ID service as it existed in July  
4 1996;" is that right?

5 A. Yes, it is. It is correct that I  
6 think that the document describes the way the  
7 service worked in 1996.

8 Q. Did you finish?

9 A. Uh-huh.

10 Q. I'm sorry. How do you know that the  
11 contents of the document Exhibit 2044 are  
12 accurate?

13 A. Based on my recollection of the  
14 document and my experiences with my  
15 understanding of this service it accurately  
16 reflects what I recall it stating when I was  
17 involved actively with the service.

18 Q. Did you make your assessment of the  
19 document's accuracy while preparing your  
20 declaration in this matter?

21 MR. McDOLLE: Objection, form.

22 A. You threw me off. What was the  
23 question.

24 Q. Well, let me ask it a different way.

25 A. Okay.

1 WATSON-WILLIAMS - 6/21/16

2 Q. When did you determine based on your  
3 recollection of the document and your  
4 experiences with the service that the contents  
5 of the document were accurate?

6 A. I received the document in February  
7 I think of 2016 and was asked if I were  
8 familiar with and understood the document, and  
9 at that time I said I do. It was in February  
10 of 2016, I don't remember exactly when, I think  
11 it was in February when I got a copy of it.

12 Q. In paragraph 11 of your declaration  
13 2045 right at the beginning of paragraph 11,  
14 what is a roll out?

15 A. In my experience when we deploy a  
16 new product or service we identify an area of  
17 the business whether that is a city, a state,  
18 whatever we identify an area we're going to  
19 start rolling it out in, or can't use the word  
20 to describe the word. When you, an area where  
21 we're going to start selling it initially, so  
22 that we can you know, monitor and assess, how  
23 it is going to go. Usually we pick an area  
24 before we roll it out, you know, in lots of  
25 other places. It is kind of like a controlled



1 WATSON-WILLIAMS - 6/21/16

2 deployment.

3 Q. And as part of the roll out of  
4 Positive ID referenced in paragraph 11 of your  
5 declaration, who were the subscribers that were  
6 provided with the software to install on their  
7 businesses computers?

8 A. I don't know.

9 Q. Were they medium to large sized  
10 businesses?

11 MR. McDOLE: Objection, form.

12 A. I just don't know who the customers  
13 were.

14 Q. Towards the end of paragraph 11 you  
15 reference telephone numbers that were allowed  
16 access to the subscriber's telephone numbers;  
17 is that correct?

18 A. Yes, it is correct that I reference  
19 telephone numbers.

20 Q. And in this example what are the  
21 subscriber's telephone numbers?

22 A. The customer can utilize the  
23 Positive ID service to identify employees or  
24 locations that have access to certain systems.  
25 They could list those phone numbers so that

1 WATSON-WILLIAMS - 6/21/16

2 those individuals could be granted access  
3 automatically. And so it just allows a  
4 customer to be able to create that list of  
5 telephone numbers.

6 Q. And what does it mean to be allowed  
7 access?

8 A. To be able to complete a call say,  
9 into I don't know, an access to the company's  
10 network or something.

11 Q. In paragraph 12 of your declaration  
12 in the first sentence I read, "In part a  
13 subscriber could use the software to view their  
14 subscriber profile data from a computer  
15 executing the software;" is that correct?

16 A. Yes, there is a statement saying  
17 that the customer would be able to use the  
18 software to view like who is being, who is  
19 being granted access.

20 Q. So in that sentence what is profile  
21 data?

22 A. Basically it would be, like,  
23 information about who, who was able to reach  
24 whatever that endpoint was. So like as an  
25 example in, in the document 2044 there is like

1 WATSON-WILLIAMS - 6/21/16

2 an example on pages like 14, 15 that is an  
3 example of looking at, you know, the  
4 subscriber's information. They would be able  
5 to see, you know, like when somebody tried to  
6 access it because there is like date and time  
7 and whether or not they reached it successfully  
8 and when they tried. That is the kind of  
9 profile information that a customer would be  
10 able to view.

11 Q. So you have just referred us to  
12 pages 14 and 15 of Exhibit 2044?

13 A. Uh-huh.

14 Q. Are you describing the table that is  
15 headed the activity log?

16 A. Yes, that is the type of  
17 information, yes that a customer would be able  
18 to see about who tried to gain access to their  
19 system.

20 Q. Is their profile data contained in  
21 this activity log shown in Exhibit 2044?

22 A. I think we are probably playing with  
23 semantics. This is the profile you are looking  
24 at who, who, what telephone number they were  
25 trying to get access to. I don't mean profile

1 WATSON-WILLIAMS - 6/21/16

2 in the sense of knowing something about the  
3 person that is trying to call. It is who tried  
4 to call, when they tried to call, did they gain  
5 access. That is what I mean by profile.

6 Q. So to help me understand and  
7 clarify, is the entirety of the activity log  
8 shown on pages 14 and 15 of Exhibit 2044  
9 profile data in this context?

10 MR. McDOLE: Objection, form.

11 A. Every time you do that I lose part  
12 of the sentence. Say your question again.

13 Q. Is the entirety of the activity log  
14 shown on pages 14 through 15 of Exhibit 2044  
15 profile data in the context of the Positive ID  
16 service?

17 MR. McDOLE: Objection, form.

18 A. I don't know.

19 Q. What is a telephony network system?

20 A. What context are you asking?

21 Q. We're back to paragraph 12 of your  
22 declaration.

23 A. So at some point earlier we talked  
24 about like connecting to AT&T's -- the customer  
25 has the ability to interact with AT&T. In the

1 WATSON-WILLIAMS - 6/21/16

2 process of creating your telephone list in  
3 order to block or allow access for certain  
4 people and block other people, AT&T is able to  
5 utilize the infrastructure of AIN and the  
6 tables that are created with Positive -- with  
7 the PC user interface and they interact. And  
8 so the network systems we're referring to  
9 really here are the infrastructure supporting,  
10 you know, AIN as it integrates with the  
11 information that is available by the end user.

12 The end user customer on the back  
13 end like the, the individual, the customer who  
14 maintains the list we don't physically have to  
15 talk to you in order to know what your list is.  
16 And we physically don't have to have your  
17 telephone number on that list either.  
18 Somewhere in here we should have -- we could  
19 have mentioned that, you know, a customer could  
20 have an access code, you know, like so maybe  
21 you know I would give you 1, 2, 3, 4, 5, 6.

22 And even though your number is not  
23 on the list like maybe you're calling from, I  
24 guess these days your cell phone instead of  
25 your home number, you could still gain access

1 WATSON-WILLIAMS - 6/21/16

2 but it wouldn't be your home number anymore,  
3 but you're calling in with your cell, and you  
4 would be able to type in this access code and  
5 you could still get in. So the network systems  
6 would be able to, you know, discern that based  
7 on the way it is designed.

8 Q. So back to paragraph 12 of your  
9 declaration right after telephony network  
10 systems I read, "Upon the subscriber's  
11 request;" is that correct?

12 A. Yes.

13 Q. What do you mean by, "the  
14 subscriber's request"?

15 A. Obtaining information or obtaining  
16 profile information. Trying to get away from  
17 the word profile, that is not something that  
18 you just automatically get. You have to  
19 request it.

20 Q. How does the subscriber make that  
21 request?

22 A. Specifically, I don't know. Give me  
23 a minute. It doesn't say how, I don't see  
24 that. Hold on, I'm just missing it. So on  
25 page 8 of document 2044 we were talking about

1 WATSON-WILLIAMS - 6/21/16

2 the application coordinator and how they would  
3 make, how would they make that request. So on  
4 the paragraph before customer contact it says,  
5 "Southwestern Bell has established a new  
6 application coordinator who is the Southwestern  
7 Bell employee that handles the help desk and  
8 support functions for Positive ID user  
9 interface."

10 That is the contact that the  
11 customer would make. So if you go down here  
12 where customer contact is it says, For all  
13 inward activity a customer contact would be --  
14 would take place. The application server will  
15 receive a message blah blah blah, but basically  
16 the person that is identified as the admin  
17 would call the Southwestern Bell and talk to  
18 the application coordinator in order to get  
19 additional information about the service.

20 Q. So let's see if we can try to  
21 clarify the order of operations there, because  
22 I'm not sure I understand.

23 A. Okay. The question in my -- the  
24 question was how would a person contact, how  
25 would a person contact AT&T to get that

1 WATSON-WILLIAMS - 6/21/16

2 information.

3 Q. Yes. So in paragraph 12 of your  
4 declaration you refer to the subscriber's  
5 request. So what would the subscriber  
6 physically do to make that request?

7 A. The subscriber would physically  
8 contact the Southwestern Bell application  
9 coordinator who is the Southwestern Bell  
10 employee that handles the help desk and support  
11 functions for the Positive ID user interface.

12 Q. And how would the subscriber  
13 physically contact the Southwestern Bell  
14 application coordinator?

15 A. A phone call. Now, this document is  
16 documenting what the procedures are. And to  
17 that extent that is what the customer would do  
18 in order to get additional information they  
19 would contact the PC interface person.

20 Q. And the PC interface person is the  
21 application coordinator; is that correct?

22 A. Yes.

23 Q. And the application coordinator is a  
24 person; is that correct?

25 A. It is a number and a person would



1 WATSON-WILLIAMS - 6/21/16

2 answer the phone and we are talking 1996.

3 Q. And would the subscriber speak to  
4 the application coordinator to make the  
5 request?

6 A. Yes, the person would speak to the  
7 application coordinator in order to make the  
8 request. I don't have a specific telephone  
9 number, but --

10 Q. We don't need a specific telephone  
11 number.

12 A. Okay. If you go to the last page  
13 2044 this is an example of what the customer  
14 would kind of see or hear and be provided this  
15 was an example. And it says that they would  
16 give them this, please call 1-800 blah, blah,  
17 blah, blah, blah for assistance. And it says  
18 this is signed by the application support  
19 coordinator.

20 So I'm just trying to give you an  
21 idea that you know at the time that customer  
22 would have purchased the service they would  
23 have been given a contact person and a contact  
24 number and that person was called the  
25 application support person. Does that make

1 WATSON-WILLIAMS - 6/21/16

2 sense?

3 Q. Yes, thank you.

4 A. Okay.

5 Q. In paragraph 14 of your declaration  
6 marked Exhibit 2045 you say, "As I stated  
7 above, the Positive ID service as described was  
8 operational as of July 17, 1996 as supported by  
9 the document and my personal knowledge;" is  
10 that correct?

11 A. Yes. I have stated that it -- I  
12 would have considered it available for services  
13 da, da, da, yes, that is my statement.

14 Q. And when you say the document, you  
15 mean the requirements document of Exhibit 2044;  
16 is that correct?

17 A. Yes.

18 Q. Does the requirements document alone  
19 fully support that Positive ID as described was  
20 operational as of -- strike that.

21 Does the requirements document alone  
22 fully support that the Positive ID service as  
23 described was operational as of July 17, 1996?

24 A. Well, I don't think that that is the  
25 only, the only thing that supports it. My

1 WATSON-WILLIAMS - 6/21/16

2 memory supports it and I think that, you know,  
3 AT&T was also able to provide the press release  
4 that stated that I thought it was available so  
5 that at least confirms my memory of it.

6 Q. Are there any aspects of the  
7 Positive ID service that you believe are  
8 missing from the document Exhibit 2044?

9 A. I think that the requirements  
10 document as it stands represents the  
11 functionality of Positive ID and the general  
12 flow process. It doesn't represent the  
13 technical aspects of Positive ID as it relates  
14 to how it functions and performs in the network  
15 of AT&T, this document doesn't characterize  
16 that.

17 MR. BERTULLI: Do you guys need a  
18 break now? I'm going to shift gears now, I  
19 don't know if you would like a break now.

20 A. No, I'm fine.

21 Q. Let's take a look at Exhibit 2044.  
22 You said that you collaborated with Kristin  
23 Chambers on this document; is that correct?

24 A. I agree that a group of us  
25 collaborated with Kristin Chambers to develop

1 WATSON-WILLIAMS - 6/21/16

2 this document, yes.

3 Q. Why is Kristin Chambers the only  
4 named author on the cover of the document?

5 MR. McDOLE: Objection, form.

6 A. Well, I can only speak to my own  
7 experience in the development requirements  
8 documents. Is the product developer's  
9 responsibility to design, to work towards  
10 designing, developing and deploying a service  
11 that is her job and that is why her name is on  
12 the bottom of the paper. That is my  
13 experience, that, that her name should be at  
14 the bottom of the piece of paper.

15 Q. If we could turn to page 5 of  
16 Exhibit 2044. There is a section somewhere in  
17 the middle approximately called user interface  
18 DTMF; is that correct?

19 A. Uh-huh.

20 Q. What is DTMF?

21 A. It is a dial tone multi flexing. It  
22 is actually you taking your finger and dialing  
23 a telephone number so you would be able to  
24 enter the telephone numbers that you want to  
25 allow access. You could create that list over

1 WATSON-WILLIAMS - 6/21/16

2 the phone.

3 Q. So could a subscriber use the DTMF  
4 interface to establish and maintain their list  
5 of authorized telephone numbers and access  
6 codes?

7 A. Yes. As it states in that  
8 paragraph, that customers can establish and  
9 maintain their list of 500 authorized telephone  
10 numbers and 100 access codes via the telephone.

11 Q. So the last sentence in the user  
12 interface DTMF paragraph says, "However, to  
13 expect customers to have only the DTMF option  
14 to manipulate such extensive data is not  
15 providing adequate customer service;" is that  
16 correct?

17 A. That's correct. It is not adequate  
18 service to just give them the ability to type a  
19 list that can go up to 500 through the  
20 telephone.

21 Q. And why was that not providing  
22 adequate customer service?

23 MR. McDOLLE: Objection, outside the  
24 scope.

25 A. I think it is unwieldy to expect a

1 WATSON-WILLIAMS - 6/21/16

2 customer to first type up 500 telephone numbers  
3 and then maintain it. It just does not seem  
4 like a very user friendly thing to do.

5 Q. In the next paragraph which is  
6 titled user interface PC it starts by saying,  
7 "Thus the need for a user interface was born;"  
8 is that correct?

9 A. Yes, it does say that, yes.

10 Q. Does that need refer to the customer  
11 service referred to in the previous paragraph  
12 on DTMF that was not adequate?

13 A. Yes. It is referring to the  
14 previous paragraph indicating that asking a  
15 customer to manipulate and manage a list of 500  
16 telephone numbers was accurate or is a very  
17 user friendly way and so collectively the PC  
18 interface requirement was born.

19 Q. Is the PC user interface an  
20 advantage that Positive ID provided over the  
21 DTMF interface?

22 MR. McDOLLE: Objection, outside the  
23 scope.

24 A. Yes.

25 Q. Approximately halfway down the

1 WATSON-WILLIAMS - 6/21/16

2 paragraph that started with user interface PC  
3 there is a sentence that begins, "However, we  
4 currently do not have an adequate way to pull  
5 the current view including DTMF updates off of  
6 the ISCP;" is that correct?

7 A. Yes, it does say that in that  
8 sentence.

9 Q. What is ISCP?

10 A. I don't know. I know it has  
11 something to do with the AIN, a component of  
12 the AIN infrastructure.

13 Q. And what does it mean to pull the  
14 current view?

15 MR. McDOLE: Object, that is outside  
16 the scope.

17 A. I don't know specifically.

18 Q. The next sentence says, "Thus any  
19 updates made through DTMF will not be reflected  
20 in the user interface tables." Did I read that  
21 correctly?

22 A. The customer will be alerted by  
23 making updates through DTMF will not be  
24 reflected in their PC list, yes, it is correct.  
25 It does say that.

1 WATSON-WILLIAMS - 6/21/16

2 Q. What does it mean that any updates  
3 made through DTMF will not be reflected in the  
4 user interface tables?

5 MR. McDOLLE: Objection, outside the  
6 scope.

7 A. It means that they are not  
8 automatically synced as it states. It says  
9 that the customer will be alerted that making  
10 updates through DTMF will not be reflected in  
11 their PC list and it is the customer's  
12 responsibility to keep the two systems in sync.

13 Q. At the end of that paragraph the  
14 last sentence reads, "We realized that this is  
15 less than ideal and hope that future  
16 enhancements will allow for two-way  
17 communication;" is that correct?

18 A. Yes, it is correct that it says it  
19 is an enhancement that was desired for the DTMF  
20 and the PC functionality to communicate.

21 Q. Were future enhancements that allow  
22 for two-way communications ever made to the  
23 user interface for the PC?

24 MR. McDOLLE: Objection, outside the  
25 scope.



1 WATSON-WILLIAMS - 6/21/16

2 A. I don't know. I wasn't involved  
3 with an enhancement for the service.

4 Q. So as an approver of this document,  
5 your involvement was only up until -- strike  
6 that.

7 So as an approval of this document,  
8 your involvement with the Positive ID project  
9 was limited to the system as it is described in  
10 this document and not future enhancements; is  
11 that correct?

12 A. I was not involved in an enhancement  
13 with Positive ID service after its initial  
14 development and deployment.

15 Q. And so you do not know if those  
16 enhancements occurred?

17 A. I wasn't involved in the  
18 enhancements involving Positive ID after I left  
19 the group.

20 Q. And when did you leave the group?

21 A. 1997.

22 Q. If we could turn to page 7 of  
23 Exhibit 2044 there is a bullet point list of  
24 system requirements and approximately the  
25 middle of the page and before that it says, "To

1 WATSON-WILLIAMS - 6/21/16

2 run our software each Positive ID customer will  
3 need to have," and then the list goes on; is  
4 that correct?

5 A. Yes. There is a list identified on  
6 page 7 of the PC software requirements.

7 Q. Do you recall what percentage of  
8 your subscribers in July of 1996 would have met  
9 these system requirements?

10 MR. McDOLE: Objection, form.

11 A. No, I don't remember what percentage  
12 of people met these criteria.

13 Q. Do you know what percentage of your  
14 customers in July 1996 were operating in an  
15 exclusively Macintosh or non-PC environment?

16 MR. McDOLE: Objection, form.

17 A. No, I do not know how many customers  
18 had exclusively Mac or non-PC environment.

19 Q. Did you have any customers that were  
20 Macintosh or non-PC environment subscribers?

21 MR. McDOLE: Objection, form.

22 A. I don't know. Just so we are clear,  
23 when you say did we have any customers, you  
24 know, that statement is like really loaded.  
25 Like I mean because you are talking about AT&T,

1 WATSON-WILLIAMS - 6/21/16

2 when you say any are we talking about Positive  
3 ID or all? In either way the answer is no, I  
4 don't know, but I don't know what you are  
5 talking about.

6 Q. So the paragraph underneath the  
7 bullet points?

8 A. Yes.

9 Q. On this page says, "These  
10 requirements mean that the interface will not  
11 be available to customers operating in an  
12 exclusively Macintosh or non-PC environment."

13 A. Uh-huh.

14 Q. And so that is why I want to  
15 understand if you are aware of any Macintosh or  
16 non-PC environment users at this time?

17 A. No, I don't know. I do know that  
18 the reason the statement was there was because  
19 we wanted to be clear that based on the way the  
20 software was designed in 1996, it did not  
21 support a Macintosh environment. And it didn't  
22 support, like, VT 100 terminal type  
23 environments so we wanted to be clear about  
24 that.

25 Q. If we could turn to page 17 of

1 WATSON-WILLIAMS - 6/21/16

2 Exhibit 2044. About two-thirds of the way down  
3 there is a section headed, "Establishment of  
4 user IDs;" is that right?

5 A. Yes, there is a section called  
6 establishment of user ID.

7 Q. The first sentence reads, "Because  
8 SMS will not be available to pass new Positive  
9 ID accounts to the application server until  
10 9/7/96, we need an alternative method;" is that  
11 correct?

12 A. Yes, it does state that.

13 Q. Did SMS become available to pass new  
14 Positive ID accounts to the application server  
15 on September 7, 1996?

16 MR. McDOLE: Object as outside the  
17 scope.

18 A. I don't know and that is because SMS  
19 is a network component of the AIN  
20 infrastructure and I don't know if that piece  
21 of infrastructure was available or not.

22 Q. Do you know what it means to pass  
23 new Positive ID accounts to the application  
24 server?

25 A. No, I don't know exactly what they

1 WATSON-WILLIAMS - 6/21/16

2 mean.

3 Q. The last page on paragraph 17  
4 Exhibit 2044 is headed by sending tables to  
5 space. Do you see that?

6 A. Uh-huh.

7 Q. The first sentence says, "The second  
8 concern for this interim period is how new  
9 tables sent from the customer through the  
10 application server will make it to space;" is  
11 that correct?

12 A. Yes, that is what it states.

13 Q. And then the following statements  
14 say, "This procedure will involve the CNOC and  
15 a manual workaround until 9/7/96;" is that  
16 correct?

17 A. Yes, it is correct that it says that  
18 it has got, it would involve a manual  
19 workaround until 97/96.

20 Q. Did new tables sent from the  
21 customer through the application server make it  
22 to space on September 7, 1996?

23 A. I don't know.

24 MR. McDOLLE: Objection, outside the  
25 scope.

1 WATSON-WILLIAMS - 6/21/16

2 Q. If I could turn your attention to  
3 page 19 of Exhibit 2044 at the top of the page  
4 under a transition at 9/7 heading it reads, "At  
5 9/7, SMS will need to populate their copy of  
6 the tables;" is that correct?

7 A. Yes, it does state that on the  
8 transitions at 9/7.

9 Q. Did SMS populate their copy of the  
10 tables on September 7, 1996?

11 MR. McDOLE: Objection, outside the  
12 scope.

13 A. I don't know.

14 Q. In the next paragraph it reads, "The  
15 SMS transaction layouts are very important to  
16 this project;" is that correct?

17 A. Yes, it does state that the SMS  
18 transaction layouts are important to the  
19 project.

20 Q. Do you know why the SMS transaction  
21 layouts were important to the project?

22 MR. McDOLE: Objection, outside the  
23 scope.

24 A. No, I don't know. It is a part of  
25 the AIN infrastructure and I don't know the

1 WATSON-WILLIAMS - 6/21/16

2 technology.

3 Q. Below that there is a new paragraph  
4 headed by dial-up procedures, do you see that?

5 A. Yes, I see the dial-up procedure  
6 section.

7 Q. And it starts with, "The RAS team is  
8 currently reviewing the issues with external  
9 customer access and timing and RAS is expected  
10 to be ready 8/1/96;" is that correct?

11 A. Yes, it does state that the RAS will  
12 be expected to be ready August 1st of '96.

13 Q. What is RAS?

14 A. It is a security team.

15 Q. Do you know what the issues with  
16 external customer access and timing were that  
17 are referred to in this paragraph?

18 MR. McDOLLE: Objection, outside the  
19 scope.

20 A. No, I don't know what that is. I  
21 don't know what their issue was, I don't  
22 recollect.

23 Q. And so do you know if RAS was ready  
24 by 8/1/96?

25 MR. McDOLLE: Objection, outside the

WATSON-WILLIAMS - 6/21/16

scope.

A. No, I don't know.

Q. If we turn to page 23 of Exhibit 2044 the second section here is headed two-way communication. Do you see that?

A. Uh-huh.

Q. And the first sentence reads, "Two-way communication is the ultimate goal for this interface;" is that correct?

A. Yes, it is correct that it says that.

Q. When this paragraph says, "this interface," is it referring to Positive ID?

MR. McDOLLE: Objection, outside the scope.

A. I'm not sure specifically what they're referring to, because it is referencing, you know, two components of the AIN infrastructure that, you know, I'm not, I'm not positive. The ICP and the SMS when they say this, I don't know which one they're talking about to be clear.

I would have said that it was the goal to have the updates that were identified



1 WATSON-WILLIAMS - 6/21/16

2 for DTMF and the updates that are done through  
3 the PC communicate. I know that is the goal of  
4 the service evolution, so that last statement  
5 is very clear. But so I believe we're talking  
6 about the PC interface, but I don't know for  
7 sure because they kind of throw in SMS and  
8 ISPC, too, so -- ISCP, I'm sorry.

9 Q. The very last phrase of that  
10 paragraph says, "which today they are not;" is  
11 that correct?

12 A. That's correct.

13 Q. Do you understand the word to refer  
14 to July 17, 1996?

15 A. Yes, it refers to July 17, 1996.

16 Q. In the middle of the page there is a  
17 section headed incorporation of other AIN  
18 services; is that correct?

19 A. Yes, there are other services.

20 Q. Like what other services?

21 A. As stated on page 23 intelligent  
22 redirect disaster recovery service, area wide  
23 network and tech stand will require PC  
24 interface for their customers.

25 Q. Are those services part of Positive

1 WATSON-WILLIAMS - 6/21/16

2 ID?

3 A. No, these services are not a part of  
4 Positive ID.

5 Q. And then in the second sentence it  
6 says, "At that time Positive ID will be  
7 redesigned;" is that correct?

8 A. Yes, it states that Positive ID will  
9 be redesigned.

10 Q. Why did Positive ID have to be  
11 redesigned at that time?

12 MR. McDOLE: Objection, outside the  
13 scope.

14 A. It doesn't say that Positive ID had  
15 to be redesigned. It is saying that it is  
16 going to integrate additional services so that  
17 the PC interface would be -- it will include  
18 all services not just Positive ID.

19 Q. So when the word redesigned is used  
20 here, what do you understand it to mean?

21 MR. McDOLE: Objection, outside the  
22 scope.

23 A. All services will be managed in a  
24 similar fashion. It says that Positive ID  
25 logic will be migrated to an independent

1 WATSON-WILLIAMS - 6/21/16

2 application server that will be used by all the  
3 services, so that is the design change.

4 Q. Do you know if that design change  
5 happened in mid to late 1997?

6 MR. McDOLE: Objection, outside the  
7 scope.

8 A. I don't know.

9 Q. Can we turn pack to page 14 of  
10 Exhibit 2044. Down at the bottom there is a  
11 table headed the activity log?

12 A. Yes, I see the table on page 14.

13 Q. And that goes from page 14 a little  
14 bit over to page 15; is that correct?

15 A. Uh-huh.

16 Q. So what is the activity log?

17 MR. McDOLE: Objection, outside the  
18 scope.

19 A. A user has the ability to retrieve  
20 information associated with either one of their  
21 Positive ID numbers or all, so that they can  
22 see for the last 90 days who has accessed the  
23 number in question.

24 Q. So in the left-hand column of the  
25 activity log I see the heading user ID; is that

1 WATSON-WILLIAMS - 6/21/16

2 correct?

3 A. Yes.

4 Q. Does each set of characters in a row  
5 underneath user ID represent a unique user?

6 MR. McDOLE: Objection, outside the  
7 scope.

8 A. I believe so, yes, but I don't think  
9 you can use that out of context, I think, I  
10 think. So I don't know for sure, but I think  
11 so.

12 Q. What do you mean when you say I  
13 don't think we can use that out of context?

14 A. Well, because each user is accessing  
15 a different Positive ID number. So as an  
16 example you see KC 4163 twice, those are two  
17 different Positive ID numbers. See what I  
18 mean?

19 Q. I do. Is a Positive ID number a  
20 telephone number?

21 A. Yes. A Positive ID number is a  
22 telephone number in this example because that  
23 must mean that the customer has placed that  
24 number on their list so that a number that,  
25 that the customer is either blocking things

1 WATSON-WILLIAMS - 6/21/16

2 from or granting people access to.

3 Q. So let's just look at the first row  
4 which is user ID KC1463 and Positive ID number  
5 3143312151. Do you follow?

6 A. Yes.

7 Q. So back in your declaration in  
8 paragraph 12 we were talking about subscriber  
9 profile data, do you remember that?

10 A. Uh-huh.

11 Q. In that row for Positive ID number  
12 3143312151, in the activity log on page 14 of  
13 Exhibit 204 is there any subscriber profile  
14 data?

15 MR. McDOLE: Objection, form and  
16 outside the scope.

17 A. And the telephone number and the  
18 information displayed and the profile data.

19 Q. What do you mean by the information  
20 displayed?

21 MR. McDOLE: Same objection.

22 A. The user ID, the user ID, you know  
23 the, for the customer, say, Scott this displays  
24 the profile of the telephone numbers that  
25 people are gaining access to are trying to gain

1 WATSON-WILLIAMS - 6/21/16

2 access to that is what this is showing. This  
3 is that profile. So KC1463 tried to call  
4 343143312151. They tried to call on 12/23.  
5 Well, it clearly this is a made up date, 95.  
6 Maybe it is not, I guess it is not because it  
7 was 95. And it does tell you what the status  
8 was. That the status was it failed to gain  
9 access.

10 So when I say profile I don't mean,  
11 you know, something about the person that  
12 called what you are doing is looking at Scott's  
13 profile of people who tried to gain access to  
14 the numbers that that customer has using  
15 Positive ID.

16 Q. So does that user's profile contain  
17 profile data?

18 A. No.

19 MR. McDOLE: Objection, outside the  
20 scope.

21 A. I think we keep talking past  
22 profile. I think you intend to imply that  
23 profile means something about the person, but I  
24 need to point you out to a sentence that is in  
25 this document that says what it doesn't

1 WATSON-WILLIAMS - 6/21/16

2 include. Give me a minute I have to find it.

3 I think you are implying that we are  
4 providing something other than what you see.  
5 So I want to make sure that you know what we  
6 call profile information and what it doesn't  
7 include. So hold on, I know there is a  
8 sentence in here somewhere that I think you  
9 should see. Hold on, I've just got to find it.

10 MR. McDOLE: I'm going to object as  
11 nonresponsive to everything after no.

12 A. Does that mean I answer or not. I  
13 don't know if I should keep looking, hold on.  
14 Can you turn to page 13 in 2044. If you go  
15 down to the first parentheses that you see  
16 after the number 5 Southwestern Bell will not  
17 pull calling party name off of any database.  
18 So we are not trying to pull information in the  
19 database. We are just trying to say this  
20 telephone number tried to call this telephone  
21 number and this is what happened.

22 Q. So let me try one more clarification  
23 because I'm not trying to imply anything.

24 A. Okay.

25 Q. I'm trying to understand where in

1 WATSON-WILLIAMS - 6/21/16

2 paragraph 12 of your declaration earlier we  
3 were talking about subscriber profile data and  
4 you recall that conversation?

5 A. Yes, I recall.

6 Q. And so while we were talking about  
7 subscriber profile data in that context, you  
8 directed me to the activity log on pages 14 and  
9 15 of Exhibit 2044; right?

10 A. Uh-huh.

11 Q. So what I want to understand is does  
12 the activity log on pages 14 and 15 of Exhibit  
13 2044 contain an example of subscriber profile  
14 data?

15 MR. McDOLE: Objection, outside the  
16 scope.

17 A. Yes, it displays an example of  
18 profile data.

19 Q. And which entry or entries in the  
20 activity log table on pages 14 and 15 display  
21 examples of profile data?

22 MR. McDOLE: Objection, outside the  
23 scope.

24 A. The information that you see on the  
25 table is an example of a profile data.



1 WATSON-WILLIAMS - 6/21/16

2 Q. I have no further questions today,  
3 thank you very much for your time.

4 A. Really, oh, okay.

5 MR. McDOLE: No questions for us, we  
6 will reserve signature.

7 (Deposition adjourned at 2:21 p.m.)

8 \_\_\_\_\_  
9 MICHELLE WATSON-WILLIAMS

10  
11 Subscribed and sworn to before me  
12 this day of 2016.

13  
14 -----  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## C E R T I F I C A T E

I, SUSAN S. KLINGER, a certified shorthand reporter within and for the States of Texas and California, do hereby certify:

That MICHELLE WATSON-WILLIAMS, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 24th of June, 2016.

---

Susan S. Klinger,  
RMR-CRR, CSR  
Texas CSR# 6531

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

NAME OF CASE: Cox vs. AT&T  
DATE OF DEPOSITION: June 21, 2016  
NAME OF WITNESS: Michelle Watson-Williams  
Reason Codes:

- 1. To clarify the record.
- 2. To conform to the facts.
- 3. To correct transcription errors.

Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_  
Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_  
Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_  
Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_  
Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_  
Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_  
Page\_\_\_\_Line\_\_\_\_Reason\_\_\_\_\_  
From\_\_\_\_\_to\_\_\_\_\_