

# EXHIBIT A

1 Project Raptor?

2 A. Yes, I am.

3 Q. Does that term also refer to the

4 proposed divestiture?

5 A. I believe it does, yes.

6 Q. Are you familiar with the term Yacht?

7 A. Yes.

8 Q. Do you know what Yacht refers to?

9 A. I believe so, yes.

10 Q. What does it refer to?

11 A. I think it -- I believe it -- it's --

12 it's the -- Yacht is the change for, obviously,

13 on the Yale side of the business, Smart

14 Residential.

15 Q. Are you familiar with the term Yard?

16 A. I am -- I -- I know the term, but I

17 obviously don't reference it at the moment to

18 anything.

19 Q. Do you know what it -- what it has been

20 used --

21 A. Not in depth, no. I mean, the one for

22 me is Yacht and Raptor, I think.

23 Q. Are you familiar with the term Project

24 Gemini?

25 A. Yes, I am.

38:3 to 38:9  
SAMPLE - Plaintiff's Opening Designation

38:3 to 38:5  
SAMPLE - Defendants Objection - FRE 402 Relevance

38:10 to 38:18  
SAMPLE - Defendants Counter Designation

38:19 to 38:25  
SAMPLE - Defendants Completeness

1 Q. What does Project Gemini refer to?

2 A. Gemini -- Project Gemini is -- is the --

3 is the project we're using to just manage the

4 separation on the software side.

5 Q. Any other code words that you're aware

6 of?

7 A. Oh, I'm not into code words, but I think

8 you've covered most of them. They would be

9 Yacht, Yard. I think you've covered most of them

10 that I can -- that I've heard.

11 Q. With respect to the divestiture

12 agreement, --

13 A. Mm-hmm.

14 Q. -- can you -- can you tell me which

15 parts of the agreement you remember reviewing?

16 A. The software. The software agreement.

17 Also reviewed IP in regards to IP agreements.

18 There was a couple of them there. One's around

19 trademarks and one's around IP-related transfer.

20 I did look at the TSAs, but, I mean,

21 briefly. What else did I look at? Gee, there's

22 so many.

23 Q. Did you look at the supply agreement?

24 A. Yes. The -- I've seen the supply

25 agreement, but I'm not -- I've seen it briefly.

39:1 to 39:10  
SAMPLE - Defendants Opening Designation

39:5 to 39:10  
SAMPLE - Plaintiffs Objection - FRE 402 Relevance

39:11 to 39:13  
SAMPLE - Plaintiff's Counter Designation

39:14 to 39:22  
SAMPLE - Plaintiffs Completeness