IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BARCO, INC. AND BARCO NV, Plaintiffs, -against- YEALINK (USA) NETWORK TECHNOLOGY CO., LTD.,AND YEALINK NETWORK TECHNOLOGY CO., LTD. Defendants.	Civil Action No.: 2:23-cv-00521 (JRG)(RSP)

****
[redacted]
****

VIDEOTAPED DEPOSITION UNDER ORAL EXAMINATION OF
ERWIN SIX
DATE: April 25, 2025

REPORTED BY: CHARLENE FRIEDMAN, CCR, RPR, CRR

Page 2

TRANSCRIPT of the deposition of the ERWIN SIX, called for Oral Examination in the above-captioned matter, said deposition being taken by and before CHARLENE FRIEDMAN, a Notary Public and Certified Court Reporter, a Registered Professional Reporter, and a Certified Realtime Reporter, at K&L Gates, LLP, 599 Lexington Avenue, New York, New York, on April 25, 2025, commencing at approximately 10:07 in the morning.

Page 3

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

K&L GATES
1 Congress Street
Suite 2900
Boston, Massachusetts 02114
(67) 951-9076
BY: CHRISTOPHER CENTURELLI, ESQ.
Attorneys for Plaintiffs

DENTONS US, LLP
1900 K Street NW
Washington, DC 20006
(650) 798-0381
BY: STEPHEN WANG, ESQ.
Attorneys for Defendants

ALSO PRESENT: MICHAEL BENNETT, Video Operator

* * * * *

Page 4

I N D E X

WITNESS NAME	PAGE
ERWIN SIX	
By Mr. Yang	8

* * * * *

E X H I B I T S

EXHIBIT NO.	DESCRIPTION	PAGE
EXHIBIT 13	E-mail chain	16
EXHIBIT 14	E-mail chain	23
EXHIBIT 15	Product sheet	63
EXHIBIT 16	LauncherPlus Quick Start Guide	74
EXHIBIT 17	Settlement agreement	80
EXHIBIT 18	CleverShare product document	92
EXHIBIT 19	E-mail chain	101
EXHIBIT 20	License agreement	129
EXHIBIT 21	Printout of website	152
EXHIBIT 22	List of patents	154
EXHIBIT 23	List of patents	155
EXHIBIT 24	List of patents	157
EXHIBIT 25	List of patents	158
EXHIBIT 26	List of patents	159
EXHIBIT 27	Photograph	163
EXHIBIT 28	Photograph	163

Page 5

E X H I B I T S
(continued)

EXHIBIT NO.	DESCRIPTION	PAGE
EXHIBIT 29	Photograph	164
EXHIBIT 30	Photograph	166
EXHIBIT 31	Article	169
EXHIBIT 32	Photograph	170
EXHIBIT 33	Early proposal	172

* * * * *

Page 138

Page 139

3 MR. CENTURELLI: To the extent you
4 had discussions with legal counsel, I'm
5 going to instruct you not to answer.
6 You can answer with respect to
7 discussions you may or may not have had
8 with Crestron.

Page 140

Page 141

1 A Can you repeat the --

9 MR. YANG: Why don't we take a
10 quick break.
11 VIDEO OPERATOR: Off the record,
12 1:36 p.m., April 25, 2025.
13 (Brief recess taken.)
14 VIDEO OPERATOR: On the record 1:48
15 p.m., April 25, 2025.
16 Q Staying with Exhibit -- staying
17 with this license agreement for a second.
18 MR. CENTURELLI: Exhibit 20?
19 MR. YANG: Yes.
20 Q If you can go to schedule 1,
21 please, which is on page 15.
22 Does schedule 1 provide the patents
23 Crestron licensed for Barco?
24 A Yes.
25 Q So Crestron licensed all these

Page 142

1 patents, correct, all the patents listed
2 here?
3 A Correct.
[redacted]

Page 143

[redacted]
2 MR. CENTURELLI: I'm going to
3 object to that question to the extent it
4 calls for attorney-client privileged
5 communication and caution you not to
6 reveal any attorney-client privileged
7 communications or instruction you may
8 have received, but if you're able to
9 otherwise, answer the question.
[redacted]
23 MR. CENTURELLI: I'm going to
24 object, and -- to form and my prior
25 instruction, and also asked and

Page 144

1 answered.
2 Q Are you able to answer my question,
3 sir?
[redacted]
11 Q Will Barco have licensed only one
12 category of patents to Crestron?
13 A That's privileged, too. That's
14 attorney-client privileged communications.
15 MR. CENTURELLI: I instruct you not
16 to answer.
17 Q Okay. So Barco itself, other than
18 what its legal counsel may have told you,
19 does not have an answer?
20 MR. CENTURELLI: I instruct you --
21 I object to the question.
22 I believe that the witness has
23 answered the question and I have
24 instructed him not to answer.
25 MR. YANG: I'm actually just trying

Page 145

1 to clarify that -- all the information
2 that Barco has is privileged. So I do
3 need an answer to that.
4 Q Let me ask you this way.
5 So is it fair, then, that -- let me
6 rephrase.
7 So my question, sir, is would Barco
8 have licensed only one category of these
9 patents to Crestron, and I just wanted to
10 understand, is it your position that even yes
11 or no it will be privileged?
12 MR. CENTURELLI: I object to the
13 form of the question.
14 A I can only say this --
15 MR. CENTURELLI: If you can answer
16 the question without revealing
17 attorney-client communications, please
18 do.
[redacted]

Page 206

Q Okay. Again, do not reveal what your counsel may have told you, but sitting here today, are you able to tell me which features of ClickShare is patented?
A I don't --
MR. CENTURELLI: I'm going to object to the question to the extent it calls for attorney-client privileged communication, and I'm going to instruct the witness not to answer.
MR. YANG: I'm just trying to understand, outside of what may be privileged, does the witness have any knowledge.
If the answer is no, I'm happy to move on. If it's yes, then I think it's fair game.
MR. CENTURELLI: I believe he's already answered that.
MR. YANG: Well, let's try -- I don't think he -- I don't think he has on the record.
MR. CENTURELLI: Okay.
A So no.
Q No information other than what you

Page 207

may have learned from counsel, correct?
A Yes.
[redacted].
MR. CENTURELLI: I would like to mark this transcript Attorneys' Eyes Only subject to our review under the protective order.
MR. YANG: Mr. Six, I do not have any further questions for you today.
I want to thank you for being here. Really appreciate your time.
MR. CENTURELLI: Mr. Six, I have no questions for you at this time, but I also thank you for your hard work today.
THE WITNESS: Yes.
MR. YANG: Thank you.
And let me just make a note, I believe today, during this deposition, we received a number of documents from Barco. Some of it may relate to or may be relevant to the questions I had today

Page 208

for Mr. Six and also the questions we had for Mr. Lightcap.
MR. CENTURELLI: Yeah.
MR. YANG: We'll take a look, but I just want to note that on that basis, we hold this deposition open. If we need to revisit, we can talk, but I just want to make a note.
MR. CENTURELLI: I understand.
Thank you.
VIDEO OPERATOR: This will conclude today's recording of the deposition of Erwin Six.
We are off record at 3:21 p.m., April 25, 2015.
(Whereupon, the deposition was concluded at 3:21 p.m.)
(Witness was excused.)

Page 209

C E R T I F I C A T E

I, CHARLENE FRIEDMAN, a Certified Court Reporter and Notary Public, qualified in and for the State of New Jersey do hereby certify that prior to the commencement of the examination ERWIN SIX was duly sworn by me to testify to the truth the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth.

I DO FURTHER certify that I am neither a relative of nor employee nor attorney nor counsel for any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

CHARLENE FRIEDMAN, RPR, CRR, CCR of the State of New Jersey
License No: 30XI00204900
Date: April 25, 2025