

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.

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)
)
)
) Civil Action No.:
) 2:23-cv-00521
) (JRG) (RSP)

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

REPORTED BY: CHARLENE FRIEDMAN, CCR, RPR, CRR

Page 2			Page 3		
1			1	A P P E A R A N C E S:	
2			2		
3			3		
4			4	K&L GATES	
5			5	1 Congress Street	
6			6	Suite 2900	
7			7	Boston, Massachusetts 02114	
8			8	(67) 951-9076	
9	TRANSCRIPT of the deposition of the		9	BY: CHRISTOPHER CENTURELLI, ESQ.	
10	ERWIN SIX, called for Oral Examination in the		10	Attorneys for Plaintiffs	
11	above-captioned matter, said deposition being taken by		11		
12	and before CHARLENE FRIEDMAN, a Notary Public and		12	DENTONS US, LLP	
13	Certified Court Reporter, a Registered Professional		13	1900 K Street NW	
14	Reporter, and a Certified Realtime Reporter, at K&L		14	Washington, DC 20006	
15	Gates, LLP, 599 Lexington Avenue, New York, New York, on		15	(650) 798-0381	
16	April 25, 2025, commencing at approximately 10:07 in the		16	BY: STEPHEN WANG, ESQ.	
17	morning.		17	Attorneys for Defendants	
18			18		
19			19	ALSO PRESENT: MICHAEL BENNETT, Video Operator	
20			20	*****	
21			21		
22			22		
23			23		
24			24		
25			25		

Page 4			Page 5		
1	I N D E X		1	E X H I B I T S	
2	WITNESS NAME	PAGE	2	(continued)	
3	ERWIN SIX		3	EXHIBIT NO.	DESCRIPTION
4	By Mr. Yang	8	4	EXHIBIT 29	Photograph
5	*****		5	EXHIBIT 30	Photograph
6	E X H I B I T S		6	EXHIBIT 31	Article
7	EXHIBIT NO.	DESCRIPTION	7	EXHIBIT 32	Photograph
8	EXHIBIT 13	E-mail chain	8	EXHIBIT 33	Early proposal
9	EXHIBIT 14	E-mail chain	9	*****	
10	EXHIBIT 15	Product sheet	10		
11	EXHIBIT 16	LauncherPlus Quick	11		
12		Start Guide	12		
13	EXHIBIT 17	Settlement agreement	13		
14	EXHIBIT 18	CleverShare product	14		
15	EXHIBIT 19	E-mail chain	15		
16	EXHIBIT 20	License agreement	16		
17	EXHIBIT 21	Printout of website	17		
18	EXHIBIT 22	List of patents	18		
19	EXHIBIT 23	List of patents	19		
20	EXHIBIT 24	List of patents	20		
21	EXHIBIT 25	List of patents	21		
22	EXHIBIT 26	List of patents	22		
23	EXHIBIT 27	Photograph	23		
24	EXHIBIT 28	Photograph	24		
25			25		

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[REDACTED]

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[REDACTED]

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 Creston.

[REDACTED]

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[REDACTED]

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1 A Can you repeat the --
[REDACTED]

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 Creston licensed for Barco?
24 A Yes.
25 Q So Creston licensed all these

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1 patents, correct, all the patents listed
2 here?

3 A Correct.

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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.

23 MR. CENTURELLI: I'm going to
24 object, and -- to form and my prior
25 instruction, and also asked and

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1 answered.
2 Q Are you able to answer my question,
3 sir?

11 Q Will Barco have licensed only one
12 category of patents to Creston?

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

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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 Creston, 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.

Page 206 1 Q Okay. Again, do not reveal what 2 your counsel may have told you, but sitting 3 here today, are you able to tell me which 4 features of ClickShare is patented? 5 A I don't -- 6 MR. CENTURELLI: I'm going to 7 object to the question to the extent it 8 calls for attorney-client privileged 9 communication, and I'm going to instruct 10 the witness not to answer. 11 MR. YANG: I'm just trying to 12 understand, outside of what may be 13 privileged, does the witness have any 14 knowledge. 15 If the answer is no, I'm happy to 16 move on. If it's yes, then I think it's 17 fair game. 18 MR. CENTURELLI: I believe he's 19 already answered that. 20 MR. YANG: Well, let's try -- I 21 don't think he -- I don't think he has 22 on the record. 23 MR. CENTURELLI: Okay. 24 A So no. 25 Q No information other than what you	Page 207 1 may have learned from counsel, correct? 2 A Yes. 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED]. 8 MR. CENTURELLI: I would like to 9 mark this transcript Attorneys' Eyes 10 Only subject to our review under the 11 protective order. 12 MR. YANG: Mr. Six, I do not have 13 any further questions for you today. 14 I want to thank you for being here. 15 Really appreciate your time. 16 MR. CENTURELLI: Mr. Six, I have no 17 questions for you at this time, but I 18 also thank you for your hard work today. 19 THE WITNESS: Yes. 20 MR. YANG: Thank you. 21 And let me just make a note, I 22 believe today, during this deposition, 23 we received a number of documents from 24 Barco. Some of it may relate to or may 25 be relevant to the questions I had today
Page 208 1 for Mr. Six and also the questions we 2 had for Mr. Lightcap. 3 MR. CENTURELLI: Yeah. 4 MR. YANG: We'll take a look, but I 5 just want to note that on that basis, we 6 hold this deposition open. If we need 7 to revisit, we can talk, but I just want 8 to make a note. 9 MR. CENTURELLI: I understand. 10 Thank you. 11 VIDEO OPERATOR: This will conclude 12 today's recording of the deposition of 13 Erwin Six. 14 We are off record at 3:21 p.m., 15 April 25, 2015. 16 (Whereupon, the deposition was 17 concluded at 3:21 p.m.) 18 (Witness was excused.) 19 20 21 22 23 24 25	Page 209 1 C E R T I F I C A T E 2 I, CHARLENE FRIEDMAN, a Certified Court 3 Reporter and Notary Public, qualified in and for 4 the State of New Jersey do hereby certify that 5 prior to the commencement of the examination ERWIN 6 SIX was duly sworn by me to testify to the truth 7 the whole truth and nothing but the truth. 8 I DO FURTHER CERTIFY that the foregoing 9 is a true and accurate transcript of the testimony 10 as taken stenographically by and before me at the 11 time, place and on the date hereinbefore set forth. 12 I DO FURTHER certify that I am neither a 13 relative of nor employee nor attorney nor counsel 14 for any of the parties to this action, and that I 15 am neither a relative nor employee of such attorney 16 or counsel, and that I am not financially 17 interested in the action. 18 19 20 21 22 23 24 25  CHARLENE FRIEDMAN, RPR, CRR, CCR of the State of New Jersey License No: 30X100204900 Date: April 25, 2025