

□

1 Rubenstein

2 Q. Do you have any information at all
3 with regard to any of the IViewIt entities?

4 A. Not at this time, no.

5 Q. "Not at this time." Did you have
6 any information at any time in the past, sir?

7 A. Not that I know of right now.

8 Q. Do you have any files or records
9 indicating that you had any dealings with --
10 and I will go through a list here --
11 IViewIt.com, Inc.?

12 A. Not that I know of.

13 Q. IViewIt, LLC?

14 A. Not that I know of.

15 Q. UViewIt?

16 A. Not that I know of.

17 Q. IViewIt, Inc.?

18 A. Not that I know of.

19 Q. Have you ever heard of an
20 individual named Eliot Bernstein?

21 A. I might have.

22 Q. Well, sir, that's either a "Yes"
23 or "No" question.

24 A. Like I said, I think he works for
25 IViewIt, and I may have heard his name.

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Ken Rubenstein Deposition
Rubenstein

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2 Q. How about what is called the MPEG
3 Patent Pool, have you heard of that?

4 A. Yes, I have.

5 Q. Why don't you tell me what that
6 is.

7 A. Decline to answer at this time.

8 Q. Why do you decline to answer?

9 A. Irrelevant to this deposition.

10 Q. I'm sorry, irrelevancy is not an
11 objection that would allow you not to answer,
12 sir.

13 A. Make a motion to the judge. If he
14 orders me to tell you about it, I will tell
15 you.

16 MR. SELZ: Chris, are you
17 instructing your client not to answer?

18 MR. PRUSASKI: I am going to put
19 an question for relevancy based on the
20 court's granting of the motion and
21 limiting on the record, and if
22 Mr. Rubenstein declines to answer then
23 he is declining to answer.

24 And, just so I don't have to keep
25 objecting, Mr. Selz, to make this

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Rubenstein

2 easier, my objection is continuing in
3 nature as to any questions regarding any