

DEPOSITION TRANSCRIPT

Case: Halcyon Data Systems Corp. v. Redwood Software Group Inc.

Case No.: 3-22-cv-23774-GHW

Court: United States District Court

Witness: Michelle Larson, Managing Director

Date: 2024-03-25

Examining Attorney: [Counsel for Redwood Software Group Inc.], Latham & Watkins LLP

EXAMINATION BY COUNSEL:

Q: Please state your name and current title for the record.

A: My name is Michelle Larson. I serve as Managing Director.

Q: How long have you been in that role?

A: Approximately 6 years.

Q: I want to direct your attention to the subject of non-compete clause awareness and scope.

Were you personally involved in those matters?

A: Yes, I was directly involved.

Q: Please describe your involvement.

A: I oversaw the relevant process and was responsible for ensuring compliance with all applicable agreements and obligations.

Q: Were you aware of the specific contractual provisions at issue?

A: Yes. I reviewed those provisions carefully before proceeding.

Q: Did you take any steps to comply with the notice requirements?

A: We followed our standard procedures, which I believed to be compliant.

Q: I'm showing you what has been marked as Exhibit A. Do you recognize this document?

A: Yes, I signed it. I understood it restricted certain activities.

Q: And you understood the geographic scope of that restriction?

A: Yes. I believe it covered the entire country.

Q: At any point did you consult legal counsel regarding these obligations?

A: Yes, we engaged Latham & Watkins LLP to advise us on compliance.

Q: Nothing further. Thank you.

[END OF EXAMINATION]

Certified by: _____

Court Reporter

I, Michelle Larson, certify that the foregoing transcript accurately reflects my testimony.

Signature: _____

Date: 2024-03-25

