

# **EXHIBIT F**

Jay Vosburgh 11/17/05

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1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

4  
5 THE SCO GROUP, )

6 Plaintiff, )

7 vs. )

8 INTERNATIONAL BUSINESS MACHINES )  
9 CORPORATION, )

10 Defendant. )  
11 )

) Case No.

) 2:03CV0294DAK

12  
13 VIDEOTAPED DEPOSITION OF JAY VOSBURGH  
14 November 17, 2005  
15 Redmond, Washington  
16  
17  
18  
19  
20  
21  
22  
23

24 Reported by:

David A. Hart

CCR No. 2007

25 Job No. 75289/179359

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1 to a network within the LTC?  
 2 A. To a network?  
 3 MR. BROOKS: Objection. Vague.  
 4 THE WITNESS: All copying between  
 5 computers typically takes place over a network.  
 6 Q. (By Mr. Donohue) Is there a specific place within a network  
 7 in the LTC where what work is -- is copied?  
 8 A. I'm not sure I understand your question.  
 9 Q. Do you use SCP?  
 10 A. SCP?  
 11 Q. Do you know what that means?  
 12 A. Yes. It's the secure copy program.  
 13 Q. And do you use that program?  
 14 A. Yes.  
 15 Q. And what do you use it for?  
 16 A. Copying files between computers.  
 17 Q. Do you use SSH?  
 18 A. Yes.  
 19 Q. And what do you use that for?  
 20 A. Accessing computers remotely.  
 21 Q. Any other similar programs you use besides S- -- excuse me --  
 22 SCP or SSH?  
 23 A. The FTP, file transfer protocol, program.  
 24 Q. With respect to the machines that you described that are at  
 25 your home, have you ever had ptx source code on those

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1 machines?  
 2 A. No, I have not.  
 3 Q. Not at any time?  
 4 A. Not at any time.  
 5 Q. Have you ever had any System V code on those machines?  
 6 A. No, I have not.  
 7 Q. Are there any previous machines that you have had at your  
 8 home that have contained ptx source code?  
 9 A. No.  
 10 Q. Any previous machines that you maintained at your home that  
 11 had System V source code?  
 12 A. No.  
 13 Q. Are you familiar with the term "sandbox" as it relates to  
 14 computer programming?  
 15 A. Of recent. Yes.  
 16 Q. And how is it that -- that you became familiar with that  
 17 term?  
 18 A. One of the counsel here asked me at one point to check my  
 19 sandbox to see if I had any remaining files that I had missed  
 20 previously for disclosure.  
 21 Q. And when was that?  
 22 A. Approximately two weeks ago.  
 23 Q. And did you locate any files on your sandbox?  
 24 A. Yes.  
 25 Q. And what were those files?

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1 A. They were archived copies from the revision control system  
 2 relating to bonding work. Said work for bonding has now been  
 3 public with the previous -- the previous versions are still  
 4 on my computer.  
 5 Q. And this was a revision control system for Linux?  
 6 A. Not specifically for Linux but ...  
 7 Q. But that's -- that's where the -- was this Linux code that --  
 8 that was in the revision control system?  
 9 A. Yes. It's Linux source code.  
 10 Q. Was there other source code that you found?  
 11 A. At what time?  
 12 Q. This -- when you -- when you looked just recently.  
 13 A. No. That was all that I found at the time. It was subject  
 14 to disclosure.  
 15 Q. What else did you find that was subject to disclosure that  
 16 was on your sandbox?  
 17 A. That was all.  
 18 Q. Were there other documents that you found just recently on  
 19 that were subject to disclosure?  
 20 A. Recently being when?  
 21 Q. I think you had mentioned about two weeks ago.  
 22 A. No. It was just those two things. Three things.  
 23 Q. Have you used a remote access program like SSH to access a  
 24 machine that has ptx code on it while you were working at  
 25 home?

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1 A. At any time?  
 2 Q. At any time.  
 3 A. No.  
 4 Q. Can you describe to me what -- what a sandbox is.  
 5 A. Not specifically at this time. Counsel sent me a precise  
 6 definition that I worked against. And I cannot quote it.  
 7 MR. BROOKS: Even if you could quote  
 8 it --  
 9 I'm going to instruct the witness not to testify in any  
 10 detail about instructions received from counsel.  
 11 Q. (By Mr. Donohue) Putting aside the instruction you received  
 12 from counsel, do you have a general understanding of what a  
 13 sandbox is?  
 14 A. Vaguely. It's not a term I normally use.  
 15 Q. Could you just give me what understanding you do have about a  
 16 sandbox.  
 17 A. A development system that is -- or a development environment  
 18 that is used for work that may be destructive to the system  
 19 itself unless it's on a separate area where it cannot damage  
 20 critical information.  
 21 Q. And physically where does this -- where is the sandbox  
 22 located?  
 23 A. What do you mean?  
 24 Q. Is it -- is it -- is it a file that's -- that's in your  
 25 computer or --