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IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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IN RE MICROSOFT CORP.
ANTITRUST LITIGATION

:
:
MDL Docket No.
(Judge J. Frederick Motz)
:

This Document Relates To
All Actions

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1 THE WITNESS: The -- what happened when
2 this -- when this issue came about is that I was moved
3 from being an architect -- I still held that role, but
4 I was also placed in charge of a team, and it became
5 the open file team.

6 We had a manager that managed other groups
7 as well, and he oversaw what we were doing. But I was
8 basically the lead developer in charge of making sure
9 that the file system would work out. And I had seven
10 developers assigned to me to make sure that file system
11 would work in the applications.

12 I also had a developer -- one, two,
13 three -- amongst the applications that we were working
14 with, including Quatro Pro, so that would be five
15 applications. We had nine people in those applications
16 that were to coordinate with us as we made progress how
17 those -- how the working of the shell APIs and the open
18 file system would work in those applications. And all
19 of our tasks was basically that once we got the
20 shell -- as we were working on the shell APIs and
21 learned their behaviors and adjusted to the changes
22 that happened in the operating system, how those things
23 were to work out into it.

24 We would have had a cost in trying to move
25 to Windows 95 in the file system anyways, the -- but

1 the addition of having to work out our own -- not
2 having our own -- not having the system dialogs for
3 anything, but having to build all of those from scratch
4 as well, and making sure then that they could mimic
5 what Windows was doing and giving the same kind of
6 response, our team of seven worked on that for a year.
7 And I would say that you could -- you could consume
8 easily one half of the time of the other nine people as
9 well. So that would be four and a half, seven, eleven
10 and a half developer years.

11 Q. And those eleven and a half developer
12 years were years that WordPerfect and Novell would not
13 have had to expend had Microsoft not changed the APIs?

14 A. I currently feel that way, yes, from what
15 I know.

16 Q. Have you heard the term "rich text format"
17 before?

18 A. RTF, yes.

19 Q. What is "rich text format"?

20 A. Rich text format has two definitions. The
21 first one is that it is a language that is used to
22 express -- when WordPerfect came into being, a word
23 processor, documents were thought of as typed
24 documents, and so basically coming from a typewriter.
25 And then as graphical environments and WUSIWUG came on,

1 MR. BETTILYON: Objection.

2 THE WITNESS: I do not require -- I do not
3 remember providing any information directly. I did
4 have my managers talk to me about some of these issues.

5 Q. BY MR. BENZ: Okay. And with respect to
6 the issues that are identified on Harral Exhibit 1,
7 would it be fair to say that -- that each of these
8 issues were put together by individuals at Novell
9 regarding Microsoft's conduct?

10 MR. BETTILYON: Objection.

11 THE WITNESS: Yes.

12 Q. BY MR. BENZ: Okay. Let's just -- if we
13 could just go through them quickly, and if you could
14 as -- I'll go one by one and --

15 A. Okay.

16 Q. -- to the extent you have personal
17 knowledge about this, if you could briefly describe
18 what the issue was with respect to Microsoft conduct
19 and then we'll keep going.

20 A. All right.

21 Q. The first one, as you mentioned, it says:
22 "Microsoft removed the ability to
23 hook into the Explorer."

24 Do you see that?

25 A. Yes, I do.

1 Q. Okay. Can you briefly describe to the
2 jury why that was a problem.

3 MR. BETTILYON: Objection.

4 THE WITNESS: The -- basically to -- to go
5 back to what I had said before, we were the provider of
6 the open dialog and the name space browsers. Our
7 ability in our application to represent what the
8 Windows 95 Explorer, their desktop, would be able to
9 have in it inside of our application was a crucial
10 piece of our being able to be and integrated a well
11 participating citizen in the Windows 95 desktop. And
12 that's what -- and in having removed the APIs that I
13 was previously talking about, that severely crippled
14 our ability to do that without significant effort.

15 Q. BY MR. BENZ: Number 3 reads:

16 "The largest area that has held us
17 up has been that Microsoft initially
18 published integration features (plug
19 & play, shell integration, etc.) and
20 then pulled the features without
21 letting us know."

22 Do you see that?

23 A. I do.

24 Q. So what -- why was that an issue with
25 Microsoft?

1 All of those interactions, we expected
2 people to start doing through the Windows API and it
3 was shell APIs that allowed us to do that. That's what
4 this is speaking about.

5 Q. And as a result of Microsoft's actions in
6 pulling those features, you had to redesign and recode,
7 correct?

8 A. We had to redesign, code, and in some
9 cases drop features. We knew that in some places
10 people could get at things and in other places we could
11 not provide them.

12 Q. Now, Number 4 mentions QF group. That's a
13 Novell technology, correct?

14 A. It is a Novell technology and it was
15 before then a WordPerfect technology.

16 Q. Okay. What is the QF group?

17 A. That's the Quick Finder team.

18 Q. Oh, yes. Okay. Number 4 reads:

19 "I believe there were additional
20 issues for the QF group when tying
21 into the shell. Since they want to
22 replace their find several API's
23 were changed and even removed to
24 make things difficult."

25 Do you see that?