

Gil4_30PM

Designation List Report



Bizinsky, Sarit

2024-09-06

P's Narrowed	00:05:00
D's Counters	00:00:13
TOTAL RUN TIME	00:05:14



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DESIGNATION	SOURCE	DURATION	ID
9:12 - 9:16	<p>Bizinsky, Sarit 2024-09-06</p> <p>9:12 MR. MARZORATI: Good morning.</p> <p>9:13 A. Good morning.</p> <p>9:14 By Mr. Marzorati:</p> <p>9:15 Q. Would you please state your name for the record?</p> <p>9:16 A. Sarit Bizinsky Gil.</p>	00:00:06	Gil4_30PM.1
12:12 - 12:19	<p>Bizinsky, Sarit 2024-09-06</p> <p>12:12 Q. What legal entity is your employer?</p> <p>12:13 A. It is Q Cyber Ltd.</p> <p>12:14 Q. Q Cyber Ltd of Israel?</p> <p>12:15 A. Of Israel.</p> <p>12:16 Q. Is that the company on your paychecks?</p> <p>12:17 A. Yes.</p> <p>12:18 Q. Okay. Has that been your employer since February 2017?</p> <p>12:19 A. Yes.</p>	00:00:26	Gil4_30PM.2
16:11 - 16:22	<p>Bizinsky, Sarit 2024-09-06</p> <p>16:11 Q. Was your role, at the beginning of 2018, still</p> <p>16:12 director of business operations?</p> <p>16:13 A. Yes.</p> <p>16:14 Q. And did your role change at some point in time?</p> <p>16:15 A. Yes.</p> <p>16:16 Q. When did it change?</p> <p>16:17 A. Um, I think it was in September 2020.</p> <p>16:18 Q. What was your role starting in September 2020?</p> <p>16:19 A. I was promoted to be vice president of the global</p> <p>16:20 business operations.</p> <p>16:21 Q. And is that the role you have today?</p> <p>16:22 A. Yes.</p>	00:00:32	Gil4_30PM.3
17:18 - 17:21	<p>Bizinsky, Sarit 2024-09-06</p> <p>17:18 Q. So, from 2020, September 2020, to today, you have been</p> <p>17:19 the vice president of global business operations, is</p> <p>17:20 that right?</p> <p>17:21 A. Yes.</p>	00:00:11	Gil4_30PM.4
42:04 - 42:06	<p>Bizinsky, Sarit 2024-09-06</p> <p>42:04 Q. And you have been designated to provide testimony as</p> <p>42:05 defendants' corporate representative on certain topics?</p> <p>42:06 A. Yes.</p>	00:00:07	Gil4_30PM.5
43:07 - 43:12	<p>Bizinsky, Sarit 2024-09-06</p> <p>43:07 Q. We can</p>	00:00:19	Gil4_30PM.6

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DESIGNATION	SOURCE	DURATION	ID
	43:08 all agree that you are at least providing testimony 43:09 under rule 30(b)(6) as to the terms of the contracts by 43:10 which NSO customers obtained the right to use the 43:11 accused technology in use between April 29, 2018, 43:12 and May 10, 2020?		
43:13 - 43:16	Bizinsky, Sarit 2024-09-06	00:00:13	Gil4_30PM.7
	43:13 MR. CRAIG: The financial terms of those contracts, yes. 43:14 Mr. Shohat was designated to testify, and did testify, 43:15 about the remaining portion of that topic, meaning all 43:16 the other terms of the contracts that are not financial.		
43:17 - 43:21	Bizinsky, Sarit 2024-09-06	00:00:11	Gil4_30PM.8
	43:17 Q. You understand that? 43:18 A. I understand. 43:19 Q. And you are also designated to topic 40, which is the 43:20 consideration received by defendants from NSO customers 43:21 for using the relevant spyware. Do you understand that?		
44:01 - 44:05	Bizinsky, Sarit 2024-09-06	00:00:13	Gil4_30PM.9
	44:01 A. Yes. 44:02 Q. Do you consent to provide corporate representative 44:03 testimony on those topics, subject to your counsel's 44:04 objection? 44:05 A. Yes.		
106:21 - 106:22	Bizinsky, Sarit 2024-09-06	00:00:06	Gil4_30PM.10
	106:21 Q. For 2018 through 2020, what was the price on the price 106:22 list of 15 concurrent targets, triggered only?		
107:03 - 107:04	Bizinsky, Sarit 2024-09-06	00:00:13	Gil4_30PM.11
	107:03 A. Okay, so as far as I remember, for Europe, for example, 107:04 the standard price was around 7 million.		
108:12 - 108:14	Bizinsky, Sarit 2024-09-06	00:00:09	Gil4_30PM.12
	108:12 Q. Okay. And how much were covert vectors? How much extra 108:13 would a customer, let's say in Europe, have to pay for 108:14 the use of covert vectors?		
108:17 - 108:18	Bizinsky, Sarit 2024-09-06	00:00:12	Gil4_30PM.13
	108:17 A. So it could be additional 1 million. 1.5. Again, 108:18 I don't remember exactly the pricing.		
110:22 - 110:23	Bizinsky, Sarit 2024-09-06	00:00:06	Gil4_30PM.14
	110:22 Q. Are you aware that certain customers paid more than 110:23 \$7 million for 15 concurrent targets?		

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DESIGNATION	SOURCE	DURATION	ID
111:01 - 111:01	Bizinsky, Sarit 2024-09-06 111:01 A. Yes. I don't remember but, potentially, yes.	00:00:06	Gil4_30PM.15
111:16 - 111:17	Bizinsky, Sarit 2024-09-06 111:16 Why would defendants charge more, an additional 111:17 amount, for covert vectors?	00:00:05	Gil4_30PM.16
111:19 - 112:01	Bizinsky, Sarit 2024-09-06 111:19 A. Um, many of the veteran customers, their original deals 111:20 did not include covert, because the company did not have 111:21 covert vectors in 2013, okay. So these potential 111:22 customers, we could offer them now this option to buy it 111:23 as a separate upsell. 111:24 Q. So the use of covert vectors was an upsell from the use 111:25 of triggered vectors? 112:01 A. For those who didn't get it in the original deal, yes.	00:00:40	Gil4_30PM.17
121:21 - 122:01	Bizinsky, Sarit 2024-09-06 121:21 Q. You 121:22 testified that there is at least one customer you are 121:23 aware of that purchased this additional option to use 121:24 Pegasus outside of the country -- outside of the home 121:25 country, correct? 122:01 A. Correct.	00:00:12	Gil4_30PM.18
122:03 - 122:04	Bizinsky, Sarit 2024-09-06 122:03 system. And I am asking you, would it double the price 122:04 of the system?	00:00:04	Gil4_30PM.19
122:07 - 122:12	Bizinsky, Sarit 2024-09-06 122:07 A. So, for the time period of 2018 until 2020, this could 122:08 add some amount, but I don't recall it ever doubled the 122:09 price. 122:10 Q. Do you recall how much it added? 122:11 A. Again, I don't remember, but it could be 1 million to 122:12 2 million, maybe.	00:00:29	Gil4_30PM.20
174:21 - 175:02	Bizinsky, Sarit 2024-09-06 174:21 Q. To return to one of the first questions I asked you, 174:22 your legal employer is Q Cyber of Israel, correct? 174:23 A. Yes. 174:24 Q. Do you -- in your day to day work in 2018 and 2019, did 174:25 you perceive any difference between people who worked 175:01 for Q Cyber Israel and NSO Group? Was there anything	00:00:26	Gil4_30PM.21

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175:04 - 175:06	175:02 that was specific to one company or to the other? Bizinsky, Sarit 2024-09-06 175:04 A. I don't know. 175:05 Q. You don't know, or you didn't perceive anything? 175:06 A. I didn't perceive anything.	00:00:08	Gil4_30PM.22

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