

Shohat4_30PM

Designation List Report



Shohat, Yaron

2024-08-29

P's Narrowed	00:06:37
D's Counters	00:03:39
TOTAL RUN TIME	00:10:16



Documents linked to video:

- P36
- P44



Shohat4_30PM

DESIGNATION	SOURCE	DURATION	ID
10:20 - 10:23	Shohat, Yaron 2024-08-29	00:00:11	Shohat4_30PM.1
	10:20 Q. Would you start by stating your full name and spelling		
	10:21 it for the record please.		
	10:22 A. Yes. My first name is Yaron, Y-A-R-O-N; last name is		
	10:23 Shohat, S-H-O-H-A-T.		
39:25 - 40:02	Shohat, Yaron 2024-08-29	00:00:04	Shohat4_30PM.2
	39:25 Q. Have you ever worked professionally as a software		
	40:01 engineer?		
	40:02 A. Yes.		
43:14 - 43:24	Shohat, Yaron 2024-08-29	00:00:43	Shohat4_30PM.3
	43:14 Q. You were COO at NSO Group from May 2019		
	43:15 through August 2022, correct?		
	43:16 A. Yes.		
	43:17 Q. Throughout that time did you report to Shalev Hulio?		
	43:18 A. Yes.		
	43:19 Q. You became CEO in August 2022? You can refer to your		
	43:20 LinkedIn, if it helps?		
	43:21 A. Yes, I became COO in August 2022. The first couple of		
	43:22 months I was defined as acting CEO, because Shalev has		
	43:23 left and I still didn't get my formal board appointment,		
	43:24 it took another two months. But I acted as CEO.		
46:15 - 46:22	Shohat, Yaron 2024-08-29	00:00:39	Shohat4_30PM.4
	46:15 Q. Are you familiar with the Pegasus technology that the		
	46:16 defendants offer?		
	46:17 A. Of course.		
	46:18 Q. Okay. Does that technology deploy a software component		
	46:19 that defendants describe as "invisible"?		
	46:20 A. It deploys an agent which the owner or user of the		
	46:21 targeted device is not aware of. If that's what		
	46:22 "invisible" means ...		
55:22 - 56:08	Shohat, Yaron 2024-08-29	00:00:24	Shohat4_30PM.5
 P44.2.2	55:22 Q. Exhibit 2017 is dated January 25, 2018. Do you see		
	55:23 that?		
	55:24 A. Yes.		
	55:25 Q. It says:		
	56:01 "Pegasus 2.5 is officially approved for production."		
	56:02 Do you see that?		
	56:03 A. Yes.		
	56:04 Q. And then it says:		

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DESIGNATION	SOURCE	DURATION	ID
	56:05 "This version introduces Heaven, the first zero 56:06 clicks installation vector for broad Android devices." 56:07 Do you see that? 56:08 A. Yes.		
56:09 - 56:12	Shohat, Yaron 2024-08-29	00:00:11	Shohat4_30PM.6
	56:09 Q. Do you know what exhibit 2017 means when it describes 56:10 Heaven as: 56:11 "The first zero click installation vector for broad 56:12 Android devices."?		
56:14 - 56:18	Shohat, Yaron 2024-08-29	00:00:10	Shohat4_30PM.7
	56:14 A. It means what it says. 56:15 Q. What does "broad Android devices" mean? 56:16 A. Are you asking about the word "broad"? 56:17 Q. In this context, yes. 56:18 A. In this context?		
56:20 - 56:23	Shohat, Yaron 2024-08-29	00:00:15	Shohat4_30PM.8
	56:20 A. The meaning of "broad", to my understanding, is that it 56:21 would run on a very broad set of Android devices. As 56:22 opposed to only Samsung devices, which would be limited 56:23 to Samsung.		
58:05 - 58:20	Shohat, Yaron 2024-08-29	00:00:58	Shohat4_30PM.9
	58:05 Q. Underneath the text we have just read it says: 58:06 "This is a significant milestone for Pegasus." 58:07 Do you see that? 58:08 A. I do. 58:09 Q. Do you agree that the introduction of the Heaven 58:10 installation vector using Whatsapp was a significant 58:11 milestone for Pegasus? 58:12 A. I agree the fact that it is a broad vector is 58:13 a significant milestone. Not to the fact that it uses 58:14 Whatsapp, or anything like that. 58:15 Q. You agree that the introduction of the Heaven 58:16 installation vector, which enabled installation on 58:17 a broad set of Android devices, was a significant 58:18 milestone for Pegasus? 58:19 A. I agree that the fact that the product introduced broad 58:20 Android coverage is significant.		
	 Clear		
62:07 - 62:15	Shohat, Yaron 2024-08-29	00:00:30	Shohat4_30PM.1
	62:07 Q. Does the perceived value of NSO as a market leader		0

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DESIGNATION	SOURCE	DURATION	ID
	62:08 depend, in part, on its ability to offer zero click		
	62:09 installation vectors to a broad range of Android		
	62:10 devices?		
	62:11 A. It depends on its ability compared to the abilities of		
	62:12 competitors. If other competitors have this ability,		
	62:13 you try to get it as well. If others do not, the answer		
	62:14 is hypothetical.		
	62:15 Q. Are you aware of any competitors with that ability?		
62:17 - 62:17	Shohat, Yaron 2024-08-29	00:00:03	Shohat4_30PM.1
	62:17 A. Not in the respective time period.		1
62:18 - 62:18	Shohat, Yaron 2024-08-29	00:00:01	Shohat4_30PM.1
	62:18 Q. How about today?		2
62:20 - 62:24	Shohat, Yaron 2024-08-29	00:00:20	Shohat4_30PM.1
	62:20 A. I am aware of competitors with -- which I believe have		3
	62:21 such capabilities today.		
	62:22 Q. By "respective time period" in your previous answer, did		
	62:23 you mean 2018/2019?		
	62:24 A. Yes.		
68:01 - 68:16	Shohat, Yaron 2024-08-29	00:00:53	Shohat4_30PM.1
	68:01 Q. And thinking of your knowledge of the UI as it exists		4
	68:02 today, you have also never seen Pegasus give a customer		
	68:03 an option to choose which zero click installation vector		
	68:04 to use; right?		
	68:05 A. Correct.		
	68:06 Q. And that's been true consistently over the course of		
	68:07 your time at NSO?		
	68:08 A. Yes.		
	68:09 Q. Why would you be surprised if Pegasus gave a customer		
	68:10 an option to choose which zero click installation vector		
	68:11 to use?		
	68:12 A. Because customers don't care which vector they use, as		
	68:13 long as they get the intelligence they need.		
	68:14 Q. That's a matter for NSO and the system to take care of,		
	68:15 not a matter for customers to operate?		
	68:16 A. Correct.		
69:05 - 69:09	Shohat, Yaron 2024-08-29	00:00:13	Shohat4_30PM.1
	69:05 Q. Setting aside the question of whether it was the		5
	69:06 defendants themselves or the defendants' customers who		
	69:07 operated the technology at issue, do you admit that NSO		

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DESIGNATION	SOURCE	DURATION	ID
	69:08 created the technology that was used to implement the 69:09 attacks that the complaint describes?		
69:11 - 69:15	Shohat, Yaron 2024-08-29	00:00:13	Shohat4_30PM.1
	69:11 A. NSO developed the technology that our customers are 69:12 using. 69:13 Q. And that's the technology that was used in the events 69:14 that the complaint in this lawsuit describes in April 69:15 and May 2019; correct?		6
69:17 - 69:18	Shohat, Yaron 2024-08-29	00:00:10	Shohat4_30PM.1
	69:17 A. NSO developed the technology that was used in the event 69:18 that the complaint refers to.		7
76:08 - 76:11	Shohat, Yaron 2024-08-29	00:00:13	Shohat4_30PM.1
P36.2.2	76:08 Q. Okay. I have handed you what was previously marked 76:09 exhibit 2009. It is entitled "structure chart as 76:10 of December 31, 2019". 76:11 A. Yes.		8
77:21 - 77:25	Shohat, Yaron 2024-08-29	00:00:17	Shohat4_30PM.1
	77:21 Q. To be clear for the record, can you confirm that 77:22 exhibit 2009 accurately depicts the organizational 77:23 structure for the corporate family that included Q 77:24 Cyber, NSO, and WestBridge as of the middle of 2019? Clear 77:25 A. Correct.		9
184:13 - 184:15	Shohat, Yaron 2024-08-29	00:00:11	Shohat4_30PM.2
	184:13 Q. Was Pegasus in use between April 29, 2018, and May 10, 184:14 2020? 184:15 A. In use where? In use somewhere? Yes.		0
189:09 - 189:12	Shohat, Yaron 2024-08-29	00:00:14	Shohat4_30PM.2
	189:09 Isn't it true, Mr. Shohat, that you don't want the 189:10 companies whose technology you use in your installation 189:11 vectors to know about those exploits, because if they 189:12 did, they would stop those exploits from happening?		1
189:15 - 189:16	Shohat, Yaron 2024-08-29	00:00:09	Shohat4_30PM.2
	189:15 A. It is true that I prefer that they will not know about 189:16 it, because they might make changes that will close it.		2
189:17 - 189:25	Shohat, Yaron 2024-08-29	00:00:34	Shohat4_30PM.2
	189:17 Q. You used the term "zero day exploit". That's different 189:18 from zero click, right? 189:19 A. Correct, no relation.		3


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DESIGNATION	SOURCE	DURATION	ID
	189:20 Q. What's a zero day exploit?		
	189:21 A. Zero day exploit is an exploit that is not known in		
	189:22 public.		
	189:23 Q. And as someone experienced in the cyber intelligence		
	189:24 industry, what happens when a zero day exploit becomes		
	189:25 known?		
190:03 - 190:05	Shohat, Yaron 2024-08-29	00:00:22	Shohat4_30PM.2
	190:03 A. Usually, when zero day exploit becomes public, the		4
	190:04 company responsible for the technology, the company		
	190:05 which has the exploit, will seek to close that exploit.		
190:15 - 190:17	Shohat, Yaron 2024-08-29	00:00:06	Shohat4_30PM.2
	190:15 go again. As someone experienced in the cyber		5
	190:16 intelligence industry, what happens when a zero day		
	190:17 exploit becomes known?		
190:19 - 190:21	Shohat, Yaron 2024-08-29	00:00:17	Shohat4_30PM.2
	190:19 A. When a zero day exploit becomes public, the technology		6
	190:20 provider in which product or code that has the		
	190:21 vulnerability will seek to close that vulnerability.		
190:22 - 191:05	Shohat, Yaron 2024-08-29	00:00:30	Shohat4_30PM.2
	190:22 Q. Previous to your time with defendants, you worked in		7
	190:23 roles that included defensive cybersecurity, correct?		
	190:24 A. Correct.		
	190:25 Q. And I think you gave some testimony about work you did		
	191:01 to find and stop threats, do you remember that?		
	191:02 A. Correct.		
	191:03 Q. When you were on the defensive side, had you discovered		
	191:04 a vulnerability in code for which you were responsible,		
	191:05 what would you have done?		
191:08 - 191:11	Shohat, Yaron 2024-08-29	00:00:10	Shohat4_30PM.2
	191:08 A. If you discover that you have a bug in your system, you		8
	191:09 seek to fix it.		
	191:10 Q. That's standard practice, right?		
	191:11 A. Yes.		
191:19 - 191:22	Shohat, Yaron 2024-08-29	00:00:14	Shohat4_30PM.2
	191:19 What would happen to defendants' ability to provide		9
	191:20 installation vectors if defendants had to tell the		
	191:21 companies whose technology those installation vectors		
	191:22 use?		

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DESIGNATION	SOURCE	DURATION	ID
191:25 - 192:06	Shohat, Yaron 2024-08-29 191:25 A. I assume that the company which has the -- I assume that 192:01 the technology provider which has the vulnerability 192:02 would seek to fix it. 192:03 Q. And in this case defendants never told Whatsapp about 192:04 the zero click installation vectors that exploited 192:05 Whatsapp technology, because you understood that 192:06 Whatsapp would not permit them; right?	00:00:30	Shohat4_30PM.3 0
192:09 - 192:12	Shohat, Yaron 2024-08-29 192:09 A. I don't know if "permit" is the right word, but they 192:10 will seek to fix them. 192:11 Q. Did anyone at NSO ever ask permission to use Whatsapp 192:12 messages as a way of installing Pegasus?	00:00:19	Shohat4_30PM.3 1
192:14 - 192:14	Shohat, Yaron 2024-08-29 192:14 A. No.	00:00:02	Shohat4_30PM.3 2
192:15 - 192:15	Shohat, Yaron 2024-08-29 192:15 Q. Why not?	00:00:02	Shohat4_30PM.3 3
192:17 - 192:18	Shohat, Yaron 2024-08-29 192:17 A. I don't know that when someone sends message over 192:18 Whatsapp he needs to ask Whatsapp for permission.	00:00:07	Shohat4_30PM.3 4

P's Narrowed	00:06:37
D's Counters	00:03:39
TOTAL RUN TIME	00:10:16

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