

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

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| 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. | | |
| 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 |

 Clear

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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 | | 6 |
| | 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? | | |
| 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 | | 7 |
| | 69:18 that the complaint refers to. | | |
| 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 | | 8 |
| | 76:09 exhibit 2009. It is entitled "structure chart as | | |
| | 76:10 of December 31, 2019". | | |
| | 76:11 A. Yes. | | |
| 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 | | 9 |
| | 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. | | |
| 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, | | 0 |
| | 184:14 2020? | | |
| | 184:15 A. In use where? In use somewhere? Yes. | | |
| 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 | | 1 |
| | 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? | | |
| 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 | | 2 |
| | 189:16 it, because they might make changes that will close it. | | |
| 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 | | 3 |
| | 189:18 from zero click, right? | | |
| | 189:19 A. Correct, no relation. | | |

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|-----------------|---|----------|-----------------------|
| | 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 | 00:00:30 | Shohat4_30PM.3 |
| 191:25 | A. I assume that the company which has the -- I assume that | | 0 |
| 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? | | |
| 192:09 - 192:12 | Shohat, Yaron 2024-08-29 | 00:00:19 | Shohat4_30PM.3 |
| 192:09 | A. I don't know if "permit" is the right word, but they | | 1 |
| 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? | | |
| 192:14 - 192:14 | Shohat, Yaron 2024-08-29 | 00:00:02 | Shohat4_30PM.3 |
| 192:14 | A. No. | | 2 |
| 192:15 - 192:15 | Shohat, Yaron 2024-08-29 | 00:00:02 | Shohat4_30PM.3 |
| 192:15 | Q. Why not? | | 3 |
| 192:17 - 192:18 | Shohat, Yaron 2024-08-29 | 00:00:07 | Shohat4_30PM.3 |
| 192:17 | A. I don't know that when someone sends message over | | 4 |
| 192:18 | Whatsapp he needs to ask Whatsapp for permission. | | |

| | |
|-----------------------|-----------------|
| P's Narrowed | 00:06:37 |
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| TOTAL RUN TIME | 00:10:16 |



Documents linked to video:

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