

EXHIBIT 11

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

MDY INDUSTRIES, LLC,)	
)	
Plaintiff and)	
Counterclaim Defendant,)	
)	
vs.)	No. CV06-2555
)	PHX DGC
BLIZZARD ENTERTAINMENT, INC.,)	
et al.,)	
)	
Defendants and)	
Counterclaim Plaintiffs.)	
)	
_____)	
AND ALL RELATED ACTIONS.)	
_____)	

DEPOSITION OF MATTHEW VERSLUYS

November 14, 2007

253931



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1 is tested before you log -- that applies before you
2 enter your credentials. And if that finds any
3 third-party infringing software on your system,
4 then you are prevented from even logging into the
5 service entirely.

6 BY MR. VENABLE:

7 Q. Is that what's called scan.dll?

8 A. Yes.

9 Q. Let's just assume for the sake of
10 argument that I am running an unauthorized
11 third-party program that -- and let's just use my
12 client's software, for example, Glider.

13 Are you familiar with Glider?

14 A. Yes.

15 Q. I might ask you a couple questions about
16 the Glider later, but I think it's no secret that
17 Glider is capable -- it's capable of allowing a
18 user to play without, under certain circumstances,
19 Warden being able to detect it; is that correct?

20 A. Correct.

21 Q. So if I am playing World of Warcraft
22 while Glider is running, what portion of the
23 World of Warcraft software that is on my hard
24 drive -- what portion of that software actually
25 ends up in my computer's RAM?

1 A. The entire executable is loaded into RAM
2 once, when you launch the executable. And then
3 data for the actual game is loaded from the hard
4 drive into RAM as needed, depending on the
5 circumstances within the game.

6 Q. So the entire executable file is loaded?

7 A. Yes.

8 Q. But the -- and I would ask you, how big
9 is the executable file?

10 A. Several megabytes in size.

11 Q. Several megabytes?

12 A. Yes.

13 Q. Is it possible to load the entire code
14 that is on my hard drive, that's World of Warcraft
15 code, into my RAM at any one time?

16 A. The executable portion?

17 Q. No, no, no. The entire -- in other
18 words, all of the --

19 A. All of the game assets, all of the data?

20 Q. Everything that was loaded or installed
21 from the -- let's say the CDs -- onto my hard
22 drive, am I capable -- or I shouldn't say "Am I
23 capable."

24 Does, at any time, the entire content of
25 what was on the CDs during the installation process

1 get loaded into RAM?

2 A. I don't know. It's very impractical
3 because of the size of it, that you would have to
4 have a massive amount of RAM. But I don't know
5 specifically if at any one time with WoW if all of
6 the assets could be loaded into RAM.

7 Q. So with regard to RAM, I mean, is it fair
8 to say that -- let me ask you this: Why is it that
9 we have to load the software that's on the hard
10 drive into RAM for World of Warcraft?

11 A. The assets of the game are loaded as you
12 move through the game. So when I move to a new
13 zone within the game, then the assets for that zone
14 are loaded from the hard drive into memory.

15 Q. Let's talk about the executable file.

16 A. Uh-huh.

17 Q. Why is it that I need to load the
18 executable file from my hard drive into RAM?

19 A. It's part of the operating system.
20 That's how the operating system -- it loads an
21 executable before you can execute it.

22 Q. Is it possible that you could play the
23 World of Warcraft game by simply using your hard
24 drive to play from using the executable file?

25 MR. GENETSKI: Object to form.

1 A. Yes.

2 Q. Is Warden -- is it fair to say Warden is
3 one part of Blizzard's technology measures for
4 preventing unauthorized access to
5 World of Warcraft?

6 A. Yes.

7 Q. And I believe Mr. Venable mentioned
8 scan.dll.

9 Is that another part of Blizzard's
10 technology designed to prevent unauthorized access
11 to World of Warcraft?

12 A. Yes.

13 Q. And I believe you mentioned that there
14 are game servers linked with the Warden technology
15 that are responsible for implementing the
16 discipline when Warden flags an unauthorized use.

17 So are those game servers, to the extent
18 they are performing that functionality, part of
19 Blizzard's technology measures to prevent
20 unauthorized access to World of Warcraft?

21 A. Yes.

22 MR. GENETSKI: That's all I have.

23 MR. VENABLE: We are done.

24 THE VIDEOGRAPHER: We are off the record
25 at 11:47. This is the end of Disk No. 1. And this