

1 Jeffrey N. Mausner (State Bar No. 122385)  
 2 Law Offices of Jeffrey N. Mausner  
 3 Warner Center Towers  
 4 21800 Oxnard Street, Suite 910  
 5 Woodland Hills, California 91367-3640  
 6 Email: Jeff@mausnerlaw.com  
 7 Telephone: (310) 617-8100, (818) 992-7500  
 8 Facsimile: (818) 716-2773

9 Attorneys for Plaintiff Perfect 10, Inc.

10 UNITED STATES DISTRICT COURT  
 11 CENTRAL DISTRICT OF CALIFORNIA

12 PERFECT 10, INC., a California  
 13 corporation,

14 Plaintiff,

15 v.

16 GOOGLE, INC., a corporation; and  
 17 DOES 1 through 100, inclusive,

18 Defendant.

19 AND CONSOLIDATED CASE.

Case No. CV 04-9484 AHM (SHx)  
 Consolidated with Case No. CV 05-4753  
 AHM (SHx)

**DECLARATION OF JEFFREY N.  
 MAUSNER IN SUPPORT OF  
 PERFECT 10'S EVIDENTIARY  
 OBJECTIONS AND RESPONSES TO  
 GOOGLE'S EVIDENTIARY  
 OBJECTIONS RE GOOGLE'S  
 THREE MOTIONS FOR SUMMARY  
 JUDGEMENT**

**[EXHIBITS AA AND BB FILED  
 SEPARATELY UNDER SEAL  
 PURSUANT TO PROTECTIVE  
 ORDER]**

**BEFORE JUDGE A. HOWARD MATZ**

Date: None Set (taken under submission)\_  
 Time: None Set  
 Place: Courtroom 14, Courtroom of the  
 Honorable A. Howard Matz

Discovery Cut-Off Date: None Set  
 Pretrial Conference Date: None Set  
 Trial Date: None Set

1 I, Jeffrey N. Mausner, declare as follows:

2 1. I am a member of the State Bar of California and admitted to  
3 practice before this Court. I am counsel of record for Plaintiff Perfect 10, Inc.  
4 (“Perfect 10”) in this action. All of the matters stated herein are of my own  
5 personal knowledge, except where otherwise stated, and if called as a witness, I  
6 could and would testify competently thereto. I make this declaration both in  
7 support of Perfect 10’s Responses to Google’s Evidentiary Objections to the  
8 declarations that Perfect 10 filed in opposition to Google’s Three Motions for  
9 Summary Judgment, and in support of Perfect 10’s Evidentiary Objections to  
10 the declarations Google submitted in support of those motions and in reply.

11 **GOOGLE’S EVIDENTIARY OBJECTIONS**

12 2. Perfect 10’s Rule 26 disclosures in the instant case were made in  
13 2005 and supplemented in August of 2008. Perfect 10 became aware of the  
14 witnesses that Google objects to, on the basis that they weren’t disclosed, in  
15 2009, shortly before the dates of their declarations. The witnesses were  
16 disclosed to Google shortly thereafter, when Google was served with their  
17 declarations.

18 3. I first knew about and spoke with Margaret Jane Eden on or about  
19 July 31, 2009; her declaration was obtained on August 4, 2009 and provided to  
20 Google on August 9, 2009. (Docket No. 475.) I first knew about and spoke  
21 with Les Schwartz on or about July 27, 2009; his declaration was obtained on  
22 July 28, 2009 and provided to Google on August 9, 2009. (Docket No. 478.) I  
23 first knew about and spoke with C.J. Newton on or about May 27, 2009; his  
24 declaration was obtained on May 28, 2009 and provided to Google on July 6,  
25 2009. (Docket Nos. 445, 477.) I first knew about and spoke with Dean  
26 Hoffman on or about May 29, 2009; his declaration was obtained on May 29,  
27 2009 and provided to Google July 6, 2009. (Docket Nos. 444, 476.)

28 4. I first knew about David O’Connor on or about June 10, 2009, and

1 first spoke with him on or about June 11, 2009; his declaration was obtained on  
2 June 16, 2009 and provided to Google on July 6, 2009. (Docket No. 480). I first  
3 knew about and spoke with Bennett McPhatter on or about July 5, 2009; his  
4 declaration was obtained on July 9, 2009 and provided to Google on August 9,  
5 2009. (Docket No. 481).

6 5. To the best of my knowledge, Google did not disclose the following  
7 witnesses for which it submitted declarations in support of its summary  
8 judgment motions, Shantal Rands Poovala, Bill Brougher, or Paul Haahr, in its  
9 Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1). To the best of my  
10 knowledge, Google did not disclose those witnesses in any of its interrogatory  
11 responses. In contrast, Perfect 10 has disclosed Dr. Norman Zada, Sean  
12 Chumura, and Sheena Chou, as individuals with knowledge relating to the case,  
13 in its Rule 26 disclosures. Dr. Zada and Ms. Chou were disclosed in both the  
14 2005 Initial Disclosures and August 2008 update. Mr. Chumura was disclosed  
15 in Perfect 10's August 2008 updated Rule 26 disclosures, but Google has not  
16 attempted to depose him.

17 **PERFECT 10'S OBJECTIONS TO THE DECLARATIONS OF**  
18 **SHANTAL RANDS POOVALA**

19 6. I took the deposition of Shantal Rands (Poovala) on November 19,  
20 2008. Google has designated that transcript highly confidential. Accordingly,  
21 portions of that transcript are filed separately under seal, as Exhibit AA. Exhibit  
22 AA is a true and correct copy of portions from the transcript of that deposition,  
23 filed separately under seal pursuant to protective order, as well as true and  
24 correct copies of Exhibits 64 and 65 to the Haahr deposition which were also  
25 used at the Poovala deposition.

26 7. I took the deposition of Paul Haahr on November 19, 2008. Google  
27 has designated that transcript highly confidential. Accordingly, portions of that  
28 transcript are filed separately under seal, as Exhibit BB. Exhibit BB is a true and

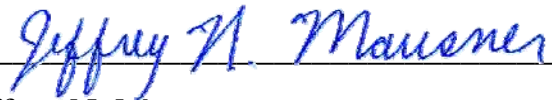
1 correct copy of portions from the transcript of that deposition, filed separately  
2 under seal pursuant to protective order.

3 8. Attached hereto as Exhibit CC is a true and correct copy of a letter  
4 from Winston & Strawn, who at that time was representing Google, to me, dated  
5 October 26, 2006, as well as a true and correct copy of Perfect 10's Rule  
6 30(b)(6) notice to Google dated October 5, 2006, referred to therein.

7 9. Attached hereto as Exhibit DD are true and correct copies of pages  
8 from the website of the company Visual Analytics Inc., which I downloaded  
9 from the Internet on October 11, 2009.

10 10. Attached hereto as Exhibit EE are true and correct copies of pages I  
11 downloaded from a Google Image Search that I conducted on October 5, 2009.  
12 Pages 1 and 2 of Exhibit EE show the first page of the results of a Google image  
13 search on the term Isabelle Funaro. Pages 1 and 2 of Exhibit EE show several  
14 infringing Perfect 10 images. At the bottom of page 2, there is a link to "Report  
15 Offensive Images." Pages 3 and 4 of Exhibit EE is a true and correct copy of  
16 what I got when I clicked on that link. These pages allow a user to check the  
17 box to report offensive images to Google. To my knowledge, Google has not  
18 implemented such a check the box tool to report infringing images.

19 I declare under penalty of perjury under the laws of the United States of  
20 America that the foregoing is true and correct to the best of my knowledge.  
21 Executed this 12th day of October, 2009 in Los Angeles County, California.

22   
23 \_\_\_\_\_  
24 Jeffrey N. Mausner

# Exhibit AA

Filed Under Seal  
Pursuant to Protective Order

# Exhibit BB

(Filed Under Seal  
Pursuant to Protective Order)

# Exhibit CC

# WINSTON & STRAWN LLP

35 WEST WACKER DRIVE  
CHICAGO, ILLINOIS 60601-9703

43 RUE DU RHONE  
1204 GENEVA, SWITZERLAND

BUCKLESBURY HOUSE  
3 QUEEN VICTORIA STREET  
LONDON, EC4N 8NH

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SAN FRANCISCO, CALIFORNIA 94111-5894

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200 PARK AVENUE  
NEW YORK, NEW YORK 10166-4193

21 AVENUE VICTOR HUGO  
75116 PARIS, FRANCE

1700 K STREET, N.W.  
WASHINGTON, D.C. 20006-3817

WRITER'S DIRECT DIAL  
415-591-1506  
[jgolinveaux@winston.com](mailto:jgolinveaux@winston.com)

October 26, 2006

VIA EMAIL AND U.S. MAIL

Jeffrey N. Mausner  
Berman Mausner & Resser  
11601 Wilshire Blvd. #600  
Los Angeles, CA 90025-1742

**Re: Perfect 10, Inc. v. Google Inc.  
Case No. CV 04-9484 AHM (SHx)**

Dear Jeff:

Google provides the following information regarding corporate designees and the following objections in response to the Matters for Testimony set forth in Plaintiff Perfect 10's draft Rule 30(b)(6) notice to Google dated October 5, 2006.

1. Alexander Macgillivray, Senior Product and Intellectual Property Counsel, employed by Google since May 12, 2003.
2. Alexander Macgillivray.
3. Alexander Macgillivray. In addition, Google objects to this topic as unintelligible as to the following "identification of those notices by the date they were faxed or emailed by Perfect 10, for each of the following documents."
4. Google objects to this topic as failing to describe with reasonable particularity the matters on which examination is requested as the topic is vague and ambiguous as to the meaning of the term "handled" in this context. To the extent that Google can understand the request, Google designates Alexander Macgillivray.



**WINSTON & STRAWN LLP**

Jeffrey N. Mausner

October 26, 2006

Page 2

5. Alexander Macgillivray.
6. Alexander Macgillivray.
7. Bill Brougher, Senior Product Manager, employed by Google since March 31, 2003 regarding Google Web Search and Sissie Hsiao, Product Manager, employed by Google since October 2, 2006 regarding Google Image Search.
8. Google objects to this topic as failing to describe with reasonable particularity the matters on which examination is requested.
9. Bill Brougher.
10. Alexander Macgillivray.
11. Google objects to this topic as calling for testimony concerning a subject that the Court has deferred as a mega-request.
12. Google objects to this topic as failing to describe with reasonable particularity the matters upon which examination is requested to the extent it calls for examination concerning "other statistics" and "various searches." To the extent that Google can understand the request, Google designates Bill Brougher to testify regarding Google Web Search and Sissie Hsiao regarding Google Image Search.
13. Google objects to this topic as failing to describe with reasonable particularity the matters upon which examination is requested. To the extent that Google can understand the request, Google designates Bill Brougher.
14. Google objects to this topic as argumentative, assuming facts not in evidence, and failing to describe with reasonable particularity the matters upon which examination is requested. To the extent that Google can understand the request, Google designates Bill Brougher.
15. Google objects to this topic as calling for testimony concerning a subject that the Court has deferred as a mega-request.
16. Google objects to this topic as failing to describe with reasonable particularity the matters upon which examination is requested. To the extent that Google can understand the request, Google designates Sissie Hsiao.
17. Google objects to this topic as argumentative, assuming facts not in evidence, and failing to describe with reasonable particularity the matters upon which examination is requested. To the extent that Google can understand the request, Google designates Bill Brougher.
18. Sissie Hsiao.

**WINSTON & STRAWN LLP**

Jeffrey N. Mausner  
October 26, 2006  
Page 3

19. Sissie Hsiao.
20. Sissie Hsiao.
21. Bill Brougher.

Sincerely,



Jennifer A. Golinveaux

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RUSSELL J. FRACKMAN (State Bar No. 49087)  
JEFFREY D. GOLDMAN (State Bar No. 155589)  
MITCHELL SILBERBERG & KNUPP LLP  
11377 West Olympic Boulevard  
Los Angeles, CA 90064-1683  
Telephone: (310) 312-2000  
Facsimile: (310) 312-3100

**ORIGINAL**

DANIEL J. COOPER (State Bar No. 198460)  
PERFECT 10, INC.  
72 Beverly Park Dr.  
Beverly Hills, California 90210  
Telephone: (310) 205-9817  
Facsimile: (310) 205-9638

JEFFREY N. MAUSNER (State Bar No. 122385)  
BERMAN, MAUSNER & RESSER  
11601 Wilshire Boulevard, Suite 600  
Los Angeles, California 90025-1742  
Telephone: (310) 473-3333  
Facsimile: (310) 473-8303

Attorneys for Plaintiff PERFECT 10, INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California Corporation,  
  
Plaintiff,  
  
vs.  
  
GOOGLE, INC., a corporation; and  
Does 1 through 100, inclusive,  
  
Defendants.

Case No: CV 04-9484 AHM (SHx)  
  
**PLAINTIFF PERFECT 10, INC.'S  
RULE 30(B)(6) NOTICE OF  
DEPOSITION TO GOOGLE, INC.**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:  
  
PLEASE TAKE NOTICE that plaintiff Perfect 10, Inc. will take the  
deposition upon oral examination of defendant Google, Inc. ("Google"), pursuant  
to Federal Rule of Civil Procedure 30(b)(6). The deposition shall be conducted

1 beginning on October 24, 2006, at 10:00 a.m. at the offices of Berman, Mausner &  
2 Resser, 11601 Wilshire Blvd., Suite 600, Los Angeles, California, 90025. The  
3 deposition will be recorded stenographically and by audio and videotape.

4 Pursuant to Rule 30(b)(6), Google shall designate the person or persons who  
5 are most qualified to testify on its behalf on the following matters. If more than  
6 one witness is designated by Google, the witnesses shall appear in the order set  
7 forth below:

### 8 9 **DEFINITIONS AND INSTRUCTIONS**

10 The terms "Google", "YOU" and "YOUR" shall refer to Defendant Google,  
11 Inc.

### 12 **MATTERS FOR TESTIMONY**

- 13 1. What Google did to process Perfect 10's DMCA notices, and when.
- 14 2. Google's e-mail to Perfect 10 dated June 27, 2001, which states:  
15 "Without administrator cooperation we cannot exclude material available  
16 on the Internet from our index."
- 17 3. The name of the Google employee who wrote the document, and if that  
18 person is no longer employed by Google, his or her last known address;  
19 the years that employee worked for Google; his or her position and job  
20 duties; whether that person has processed any Perfect 10 infringement  
21 notices; and if so, identification of those notices by the date they were  
22 faxed or emailed by Perfect 10, for each of the following documents:
  - 23 a. ERG377, an e-mail from "Google Tech," sent June 27, 2001, which  
24 states: "Without administrator cooperation we cannot exclude material  
25 available on the Internet from our index."
  - 26 b. SERG0188, a document from the "Google Team" stating that P10's  
27 complaints dated 6/28/04 and 6/1/04 are "almost finished processing."
  - 28 c. ERG1120, an e-mail dated May 13, 2005, stating that Google has

1 completed processing P10's infringement complaints.

2 d. SERG0183, a document which states that Google has received P10's  
3 6/28/04 complaint regarding the infringement of P10's copyrights and  
4 is reviewing it.

5 e. SERG0187, a document from the "Google Team" asking P10 to  
6 resubmit a list of URLs which P10 believes infringe P10 copyrights.

7 f. FERG1. A print-out from Google's website which discusses Google  
8 Page Creator, and why Google users should not link to images hosted  
9 by others without their permission.

- 10 4. The person who handled the largest number of Perfect 10's DMCA  
11 notices which were sent to Google from May 31, 2004 through July of  
12 2004 among those employees who processed at least one notice received  
13 by Google between June 28, 2004 and July 19, 2004.
- 14 5. All actions taken by Google with respect to disabling access to Perfect 10  
15 copyrighted material.
- 16 6. The allegations in paragraph 50 of Google's Counterclaim.
- 17 7. Why certain websites appear more frequently and in better positions in  
18 Google Web and Image Search results.
- 19 8. Google's biggest advertisers in the adult content business.
- 20 9. The manner in which Google earns money through its Adsense and  
21 Adwords programs.
- 22 10. Google's review of the content of the websites in its Adsense and  
23 Adwords program.
- 24 11. The number of searches on the names of various Perfect 10 models.
- 25 12. The most frequently used search terms for Image Search, and the most  
26 frequently used search terms for Web Search, and other statistics related  
27 to the frequency of various searches by Google users.
- 28 13. How Image Search impacts Google's revenues.

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- 14. How the availability of adult content through Google draws traffic to Google and impacts its revenues.
- 15. The number of clicks on Perfect 10 images presented in Google Image Search results.
- 16. The various statistics that Google keeps, including on the habits and number of downloads of images by its users.
- 17. The archiving of images on Google's servers, accessible to consumers through a "cached" link through Web Search, including how such images are collected, and the length of time they remain on Google's servers.
- 18. How Google creates and stores images on its servers, how Google removes images from its servers, and how Google determines which images appear in its Image Search results.
- 19. The extraction process mentioned in paragraph 18 of Google's Counterclaim.
- 20. The feasibility or infeasibility of using image recognition software to locate Perfect 10 images in Google's indexes.
- 21. The allegations in paragraph 58 of Google's Counterclaim.

Dated: October 5, 2006

RUSSELL J. FRACKMAN  
MITCHELL, SILBERBERG & KNUPP, LLP

DANIEL J. COOPER  
PERFECT 10, INC.

JEFFREY N. MAUSNER  
BERMAN, MAUSNER & RESSER

By: Jeffrey N. Mausner  
Jeffrey N. Mausner  
Attorneys for Plaintiff Perfect 10, Inc.

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the county of Los Angeles, State of California.

4 I am over the age of 18 and am not a party to the within action; my business address is:  
11601 Wilshire Blvd., Suite 600, Los Angeles, CA 90025-1742.

5 On October 5th, 2006, I served the foregoing document(s) described as follows:

6 **PLAINTIFF PERFECT 10, INC.'S RULE 30 (B)(6) NOTICE OF DEPOSITION**  
7 **TO GOOGLE, INC.**

8 on the interested party(ies) in this action by faxing a copy to the fax number(s) as shown below  
9 and by placing a true copy thereof enclosed in a sealed envelope addressed to the address(es) as  
follows:

10 **Andrew P. Bridges**  
11 **Jennifer A. Golinveaux**  
12 **Winston & Strawn LLP**  
13 **101 California Street, Suite 3900**  
**San Francisco, CA. 94111-5894**  
**Fax: (415) 591-1400**

**Mark T. Jansen**  
**Anthony J. Malutta**  
**Townsend and Townsend and Crew LLP**  
**Two Embarcadero Center, Eight Floor**  
**San Francisco, CA 94111-3834**  
**Fax: (415) 576-0300**

14 **FACSIMILE:** I transmitted by facsimile such document(s) to the office(s) of the addressee(s).

15 **MAIL:** I placed such envelope with fully prepaid postage thereon in the United States mail at  
16 Los Angeles, California.

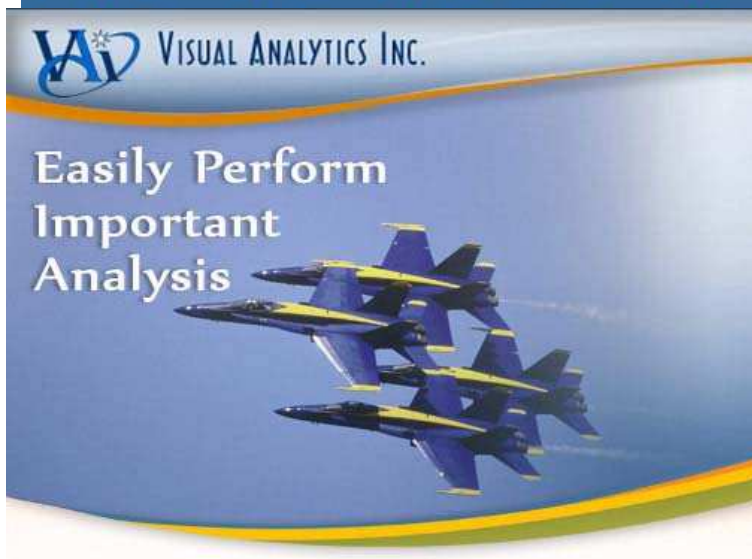
17 **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at  
18 whose direction the service was made. I declare, under penalty of perjury, that the foregoing is  
true and correct.

19 **Executed on October 5, 2006 at Los Angeles, California**

20 **BY:**   
21 **Jordan Bekier**

# Exhibit DD



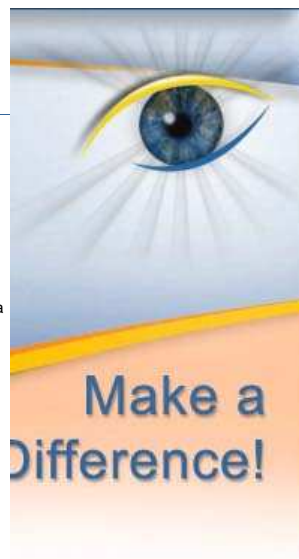


News / Media

**October 1, 2009**  
The 2009 Best of New York Awards Honor Visual Analytics Inc.

**September 29, 2009**  
DCJS Wins "Best of New York" Award

**September 22, 2009**  
\* UPDATE \* VAI's CEO to Present at Nlets Technical Implementers Conference in Arizona



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- Preview
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- Live Demo
- Featured Components
- System Requirements

Digital Information Gateway

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- Scalability
- Preview
- Web Demo
- Live Demo
- Featured Components
- System Requirements

Solutions

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- Commerical Business...

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- DIG Symphony
- Technical Information
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- Overview** ::
  - Features
  - Specifications
- At a Glance**
  - Preview

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- 508 Compliance
- Value Added Data
- Localization
- GSA Schedule
- SOAP

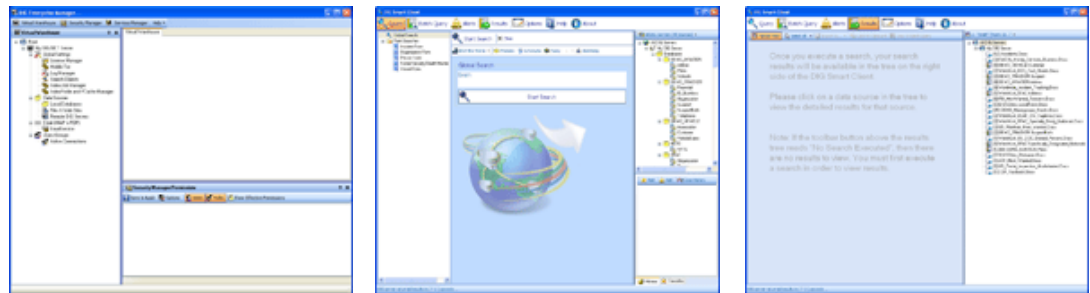
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DIG is currently operational in a number of state & local law enforcement agencies where over 30 organizations are able to securely share over 100 data sources in real time. DIG is changing how organizations share data - while securely controlling access, logging queries, and enabling the data owner to remain in control of their own sources.



The DIG Virtual Data Warehouse approach to information sharing ensures that:

- Data is always up to date (never copied or moved)
- There are no ownership issues (owners of the data maintain their ownership and access control)
- Security, data access and data purity is maintained by the original owners of the data (no changes can be made by outside users)
- There is no costly translation, fixed schema, or data transport (as would be required by a physical data warehouse or other approaches)

DIG Symphony manages key data processing operations providing integrated data quality, standardization, integration, parsing, enhancing, correcting, merging, matching, purging and general cleansing functionality.

The DIG Symphony Designer enables visualization of data quality programs through a point-and-click designer that builds on-the-fly transformations and generates results for review prior to deployment. Use the DIG Symphony Designer to build any number of transformations to fully integrate your data sources and provide a single, consistent view of all of your data.

The DIG suite of tools provides your organization with:

- A single, integrated solution to managing data availability and access
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- Full control over data access permissions at the user level
- The ability to create common, searchable data types across multiple, disparate databases
- Complete data cleansing and transformation functionality
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The DIG suite of tools provides your users with a simple search interface that:

- Lets users search from any platform (Windows, UNIX, Linux) using their favorite web browser.
- Searches and displays any and all types of data available to your organization – and any organization that you choose to share data with.
- Searches multiple, disparate databases simultaneously.
- Searches over 60 different types of files.
- Searches databases, documents, e-mail archives and web sites all at once.
- Searches large volumes of data – with no size limit.
- Lets users choose how they want to build searches – using either a simple search form or a more structured, field-based search form.
- Transforms results into phonetic codes for “sounds-like” comparisons.
- Instantly groups results by common values.
- Presents findings using standard and custom-defined reports.
- Displays original file content in HTML and native formats.
- Saves and exports data in a variety of formats.



Superior Pattern Discovery Solutions

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### About VAI

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[Area Map](#)  
[Accommodations](#)

### Officer Biography

[Chris Westphal](#)  
[David O'Connor](#)  
[Bennett McPhatter](#)

## Chief Operating Officer



**Bennett McPhatter**  
Co-Founder

Mr. McPhatter is co-founder and COO of Visual Analytics, Inc. He is the software architect for Digital Information Gateway (DIG<sup>®</sup>) and DIG Symphony, VAI's Federated Search and Information Sharing technologies. The DIG system consists of powerful searching and data brokering technologies, which have seen widespread acceptance within the law enforcement and financial crimes communities worldwide. Mr. McPhatter's technical knowledge and innovative concepts have been vital to VAI's success since 1998. In recent years, he has guided the development of several federal, state, and local law enforcement information sharing initiatives. These initiatives utilize DIG server software to provide a dynamic information exchange capability among dozens of participating agencies. Mr. McPhatter continues to be involved with a wide variety of projects for law enforcement and the federal intelligence communities.

Clients include: The Office of National Drug Control Policy (ONDCP), several regional High Intensity Drug Trafficking Areas (HIDTAs), State Attorney General's Offices, State Police Departments, Defense Intelligence Agency (DIA), Internal Revenue Service (IRS, Criminal Investigations), Office of Naval Intelligence (ONI), U.S. Customs, U.K. Customs, Financial Intelligence Unit (FIU, Bangkok), and several large corporations.

Mr. McPhatter, a U.S. Marine Corps veteran, has over 18 years of technical and management experience with databases, distributed software systems, network security, data visualization, and associated technologies.

# Exhibit EE

Google images

Isabelle Funaro

Search images

[Advanced Image Search](#)

SafeSearch: [Off](#) ▼

**Images** [Show options...](#)

Results 1 - 20 of about 748 (0.19 seconds)



**Isabelle Funaro** |  
229 x 309 - 14k  
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**Isabelle funaro** movies pics  
500 x 676 - 98k - jpg  
[thefamous.org](#)



**Isabelle Funaro**  
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[purepeople.com](#)



**Isabelle Funaro 1**  
1024 x 768 - 149k - jpg  
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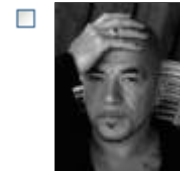
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