01:17:25 1 1:17:25 2 01:17:28 3 01:17:32 4 01:17:34 5 01:17:35 6 01:17:36 7 01:17:36 8 01:17:40 9 01:17:43 10 01:17:45 11 01:17:47 12 01:17:49 13 1:17:51 14 01:17:55 15 01:17:59 16 01:18:01 17 01:18:02 18 01:18:07 19 01:18:10 20 01:18:12 21 01:18:13 22 01:18:17 23 01:18:18 24 01:18:21 25

with these features?

Q.

- A. We looked at Thefacebook, yes.
- ConnectU -- I mean, from Thefacebook?

 MR. HORNICK: Object to the form of the question and assumes facts not in evidence.

And you extracted course information from

- A. Yeah, when collecting course information there's basically two -- you know, it's public course information that's posted by a registrar from the school, and you can either go to the registrar or you can go, you know -- and Thefacebook had the courses. So, yes, we did look at the courses which, again, is public proprietary information, and we collected that, yes.
- Q. How did you collect it?
- A. We just would like look at the file in a text editor and just take the course file.
- Q. Did you ever extract e-mails from Thefacebook?
- A. We -- yes, we have extracted e-mails from Thefacebook.
- Q. Isn't it true that you've extracted 2.9 to 3 million e-mails from Thefacebook because of

01:18:24	1
1:18:25	2
01:18:27	3
01:18:29	4
01:18:30	5
01:18:38	6
01:18:45	7
01:18:46	8
01:18:49	9
01:18:52	10
01:18:55	11
01:18:57	12
01:19:01	13
1:19:06	14
01:19:07	15
01:19:09	16
01:19:12	17
01:19:15	18
01:19:19	19
01:19:21	20
01:19:24	21
01:19:25	22
01:19:28	23
01:19:29	24
01:19:29	25

a security hole you found?

MR. HORNICK: Objection. It's a misleading question, but you can answer it if you can.

- A. We have extracted e-mails basically just,

 you know, following -- an e-mail has a -- at

 that point they had a URL, and you could

 follow that URL and it's completely

 authorized -- it's not unauthorized access,

 and you can follow that URL to find an

 e-mail address, yes, you could. And we did.
- Q. So did you find a way to extract those e-mails without logging onto Thefacebook?

 MR. HORNICK: Objection. I think this is outside the scope. It's not 30(b)(6) testimony.
- A. See, again, I don't remember -- I'm not a programmer, but it's my understanding that with unauthorized -- excuse me, with authorized -- without using unauthorized access those e-mails were accessible.
- Q. And ConnectU took them?

MR. HORNICK: Object to the form of the question.

A. What do you mean by take?

01:19:31 1 1:19:32 2 01:19:36 3 01:19:41 4 01:19:44 5 01:19:46 6 01:19:50 7 01:19:50 8 01:19:51 9 01:19:52 10 01:19:55 11 01:19:56 12 01:19:58 13 1:19:58 14 01:20:01 15 01:20:06 16 01:20:06 17 01:20:07 18 01:20:11 19 01:20:14 20 01:20:16 21 01:20:20 22

01:20:22

01:20:29 24

01:20:31 25

23

- Q. Extracted the information?
- A. ConnectU followed an open URL, "open" being that it was accessible with not having to use unauthorized access, it was accessible, out in the open, and ConnectU followed those URLs and was able to collect e-mail addresses.
- Q. And who did that?
- A. Winston Williams.
- Q. Winston Williams did that? And when did he do that?
- A. I believe he did it in the spring of this year.
- Q. Were those e-mails ever used by ConnectU?
- A. I think we used some of them with the Social
 Butterfly software.
- Q. And how were they used?
- A. If a friend used Social Butterfly and wanted to invite their friends, then they could do that with Social Butterfly. And they --
- Q. So when you -- once you had those e-mails,

 did you -- well, what did you do with them?
- A. We just held them in a holding bin, and if a user said, I would like to invite my friend, well, we would just invite their friends.