

# EXHIBIT F

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DANIEL M. MILLER, )  
 )  
 )  
 Plaintiff, )  
 )  
 -vs- ) NO. CV-10-264 (WHA)  
 )  
 FACEBOOK, INC., and YAO WEI )  
 YEO, )  
 )  
 Defendants. )  
 )

\*\*This transcript has been designated  
HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

DEPOSITION OF JULIE TUNG

Thursday, February 3, 2011

Menlo Park, California

REPORTED BY: JANIS G. ANDERSEN, CM, CSR NO. 3333

1 Q Is that the same month you began work at Facebook?

2 A Yes.

3 Q What is your present position with Facebook?

4 A Engineering Manager.

5 Q How long have you held that position?

6 A One month.

7 Q One month?

8 A Roughly.

9 Q And as an engineering manager, could you just  
10 briefly describe your duties and responsibilities?

11 A I manage the Platform API team.

12 Q What does that entail?

13 A I still write code and I also participate in the  
14 career development for the software engineers on the API team.

15 Q You say participate in career development?

16 A Yes.

17 Q What position did you hold with Facebook prior to  
18 becoming the Engineering Manager?

19 A Software Engineer.

20 Q Is that the only other position other than  
21 Engineering Manager that you've held with Facebook?

22 A Yes.

23 Q If you would briefly describe your duties and  
24 responsibilities as a software engineer at Facebook?

25 A I write code, I write tests, and I fix bugs.

1           A     Correct.

2           Q     Have you taken any medication today, Ms. Tung, that  
3 would prevent you from testifying truthfully and accurately?

4           A     No.

5           Q     Before we proceed, I'd just want to ask you on the  
6 record that as we move forward, if you would, when we're  
7 talking about various operations at Facebook that I'll be  
8 questioning you about, if you can, I'd like you to  
9 differentiate between if there's any difference between  
10 operations as they existed in 2009 and operations as they  
11 exist presently. If you would make that differentiation on  
12 the record. If you don't, I'm just going to assume that what  
13 you're testifying to is the way things were done in '09 or  
14 presently.

15                   MR. AVALOS: Objection; vague and ambiguous. If you  
16 have a question about 2008, ask about 2008. If you have a  
17 question about 2009, ask about 2009.

18                   MR. HANCOCK: Well, I'm just trying to save time so  
19 that every time I go through a sequence of questioning, I  
20 don't have to ask you if that's how things were done in 2009.  
21 If your counsel objects to that, I will ask that question, but  
22 it's just more than likely going to prolong your deposition.  
23 But that's fair.

24                               What is Facebook Platform?

25                               THE WITNESS: Facebook Platform is basically the

1 vehicle through which third-party applications or websites can  
2 integrate with Facebook.

3 Q When you say "integrate," what do you mean?

4 A That actually covers several different ways. It can  
5 mean that an application or website uses Facebook data on  
6 their site or it can mean that third-party applications appear  
7 inside Facebook.com.

8 Q When was Platform established?

9 A I believe -- this is before I got to Facebook, but I  
10 believe the first API was released in fall 2006 and the rest  
11 of the Platform was launched May 2007.

12 Q The integration you previously testified to, is it  
13 your understanding that Facebook Platform has offered that  
14 since its inception?

15 A MR. AVALOS: Objection; vague and ambiguous.

16 Q (By Mr. Hancock) You can answer.

17 A Which integration?

18 Q What you've previously testified to as to what  
19 Facebook Platform does or what it is. Is that your  
20 understanding what Facebook Platform is since its inception or  
21 since you first began working at Facebook?

22 MR. AVALOS: Same objection.

23 THE WITNESS: Facebook Platform offerings have  
24 evolved over time.

25 Q (By Mr. Hancock) Okay. Tell me about that

1 evolution.

2 A So I think the goal of Platform has remained the  
3 same. However --

4 Q Is that goal the integration you previously  
5 testified to?

6 A Yes.

7 Q Okay. Go ahead. I'm sorry.

8 A I think the main change was the launch of the  
9 Facebook Connect, and that was in -- I think it was in 2008.  
10 2008 or 2009? Anyway, I think that's the -- so prior to that,  
11 the first launch of the Facebook Platform was primarily  
12 integrations inside Facebook.com. The launch of the Facebook  
13 Connect introduced more integrations outside of Facebook.com.

14 Q What do you mean by integration outside of  
15 Facebook.com?

16 A A third-party website that uses Facebook data in  
17 order to make the experience social for the user.

18 Q Is that really the purpose or function of Facebook  
19 Connect?

20 A Yes.

21 Q Speaking to a lay person, would you describe briefly  
22 what a Facebook user can do through Facebook Connect?

23 MR. AVALOS: Objection; vague and ambiguous. You  
24 can answer.

25 THE WITNESS: I can give some examples.

1 Q Okay. '07. How would a developer use Platform to  
2 make his game application available on Facebook?

3 MR. AVALOS: Calls for speculation.

4 Q (By Mr. Hancock) Do you have knowledge, personal  
5 knowledge? I know you weren't working there then but --

6 A I'm sorry. Could you repeat the question?

7 Q When Platform was established in 2007, do you have  
8 any knowledge as to how a developer would use Platform to make  
9 his application available on Facebook?

10 A Yes.

11 Q Please tell me what that is.

12 A A developer could make it available through a canvas  
13 page.

14 Q How would a developer in 2007 set up a canvas page?

15 A The developer needs to have a third-party -- it  
16 needs to have his own application server to provide the  
17 content for the application.

18 Q What else would he need to do?

19 A They need to register an application with Facebook.

20 Q How would he do that?

21 A I believe Facebook has some sort of developer  
22 application that would allow you to create an application and  
23 change the settings for the application.

24 Q So we're talking about 2007. And would the  
25 developer create the application using information or content

1 on Facebook servers?

2 A No.

3 Q So he would do that independently.

4 A Sorry. Maybe I didn't understand the question. The  
5 developer needs to enter the application's data on like -- the  
6 developer needs to enter data for the application, like the  
7 application's name, the URL, if there's a third-party server,  
8 as well as other settings for the application. And he would  
9 do that on Facebook.com.

10 Q What are those other settings; do you know?

11 A Whether the application is an FBML or an iFrame app,  
12 as well as -- I actually don't know what the other settings  
13 available in 2007 were.

14 Q Okay. Other than in 2007, other than a developer  
15 needing his own application server with content for the  
16 application -- and I'm just trying to go back over your  
17 previous testimony -- and registering the application with  
18 Facebook, filling out the fields that you've talked about,  
19 what else would a developer need to do to make his application  
20 available on Facebook?

21 MR. AVALOS: Brian, the deposition time -- I'm going  
22 to object. The deposition topics started in, if I'm not  
23 mistaken, January 2008. You're asking questions about 2007.  
24 I'll read Topic 1 --

25 MR. HANCOCK: That's okay. That's a fair objection.



1                   Let's go to 2008 then.

2           Q       What you previously testified to as current in 2007,  
3 would there be any difference as to what a developer would  
4 need to do to -- (reporter interruption.)

5                   I'm just trying to move things along.    But in 2008,  
6 other than what you have previously testified to, Ms. Tung,  
7 what would a developer need to do to make his application  
8 available on Platform?   Or on Facebook; sorry.

9           A       I believe that's all.

10          Q       So that's it.

11          A       (Witness nodding head up and down.)

12          Q       Okay.   So whatever a developer would need to do in  
13 '07 would be the same thing in '08, to your knowledge?

14          A       I believe so, yes.

15          Q       What about 2009?   Would a developer who wanted to  
16 put his application on Facebook, would he have to do anything  
17 other than what you've previously testified to?

18          A       No.

19          Q       What about 2010?

20          A       No.

21          Q       What about at present?

22          A       No.

23          Q       So then your testimony is in order for a developer  
24 to put his application or make it available on Facebook, he  
25 would need to have an application server with content for the

1 application. Would that be code for the application on his  
2 server?

3 MR. AVALOS: Objection; misstates prior testimony.

4 MR. HANCOCK: Okay. What content would a developer  
5 need in order to put -- on his server, in order to put his  
6 application -- or make it available on Facebook?

7 MR. AVALOS: Objection; vague and ambiguous.

8 THE WITNESS: It would depend on the application.

9 Q (By Mr. Hancock) You previously stated that you  
10 have some passing familiarity with Chain Rxn, that it was a  
11 flash application.

12 What would a developer of a flash application need on  
13 his server in order to make it available using Facebook  
14 Platform -- make it available on Facebook?

15 MR. AVALOS: Objection; calls for speculation.

16 MR. HANCOCK: If you know.

17 THE WITNESS: I know some of the things they would  
18 need. I don't know all of them.

19 Q (By Mr. Hancock) That's fine. Tell me what you do  
20 know.

21 A They would need to have a flash file that they host  
22 on their application server.

23 Q What else?

24 A They would need some end point that would respond to  
25 Facebook's canvas page requests.

1 Q When you say end point, what do you mean?

2 A When I specified that they would need to specify the  
3 URL to their application server. They would need to have  
4 something that responds there.

5 Q Would that be the URL for the canvas page?

6 A Not quite. The URLs for canvas pages are like  
7 apps.facebook.com, slash, some application name.

8 Q Right.

9 A The URL in question here would be the URL of their  
10 server that responds to our request in order to populate the  
11 page.

12 Q Anything else?

13 A That's all that I know of.

14 Q Then if the developer filled out certain information  
15 with Facebook in registering the application, the developer  
16 would what? He would then have a canvas page for the  
17 application available on Facebook?

18 A Yes.

19 MR. AVALOS: Objection.

20 Q (By Mr. Hancock) What's an API?

21 A Application public interface, I think.

22 Q Application public interface?

23 A I believe that's it -- or actually maybe programming  
24 interface. I'm not totally sure what it stands for, actually.

25 Q You probably know what it does.