

EXHIBIT 6

0001

1 DEPOSITION OF MAUREEN GRIFFIN
2 UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 NORBERT WU, individually and on)
behalf of all similarly situated)
5 persons,)
))
6 Plaintiffs,)
))
7 vs.)
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8 PEARSON EDUCATION, INC.,)
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9 Defendant.)

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The deposition of MAUREEN GRIFFIN, called for examination pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before JUDITH A. WALSH, Illinois Certified Shorthand Reporter No. 84-2824, at Suite 500, 77 West Wacker Drive, Chicago, Illinois, on the 16th day of June 2010, at the hour of 8:38 o'clock a.m.

There were present at the taking of this deposition the following counsel:

1 DEPOSITION OF MAUREEN GRIFFIN
2 NELSON & McCULLOCH, LLP, by
3 MR. DAN NELSON
4 405 Lexington Avenue, Suite 2500
5 New York, New York 10174
6 (646) 704-4900
7 dnelson@nelsonmcculloch.com,

8 on behalf of the Plaintiffs;

9 MORGAN, LEWIS & BOCKIUS, LLP, by
10 MR. DAVID W. MARSTON, JR.
11 1007 North Orange Street, Suite 501
12 Wilmington, Delaware 19081
13 (302) 574-7222
14 dmarston@morganlewis.com,

15 on behalf of the Defendant.
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I N D E X

WITNESS	EXAMINATION
MAUREEN GRIFFIN	
By Mr. Nelson	4
	92
By Mr. Marston	89

E X H I B I T S

NUMBER	DESCRIPTION	MARKED
Deposition		
Exhibit 24	11-page document, November 1, 2009, to Science Faction on first page	51
Exhibit 25	Spreadsheet	59

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2 (Whereupon, the witness was
3 duly sworn.)

4 MAUREEN GRIFFIN,

5 called as a witness herein, having been first duly
6 sworn, was examined upon oral interrogatories and
7 testified as follows:

8 EXAMINATION

9 BY MR. NELSON:

10 Q. Ms. Griffin, have you ever had your deposition
11 taken before?

12 A. No.

13 Q. Just so you know, the court reporter is here
14 taking down everything that you say. So you need to
15 verbalize your answers "yes" or "no" instead of
16 "uh-huh" or "uh-uh." Also for her sake, I'll try to
17 finish my question before you start your answer, if
18 you can try to wait until I'm finished asking my
19 question to answer.

20 You realize you're under oath today?

21 A. Yes.

22 Q. What's your current job title?

23 A. Photo commissions, editor.

24 Q. And that's at the curriculum group --

25 A. Yes.

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Q. -- of Pearson Education, Inc.?

A. Yes.

Q. How long have you been at Pearson?

A. Approximately a year, a year and a half.

Q. When did you start?

A. December of 2008.

Q. Did you start there in your current position?

A. No.

Q. What was your original position?

A. Image coordinator.

Q. How long were you in that position?

A. One month.

Q. What was your job title -- or what were your responsibilities, excuse me, as image coordinator?

A. I delivered files to our production team, logged them in to our Image Tracker, delivered the proofs to graphic designers.

Q. What is your Image Tracker?

A. It's the database we use to track all images we use in our programs.

Q. When you say to track the images, what sort of information do you track?

A. The image ID, the source it came from, the photographer, the book that it is presented in.

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2 Q. And I think you answered this previously, but
3 you've never been asked to do any of that sort of
4 compilation or information?

5 MR. MARSTON: Objection, form.

6 THE WITNESS: Specifically --

7 BY MR. NELSON:

8 Q. For the lawsuit.

9 A. No.

10 Q. I assume you have done it generally as part of
11 your job in following permissioning problems at the
12 curriculum group?

13 MR. MARSTON: Objection, form.

14 THE WITNESS: Yes.

15 BY MR. NELSON:

16 Q. And you know what I mean when I say
17 permissioning problems at the curriculum group?

18 MR. MARSTON: Objection, form.

19 THE WITNESS: No.

20 BY MR. NELSON:

21 Q. Are you aware of problems pertaining to
22 permissioning at Pearson's curriculum group?

23 A. I'm aware of past problems.

24 Q. What sort of problems are you aware of?

25 A. I'm aware of programs not being permissioned

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2 before the FTP date.

3 Q. What other problems are you aware of?

4 A. I'm aware that the number of textbooks printed
5 exceeded the licenses we obtained.

6 Q. Any other problems?

7 A. No.

8 Q. Let's go back to the process. You said that
9 at a certain point, you start the permissioning
10 process. What does that entail?

11 A. I pull a log of all the images requiring
12 permission. I enter the appropriate usage fee. I
13 generate a billing request and a permissions letter.
14 I e-mail them to the source. I ask that they check my
15 billing request for any credit errors or if the images
16 are no longer available. I ask them to confirm they
17 can invoice all the images. I collect invoices.

18 Q. Is it fair to say that as part of your job,
19 you get permission to use pictures in textbooks?

20 A. Yes.

21 Q. Is it part of your job to get retroactive
22 permission to use pictures in textbooks?

23 A. No.

24 Q. Have you been informed expressly that that's
25 not part of your job?