

1 DEPOSITION OF ARTHUR BILGER,
2 taken on behalf of the Plaintiff at
3 880 Apollo Street , Suite 222,
4 El Segundo, California, on Tuesday,
5 June 5, 2007, at 1:10 P.M.
6 before Chia Mei Jui, CSR No. 3287.

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8 APPEARANCES:

9 For Plaintiff:

10 IO GROUP, INC.
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15 (415) 487-1211

16 For Defendant Veoh Networks, Inc., and
17 Shelter Capital Partners, LLC, and the
18 Deponent Arthur Bilger:

19 WINSTON & STRAWN, LLP
20 BY: JENNIFER A. GOLINVEAUX, ESQ.
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I N D E X

WITNESS	PAGE
ARTHUR BILGER	
By Mr. Sperlein	4

E X H I B I T S

PLAINTIFF'S	PAGE
1 Amended Notice of Deposition of Shelter Capital Partners, LLC Pursuant to FRCP 30(b)(6)	45

I N F O R M A T I O N R E Q U E S T E D

(None.)

Q U E S T I O N S M A R K E D

(None.)

1 El Segundo, California

2 Tuesday, June 5, 2007

3 1:10 P.M.

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7 ARTHUR BILGER,

8 having been duly sworn

9 to tell the truth,

10 was examined and testified as follows:

11

12 EXAMINATION

13 BY MR. SPERLEIN:

14 Q Good afternoon, Mr. Bilger.

13:10:32

15 Thank you for coming. I know you're busy.
16 I'm going to try to keep things as short as possible
17 today. And I hope it wasn't too far for you. We
18 tried to get a location that was convenient.

19 Have you ever had your deposition taken
20 before?

13:10:45

21 A Yes.

22 Q So you are familiar with this process. But
23 I am going to go over the ground rules just to make
24 sure that we have a record, that we're clear on that
25 process.

13:10:53

13:55:43 1 A Not necessarily.

2 Q Did Veoh ever indicate to you that with the
3 appearance of YouTube.com coming onto the scene that
4 there was a requirement that content got put onto
13:56:01 5 the system at a faster pace than previously
6 required?

7 MS. GOLINVEAUX: Object to the extent the
8 question is misleading and misstates facts and
9 mischaracterizes evidence in this case.

13:56:17 10 BY MR. SPERLEIN:

11 Q Did Veoh ever give you any indication that
12 that was the case?

13 MS. GOLINVEAUX: Would you read back the
14 question, please.

13:56:23 15 (The record was read.)

16 THE WITNESS: Not that I recall.

17 BY MR. SPERLEIN:

18 Q Did Veoh ever indicate that, because of the
19 popularity of YouTube, that they needed to change
13:57:01 20 any procedures relating to the Veoh system?

21 A Nothing specific that I can recall.

22 Q Was there any kind of general awareness of
23 YouTube and changes that needed to be made because
24 of that?

13:57:22 25 A Not that I recall.

13:57:44 1 Q Did Veoh have discussions with you about
2 how their technology would work generally?

3 A Yes.

4 Q Did Veoh ever specifically tell you that,
13:57:57 5 when a video file was submitted, that the technology
6 in use would create still images from that video
7 file?

8 A Not that I recall.

9 Q Did Shelter know that Veoh would permit
13:58:17 10 sexually explicit video files on their Web site?

11 Let me rephrase that -- restate that.

12 Did Shelter know that Veoh would allow
13 users to submit sexually explicit content to the
14 Veoh platform?

13:58:38 15 MS. GOLINVEAUX: I'm sorry.

16 Could you read back the question, please.

17 (The record was read.)

18 THE WITNESS: At some point, yes.

19 BY MR. SPERLEIN:

13:58:59 20 Q At some point Shelter became aware of that;
21 is that --

22 A Yes.

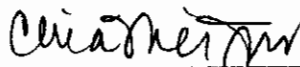
23 Q Do you know at what point?

24 A Spring of '06.

13:59:31 25 Q Do you recall how Shelter Capital became

1 I, CHIA MEI JUI, CSR 3287, certify:
2 That the foregoing deposition of
3 ARTHUR BILGER was taken before me at the time and
4 place therein set forth, at which time the witness
5 declared under penalty of perjury to tell the truth;
6 That the testimony of the witness and all
7 objections made at the time of the deposition were
8 recorded stenographically by me and were reduced to
9 a computerized transcript under my direction;
10 That the transcript is a true record of the
11 testimony of the witness and of all objections and
12 colloquy made at the time of the deposition.
13 I further certify that I am neither counsel
14 for nor related to any party to said action nor
15 interested in the outcome thereof.
16 The certification of this transcript does
17 not apply to any of the same by any means unless
18 under the direct control and direction of the
19 certifying deposition reporter.
20 IN WITNESS WHEREOF, I have subscribed my
21 name this 18th day of June, 2006.

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CHIA MEI JUI, CSR No. 3287