

# Exhibit D

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC,	)	
etc., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.
	)	05-03639 JW
GOOGLE, INC.,	)	
	)	
Defendant.	)	
_____	)	

30 (b) (6) DEPOSITION OF BRETT R. HANSON

August 18, 2006

228010



(310) 207.8000 Los Angeles  
 (949) 955.0400 Orange County  
 (415) 433.5777 San Francisco

(916) 922.5777 Sacramento  
 (408) 885.0550 San Jose  
 (951) 686.0606 Inland Empire

(818) 702.0202 San Fernando Valley  
 (858) 455.5444 San Diego  
 (760) 322.2240 Palm Springs

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

-----x  
CLRB HANSON INDUSTRIES, LLC d/b/a  
INDUSTRIAL PRINTING, and HOWARD  
STERN, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

GOOGLE, INC.,

Defendant.

Case No.  
05-03639 JW

Confidential  
Portions Bound  
Separately

-----x

August 18, 2006

9:45 a.m.

30(b)(6) VIDEOTAPED DEPOSITION

of CLRB HANSON INDUSTRIES d/b/a  
INDUSTRIAL PRINTING by BRETT R. HANSON,  
taken by Defendant, pursuant to notice,  
held at the offices of Thacher Proffitt  
& Wood, 2 World Financial Center, New  
York, New York, before Amy E. Sikora,  
CRR, CSR, RPR, Certified Realtime  
Reporter, Certified Shorthand Reporter,  
Registered Professional Reporter, and  
Notary Public within and for the State  
of New York.

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A P P E A R A N C E S:

WOLF POPPER LLP

Attorneys for Plaintiffs and the Proposed Class

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New York, New York 10022

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MICHELE F. RAPHAEL, ESQ.

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Attorneys for Defendant

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BY: DAVID T. BIDERMAN, ESQ.

M. CHRISTOPHER JHANG, ESQ.

ALSO PRESENT:

THOMAS DELVECCHIO, Videographer

1 B. Hanson

0:08 2 an AdWords program, and entered the  
0:08 3 information that was requested of me.

0:08 4 Q. And this is sometime in  
0:08 5 July 2002, as best as you recall?

0:08 6 A. Yes, sir.

0:08 7 Q. And did you review any materials  
0:08 8 on the Google site before you made the  
0:08 9 decision to join the AdWords program?

0:08 10 A. I remember the page -- the  
0:09 11 sign-up page saying it was an easy-to-use  
0:09 12 pay-for-click program. That it was a -- we  
0:09 13 controlled the -- the program from a -- from  
0:09 14 a budget standpoint. We controlled the cost  
0:09 15 per click. We controlled the daily budget.  
0:09 16 And that's what intrigued me to the value  
0:09 17 proposition that Google offered at that time.

0:09 18 Q. And when did you first see the  
0:09 19 page that you just described?

0:09 20 A. I think it's the first page that  
0:09 21 was presented to me.

0:09 22 Q. Okay. As part of the AdWords  
0:09 23 sign-in?

0:09 24 A. Yes, sir.

0:09 25 Q. And had you reviewed any

1 B. Hanson

.1:27 2 interrupt you? And what -- what caused you  
.1:27 3 to use the pausing feature?

.1:27 4 A. It's a unique selling feature  
.1:27 5 allowing you to turn off and on your costs.  
.1:27 6 Having more ability to control the costs  
.1:27 7 associated with your pay-for-click  
1:27 8 advertising. I thought that was an asset of  
1:27 9 Google's that others did not have.

1:27 10 Q. Okay. And what did you use the  
1:27 11 pausing feature to accomplish?

1:27 12 A. That was my cost certain. If I  
1:27 13 had a daily budget of \$100 and my costs at  
1:27 14 that certain time were -- were, as an  
1:27 15 example, \$52 to my \$100 budget, I wasn't  
1:27 16 going to spend more than \$52 that day,  
1:28 17 period.

1:28 18 Q. So could you give me an example  
1:28 19 of how you would implement that pausing?

1:28 20 A. Just go in and click. There's a  
1:28 21 button that says, "Pause."

1:28 22 Q. Okay. But you said you'd look  
1:28 23 at your billing summary; right?

1:28 24 A. Look at my daily budget, that's  
1:28 25 on one page. You've got your campaign name,