

# EXHIBIT BB

REDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

MATTHEW CAMPBELL, MICHAEL HURLEY, )  
and DAVID SHADPOUR, )  
Plaintiffs, )  
Case No. )  
vs. ) C 13-05996 PJH  
FACEBOOK, INC., )  
Defendant. )  
\_\_\_\_\_ )

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF JIAKAI LIU  
Palo Alto, California  
June 30, 2015  
Volume I

Reported by:  
KELLI COMBS, CSR No. 7705  
Job No. 2094258  
Pages 1 - 256

1 of communication did you primarily use? 10:52:01AM

2 A In what context?

3 Q In terms of electronic communication. So  
4 I'll withdraw the question.

5 Did you typically e-mail other members of 10:52:13AM  
6 the Software Engineering team between 2010 and 2012?

7 A Yes.

8 Q Other than e-mail, did you use any other  
9 form of electronic communications such as Chat or  
10 some sort of internal e-mail system, et cetera? 10:52:31AM

11 A Yes.

12 Q And tell me about those other means of  
13 communication you used.

14 A Facebook Messages, that includes Chat and,  
15 like, non-chat Message. That's primarily that, I 10:52:47AM  
16 think. I might miss some other tool, but I couldn't  
17 recall at this point.

18 Q What was -- what was your e-mail address  
19 between 2010 and 2012, your Facebook?

20 A It's liujiakai@FB.com. 10:53:21AM

21 Q If you'd turn back to Exhibit Number 2 and  
22 you look on the second page, do you see the heading  
23 "Understanding Cells"?

24 A Yes.

25 Q And do you see the third bullet point 10:53:54AM

1 send her a message and what's going to happen, like, 11:44:49AM

2 after the request enters the first, like, Facebook

3 [REDACTED]

4 Q And -- so let's -- let's walk through this

5 diagram. What does "[REDACTED]" mean? 11:45:06AM

6 A [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] 11:45:34AM

11 Q And then how about that next box, "Spam

12 Detection"; what does that mean?

13 A Spam Detection means we detect whether a

14 message is a spam message or not.

15 Q And did you play any role in creating the 11:45:47AM

16 Spam Detection functionality?

17 A No.

18 Q Who was primarily responsible for that?

19 A We call it Site Integrity on Facebook.

20 Q And did you have a primary point of 11:46:05AM

21 contact in the Site Integ- -- on the Site Integrity

22 team between 2010 and 2012?

23 A I didn't personally. I couldn't remember.

24 Q Did you write any code that dealt with

25 spam detection in the Messages product? 11:46:23AM

1 A [REDACTED] 1:22:09PM

2 [REDACTED]

3 Q Let's -- let's turn just for one few more  
4 questions back to Exhibit Number 3. And I want to  
5 go to the -- that diagram on the second page, the 1:23:34PM

6 "Incoming Flow" diagram. And we talked a little bit  
7 about spam detection earlier, and you indicated that  
8 Site Integrity was primarily responsible for that.

9 Do you know whether Facebook does any  
10 malware detection on incoming messages? 1:24:02PM

11 A I don't know.

12 Q Don't know?

13 A I don't.

14 Q And just so we're clear, do you know  
15 whether they did any malware scanning of incoming 1:24:15PM  
16 messages between January 1st, 2010, and January 1st,  
17 2013?

18 A I don't have firsthand knowledge. Yeah, I  
19 don't have firsthand knowledge.

20 Q Do you ever recall having any discussions 1:24:36PM  
21 with anyone about any malware scanning that Facebook  
22 was doing?

23 MR. JESSEN: Object to form.

24 THE WITNESS: I couldn't recall now. It  
25 might, but because it's, like, four, five years ago, 1:24:52PM

1 I couldn't recall now. 1:24:55PM

2 BY MR. CARNEY:

3 Q Do you recall whether you were -- ever  
4 wrote any code dealing with malware scanning?

5 A I couldn't remember at this point. I 1:25:15PM  
6 couldn't remember.

7 Q Do you know whether Facebook does any  
8 scanning to protect the site from hackers? Strike  
9 that.

10 Do you know whether Facebook did any 1:25:34PM  
11 scanning to protect the site from hackers between  
12 January 1st, 2010, January 1st, 2013?

13 A I think that's what Site Integrity team  
14 does -- did; that's their job detail.

15 Q Did you have any discussions with anyone 1:25:52PM  
16 at the Site Integrity team regarding their efforts  
17 to prevent or protect the site from hackers related  
18 to the Messages product?

19 A I couldn't remember the exact  
20 conversation. I might be in some e-mail thread or 1:26:10PM  
21 something, but I couldn't remember.

22 Q Do you recall whether you wrote any code  
23 dealing with efforts to protect the site from  
24 hackers?

25 A I couldn't remember. 1:26:31PM

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:

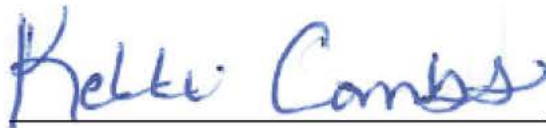
3 That the foregoing proceedings were taken  
4 before me at the time and place herein set forth; that  
5 any witnesses in the foregoing proceedings, prior to  
6 testifying, were administered an oath; that a record of  
7 the proceedings was made by me using machine shorthand  
8 which was thereafter transcribed under my direction;  
9 that the foregoing transcript is a true record of the  
10 testimony given.

11 Further, that the foregoing pertains to the  
12 original transcript of a deposition in a Federal Case,  
13 before completion of the proceedings, a review of the  
14 transcript [X] was [ ] was not requested.

15 I further certify I am neither financially  
16 interested in the action nor a relative or employee of  
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date  
19 subscribed my name.

20  
21 Dated: July 7, 2015

22  
23   
24

KELLI COMBS

25 CSR No. 7705

In the Matter of: *Campbell et al. v. Facebook, Inc.*  
 Case No. 13-CV-05996-PJH

Date of deposition: June 30, 2015

Witness: Jiakai Liu

Reason codes:

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page	Line	Reads	Should Read	Reason Code
9	23	Street address is [REDACTED]	Street address is [REDACTED]	3
14	21	Q. And what type of software did you build at Google? A. It varies. For example, I worked on Google Book Search for a while and then because the Web -- because the Web is like the photo service and a few other things.	Q. And what type of software did you build at Google? A. It varies. For example, I worked on Google Book Search for a while and then Picasa Web which is like the photo service and a few other things.	3
16	18	Q. Can you tell me what their names are? A. One of them was Hary Wang, H-A-R-Y W-A-N-G.	Q. Can you tell me what their names are? A. One of them was Harry Wang, H-A-R-R-Y W-A-N-G.	3
21	4	A. Kannan, K-A-N-N-A-N; Karthic, Karthic.	A. Kannan, K-A-N-N-A-N; Karthik.	3
28	6	Q. Who was your boss on the Home team? A. It was Tom Addison.	Q. Who was your boss on the Home team? A. It was Tom Alison.	3
29	4	Q. Is Mr. Addison still your boss? A. No.	Q. Is Mr. Alison still your boss? A. No.	1
60	24	Q. Why did you write it? A. Same reason as, like, this block post.	Q. Why did you write it? A. Same reason as, like, this blog post.	3
71	16	And when the reviewers are happy, like,	And when the reviewers are happy, like, satisfied,	3



			satisfied, they can accept the change, and then you can lend the change, commit the change to the repository.	they can accept the change, and then you can land the change, commit the change to the repository.	
94	21	A. Uh-huh.	[REDACTED]	A. Uh-huh.	3
94	23	It	[REDACTED]	It	3
99	25	Q. What's a [REDACTED]?	[REDACTED]	Q. What's a [REDACTED]?	3
106	3	A. [REDACTED]	their Facebook e-mail address, by the time team we support e-mail address for Facebook users, and that message will start an e-mail-originated thread.	their Facebook e-mail address, by the time we support e-mail address for Facebook users, and that message will start an e-mail-originated thread.	3
108	14	A. I think that's what Site Integrity team does – did; that's their job detail.	A. I think that's what Site Integrity team does – did; that's their job detail.	A. I think that's what Site Integrity team does – did; that's their job duty.	3
121	3	Q. How about Michael Adkins?	Q. How about Michael Adkins?	Q. How about Michael Adkins?	1
		A. Michael Adkins, I heard his name, but I don't know him personally or worked with him, no.	A. Michael Adkins, I heard his name, but I don't know him personally or worked with him, no.	A. Michael Adkins, it's a guy I know on Messages team and had some work relationship.	
123	21	A. Andrew Bosworth, the boss, Andrew Bosworth I mentioned earlier.	A. Andrew Bosworth, the boss, Andrew Bosworth I mentioned earlier.	A. Andrew Bosworth, the Boz, Andrew Bosworth I mentioned earlier.	3
164	21	So, to me, it's like two independent concepts. One, it's the implementation for Facebook Messages, which I had worked on and continue to work on, like, is the patent worth filing.	So, to me, it's like two independent concepts. One, it's the implementation for Facebook Messages, which I had worked on and continue to work on, like, is the patent worth filing.	So, to me, it's like two independent concepts. One, it's the implementation for Facebook Messages, which I had worked on and continue to work on, like, while the patent was filing.	3
197	7	The [REDACTED] --	The [REDACTED] --	The [REDACTED] --	3
197	10	The [REDACTED]	The [REDACTED]	The [REDACTED]	3

1 [REDACTED] 6:27:34PM  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED] 0PM  
 6 MR. CARNEY: All right. No further  
 7 questions. Thank you for your time.  
 8 THE WITNESS: Thank you.  
 9 THE VIDEOGRAPHER: Anybody else?  
 10 MR. JESSEN: Just give me a minute. 6:28:14PM  
 11 MR. CARNEY: Of course.  
 12 THE VIDEOGRAPHER: We are off the record  
 13 at 6:28 p.m.  
 14 (Recess taken.)  
 15 MR. JESSEN: No questions from me. 6:28:25PM  
 16 THE VIDEOGRAPHER: We're back on the  
 17 record at 6:29 p.m.  
 18 MR. JESSEN: I have no questions for this  
 19 witness.  
 20 THE VIDEOGRAPHER: This is the end of 6:29:15PM  
 21 today's deposition of Mr. Jiakai Liu. We are off  
 22 the record at 6:29 p.m. Thank you.  
 23 (Time noted: 6:29 p.m.)  
 24  
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1 I, the undersigned, a Certified Shorthand  
 2 Reporter of the State of California, do hereby certify:  
 3 That the foregoing proceedings were taken  
 4 before me at the time and place herein set forth; that  
 5 any witnesses in the foregoing proceedings, prior to  
 6 testifying, were administered an oath; that a record of  
 7 the proceedings was made by me using machine shorthand  
 8 which was thereafter transcribed under my direction;  
 9 that the foregoing transcript is a true record of the  
 10 testimony given.  
 11 Further, that the foregoing pertains to the  
 12 original transcript of a deposition in a Federal Case,  
 13 before completion of the proceedings, a review of the  
 14 transcript [X] was [ ] was not requested.  
 15 I further certify I am neither financially  
 16 interested in the action nor a relative or employee of  
 17 any attorney or any party to this action.  
 18 IN WITNESS WHEREOF, I have this date  
 19 subscribed my name.  
 20  
 21 Dated: July 7, 2015  
 22  
 23  
 24 Kelli Combs  
 KELLI COMBS  
 25 CSR No. 7705

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 8 I, JAIKAI LIU, do hereby declare under penalty of  
 9 perjury that I have read the foregoing transcript; that  
 10 I have made any corrections as appear noted, in ink,  
 11 initialed by me; that my testimony as contained herein,  
 12 as corrected, is true and correct.  
 13 EXECUTED this 7th day of Aug, 2015, at  
 14 MENLO PARK CA  
 15 (city) (State)  
 16  
 17  
 18 Jiakai Liu  
 JAIKAI LIU  
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