## **EXHIBIT 2**

## Gregory Grefenstette 3/30/2011 12:26:00 PM

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1		1		
2 3	UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE	2	STIPULATIONS	
4	C.A. No. 10-136-LPS-MPT	3	IT IS HEREBY STIPULATED AND AGREED, by	
5	x	4	and among counsel for the respective parties	
6	XEROX CORPORATION, :	5	hereto, that the filing, sealing, and	
7 8	: Plaintiff and :	6	certification of the within deposition shall be	
9	Counterclaim Defendant, :	7	and the same are hereby waived;	
10	:		•	
11 12	- against - :	8	IT IS FURTHER STIPULATED AND AGREED	
12	GOOGLE, INC., YAHOO! INC., RIGHT	9	that all objections, except as to the form of the	
14	MEDIA, INC., RIGHT MEDIA, LLC, :	10	question, shall be reserved to the time of trial;	
15	YOUTUBE, INC. and YOUTUBE, LLC :	11		
16 17	: Defendants. :	12	IT IS FURTHER STIPULATED AND AGREED	
18		13	that the within deposition may be signed before	
19	March 30, 2011	14	any Notary Public with the same force and effect	
20 21	9:00 a.m. 51 Madison Avenue	15	as if signed and sworn to before the Court.	
22	New York, New York	16	* * *	
23		17		
24 25	CONFIDENTIAL TRANSCRIPT	18		
26	VIDEOTAPED DEPOSITION OF GREGORY	19		
27	GREFENSTETTE, held at the above-mentioned time			
28	and place, before Randi Friedman, a Registered Professional Reporter, within and for the State	20		
29 30	of New York.	21		
31		22		
32		23		
33 34		24		
35	Job No. CS322800	25		
		2		4
1		2	Confidential	4
1 2	APPEARANCES:	1	Confidential	4
2 3		1	MR. CALVERT: We are now on the	4
2 3 4	CRAVATH, SWAINE & MOORE, LLP	1 2 3	MR. CALVERT: We are now on the record. This is the video operator	4
2 3		1 2 3 4	MR. CALVERT: We are now on the record. This is the video operator speaking, Robert Calvert, of Veritext	4
2 3 4 5 6 7	CRAVATH, SWAINE & MOORE, LLP Attorneys for Plaintiff/Counterclaim Defendant	1 2 3 4 5	MR. CALVERT: We are now on the record. This is the video operator speaking, Robert Calvert, of Veritext Reporting. Today's date is March 30th,	4
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	9			11
1	Confidential	1	Confidential	
2	that document, in the context of that document.	2	Retrieval System.	
3	Q. Okay. Was there anything new and	3	Q. How was it that the patent achieved a	
4	unique that you invented to do that?	4	precise result, as you say?	
5	MR. HARASYMIAK: I caution the	5	A. We implemented we had an	
6	witness not to reveal the substance of any	6	implementation in our ideas of the patent. In	
7	attorney/client communications when	7	our implementation, it would recognize entities	
8	answering that question.	8	in a document. Then take a certain part of text	
9	THE WITNESS: We thought the idea	9	around those entities and classify it using a	
10	was new and the patent was granted.	10	classification system. And then that	
11	BY MR. PERLSON:	11	classification that was found for that text	
12	Q. What was new?	12	around the entity would be used to add in a	
13	MR. HARASYMIAK: Same caution.	13	classification category. And that classification	
14	THE WITNESS: The combination of	14	category would then match up against some	
15	the techniques used in the patent.	15	classification category in the Information	
16	BY MR. PERLSON:	16	Retrieval System to restrict or favor the	
17	Q. Is that the only way you can describe	17	documents in that one category.	
18	what was new in the patent, by saying just the	18	Q. And how would that restriction be	
19	combination of the techniques in the patent?	19	done?	
20	A. No. I suppose I could describe it	20	A. Well, the category would favorize	
21	otherwise.	21	certain documents that were in that category.	
22	Q. Okay. Can you please do so?	22	Favorize, I'm sorry. The category that was found	
23	A. So you want me to redo could I have	23	around the entity that was the basis of the query	
24	the question?	24	would favorize the documents that are in that	
25	Q. Sure. You said that you could	25	category.	
	10			12
1	Confidential	1	Confidential	
1 2	Confidential describe it otherwise, and I'm asking you to do	1 2	Confidential Q. You said favorize?	
2	describe it otherwise, and I'm asking you to do	2	Q. You said favorize?	
2 3	describe it otherwise, and I'm asking you to do that.	2 3	<ul><li>Q. You said favorize?</li><li>A. Yes. So it depends how it's</li></ul>	
2 3 4	describe it otherwise, and I'm asking you to do that. A. Well, there's many ways to describe	2 3 4	<ul><li>Q. You said favorize?</li><li>A. Yes. So it depends how it's implementing in the Information Retrieval System,</li></ul>	
2 3 4 5	describe it otherwise, and I'm asking you to do that. A. Well, there's many ways to describe it. So it depends who the audience would be, and	2 3 4 5	<ul><li>Q. You said favorize?</li><li>A. Yes. So it depends how it's implementing in the Information Retrieval System, but it could be restricted to only the documents</li></ul>	
2 3 4 5 6	describe it otherwise, and I'm asking you to do that. A. Well, there's many ways to describe it. So it depends who the audience would be, and in what context who would be understanding the	2 3 4 5 6	<ul> <li>Q. You said favorize?</li> <li>A. Yes. So it depends how it's implementing in the Information Retrieval System, but it could be restricted to only the documents in a category, or it could take those documents</li> </ul>	
2 3 4 5 6 7	describe it otherwise, and I'm asking you to do that. A. Well, there's many ways to describe it. So it depends who the audience would be, and in what context who would be understanding the patent. Q. Give me an example of an audience.	2 3 4 5 6 7	<ul> <li>Q. You said favorize?</li> <li>A. Yes. So it depends how it's implementing in the Information Retrieval System, but it could be restricted to only the documents in a category, or it could take those documents in that category and wait them higher than other</li> </ul>	
2 3 4 5 6 7 8	describe it otherwise, and I'm asking you to do that. A. Well, there's many ways to describe it. So it depends who the audience would be, and in what context who would be understanding the patent.	2 3 4 5 6 7 8	<ul> <li>Q. You said favorize?</li> <li>A. Yes. So it depends how it's implementing in the Information Retrieval System, but it could be restricted to only the documents in a category, or it could take those documents in that category and wait them higher than other documents. There's a lot of different ways of</li> </ul>	
2 3 4 5 6 7 8 9	<ul> <li>describe it otherwise, and I'm asking you to do that.</li> <li>A. Well, there's many ways to describe</li> <li>it. So it depends who the audience would be, and in what context who would be understanding the patent.</li> <li>Q. Give me an example of an audience.</li> <li>A. Why don't you give me an example of an</li> </ul>	2 3 4 5 6 7 8 9	<ul> <li>Q. You said favorize?</li> <li>A. Yes. So it depends how it's implementing in the Information Retrieval System, but it could be restricted to only the documents in a category, or it could take those documents in that category and wait them higher than other documents. There's a lot of different ways of implementing the Information Retrieval System.</li> <li>Q. If the documents in the category were</li> </ul>	
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