

# EXHIBIT 18

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

DISNEY ENTERPRISES, INC.,  
TWENTIETH CENTURY FOX FILM  
CORPORATION, UNIVERSAL CITY  
STUDIOS PRODUCTIONS LLLP,  
COLUMBIA PICTURES INDUSTRIES,  
INC., and WARNER BROS.  
ENTERTAINMENT INC.,

Plaintiffs,

vs. No. 11-20427-WILLIAMS-TURNOFF  
HOTFILE CORP., ANTON TITOV, and  
DOES 1-10,

Defendants.

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PORTIONS OF THIS TRANSCRIPT ARE CONFIDENTIAL  
DEPOSITION OF YANGBIN WANG  
Palo Alto, California  
Thursday, December 22, 2011

REPORTED BY:  
LYNNE LEDANOIS  
CSR No. 6811  
Job No. CA128631

PAGES 105 - 113 ARE HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

HIGHLY CONFIDENTIAL ATTORNEYS EYES ONLY

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DOES 1-10,

Defendants.

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Deposition of YANGBIN WANG, taken on behalf of  
Defendant, at 2475 Hanover Street, Palo Alto,  
California, beginning at 9:43 a.m. and ending at 12:21  
p.m. on Thursday, December 22, 2011, before LYNNE  
LEDANOIS, CSR 6811.

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SARNOFF COURT REPORTERS AND LEGAL TECHNOLOGIES

BY: MARTY MAJDOUB

23

24

25

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1 A CEO of Vobile. 09:48:52

2 Q You founded Vobile? 09:48:54

3 A Yes. 09:48:55

4 Q When was that? 09:48:56

5 A 2005. 09:48:56

6 Q And can you describe for me in a few words the 09:48:58

7 founding of Vobile, please? 09:49:01

8 A Basically, 2005, you know, I left a prior 09:49:07

9 company where I was CTO and then started a company. So, 09:49:13

10 basically, that's the background. 09:49:17

11 Q Okay. What company were you CTO at? 09:49:22

12 A 1 Wave. 09:49:25

13 Q How do you spell that? 09:49:28

14 A 1,2,3,4 -- 1, W-A-V-E, 1 Wave. 09:49:29

15 Q And CTO, of course, means chief technology 09:49:37

16 officer? 09:49:41

17 A Yes. 09:49:41

18 Q What are your current responsibilities as CEO? 09:49:44

19 A Overall management of the company. You know, 09:49:50

20 just like what CEO does. And, yes, basically, that's my 09:49:53

21 responsibility. 09:50:00

22 Q You're essentially responsible for everything 09:50:01

23 at Vobile in some fashion? 09:50:03

24 A Well, ultimately, but then we've got 150 09:50:05

25 people, so -- and in four different countries. So I 09:50:08

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1 have to travel a lot, and, you know, the overall 09:50:12  
2 management. 09:50:18  
3 Q Of the 150 people employed by Vobile currently, 09:50:34  
4 about how many are engineers? 09:50:37  
5 A I would say roughly 100, you know, roughly. On 09:50:39  
6 the technical field, yes. 09:50:43  
7 Q Okay. And you understand you're here to 09:50:44  
8 testify on behalf of Vobile today? 09:50:47  
9 A Yes. 09:50:50  
10 Q Have you ever heard of Media Wise? 09:50:52  
11 A Yes, for sure. 09:50:54  
12 Q What is it? 09:50:55  
13 A It's one of our products offered for content 09:50:57  
14 identification, field training. 09:51:01  
15 Q How does it work, generally? 09:51:03  
16 A Generally, basically, you know, we deploy the 09:51:05  
17 server sites and then provide API. So the user -- I 09:51:10  
18 mean, the customer can basically call the API and submit 09:51:17  
19 video for checking. And it will query our VDDB, and 09:51:20  
20 we'll respond a result to -- through the API to the 09:51:26  
21 customer, whether that's a match to some assets in the 09:51:29  
22 VDDB or not, and also reply with a business rule. 09:51:34  
23 Q Okay. You'll have to unpack some of the 09:51:38  
24 terminology for me, please. 09:51:41  
25 A Sure. 09:51:44

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1 Q VDDB? 09:51:44

2 A Video D and A database. 09:51:45

3 Q And API? 09:51:53

4 A API is a software term, application programming 09:51:56

5 interface. In general, it refers to a software, kind of 09:52:00

6 interface we provide to a customer. 09:52:04

7 Q Okay. So the customer calls a software 09:52:05

8 application that effectuates a query to the Vobile 09:52:10

9 database? Is that fair? 09:52:16

10 A Yes. 09:52:18

11 Q And you had mentioned the results that are 09:52:19

12 returned from Vobile. 09:52:23

13 What are the possible results that are 09:52:24

14 returned? 09:52:26

15 A The results in general just tell them whether 09:52:27

16 that's a match of certain assets and what's the business 09:52:30

17 rule, take down, remove, you know, or something, yes. 09:52:33

18 Q And what do you mean by business rule? 09:52:37

19 A Business rule is essentially, you know, 09:52:40

20 certain -- I probably don't have a accurate definition. 09:52:45

21 It's basically -- in laymen's terms, you know, it's like 09:52:51

22 basically the business rules associated with assets from 09:52:54

23 the copyright's owner. The copyright's owner saying 09:52:58

24 cannot publish, you know, I don't want this to show up 09:53:02

25 on Internet and remove, you know, or certain condition, 09:53:05

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1 they allow them to exist. 09:53:07

2 Q So the copyright owner dictates the business 09:53:10

3 rule? 09:53:13

4 A Yes. 09:53:13

5 Q Is it understanding that in this case the 09:53:16

6 plaintiffs are the copyright owners? 09:53:18

7 A Yes. 09:53:20

8 Q Does the results that are returned from 09:53:38

9 MediaWise depend in any way on content provided by 09:53:43

10 rights holders? 09:53:49

11 MR. PLATZER: Objection to the form. 09:53:51

12 BY MR. LEIBNITZ: 09:53:55

13 Q Let me rephrase. 09:53:56

14 A Yes. 09:53:57

15 Q Does Vobile have any relationship with movie 09:53:59

16 studios? 09:54:02

17 MR. PLATZER: Objection, form. 09:54:04

18 THE WITNESS: What do you mean relationship? 09:54:07

19 BY MR. LEIBNITZ: 09:54:08

20 Q Does Vobile get anything from movie studios? 09:54:08

21 A Yes, they provide the fingerprint. 09:54:12

22 Q Can you describe that for me, please? 09:54:13

23 A We provide tools to the studios, and basically 09:54:15

24 business rules and fingerprints are provided by the 09:54:20

25 studios. 09:54:24

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1 Q And what do you mean by fingerprint? 09:54:25

2 A Fingerprint is a technology term to describe, 09:54:30

3 you know, ways to -- the features to identify the 09:54:36

4 content. So very much like the fingerprint of a person. 09:54:42

5 It's a signature, basically, extracted from the content 09:54:46

6 and use that to identify the content. 09:54:48

7 Q Is it fair to say that Vobile provides to the 09:54:53

8 plaintiff studios the protocol for determining a 09:54:58

9 fingerprint? 09:55:05

10 A It's not the protocol. 09:55:07

11 MR. PLATZER: Objection to the form. 09:55:08

12 THE WITNESS: It's not a protocol. 09:55:09

13 BY MR. LEIBNITZ: 09:55:11

14 Q How do the plaintiff studios, if you know, pull 09:55:11

15 together the fingerprint that is supplied to Vobile? 09:55:19

16 MR. PLATZER: Objection to the form. 09:55:22

17 MR. TIFFANY: You can answer. 09:55:26

18 THE WITNESS: Okay. So I was confused a little 09:55:28

19 bit. That's okay. 09:55:30

20 Basically, it's a piece of software. You know, 09:55:32

21 generating the fingerprint, it requires using our 09:55:33

22 technology and software. So we provide that software to 09:55:38

23 the studios and other content owners to allow them to 09:55:41

24 generate fingerprints. 09:55:45

25 BY MR. LEIBNITZ: 09:55:45

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1 Q Okay. So would it be fair to say that Vobile 09:55:49  
2 provides software to the plaintiff studios which enables 09:55:53  
3 them to provide fingerprints back to Vobile? 09:55:58  
4 A Yes. And we provide that to everybody. 09:56:01  
5 Q And maybe you can describe for me what you mean 09:56:05  
6 by everybody. 09:56:07  
7 A Content owners. 09:56:09  
8 Q Worldwide? 09:56:12  
9 A Yes. 09:56:13  
10 Q Do you discriminate by industry? 09:56:14  
11 A No. 09:56:17  
12 Q How many content owners provide fingerprints to 09:56:23  
13 Vobile? 09:56:26  
14 A I have to count, but probably dozens. 09:56:28  
15 Q Including all of the plaintiffs in this case? 09:56:32  
16 A Yes. 09:56:36  
17 Q How long did it take to develop MediaWise? 09:56:40  
18 A Years, you know, we started since 2005. And 09:56:45  
19 the core technology identification has been in 09:56:52  
20 development since day one. So if you take that into 09:56:54  
21 account, it's now, what, six years -- six, seven 09:56:59  
22 years -- six years, yes. 09:57:03  
23 Q Has it continued to improve since 2005? 09:57:05  
24 A Yes. I mean, we -- the technology, I think 09:57:11  
25 first shipment may be 2007, you know. I mean, we have 09:57:14

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1 to go back and check the record. My recollection is 09:57:21  
2 2007 -- 2006 or 2007, roughly that time frame. And we 09:57:24  
3 certainly are continuing development of lots of new 09:57:31  
4 applications. 09:57:34  
5 Q Has the database upon which MediaWise relies 09:57:39  
6 improved in any fashion in that time period? 09:57:48  
7 MR. TIFFANY: Objection to the form. 09:57:51  
8 THE WITNESS: You know, database continue to 09:57:55  
9 increase, if that's what you mean. 09:57:57  
10 BY MR. LEIBNITZ: 09:57:58  
11 Q So the database upon which MediaWise relies 09:57:59  
12 continued since 2007 to increase in the number of works? 09:58:03  
13 A Definitely. Whenever there is a new movie come 09:58:08  
14 out, that will add to the database. 09:58:11  
15 Q How many -- you mentioned it took years for 09:58:17  
16 MediaWise to be developed. 09:58:19  
17 How many engineers were involved in the 09:58:21  
18 development effort, if you can estimate? 09:58:23  
19 A You know, it's maybe -- to answer that, I mean, 09:58:30  
20 there is no direct contact I can go to really check, but 09:58:35  
21 I would say, you know, we have had those 50 or 100 09:58:41  
22 engineers, I mean, probably hundreds of man years it's 09:58:45  
23 fair to say. 09:58:50  
24 But, again, the technology -- on the line, 09:58:50  
25 technology of MediaWise is really VDDB and the querying, 09:58:52

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1 we're using across our product line. And altogether, 10:00:22  
2 you know, just by counting our engineers and multiply by 10:00:26  
3 years, we've been working on this, I said, probably 10:00:29  
4 hundreds of man years. I'm not saying specifically all 10:00:33  
5 dedicating to MediaWise alone. 10:00:37  
6 Q Are there any patents that apply to MediaWise? 10:00:40  
7 A Yes. 10:00:44  
8 Q How many? 10:00:45  
9 A Again, we don't apply patents for MediaWise 10:00:47  
10 alone. We file patents on our core technology, 10:00:50  
11 fingerprinting, you know, all the general methodologies. 10:00:52  
12 So we have filed probably ten to 20, maybe, patents. 10:00:58  
13 We've got a couple issued. 10:01:03  
14 Q Including some where you're the named inventor; 10:01:09  
15 is that right? 10:01:12  
16 A Yes. 10:01:13  
17 Q So to your understanding, are there at least 10:01:22  
18 two issued patents that cover the technologies employed 10:01:25  
19 by MediaWise? 10:01:30  
20 A There's one issue -- there's one just recently 10:01:32  
21 allowed. So I'm not sure whether we've paid the fees or 10:01:36  
22 not. But you have all the lawyers here, so, you know, 10:01:39  
23 it's the difference here. 10:01:41  
24 Q Okay. So at least one issued patent applies to 10:01:43  
25 the technologies employed by -- 10:01:47

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1 Q Moving a few paragraphs down, sir, there is a 10:45:09  
2 quote from the MPAA beginning, Vobile vCloud9... Do you 10:45:11  
3 see that quote? 10:45:16  
4 A Yes. 10:45:18  
5 Q It reads, Vobile vCloud9 offers an important 10:45:18  
6 new tool for website operators offering legitimate 10:45:21  
7 Cloud-based storage services to be able to discover 10:45:27  
8 unauthorized content online and ensure copyright 10:45:30  
9 compliance, thereby protecting the rights of content 10:45:33  
10 owners in the creative community. Do you see that? 10:45:36  
11 A Yes. 10:45:38  
12 Q Who is Kevin Suh? 10:45:40  
13 A Kevin is senior VP at MPAA. 10:45:41  
14 Q And how do you know Kevin Suh? 10:45:45  
15 A You know, I met him once in the normal course 10:45:50  
16 of business. 10:45:53  
17 Q Did you talk with Kevin Suh about this 10:45:59  
18 statement? 10:46:01  
19 A Not me, I didn't. 10:46:03  
20 Q Any reason to doubt that it's true? 10:46:05  
21 MR. PLATZER: Objection to the form. 10:46:09  
22 THE WITNESS: I mean, they didn't raise an 10:46:10  
23 objection. And that quote is from Kevin Suh. So I 10:46:11  
24 don't -- there is no -- I mean, there is no basis for me 10:46:17  
25 to doubt this is not true. 10:46:20

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1 that Hotfile even permits copyright infringement on its 10:53:11  
2 website? 10:53:16  
3 MR. PLATZER: Same objection. 10:53:17  
4 THE WITNESS: I don't know. Again, same 10:53:18  
5 reason. We just provide the tools. 10:53:19  
6 BY MR. LEIBNITZ: 10:53:23  
7 Q Mr. Wang, do you know how many reference prints 10:54:03  
8 have been submitted and are being used by MediaWise? 10:54:06  
9 A What do you mean reference? 10:54:09  
10 Q How many fingerprints? 10:54:11  
11 A Oh, reference fingerprints? A lot. I don't 10:54:12  
12 have the count, you know, but thousands and thousands of 10:54:16  
13 them, I think. 10:54:22  
14 Q Same answer for reference fingerprints used by 10:54:23  
15 vCloud9? 10:54:27  
16 A VCloud9 has a larger, broader database than 10:54:28  
17 MediaWise. 10:54:31  
18 Q What is the difference? 10:54:34  
19 A Very simple. As I said, MediaWise was designed 10:54:38  
20 for specifically UGC and P2P streaming. And those P2P 10:54:42  
21 streaming sites, they require a very short latency, so 10:54:53  
22 that we design a system optimized for that. And they 10:54:59  
23 mostly are having the live T.V. shows. So we 10:55:03  
24 specifically designed the MediaWise for that market 10:55:08  
25 and -- requirements. 10:55:12

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1 Q Do you know how many reference fingerprints 10:55:15  
2 have been submitted and are being used in vCloud9? 10:55:18  
3 A Again, I don't recall the specific numbers. 10:55:22  
4 Basically, it has more. 10:55:24  
5 Q You don't know how much more? 10:55:29  
6 A The last number I saw probably -- again, in our 10:55:37  
7 database -- I mean, I don't know. I don't know the 10:55:41  
8 details of specific numbers. But, you know, more, I 10:55:45  
9 know for sure. 10:55:49  
10 Q And it's -- not to make this hard for you, but 10:55:57  
11 it's not -- you don't know as you sit here today whether 10:56:01  
12 it's 100 percent more or 50 percent more or any other 10:56:06  
13 numerical amount more? 10:56:12  
14 A Yes, you know, again, I don't know that 10:56:17  
15 specific numeric number. I know it's more, because it 10:56:19  
16 includes a much broader database. And in part, it's 10:56:23  
17 because in a storage-based environment, the latency 10:56:27  
18 requirement is not as high as P2P live streaming. So 10:56:30  
19 checking more is okay. 10:56:34  
20 Q But by much broader, you can't quantify it in 10:56:36  
21 terms of 10 percent, 50 percent, 100 percent? 10:56:39  
22 A I have to go back to my technical staff to get 10:56:41  
23 those numbers. 10:56:44  
24 Q Okay. Can you describe for us what's happened, 10:56:45  
25 if anything, in the last two and a half years in terms 10:56:48

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1 of expanding industry buy in for Vobile? 10:56:53

2 A What do you mean? 10:56:59

3 Q Industry approval for Vobile, has it increased 10:57:01

4 in the last two years? 10:57:04

5 MR. PLATZER: Objection to the form. 10:57:06

6 THE WITNESS: Yes, in general, that's always 10:57:07

7 true. You know, we -- six, seven years ago, we were 10:57:09

8 nobody. We did not form the company. And over the 10:57:13

9 years in the course of business, we take care of our 10:57:16

10 customer. We do a good product. And our reputation, 10:57:21

11 you know, gets stronger and stronger in the industry. 10:57:25

12 BY MR. LEIBNITZ: 10:57:29

13 Q So, to your knowledge, do the reference 10:57:31

14 fingerprints provided by content owners, are they 10:57:33

15 provided automatically in some fashion or are they 10:57:36

16 decided on a case-by-case basis by the content owners? 10:57:40

17 MR. PLATZER: Objection to the form, lacks 10:57:44

18 foundation. 10:57:45

19 THE WITNESS: I don't know what you mean 10:57:47

20 automatic. Is it technical automatically, or -- I 10:57:49

21 mean... 10:57:52

22 BY MR. LEIBNITZ: 10:57:52

23 Q Is there an automated system that is on a 10:57:52

24 computerized basis just submitting additional reference 10:57:55

25 fingerprints, if you know? 10:57:59

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1 MR. PLATZER: Same objections. 10:58:01

2 THE WITNESS: It's all done by computer, for 10:58:02

3 sure, but we don't know exactly the internal process at 10:58:04

4 each customer sites. 10:58:07

5 BY MR. LEIBNITZ: 10:58:08

6 Q Okay. So, as far as you know, Columbia may 10:58:08

7 decide on a case-by-case basis to -- whether or not to 10:58:15

8 submit a reference fingerprint for use in Vobile 10:58:18

9 technology? 10:58:23

10 MR. PLATZER: Same objections. 10:58:24

11 THE WITNESS: Again, I don't know. I said it's 10:58:26

12 all done by computer for sure, because a piece of 10:58:28

13 software, and then however they use it, it's not within 10:58:30

14 our control and knowledge. 10:58:34

15 BY MR. LEIBNITZ: 10:58:37

16 Q Do you know how many reference fingerprints 10:58:37

17 have been submitted for use with either MediaWise or 10:58:40

18 vCloud9 for all content owners? Or did I already ask 10:58:45

19 that question? 10:58:49

20 A You already asked that question. I have to go 10:58:49

21 back to my technical staff. Sorry. I don't remember 10:58:52

22 all those details. The number just goes bigger and 10:58:54

23 bigger. 10:58:57

24 Q Do you get reference fingerprints from the 10:59:01

25 adult entertainment industry? 10:59:03

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1 Q And that you first began providing Vobile 11:20:08  
2 technology to customers sometime around 2006 or 2007; is 11:20:13  
3 that fair? 11:20:17  
4 A Yes. 11:20:18  
5 Q One of the market segments that Vobile serves 11:20:28  
6 is hosting providers. Is that a question that makes 11:20:31  
7 sense to you? 11:20:34  
8 A Yes. 11:20:35  
9 Q Since when has Vobile been serving hosting 11:20:37  
10 providers with Vobile's fingerprinting identification 11:20:40  
11 services? 11:20:43  
12 MR. LEIBNITZ: Object to form. 11:20:45  
13 THE WITNESS: Again, I think this can go 11:20:46  
14 back -- you know, we can trace through press release and 11:20:48  
15 other things, I think the first one we sign up may be 11:20:52  
16 2007 or 2008, around that time. 11:20:56  
17 BY MR. PLATZER: 11:20:59  
18 Q Okay. So by 2000 -- early 2009 -- 11:20:59  
19 A Yes. 11:21:06  
20 Q -- Vobile was already providing video 11:21:06  
21 identification services to hosting providers? 11:21:10  
22 MR. LEIBNITZ: Object to form. 11:21:13  
23 THE WITNESS: For sure. 11:21:15  
24 BY MR. PLATZER: 11:21:16  
25 Q Can you estimate for me about how many hosting 11:21:16

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1 providers Vobile was providing fingerprinting services 11:21:19  
2 to around early 2009? 11:21:22  
3 A I can't recall the exact numbers, but the large 11:21:26  
4 ones, there's only a few. I mean, even as of today, 11:21:29  
5 there's only a few large ones. 11:21:34  
6 Q But that was a market in which Vobile was 11:21:37  
7 offering services in early 2009? 11:21:40  
8 A Yes. 11:21:42  
9 Q And are you aware of any reason that Vobile 11:21:46  
10 might have turned hosting providers away who approached 11:21:48  
11 Vobile to purchase its services back in early 2009? 11:21:52  
12 A No. 11:21:58  
13 Q So if a customer came to you and was willing to 11:22:01  
14 pay for your services, you would have provided them? 11:22:03  
15 MR. LEIBNITZ: Object to form. 11:22:06  
16 THE WITNESS: Definitely. 11:22:08  
17 BY MR. PLATZER: 11:22:09  
18 Q Now, I know we've distinguished here today 11:22:24  
19 between sort of different product lines that Vobile 11:22:26  
20 offers, such as vCloud9 and MediaWise. Do you recall 11:22:30  
21 that testimony earlier? 11:22:33  
22 A Yes. 11:22:34  
23 Q And did you testify earlier that it's the same 11:22:35  
24 core identification technology that underlies both of 11:22:37  
25 them? 11:22:41

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1 Q It's a term you're familiar with? 11:43:57

2 A Yes. And it's a pretty standard term industry 11:43:59

3 use. 11:44:02

4 Q Are you familiar with the rate at which 11:44:07

5 Vobile's fingerprinting technology, the video DNA that 11:44:09

6 we discussed earlier, generates false positives? 11:44:12

7 A Yes. We maintain virtually zero. I mean, 11:44:17

8 that's our practice. Zero FP. 11:44:22

9 Q And what is your basis for that statement? 11:44:24

10 A It's through our orbiting experience, I mean, 11:44:29

11 so far we've had no cases -- I mean, there was several 11:44:34

12 cases being challenged, people was doubting the FP, but 11:44:42

13 all end up actually our system is correct, correctly 11:44:46

14 identify the match. So we don't have any issues out 11:44:50

15 there so far through our orbiting history that have an 11:44:54

16 FP. 11:44:59

17 Q About how many queries -- I realize you 11:45:00

18 probably won't have a specific number -- 11:45:03

19 A Yes. 11:45:05

20 Q -- but if you can give me an estimate. 11:45:05

21 How many queries has Vobile performed on behalf 11:45:07

22 of its customers since it first began providing 11:45:13

23 fingerprinting services on a commercial basis? 11:45:17

24 A A lot. I know one data, because recently -- 11:45:20

25 you know, I mean, we have to check with the system to 11:45:22

HIGHLY CONFIDENTIAL ATTORNEYS EYES ONLY

1 give you the numbers, specific you asked for. But as a 11:45:24  
2 general reference, I -- we are -- our system are 11:45:27  
3 checking about 70 million hours of video in a year. 11:45:34  
4 That's the current rate we have, and that's increasing. 11:45:38  
5 Q And out of all those queries, Vobile is not 11:45:48  
6 aware of any false positives? 11:45:50  
7 A True. No false positives. 11:45:56  
8 Q And just to make sure I'm understanding your 11:45:59  
9 testimony earlier correctly, there have been cases where 11:46:00  
10 false positives have been alleged, but those have turned 11:46:04  
11 out to not be false positives after all? 11:46:08  
12 A Yes. 11:46:11  
13 Q Earlier you were asked some questions about the 11:46:23  
14 vCloud9 service. 11:46:27  
15 A Yes. 11:46:30  
16 Q Can you explain for me -- and you don't need to 11:46:33  
17 go into too much detail -- exactly how vCloud9 is able 11:46:35  
18 to extract fingerprints from compressed files? 11:46:41  
19 A We basically integrate it together. We do 11:46:48  
20 decompress or, you know, extract files from archived 11:46:51  
21 files, and then run in parallel, you know, generate the 11:46:55  
22 fingerprint. 11:46:59  
23 Q And is the same answer true with respect to 11:47:01  
24 archived files? 11:47:03  
25 A Yes. 11:47:05

HIGHLY CONFIDENTIAL ATTORNEYS EYES ONLY

1 MR. PLATZER: Same objections. 12:05:09

2 THE WITNESS: With the context of memorizing, 12:05:10

3 you know, thousands and thousands of titles, yes, the 12:05:13

4 system is more accurate. 12:05:16

5 BY MR. LEIBNITZ: 12:05:19

6 Q In fact, Vobile has the advantage of knowing 12:05:20

7 for certain that its library of fingerprinted content is 12:05:23

8 not authorized, whereas, human review relies upon less 12:05:28

9 clear information in that regard? 12:05:35

10 MR. PLATZER: Objection to the form. 12:05:38

11 THE WITNESS: True, because human being, I 12:05:41

12 mean, you can memorize -- I mean, it's okay for you to 12:05:44

13 memorize a few shows, say, watch those shows, but to 12:05:47

14 find someone who can memorize thousands and thousand of 12:05:51

15 titles and memorize all the business rules around it, 12:05:55

16 it's just virtually impossible. 12:05:58

17 BY MR. LEIBNITZ: 12:05:59

18 Q And it would be virtually impossible for a 12:06:00

19 human being even to research on a reasonable basis all 12:06:02

20 of the authorization that Vobile has existing within its 12:06:09

21 database? 12:06:13

22 A I haven't found that human person yet. I mean, 12:06:15

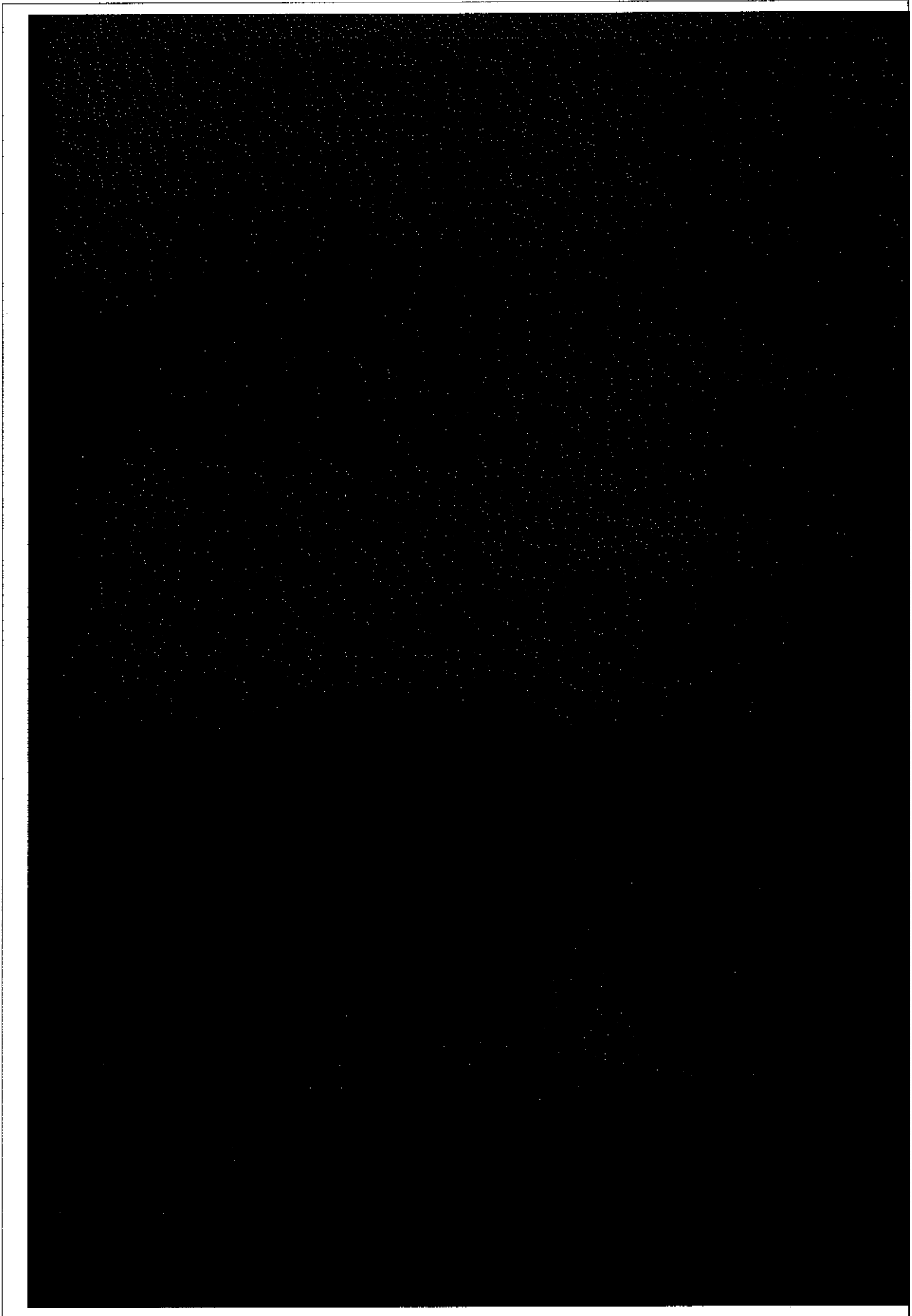
23 if you find it, it's going to cause a lot of money to 12:06:17

24 hire, yes. 12:06:20

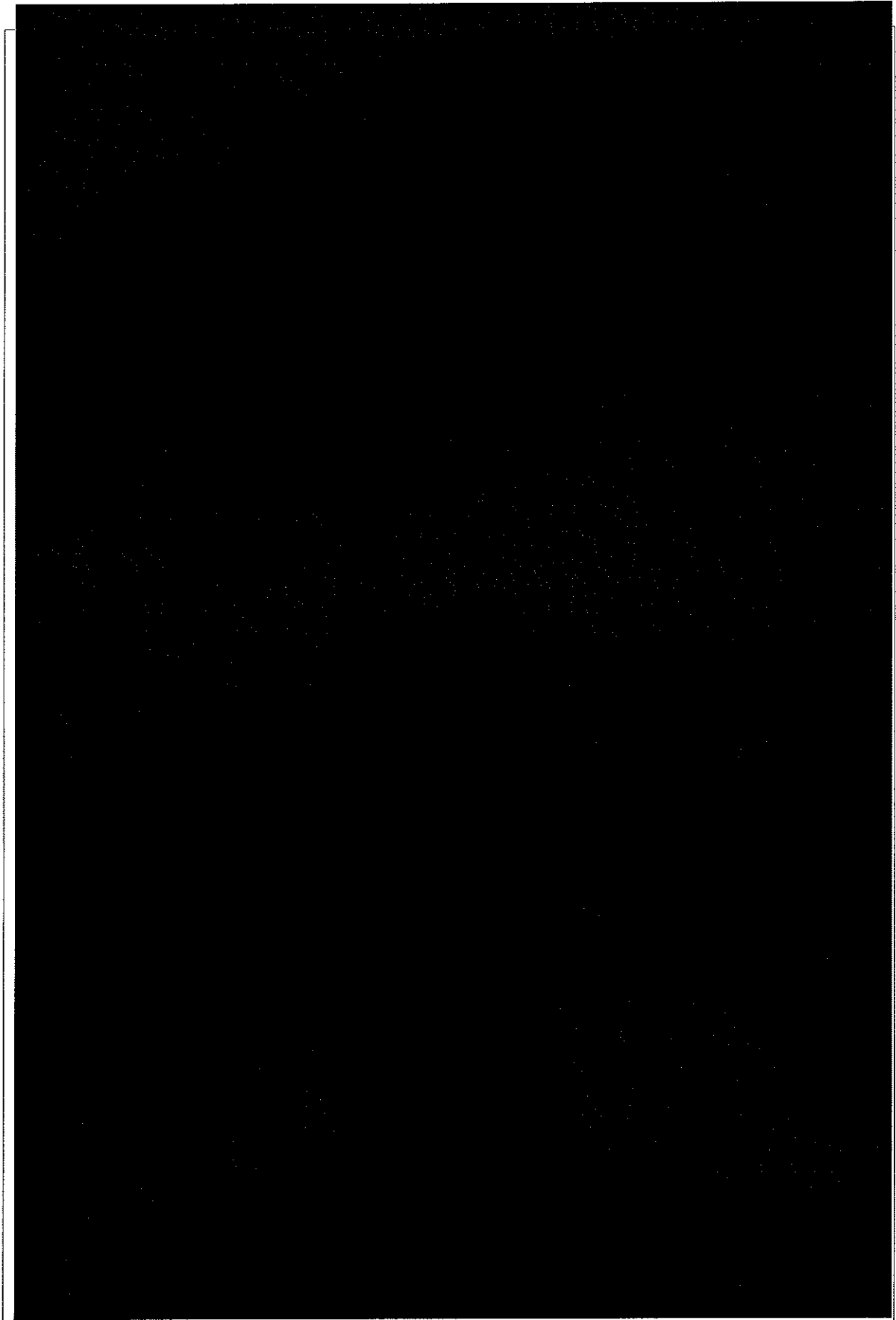
25 Q You've never heard of a person named Scott 12:06:21

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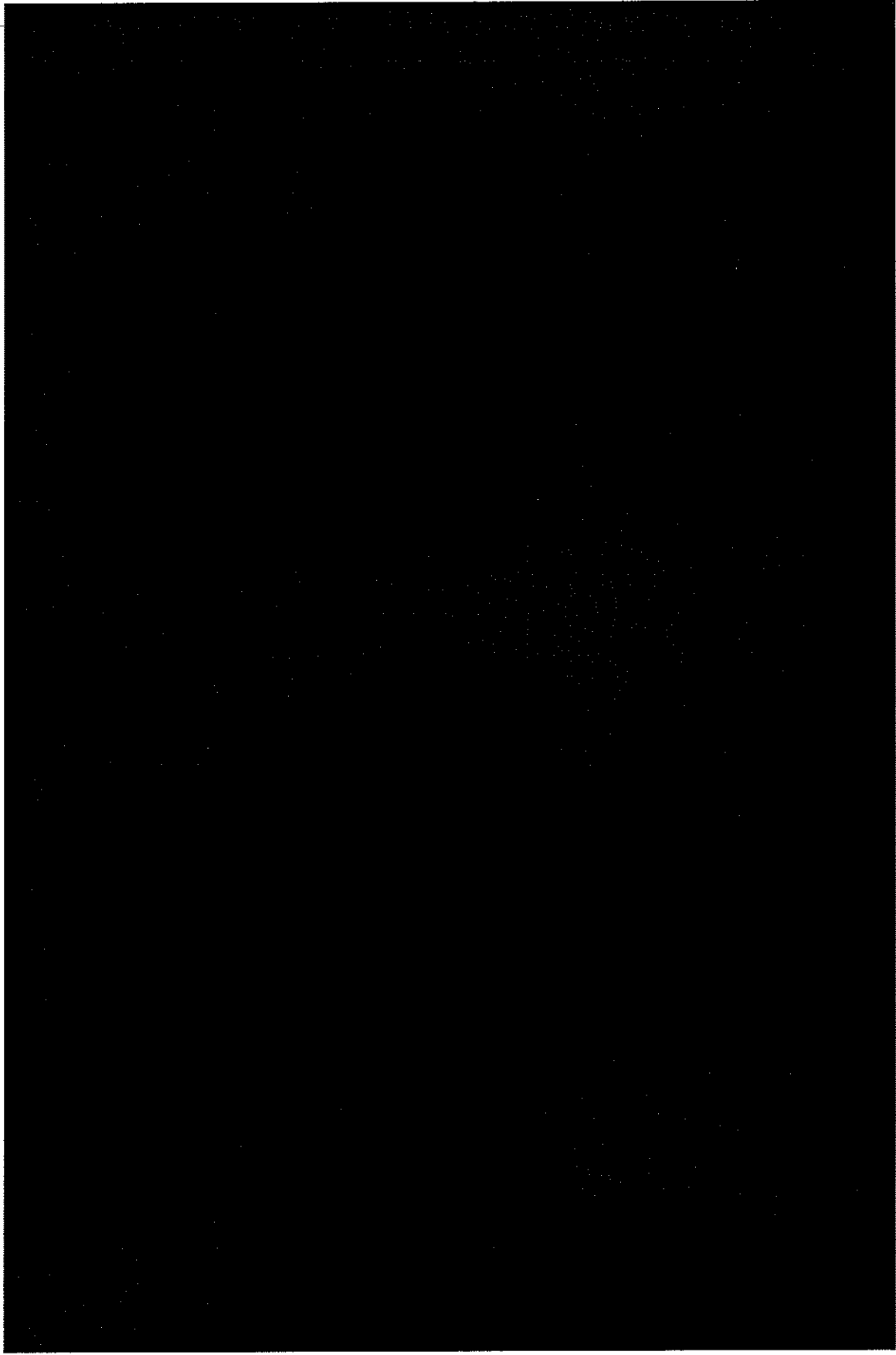


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HIGHLY CONFIDENTIAL ATTORNEYS EYES ONLY

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 duly sworn; that a record of the  
7 proceedings was made by me using machine shorthand which  
8 was thereafter transcribed under my direction; that the  
9 foregoing transcript is a true record of the testimony  
10 given.

11 Further, that if the foregoing pertains to the  
12 original transcript of a deposition in a Federal Case,  
13 before completion of the proceedings, review of the  
14 transcript [ ] 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 party to this action.

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

20  
21 Dated: January 12, 2012

22  
23 \_\_\_\_\_  
LYNNE MARIE LEDANOIS

24 CSR No. 6811

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