

EXHIBIT

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1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF ILLINOIS
4 EASTERN DIVISION

-----X
5 TIMELINES, INC.,

PLAINTIFF,

6 -against-

7 FACEBOOK, INC.,

8 DEFENDANT.
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CERTIFIED COPY

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10
11 DEPOSITION OF DR. ELI SEGGEV
12 New York, New York
13 Thursday, December 6, 2012
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20 Reported by:
21 Rebecca Schaumloffel, RPR, CLR
22 Job 56153
23
24
25

1 E. SEGGEV

2 the form, because we've got his
3 rebuttal report, the way you asked
4 your question.

5 Q. Okay. Let me rephrase that
6 question.

7 Is the entirety of your opinions
8 in this case set forth in your two reports
9 you have submitted in this case?

10 A. Yes.

11 Q. I want to go back to the issue of
12 the universe of people who were selected as
13 participants for this survey. And we talked
14 earlier, also, about your understanding of
15 the Timelines.com website, the services
16 offered there.

17 I believe you also testified that
18 you use Facebook; is that correct?

19 A. Yes, I do.

20 Q. So is it fair to say that you
21 believe you are reasonably familiar with the
22 services offered by Facebook and the services
23 offered by Timelines.com?

24 A. That's correct.

25 Q. Do you have an opinion as to the

1 E. SEGGEV

2 target market for Facebook?

3 A. I think the target market for
4 Facebook is each and every online user.

5 Q. And do you have a belief as to
6 the target market for Timelines?

7 A. I think it is the same.

8 Q. Based on your knowledge of the
9 Timelines.com website, you don't think that
10 there is a historical event focus to the
11 services offered by Timelines.com?

12 A. There may be, if you look at it
13 ex post. But I strongly believe that anyone
14 who comes in contact with a website for the
15 first time would be likely to decide on the
16 spot whether or not that is part of their
17 world of interests.

18 So I don't think that people
19 search out Timelines to satisfy the need for
20 a historical-based website. I think they
21 learn about it if they happen to come upon
22 it, as is with most websites that are not
23 heavily advertised elsewhere, and then decide
24 whether to sign up or not.

25 Q. So you don't think there is one

E. SEGGEV

C E R T I F I C A T E

STATE OF NEW YORK)

: SS.:

COUNTY OF NASSAU)

I, REBECCA SCHAUMLOFFEL, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 11th day of December, 2012.

Rebecca Schaumloffel

REBECCA SCHAUMLOFFEL