

**EXHIBIT 4**

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ARISTA RECORDS LLC; ATLANTIC	)	
RECORDING CORPORATION; ARISTA	)	
MUSIC f/k/a BMG MUSIC; CAPITOL	)	
RECORDS, INC.; ELEKTRA	)	
ENTERTAINMENT GROUP INC.;	)	
INTERSCOPE RECORDS; LAFACE	)	
RECORDS LLC; MOTOWN RECORD	)	
COMPANY, L.P.; PRIORITY	)	
RECORDS LLC; SONY MUSIC	)	
ENTERTAINMENT f/k/a SONY BMG	)	
MUSIC ENTERTAINMENT; UMG	)	
RECORDINGS, INC.; VIRGIN	)	
RECORDS AMERICA, INC.; and	)	
WARNER BROS. RECORDS INC.,	)	
	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	06 CV 5936 (KMW)
	)	
LIME GROUP LLC; LIME WIRE	)	
LLC; MARK GORTON; GREG	)	
BILDSON; and M.J.G. LIME WIRE	)	
FAMILY LIMITED PARTNERSHIP,	)	
	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF THOMAS SEHESTED

JANUARY 13, 2011

REPORTED BY: SARAH LUCIA BRANN, CSR 3887

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Deposition of THOMAS SEHESTED, taken by  
the Defendants, at 50 California Street, 22nd Floor,  
San Francisco, California, commencing at 9:10 a.m.,  
on January 13, 2011, before SARAH LUCIA BRANN, CSR,  
pursuant to Notice.

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A P P E A R A N C E S

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By: FARA S. SUNDERJI, Attorney at Law  
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ALSO PRESENT: TED HOPPE, Videographer

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1 A. Yes.

2 Q. What is Audible Magic?

3 A. It is a company that verifies audio and  
4 video content via fingerprinting.

5 Q. How long has DtecNet used Audible Magic  
6 for?

7 A. Three years, roughly.

8 Q. Was there any verification software that  
9 the company used before it began using Audible  
10 Magic?

11 A. No.

12 Q. Since it began using Audible Magic, has  
13 DtecNet used any other verification software?

14 A. Yes.

15 Q. What other verification software has it  
16 used?

17 A. Other outside vendors with similar  
18 solutions.

19 Q. Why did you choose to use Audible Magic  
20 for this project?

21 A. They were the market leader in the field.

22 Q. Why did you choose to use verification  
23 software at all for the DtecNet Lime Wire download  
24 project?

25 A. It's faster and more accurate.

1 Q. Than what?

2 A. Than manual.

3 Q. Please describe what a manual verification  
4 would be.

5 A. That would be to click on an audio file,  
6 listen to it, and compare it to a purchased album.

7 Q. Did DtecNet ever use manual verification  
8 procedures in any of its work?

9 A. Yes.

10 Q. For Audible Magic, how does the software  
11 know what to compare the downloaded file to?

12 A. So, without having all the technical  
13 details of the Audible Magic solution, they first  
14 need an original copy of the file. They then run  
15 that through their database. It collects specific  
16 information about that recording. They then store  
17 it in their database, and they can recognize any  
18 further recordings that matches that recording.

19 Q. For the Lime Wire download project how did  
20 the Audible Magic program receive the original file  
21 information?

22 A. I believe they already had it in their  
23 database.

24 Q. In the Audible Magic database, or in  
25 DtecNet's database?

1 Exhibit 5 is from the download project that you  
2 reported in your statement, Exhibit 2; right?

3 A. Well, the hash is the same. The file name  
4 is the same. I don't know if it's from the same  
5 case. I have -- I can't -- I don't have the IP --  
6 well -- no, I don't have the IP address, so I  
7 wouldn't be able to say that.

8 Q. Do you see -- do you have Exhibit 6?

9 A. Exhibit 6?

10 Q. Yes.

11 A. Yes.

12 Q. The target IP address for Exhibit 6 is  
13 what?

14 A. 68.205.50.108.

15 Q. Is that the same IP address that is  
16 reported in Exhibit 3 for the Elton John song that  
17 you circled?

18 A. Yes.

19 Q. Do you have any reason to doubt that the  
20 information on Exhibits 5 and 6 is from the download  
21 project you reported in Exhibit 2?

22 A. No.

23 Q. Does DtecNet ever distribute spoofs over  
24 the Gnutella network?

25 A. No.

1 Q. Has it ever done that?

2 A. No.

3 Q. Have you heard of that sort of work  
4 happening?

5 A. Define spoofs.

6 Q. Well, when you answered the question what  
7 did you understand spoofs to mean?

8 A. Fake files appearing to be something else.

9 Q. Have you ever heard of entities  
10 distributing fake files over the Gnutella network?

11 A. Yes.

12 Q. And have you ever heard of any entities  
13 operating on behalf of the record industry  
14 distributing fake files over the Gnutella network?

15 A. Yes.

16 Q. Do you believe that's happened?

17 A. Yes.

18 Q. Why is that happening?

19 MR. BLAVIN: Objection. Calls for  
20 speculation.

21 MR. MELORO: Q. Do you know?

22 A. No.

23 Q. Was DtecNet ever asked to distribute  
24 spoofs over the Gnutella network?

25 A. We don't have it as a service.