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*Attorneys for Defendants YouTube, Inc.,  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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THE FOOTBALL ASSOCIATION PREMIER	:
LEAGUE LIMITED and BOURNE CO., et al., on	:
Behalf of themselves and all others similarly	:
Situated,	:
	:
Plaintiffs,	:
	:
v.	:
	:
YOUTUBE, INC., YOUTUBE, LLC and	:
GOOGLE INC.,	:
	:
Defendants.	:
	:
-----X	

07 Civ. 3582 (LLS)  
(related case no. 07 Civ. 2103 (LLS))

**DEFENDANTS’  
SUPPLEMENTAL “HIGHLY  
CONFIDENTIAL” RESPONSES  
AND OBJECTIONS TO  
PLAINTIFFS’ SECOND SET  
OF INTERROGATORIES**

**\*\*CONTAINS HIGHLY CONFIDENTIAL INFORMATION\*\*  
SUBJECT TO PROTECTIVE ORDER**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rules 26.3 and 33.3 of the Local Civil Rules, defendants YouTube, Inc., YouTube, LLC and Google Inc. (collectively, "YouTube") by its attorneys, hereby supplements its response and objections to Plaintiffs' Second Set of Interrogatories as follows:

### **DEFINITIONS**

All definitions and rules of instructions set forth in Federal Rules of Civil Procedure 26 and 34, and the Uniform Definitions set forth in Local Civil Rules 26.3(c) and (d) shall apply herein, as well as the following additional definition:

1. "Plaintiffs" means, collectively all plaintiffs in this action and in the *Viacom* Action.
2. "Clips in suit" means all video clips asserted at any time in this litigation as infringing Plaintiffs' copyrights.

### **GENERAL OBJECTIONS**

A. YouTube incorporates by reference the General Objections set forth in Defendants' Highly Confidential Responses and Objections to Plaintiffs' Second Set of Interrogatories served on January 11, 2010.

B. YouTube incorporates by reference the Objections to Definitions and Instructions set forth in Defendants' Highly Confidential Responses and Objections to Plaintiffs' Second Set of Interrogatories served on January 11, 2010.

### **SUPPLEMENTAL RESPONSES AND OBJECTIONS**

#### **INTERROGATORY NO. 1 (SET 2):**

For each YouTube video identified by Plaintiffs as an alleged infringement of a work-in-suit, state whether or not an Advertisement appeared on any watch page for that YouTube video

(whether viewed in the U.S. or elsewhere), and identify the type of Advertisement and the Advertiser.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1 (SET 2):**

YouTube objects to this interrogatory to the extent it seeks information that is not within its possession, custody, and control and cannot be ascertained from its business records.

YouTube objects to this interrogatory because, to the extent this interrogatory seeks information within YouTube's possession, custody, or control, the information sought is not readily accessible to YouTube without excessive burden and cost. YouTube objects to this interrogatory as overbroad, oppressive, harassing, and unduly burdensome to the extent it seeks highly detailed information. YouTube objects to this interrogatory to the extent it seeks information that is neither relevant to the claims or defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. YouTube objects to this interrogatory because it is compound and the number of its distinct subparts exceeds 25. YouTube objects to this interrogatory because it is vague and ambiguous, including in its use of the terms "Advertisement," "appeared," "type of Advertisement," and "Advertiser."

Subject to the foregoing objections and YouTube's general objections, YouTube responds that advertisements did not appear on watch pages associated with user-uploaded video clips until approximately April 2006, and ceased to appear on or about January 1, 2007. To the extent that user-uploaded video clips alleged as infringements by Plaintiffs were not present on the YouTube service during a time period during which such advertisements were shown, it is YouTube's belief that no advertisements appeared on watch pages for those video clips.

During its history, YouTube has used third-party online advertising services and remnant advertising networks that might be or have been the exclusive repository of the information

sought by this interrogatory. The only data reasonably available to YouTube concerning watch page ads for clips in suit comes from the Google AdSense network. The data from the Google AdSense network resides in enormous logs comprising terabytes worth of data. YouTube expended over 6000 hours of computer time extracting and processing the data from the relevant time period in an effort to respond to this interrogatory with information concerning the clips in suit. This effort has already been exceptionally burdensome and difficult.

According to the extracted log data, with respect to the Google AdSense advertising network, the types of ads shown on watch pages of clips in suit were CPM (cost per mille) and/or CPC (cost per click). Of the 79,197 video ids for the clips in suit asserted collectively by Plaintiffs, 11,013 videos had AdSense ads shown on the watch pages. The accompanying chart labeled Exhibit A shows, for each video id, the amount of AdSense ad revenue from CPM ads on watch pages. The accompanying chart labeled as Exhibit B shows, for each video id, the amount of AdSense ad revenue from CPC ads on watch pages.

As to advertisers, the AdSense ads on watch pages of clips in suit were provided by advertisers who participate in Google's AdSense network (which, of course, is not specific to YouTube, but serves ads widely across the Internet). Advertisers whose ads appeared on watch pages of clips in suit included a diverse range of companies that are part of the AdSense program; examples include 20<sup>th</sup> Century Fox, American Express, Apple Computer, Johnson & Johnson, Sony Pictures, Microsoft, Warner Brothers Home Entertainment, the Walt Disney Company, and Procter & Gamble. Advertisers whose ads appeared on the watch pages of certain clips in suit also included plaintiff entities, such as MTV Networks, SpikeTV, Viacom, and Paramount Pictures.

**INTERROGATORY NO. 2 (SET 2):**

For any Advertisement identified in response to Interrogatory No. 1 above, state whether or not the Advertisement was targeted to any particular kind or kinds of content, and state how it was so targeted.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2 (SET 2):**

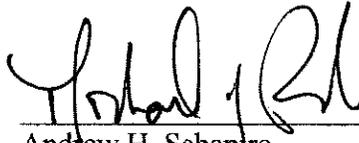
YouTube objects to this interrogatory to the extent it seeks information that is not within its possession, custody, and control and cannot be ascertained from its business records. YouTube objects to this interrogatory because, to the extent this interrogatory seeks information within YouTube's possession, custody, or control, the information sought is not readily accessible to YouTube without excessive burden and cost. YouTube objects to this interrogatory as overbroad, oppressive, harassing, and unduly burdensome to the extent it seeks highly detailed information. YouTube objects to this interrogatory because it seeks information that is neither relevant to the claims or defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. YouTube objects to this interrogatory because it is vague and ambiguous, including in its use of the terms and phrases "targeted," "kind or kinds of content," and "how it was so targeted."

Subject to the foregoing objections and YouTube's general objections, YouTube responds that the watch page advertisements for the clips in suit identified in Interrogatory No. 1 above were targeted exclusively based on text-based elements, and thus were not targeted based on the actual content of videos present on the service. More specifically, based on YouTube's investigation of the targeting mechanisms used in connection with the watch page ads for the clips in suit referenced in Interrogatory No. 1, YouTube has determined that: (1) for ads served by DoubleClick and Google AdSense, YouTube passed only the text of the video's category

(which is chosen by the user at the time of the video's upload from the available list of highly general categories) for ad-targeting information; (2) for ads served by other third-party ad networks, YouTube sometimes passed the text of the video category by itself for targeting and at other times passed no targeting information at all.

Dated:

April 26, 2010



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**VERIFICATION**

I, Alex Jakovleski, have read the foregoing Supplemental Responses and Objections to Plaintiffs' Second Set of Interrogatories. I am informed and believe that the answers therein are true and correct to the best of my knowledge, information and belief, based on information currently available to me, and on that ground verify them.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated:

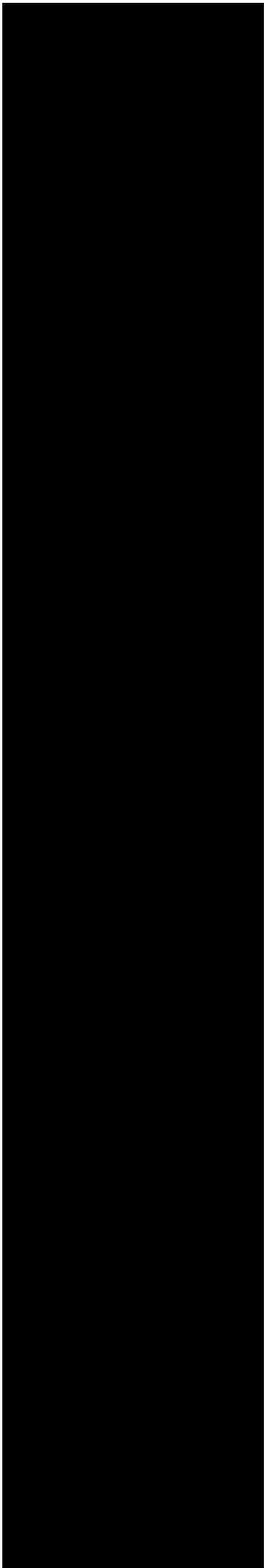
4/26/2010

  
\_\_\_\_\_  
Alex Jakovleski

# Exhibit A

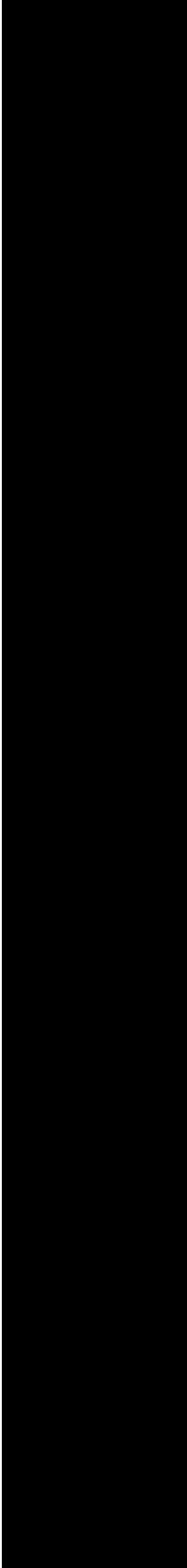
**HIGHLY CONFIDENTIAL  
SUBJECT TO PROTECTIVE ORDER**

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**HIGHLY CONFIDENTIAL**  
**SUBJECT TO PROTECTIVE ORDER**

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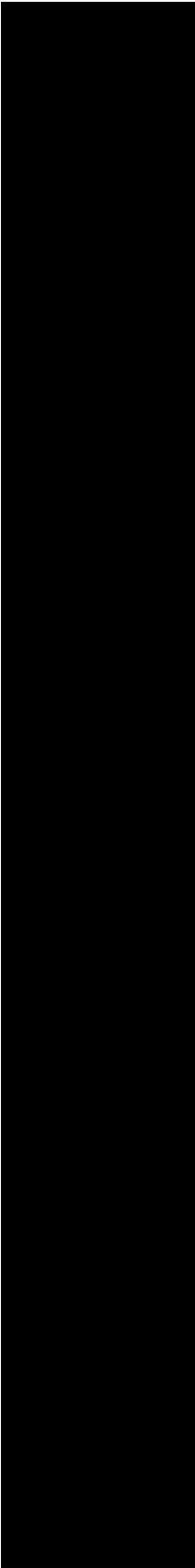
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**SUBJECT TO PROTECTIVE ORDER**

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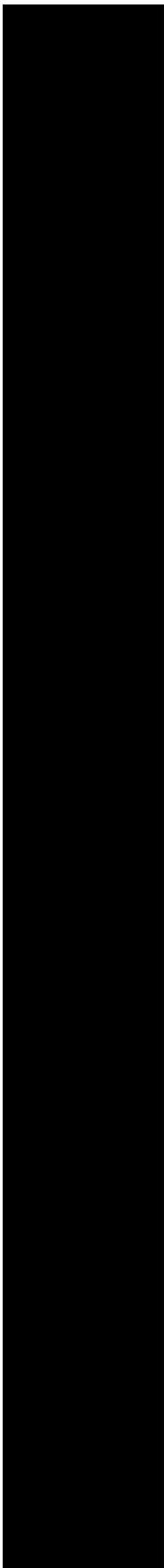


**HIGHLY CONFIDENTIAL**  
**SUBJECT TO PROTECTIVE ORDER**

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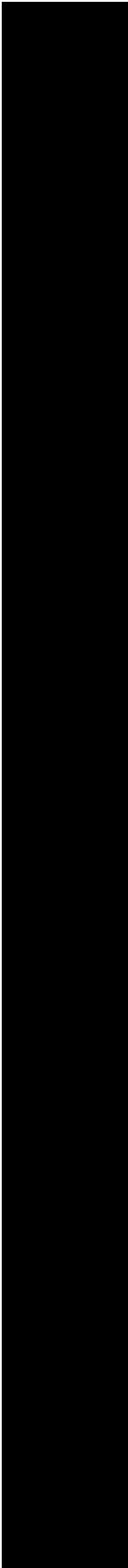
**HIGHLY CONFIDENTIAL**  
**SUBJECT TO PROTECTIVE ORDER**

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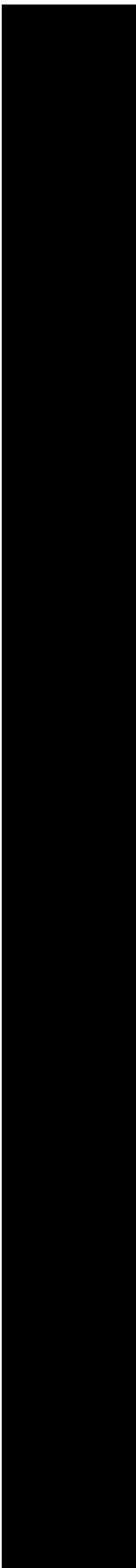


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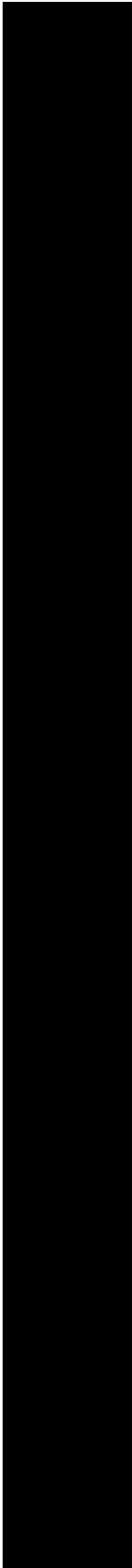
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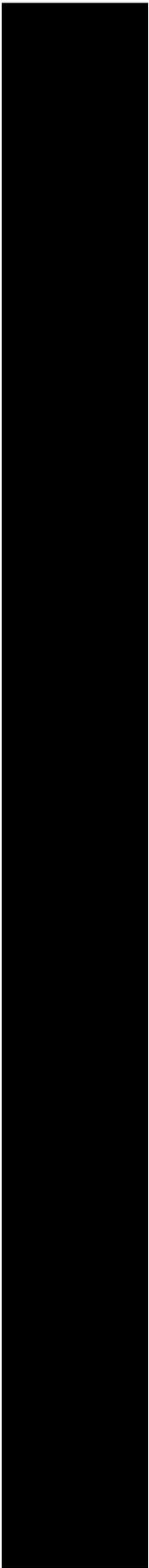


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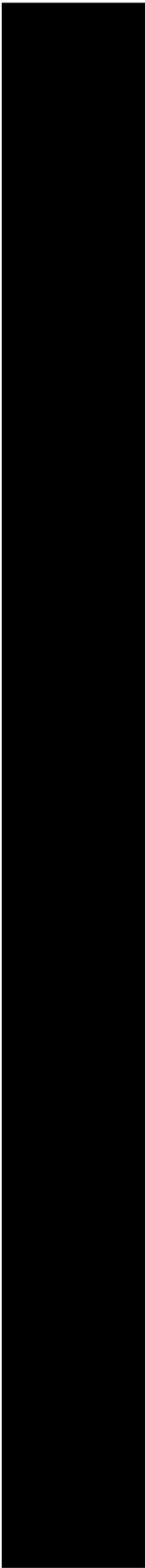


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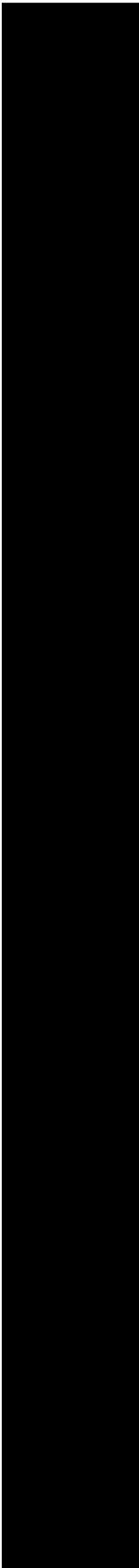


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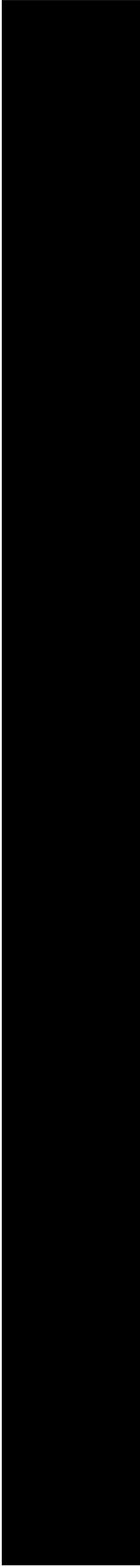


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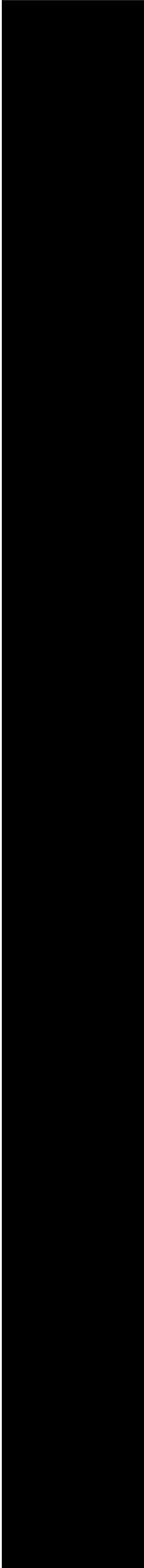


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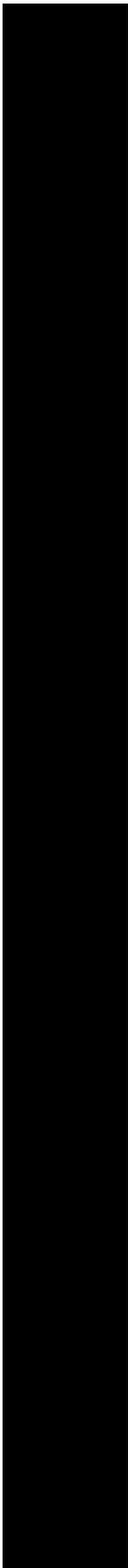
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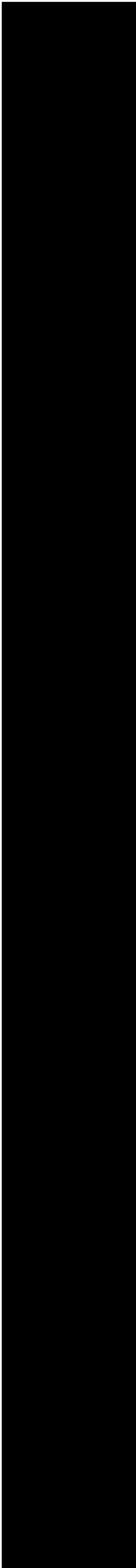
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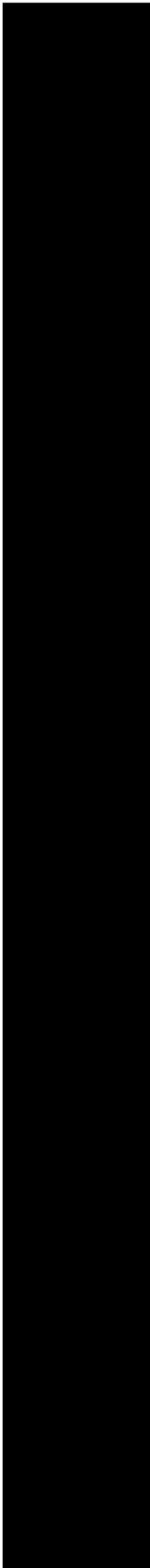
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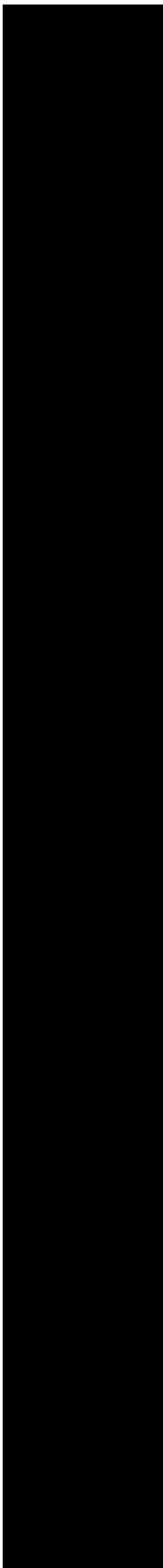


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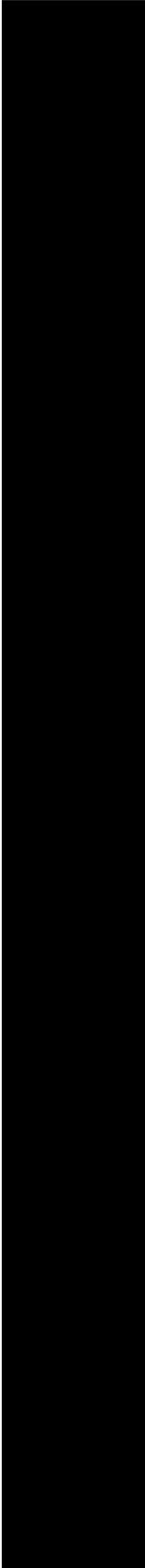
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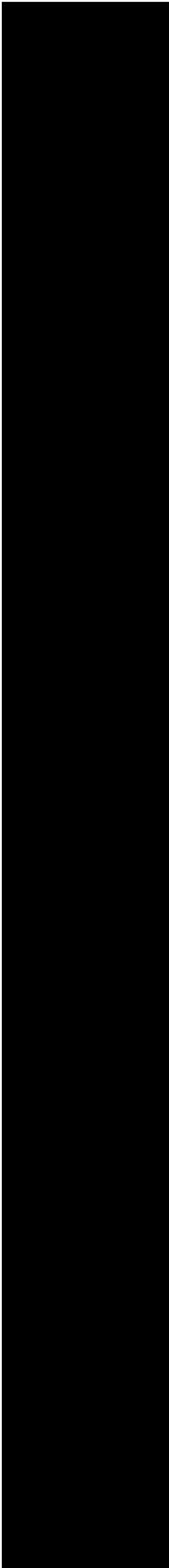
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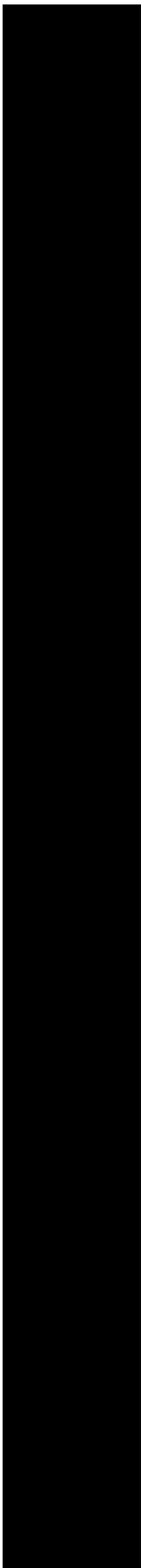
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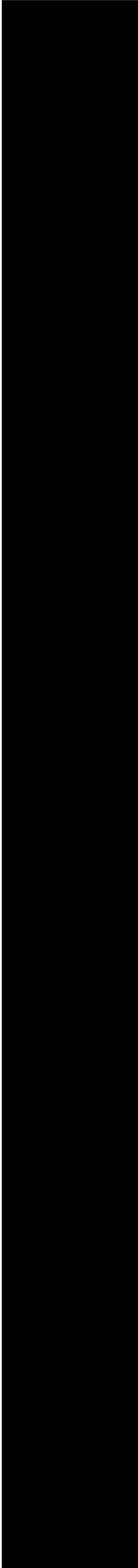
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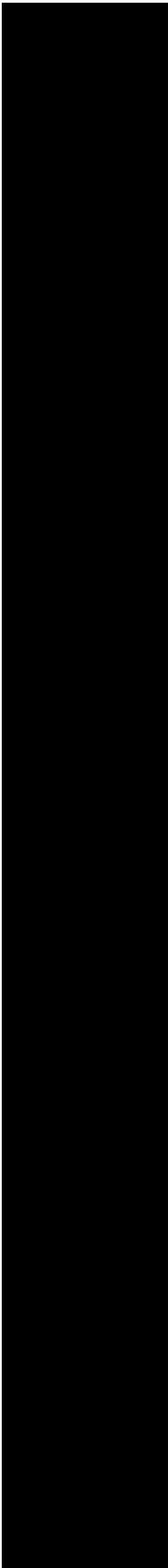
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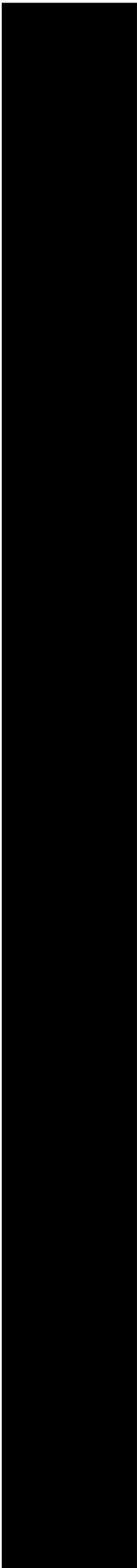
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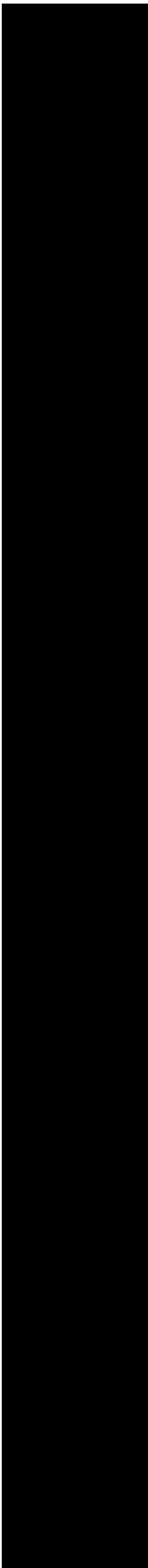
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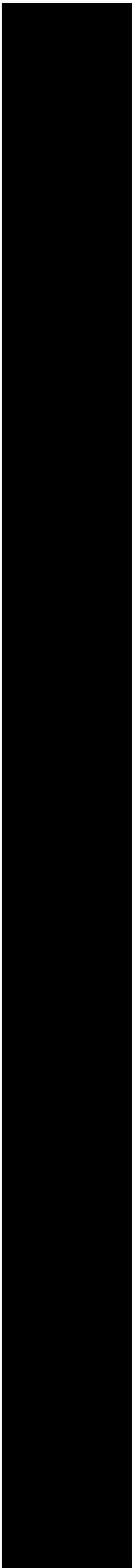


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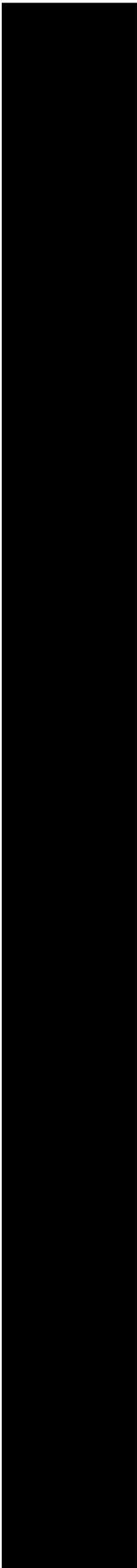


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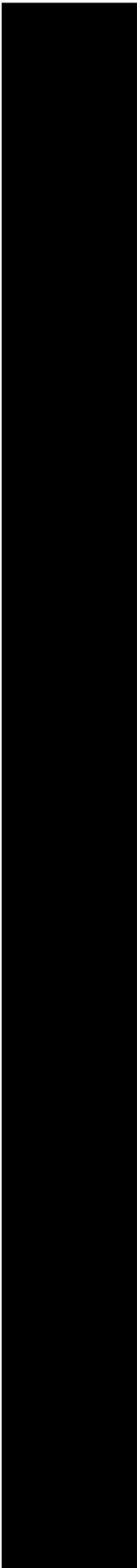


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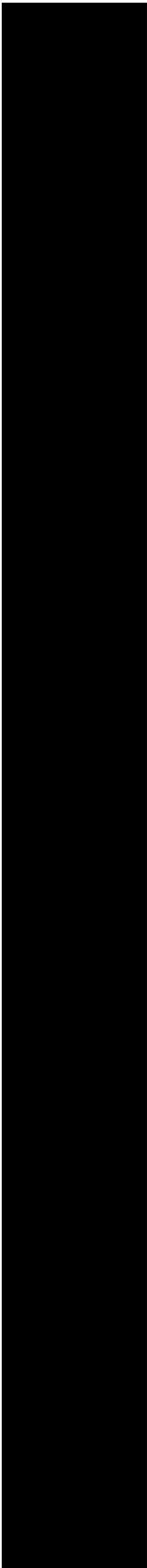
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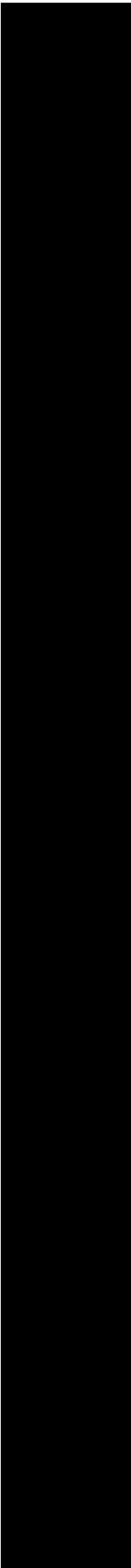
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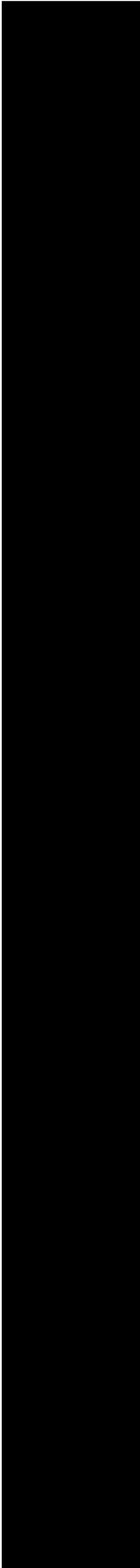


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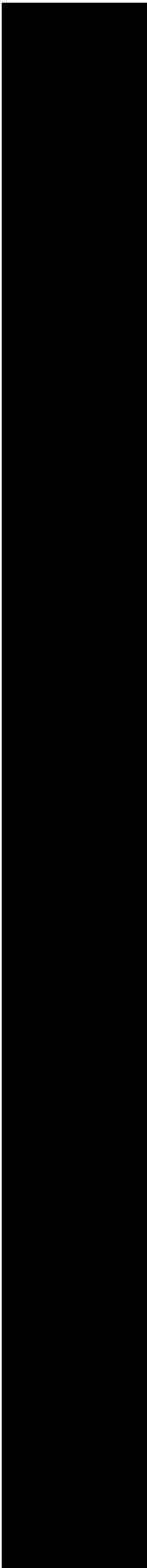
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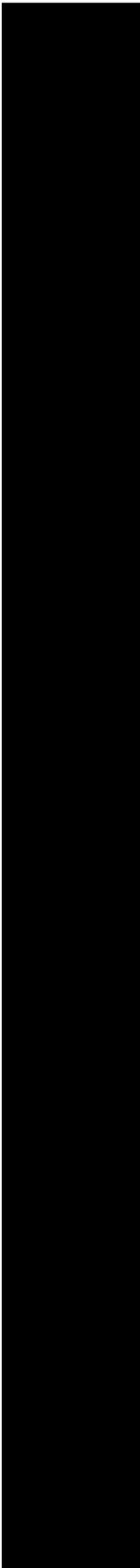
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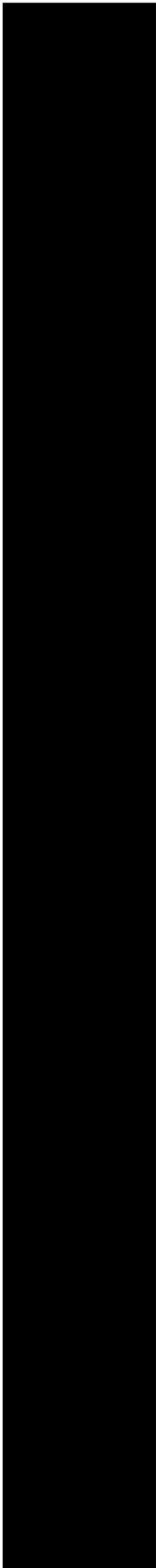
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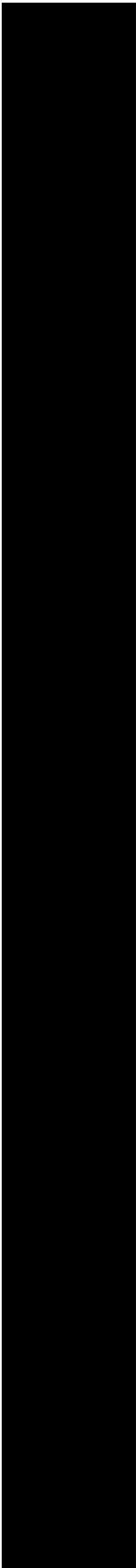


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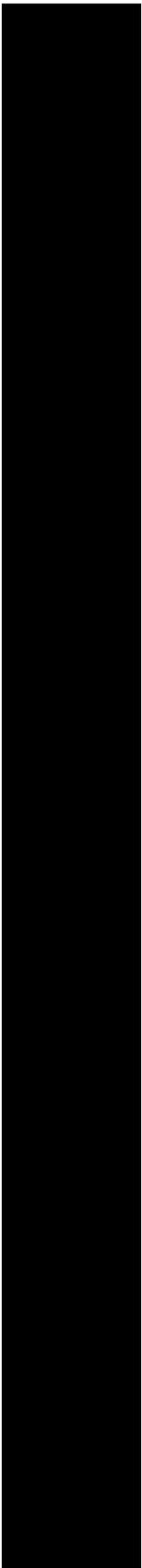
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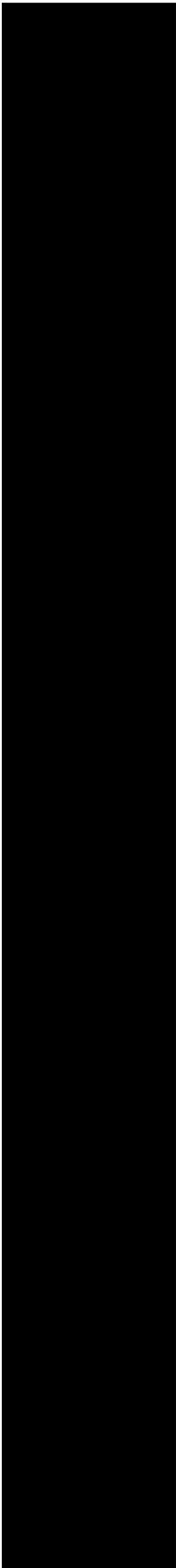


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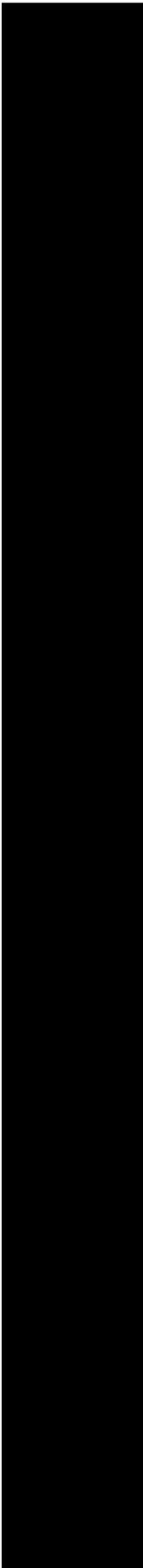
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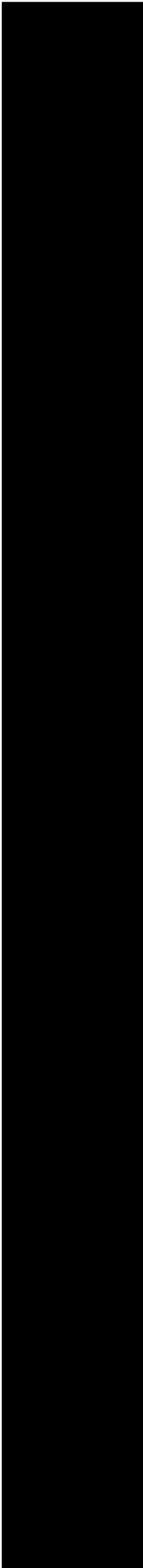
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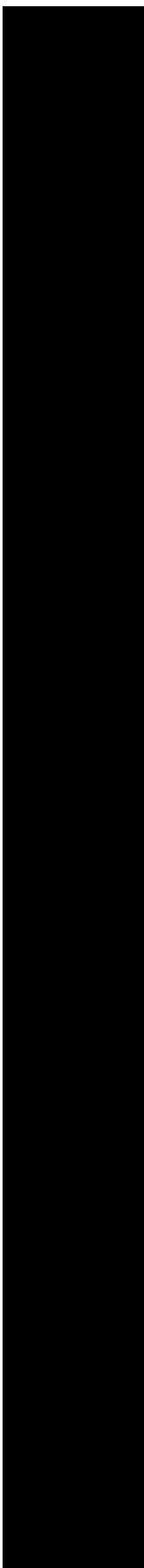


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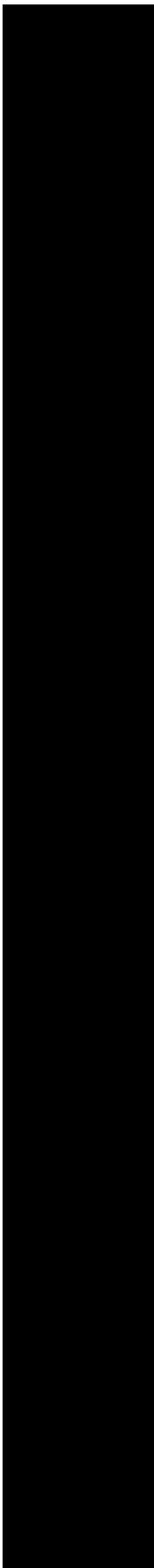


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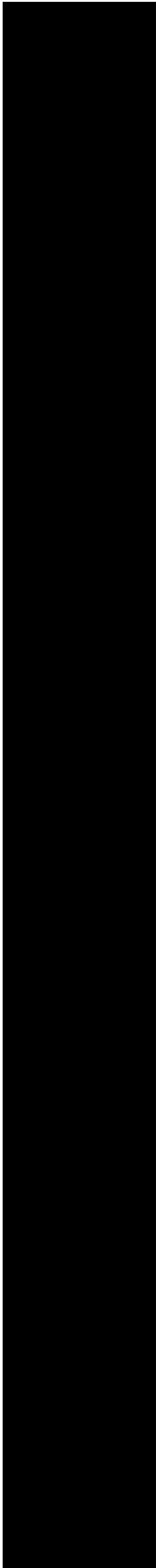
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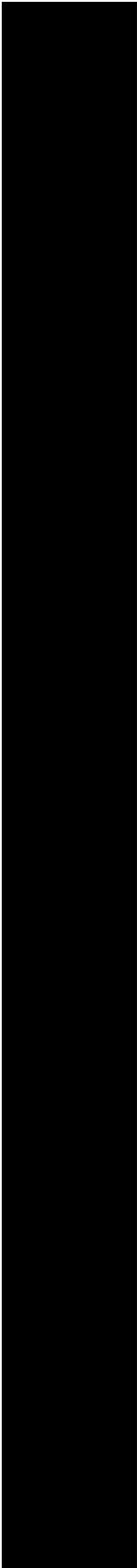
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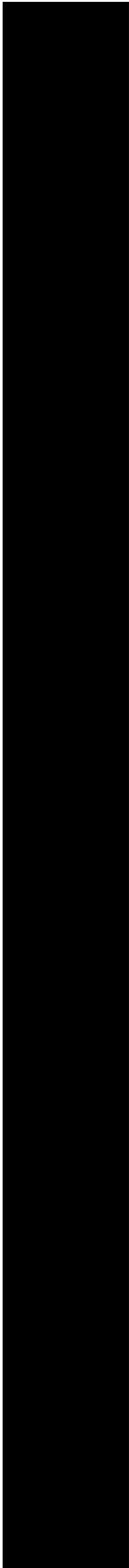
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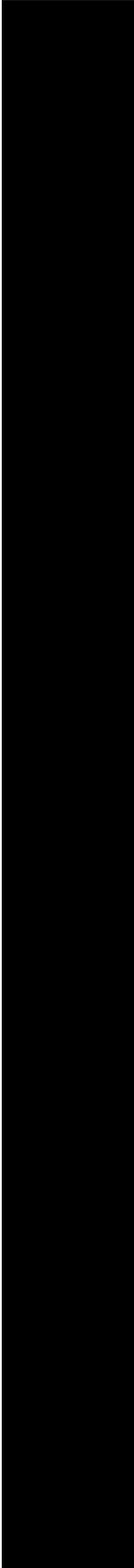


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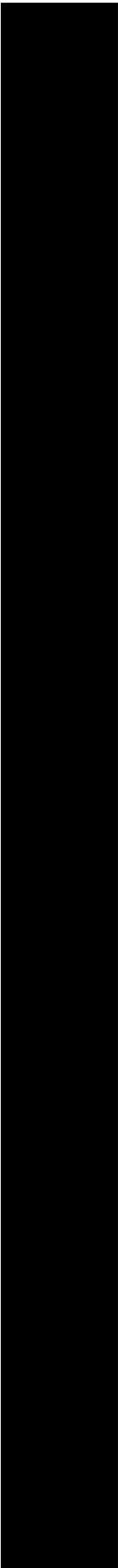


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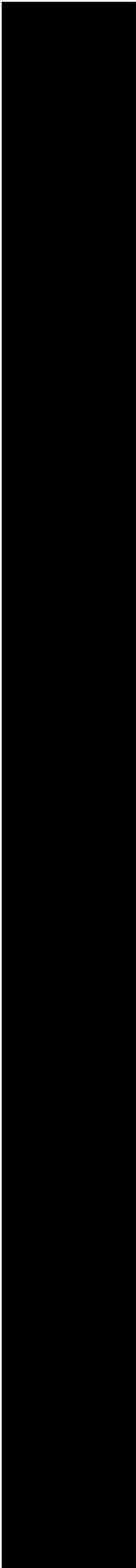
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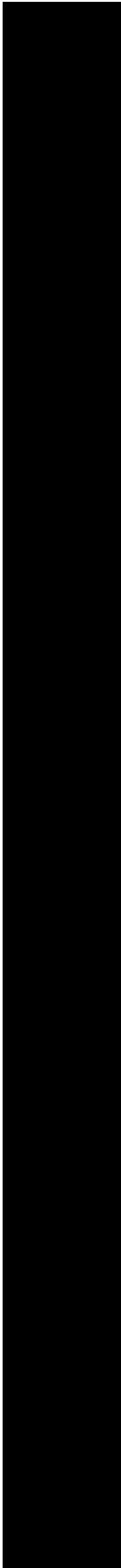


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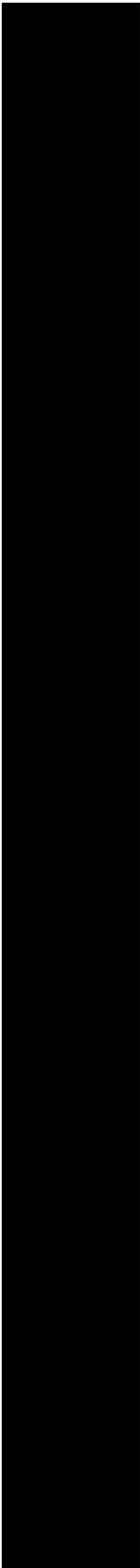


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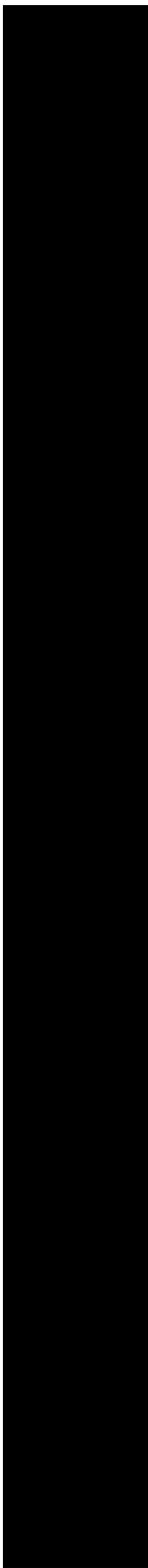
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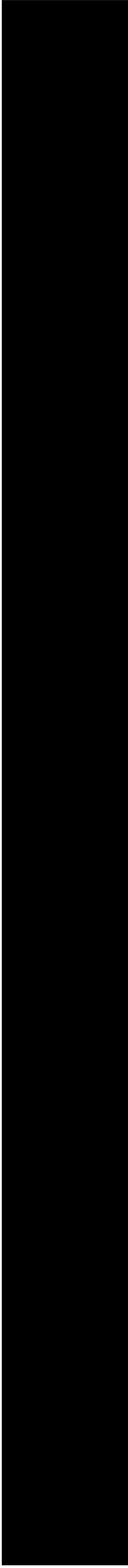


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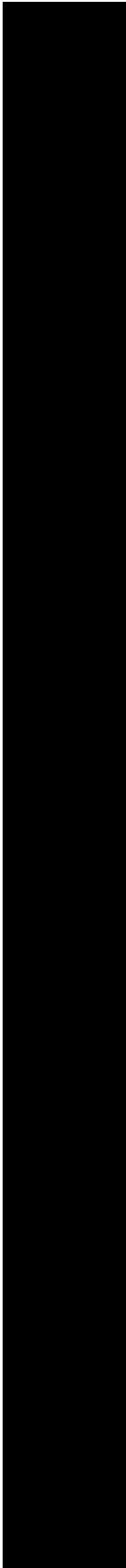
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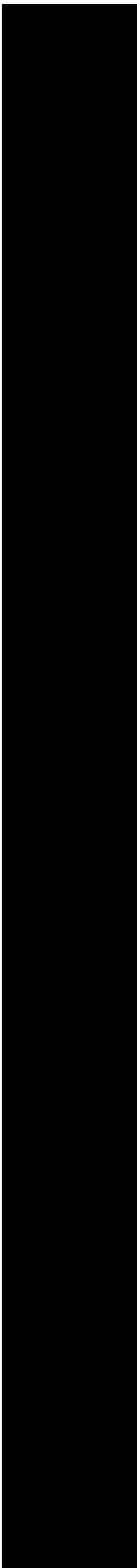
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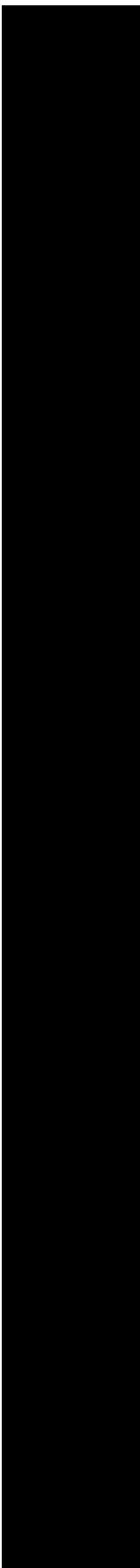
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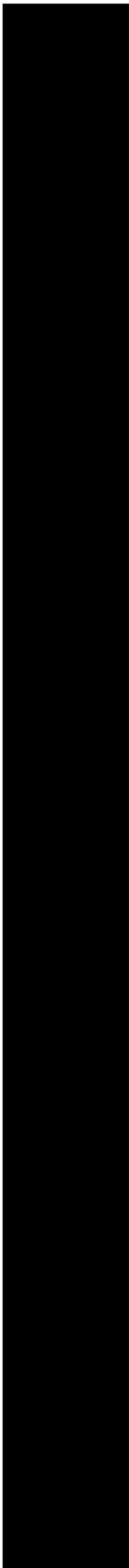
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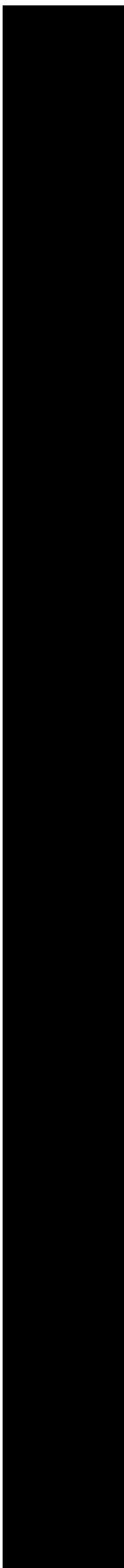
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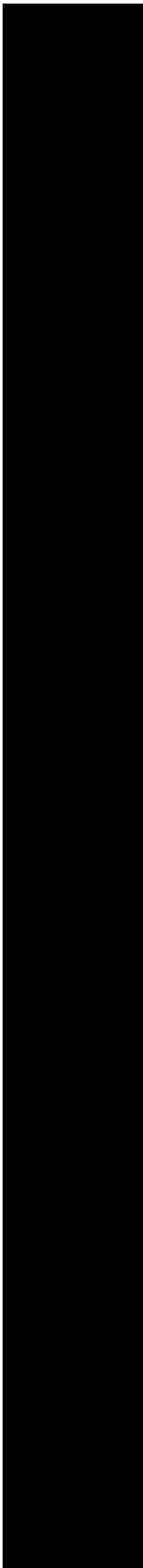


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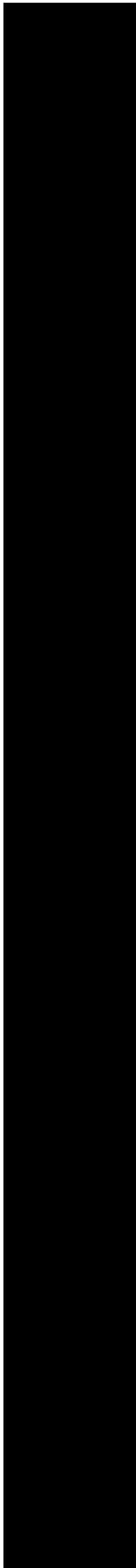


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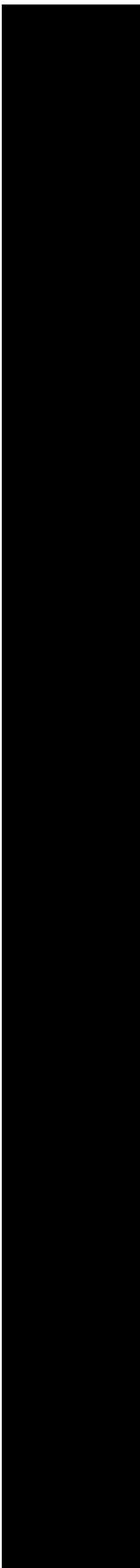
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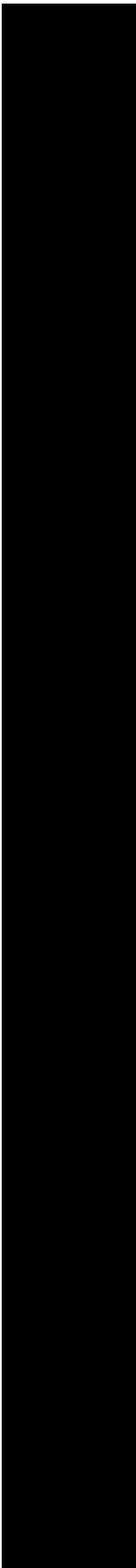
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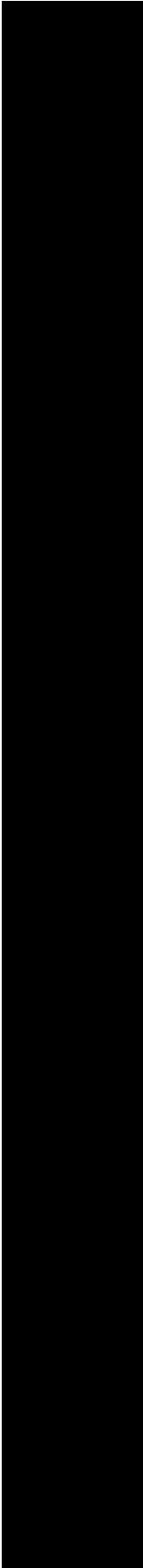
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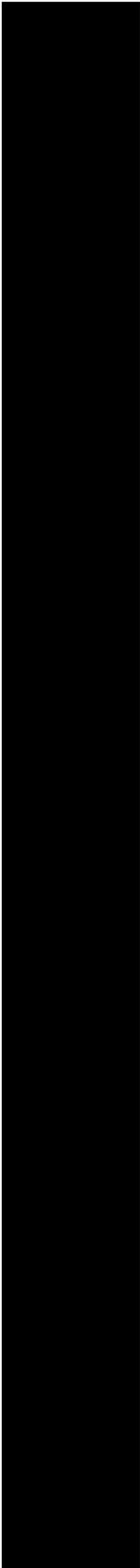


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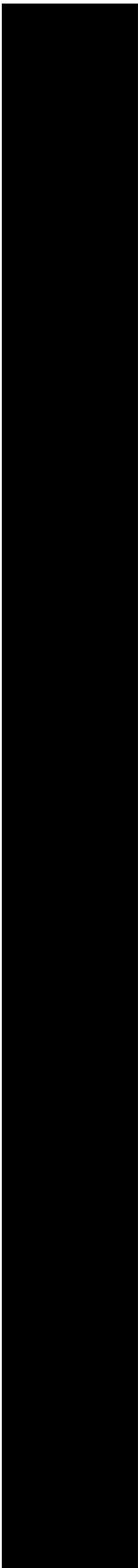
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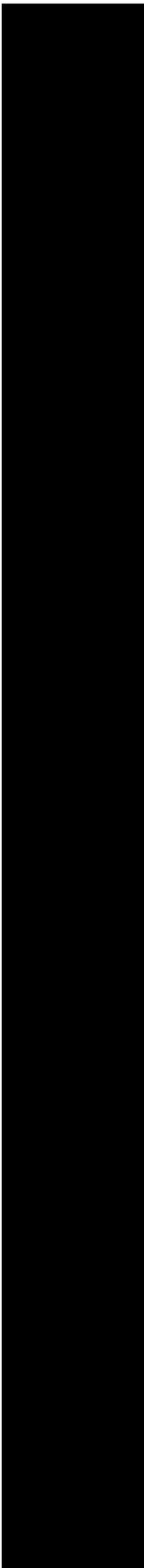
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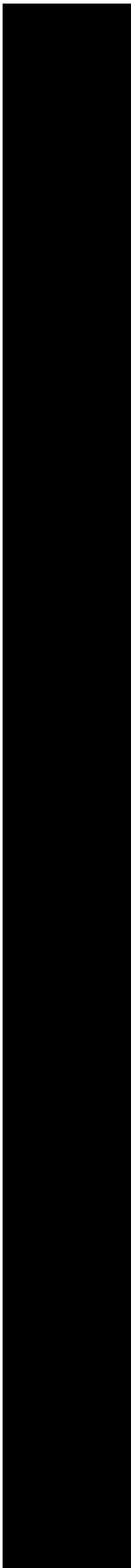
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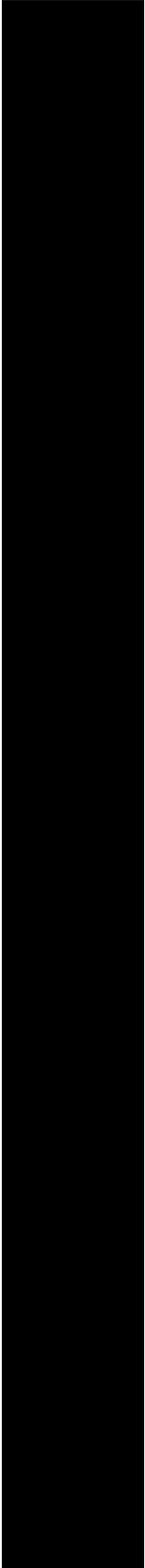
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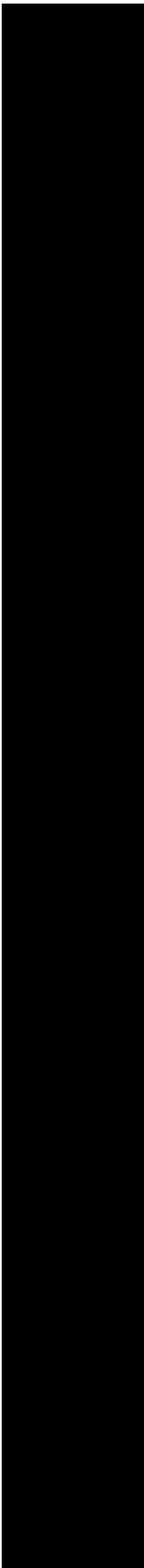


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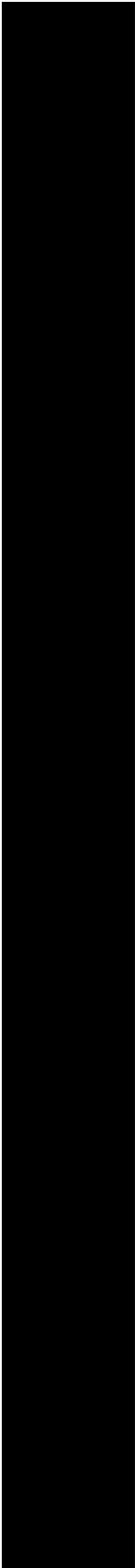
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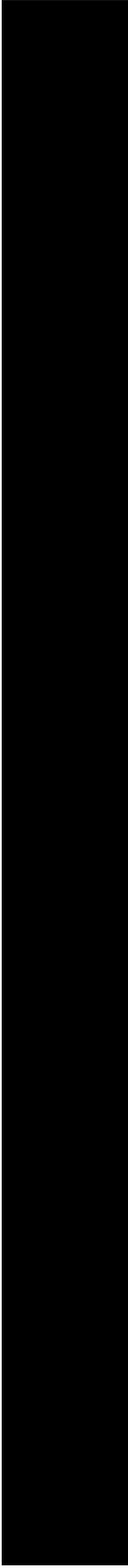
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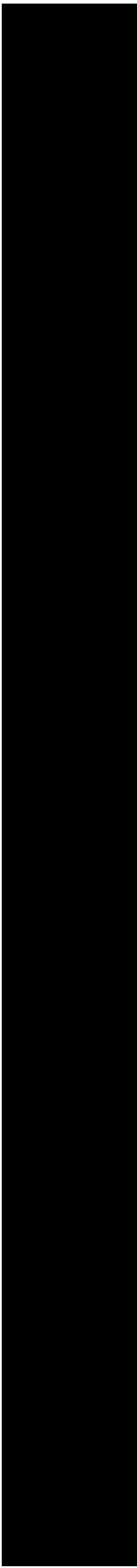
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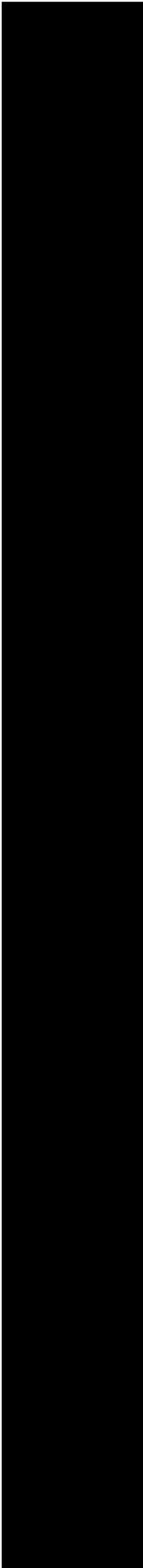
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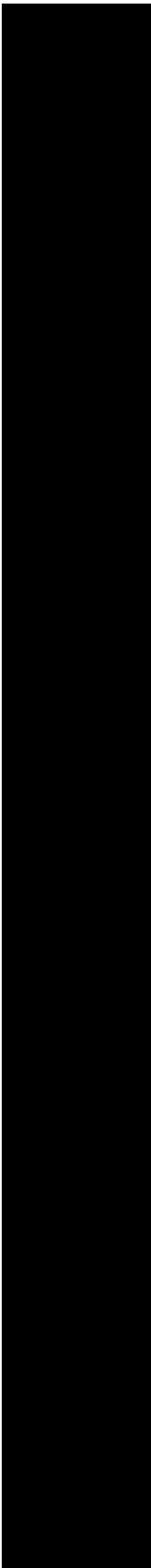
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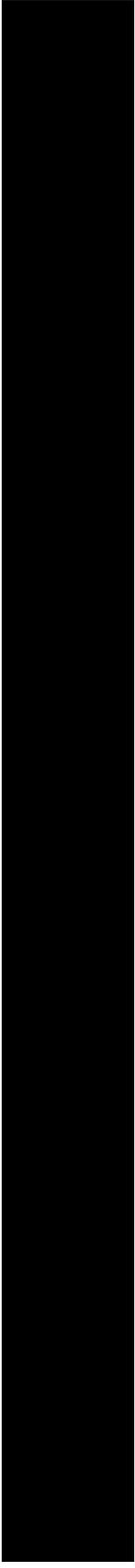


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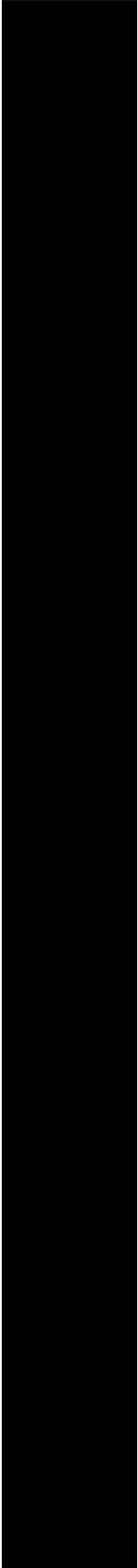
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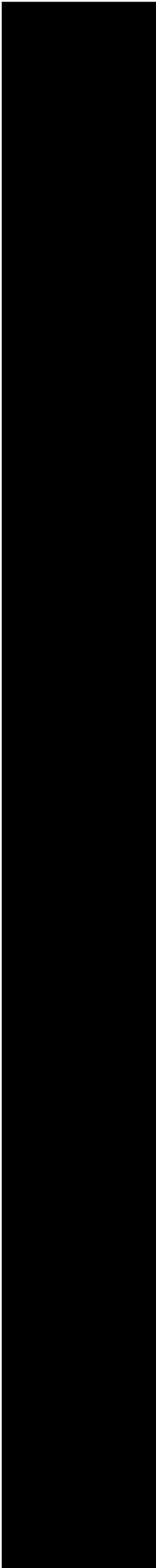


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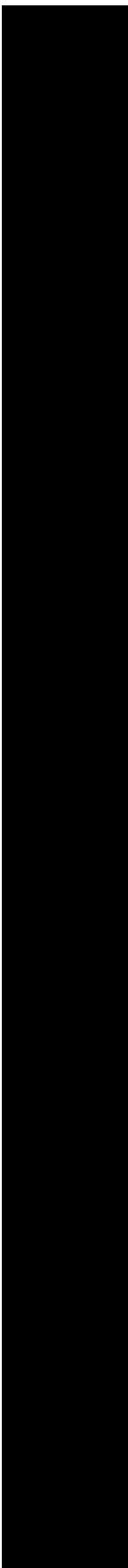
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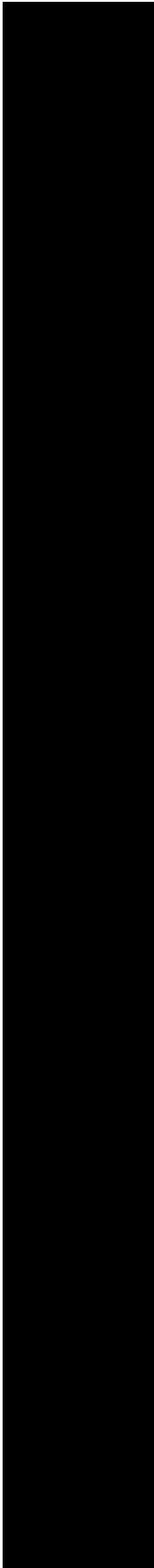
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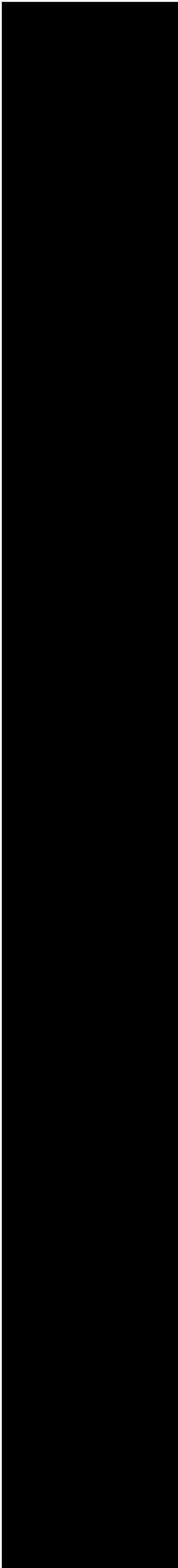
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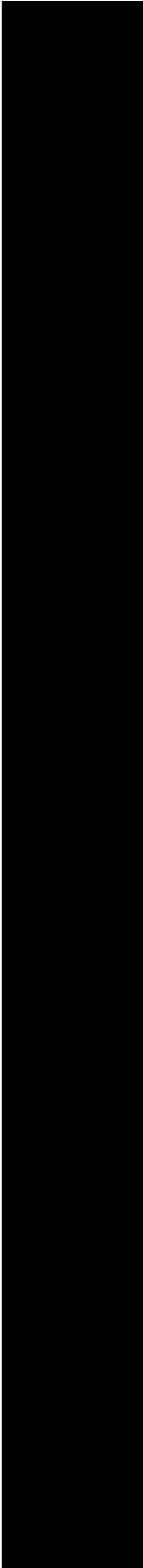


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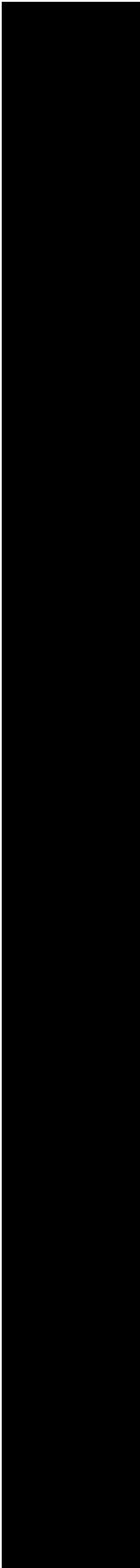


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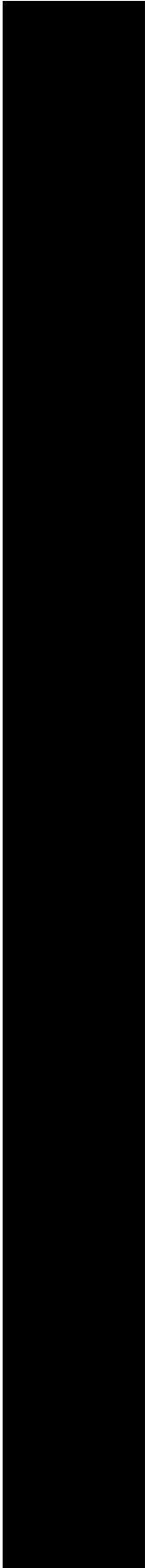
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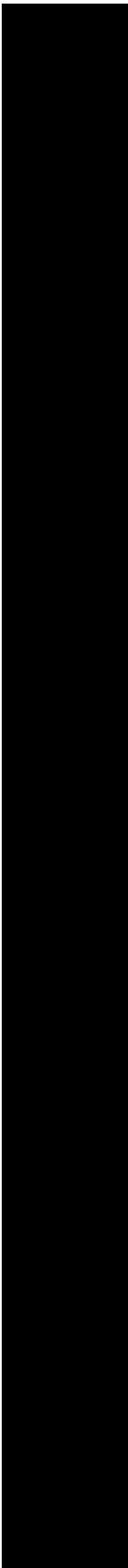


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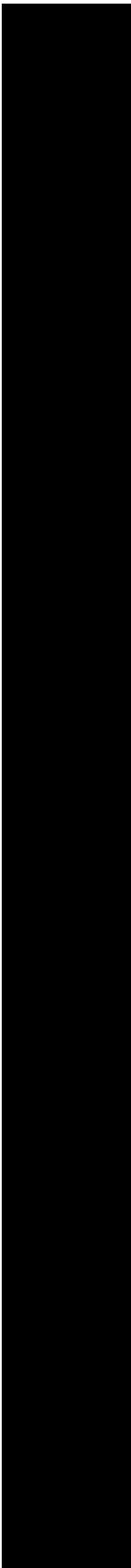
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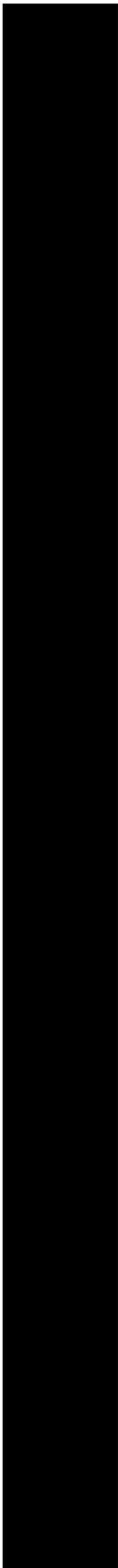


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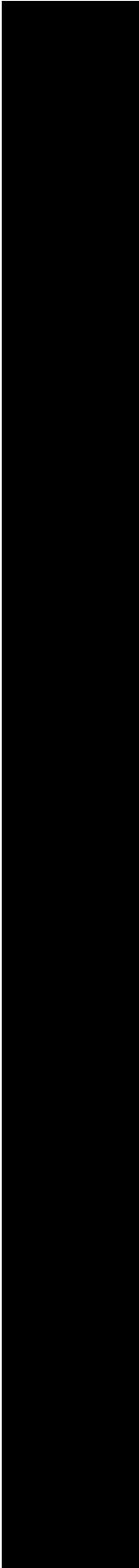
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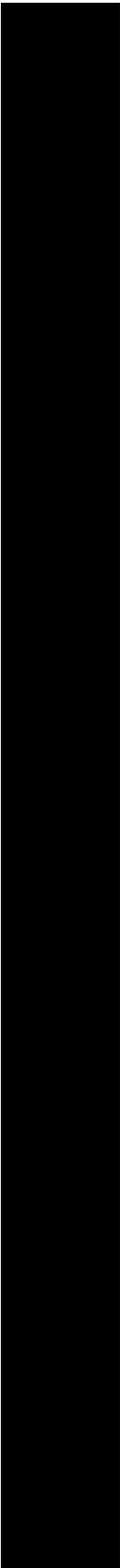
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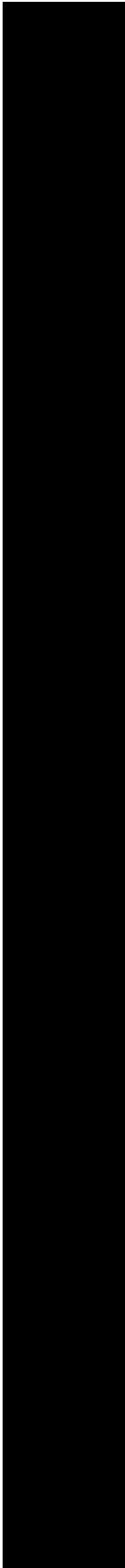


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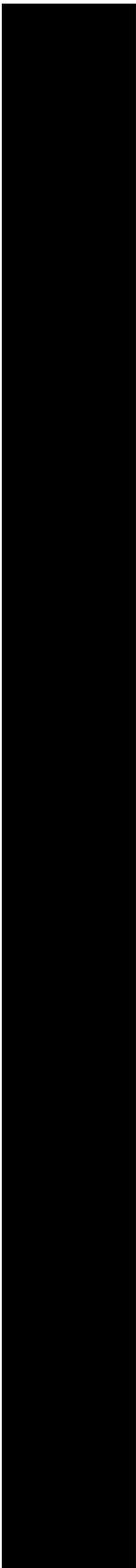


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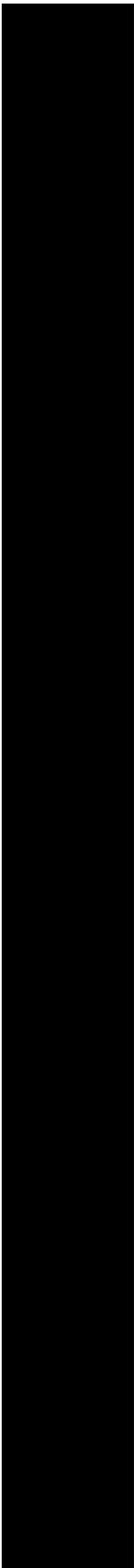


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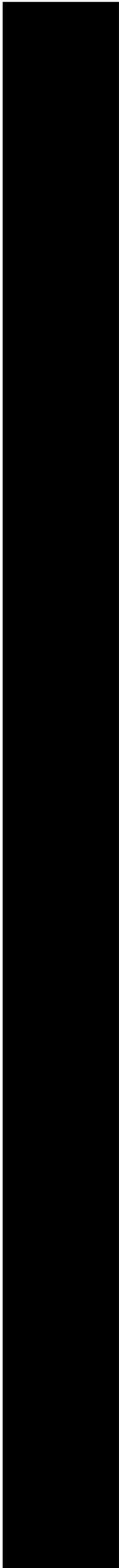


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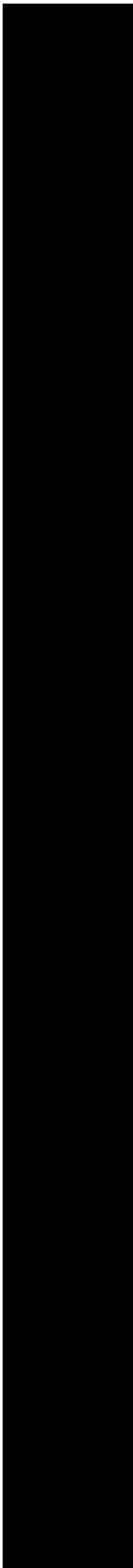


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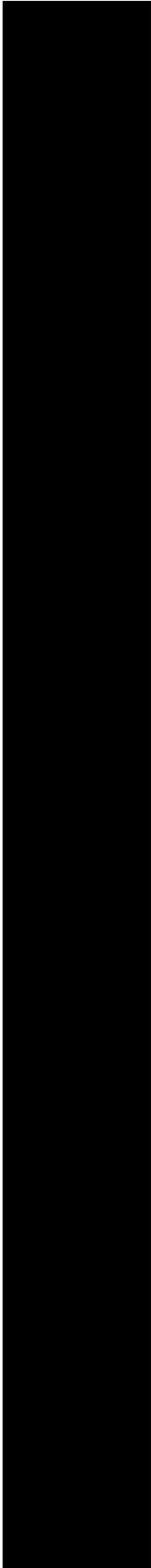


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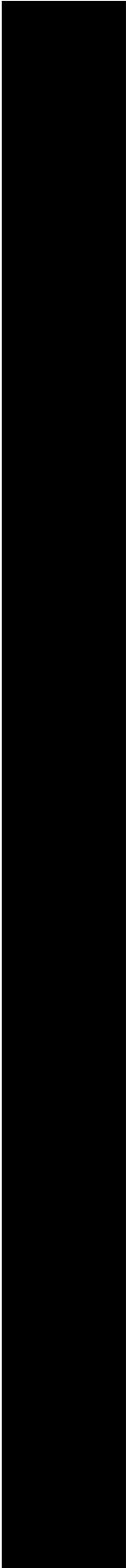


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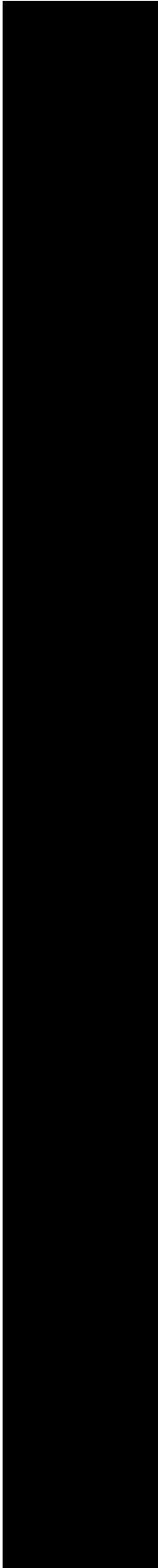
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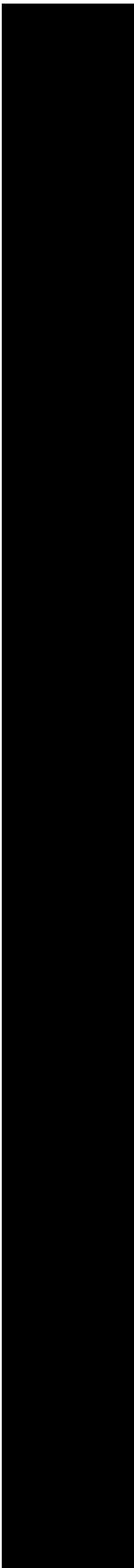
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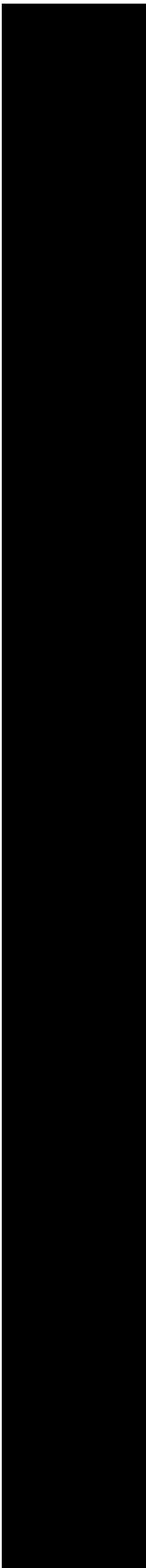
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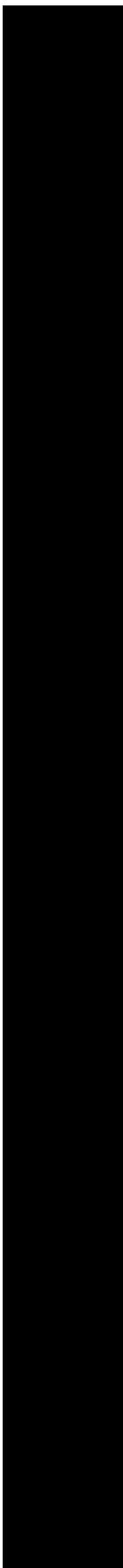
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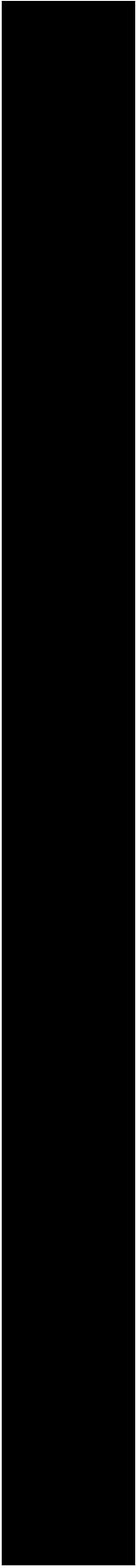


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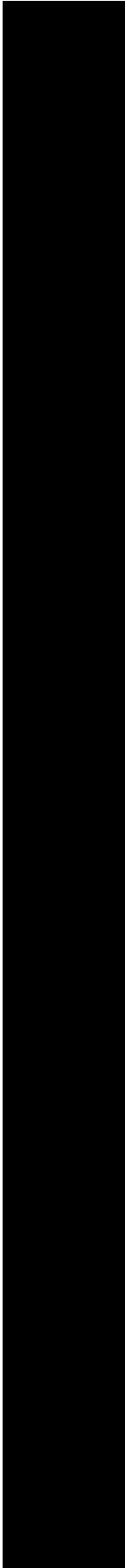


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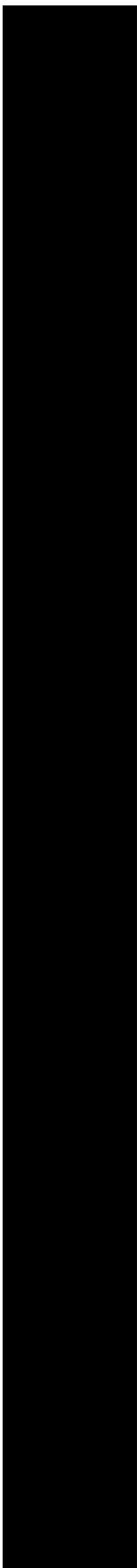
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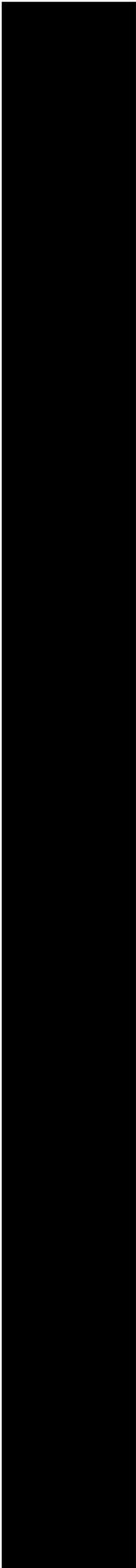
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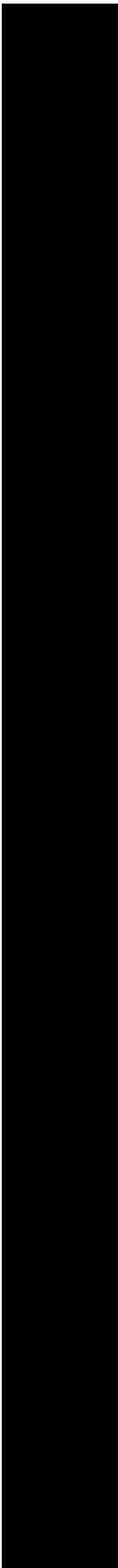
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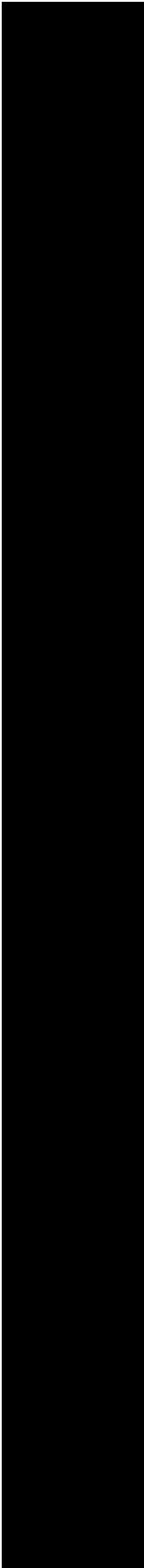
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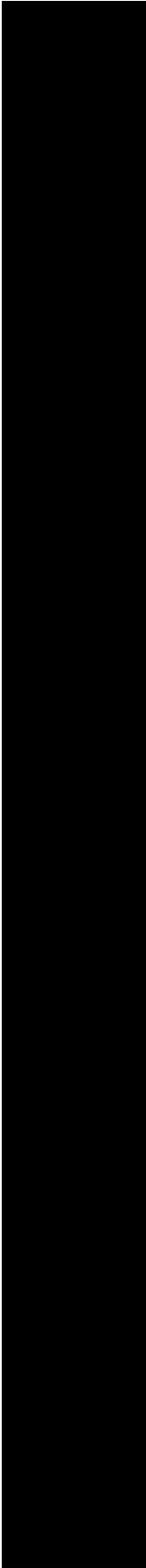
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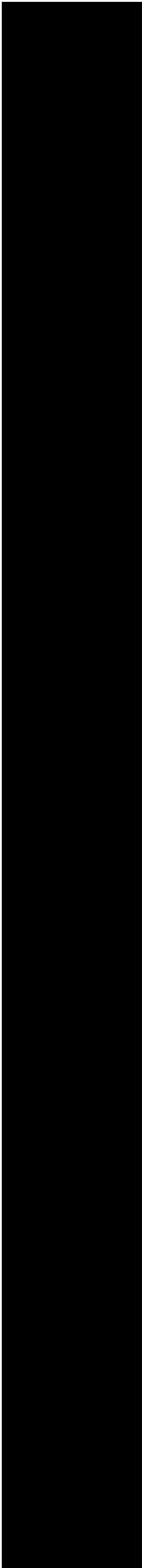


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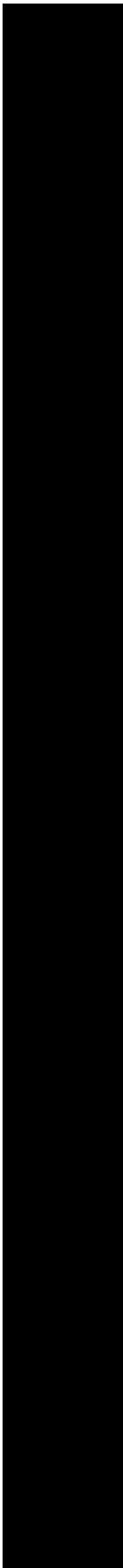


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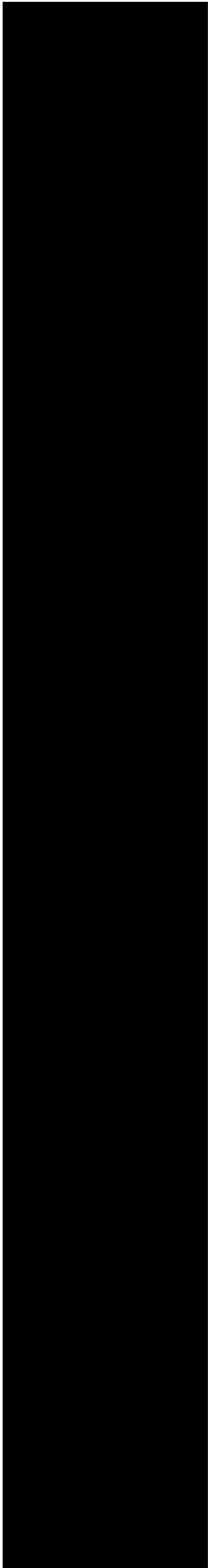


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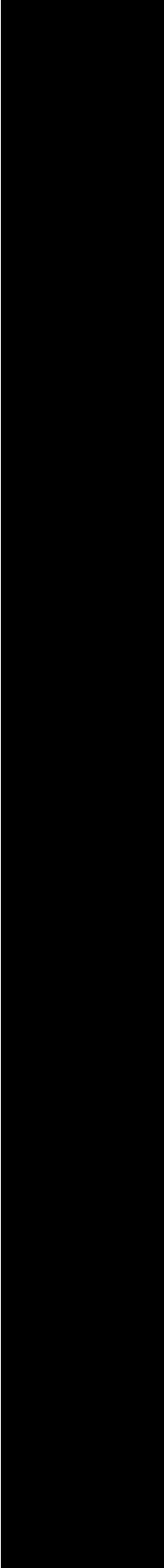


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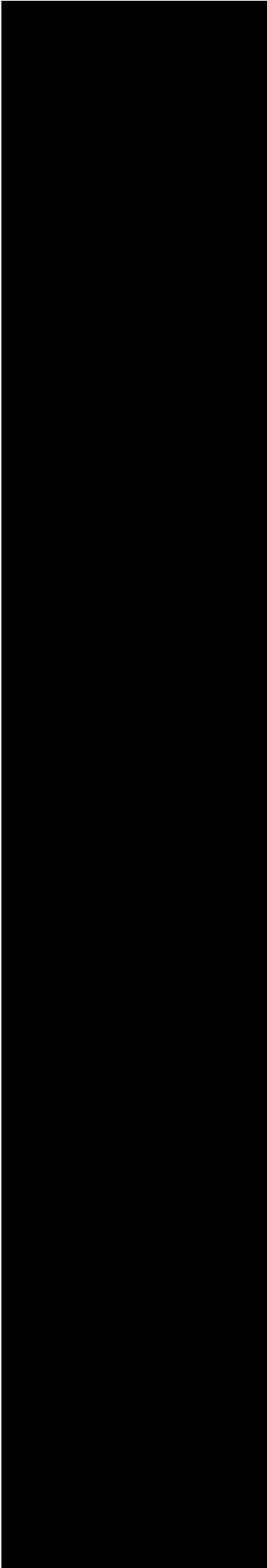
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# Exhibit B

**HIGHLY CONFIDENTIAL**  
**SUBJECT TO PROTECTIVE ORDER**

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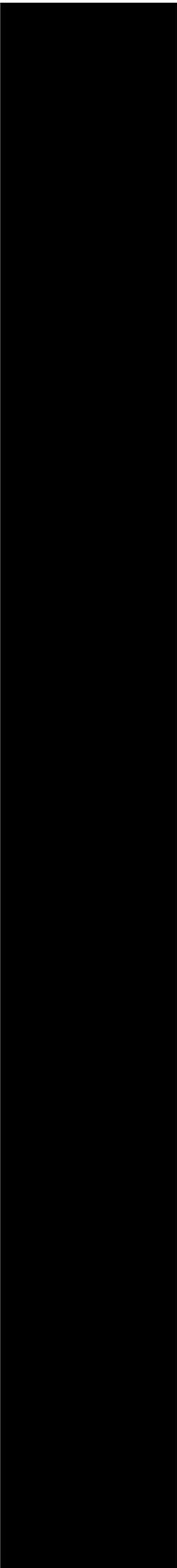


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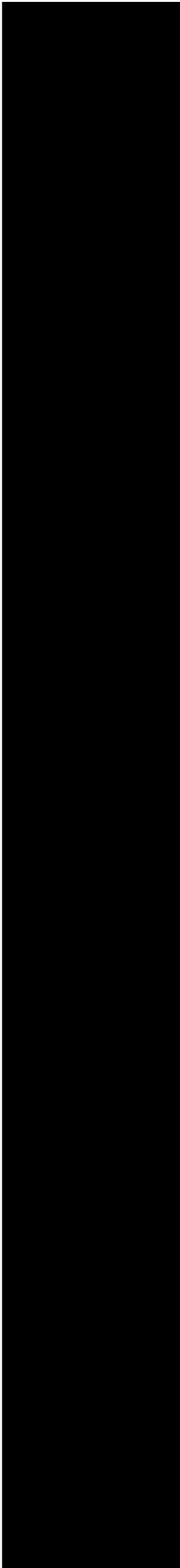
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**SUBJECT TO PROTECTIVE ORDER**

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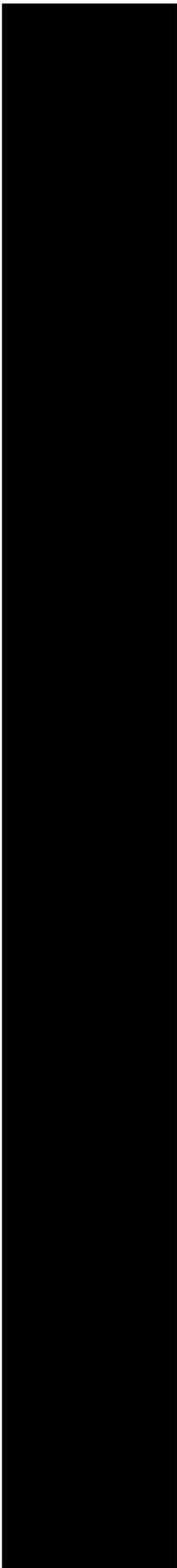


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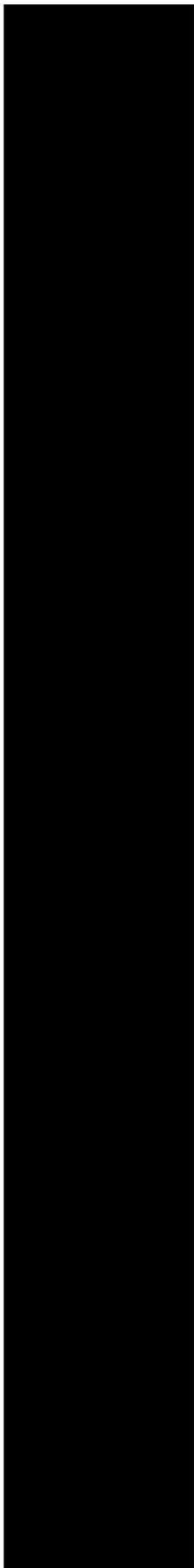
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**HIGHLY CONFIDENTIAL**  
**SUBJECT TO PROTECTIVE ORDER**

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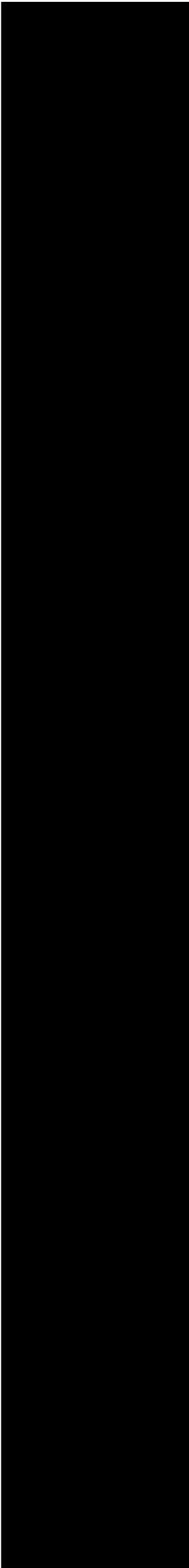
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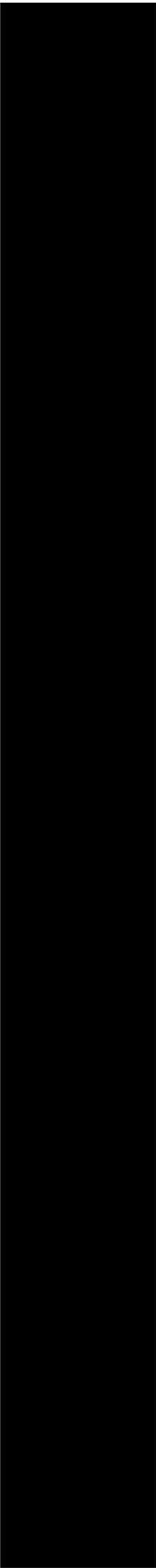


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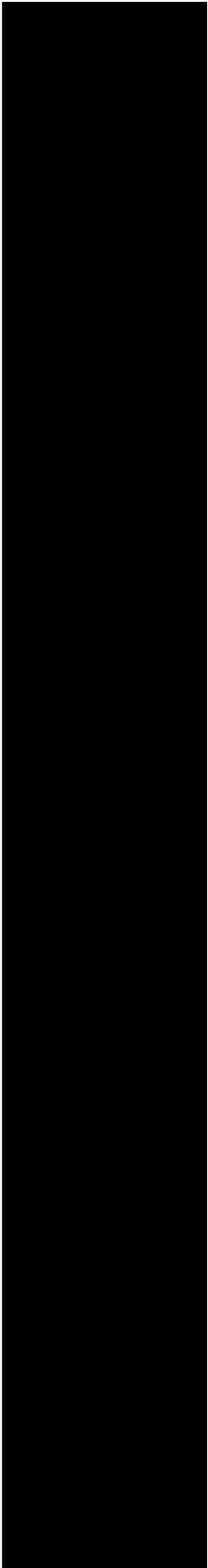
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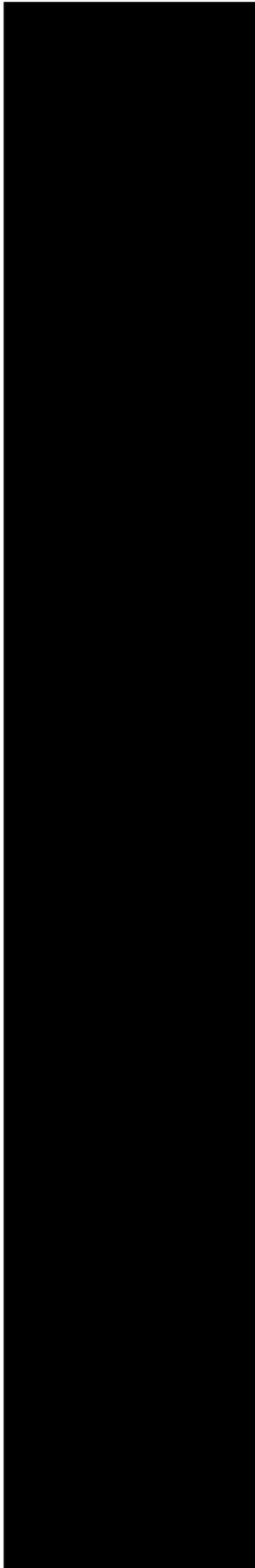


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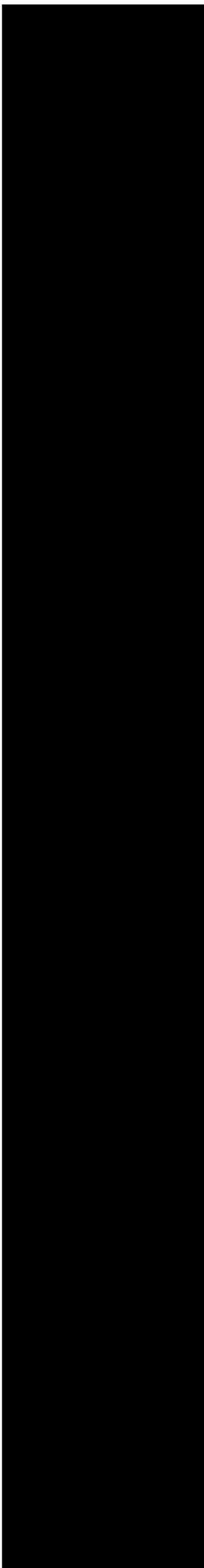
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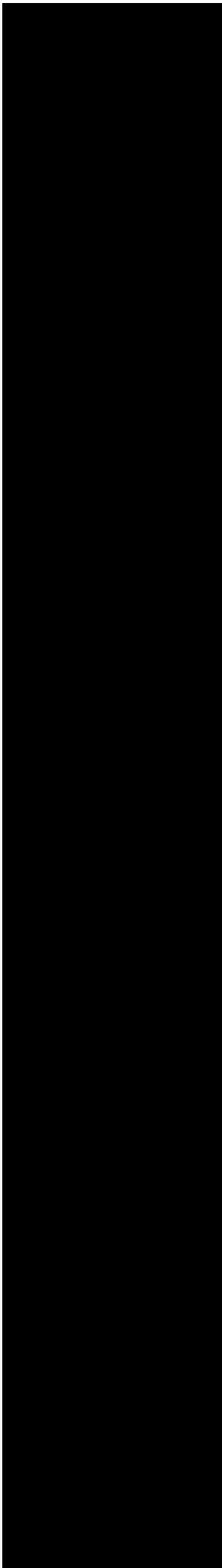


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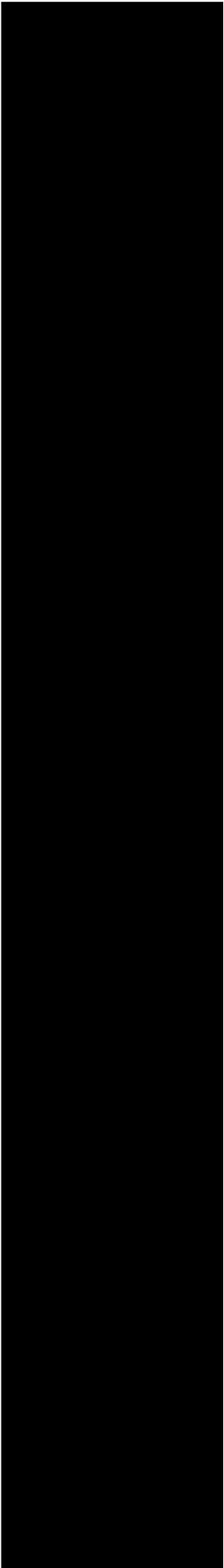
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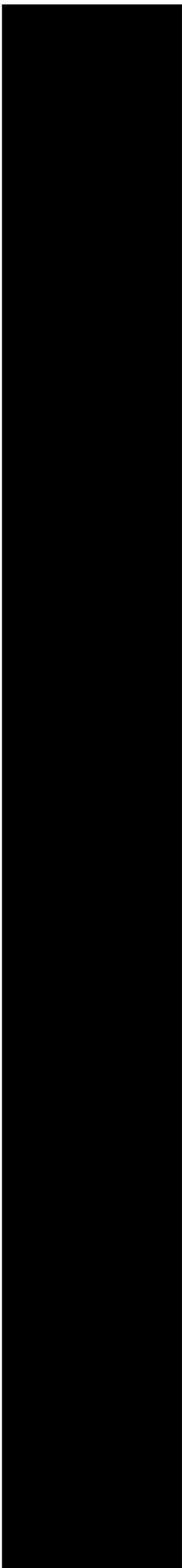
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**SUBJECT TO PROTECTIVE ORDER**

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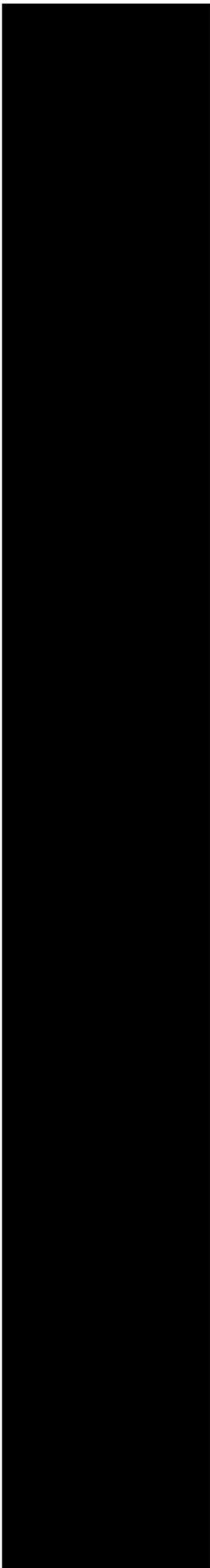


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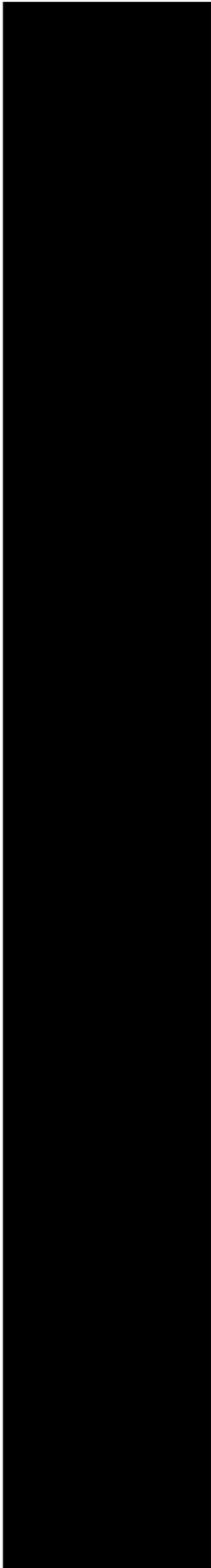
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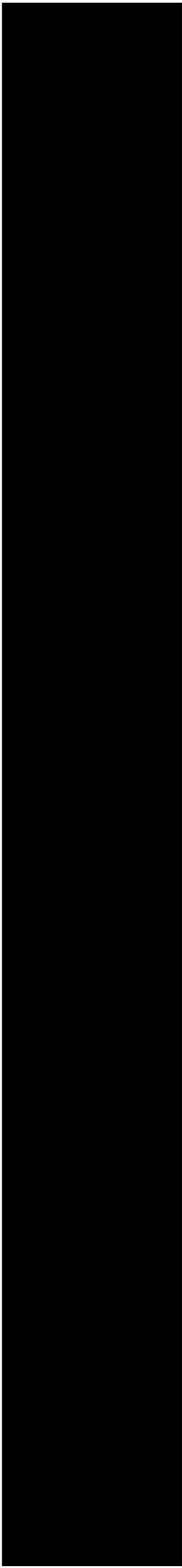
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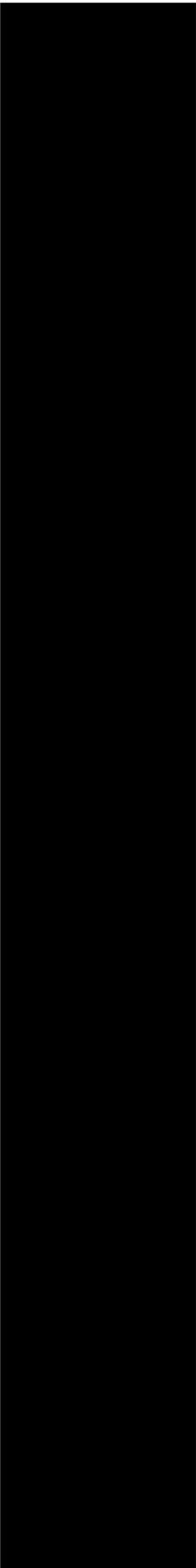


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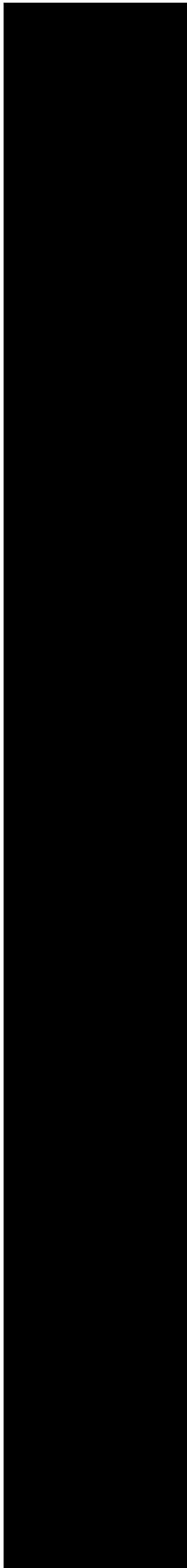


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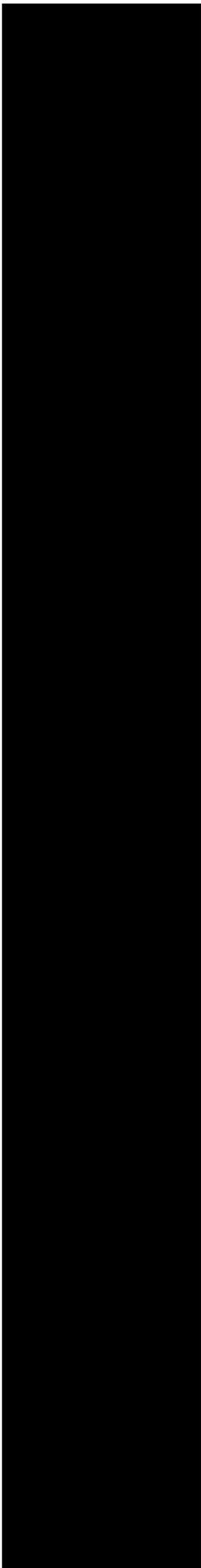


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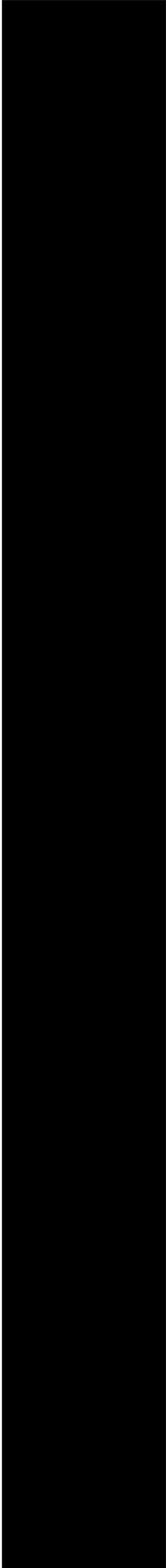
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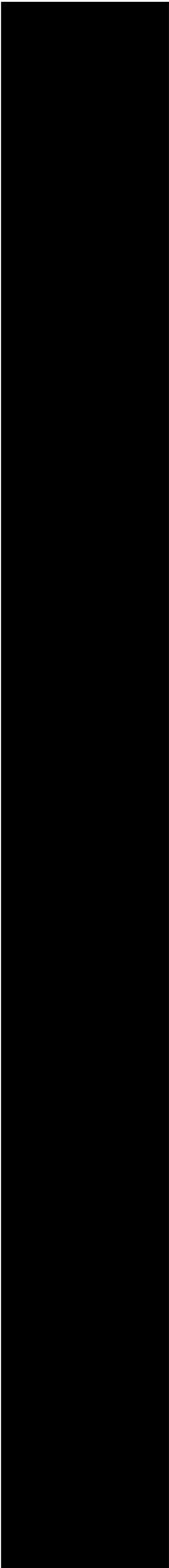


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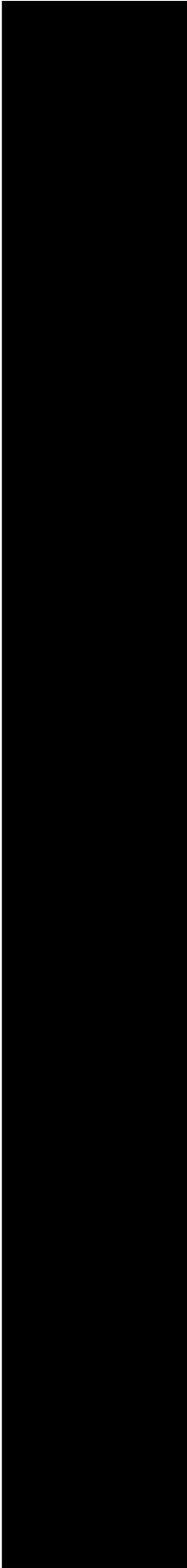
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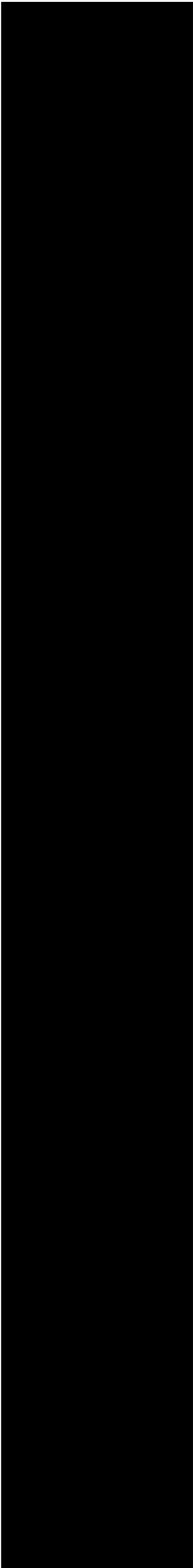
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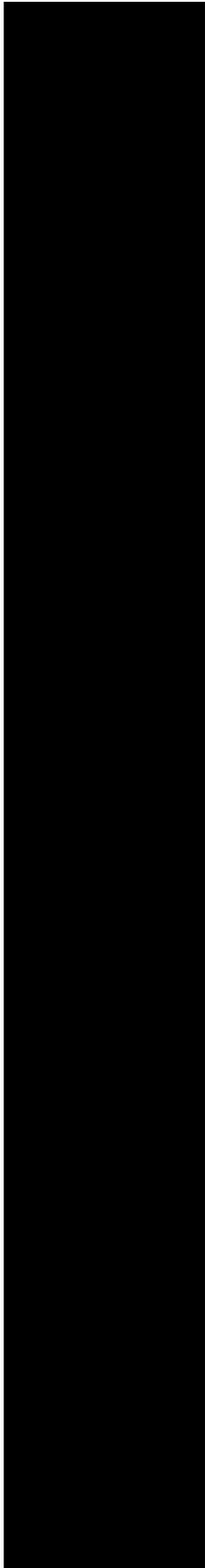
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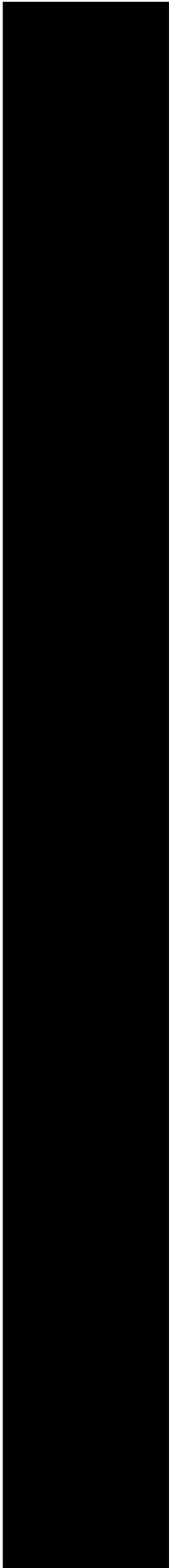
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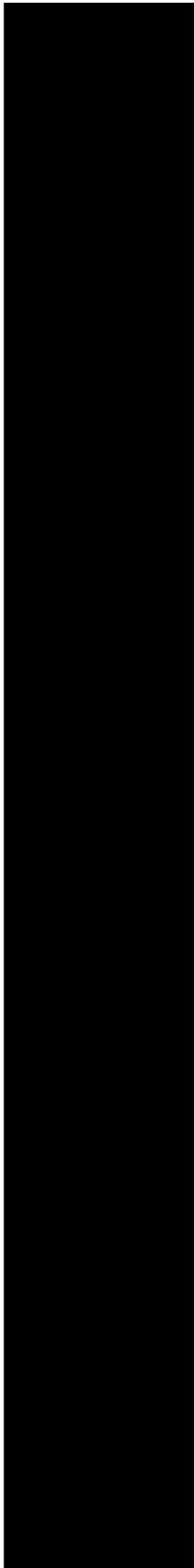
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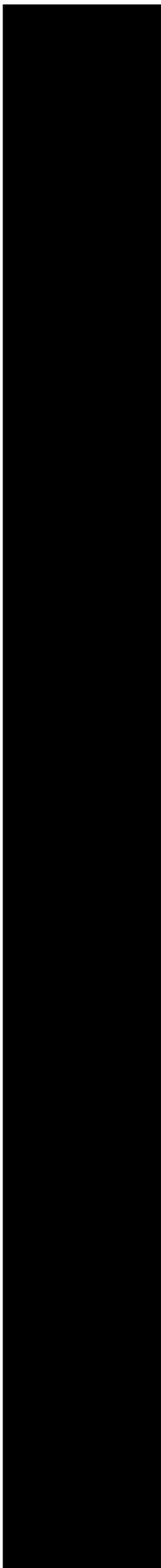


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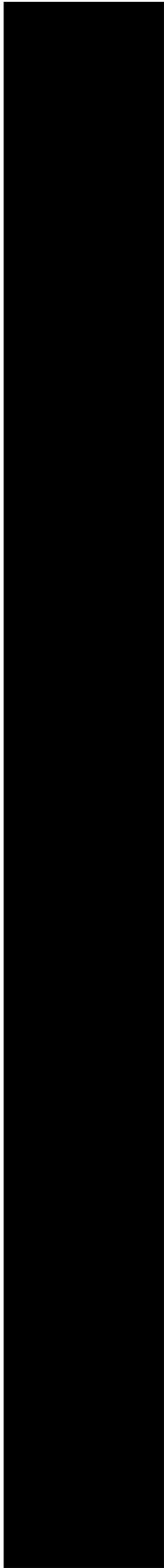


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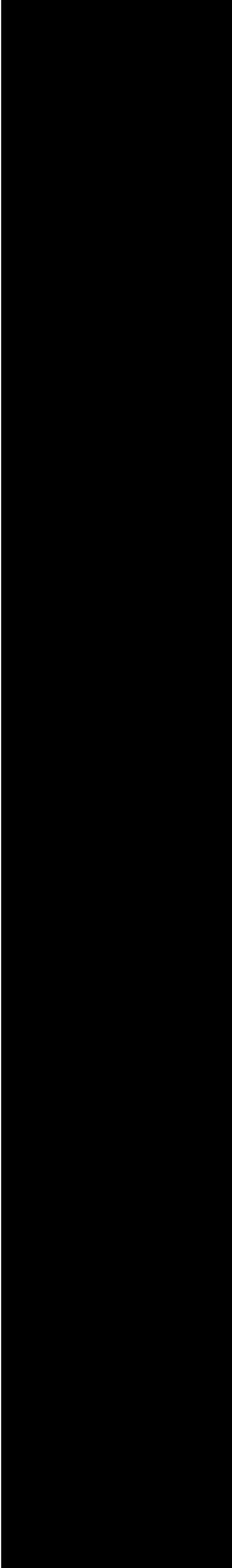


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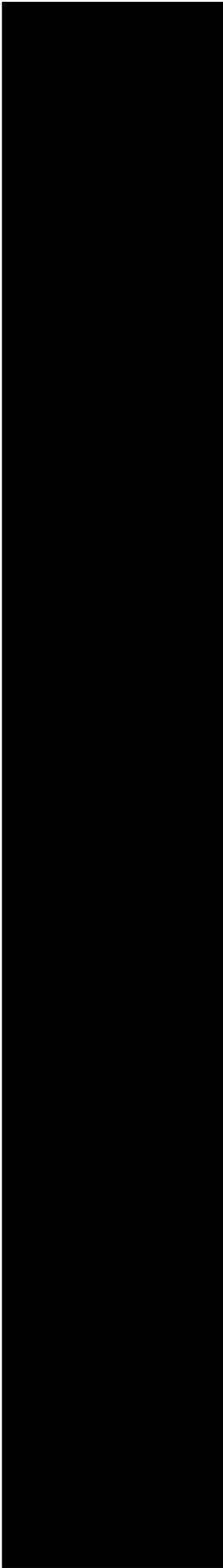
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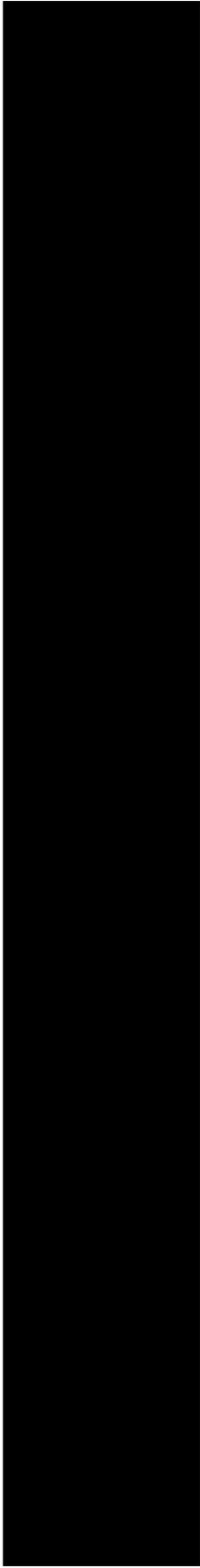


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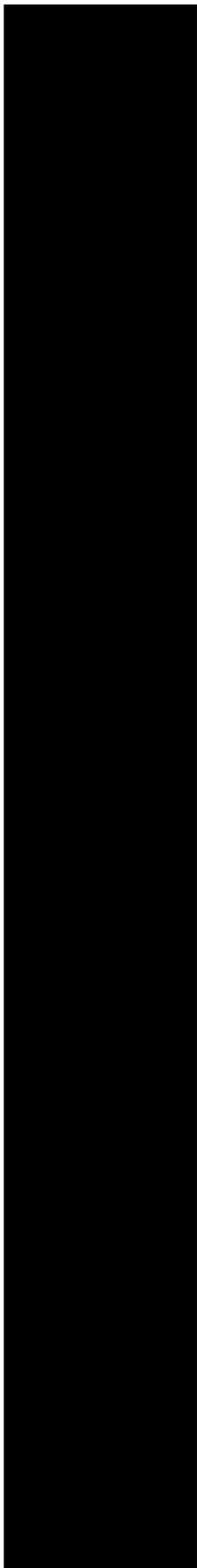
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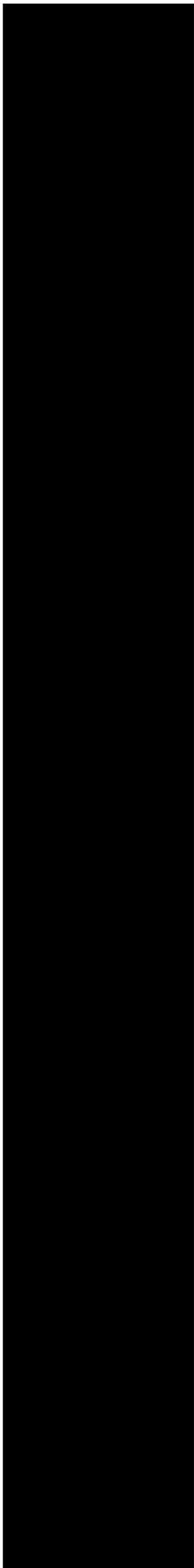
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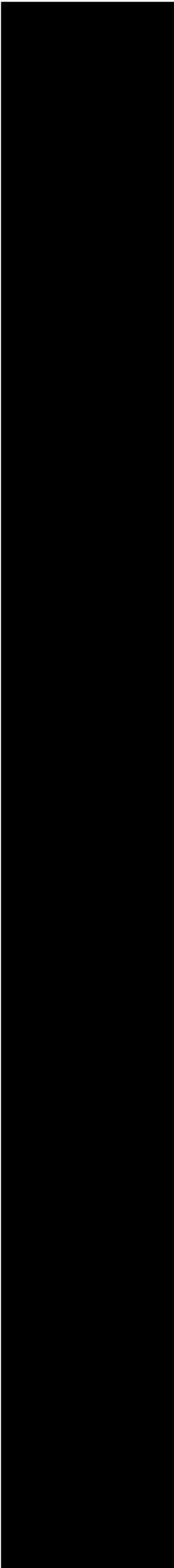
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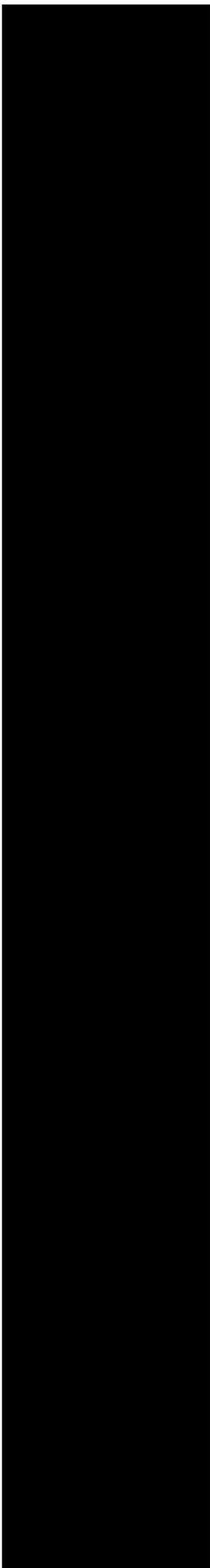
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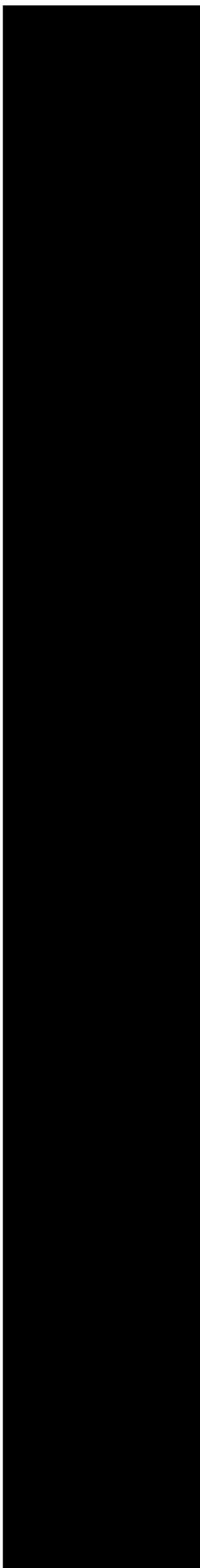
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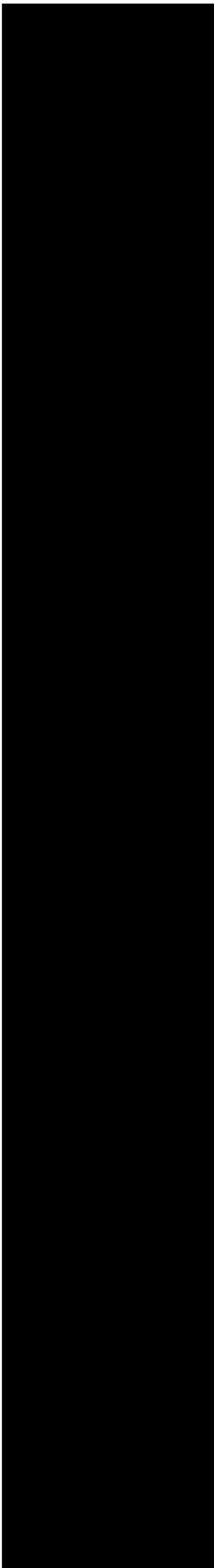
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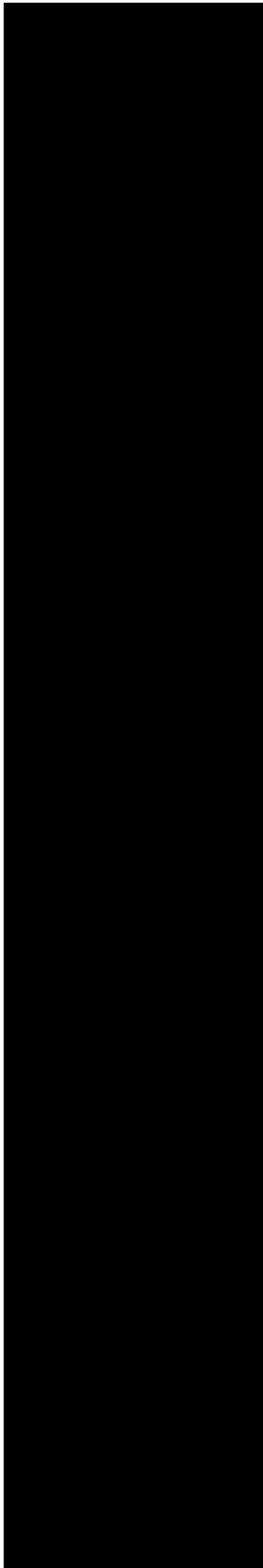
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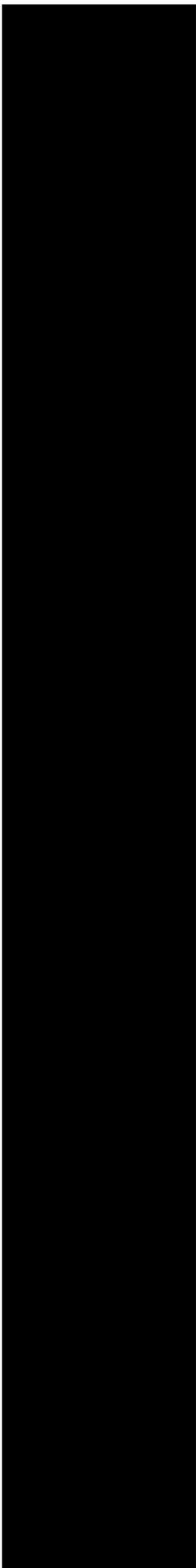
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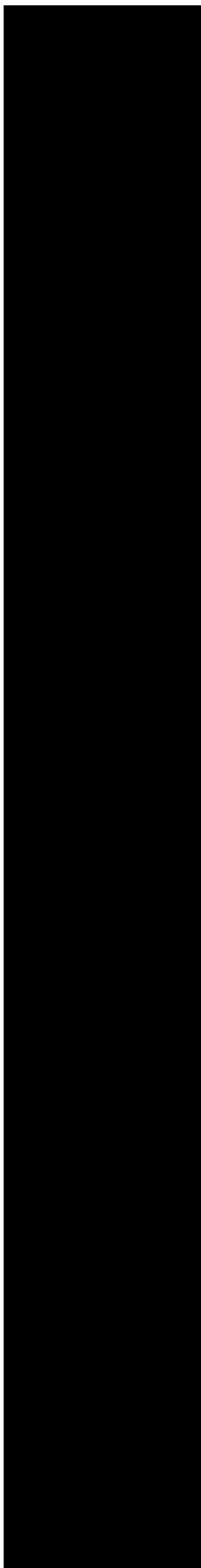


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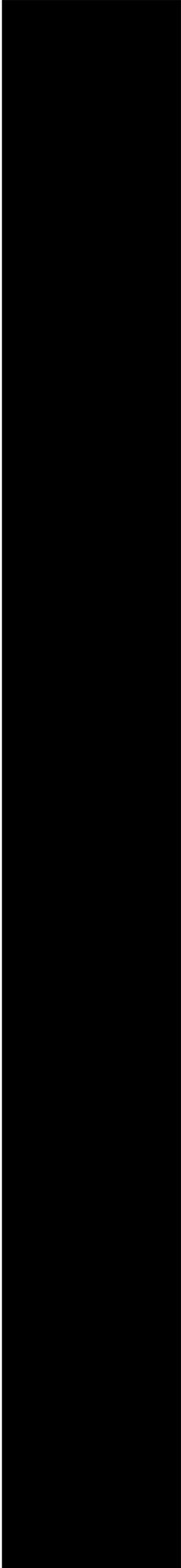
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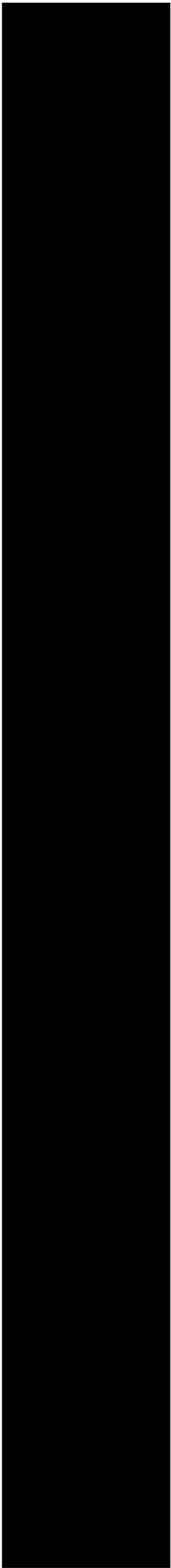


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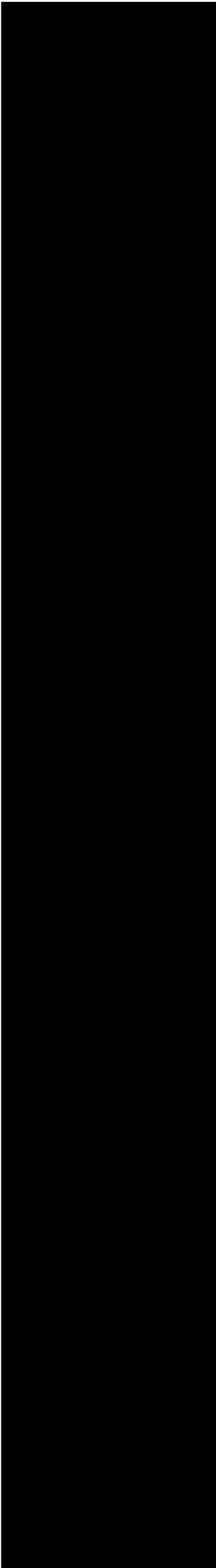


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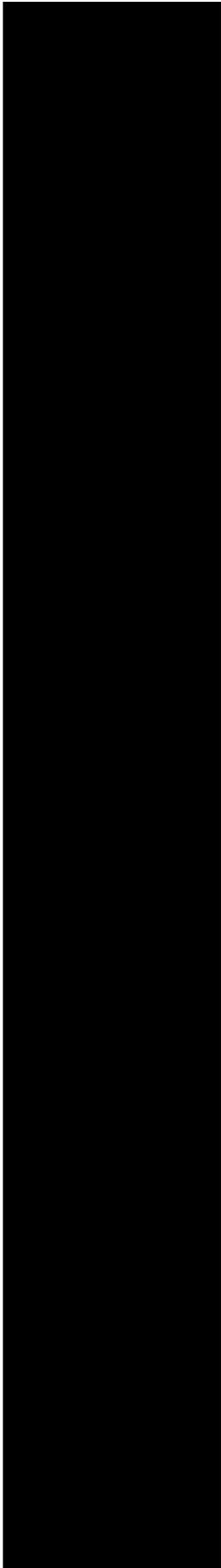


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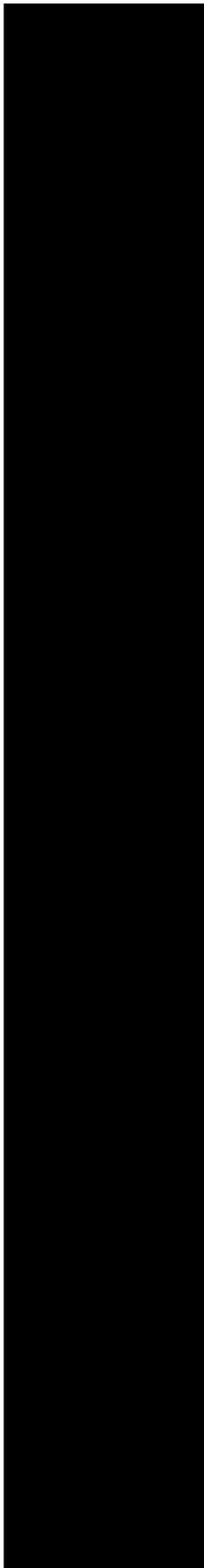


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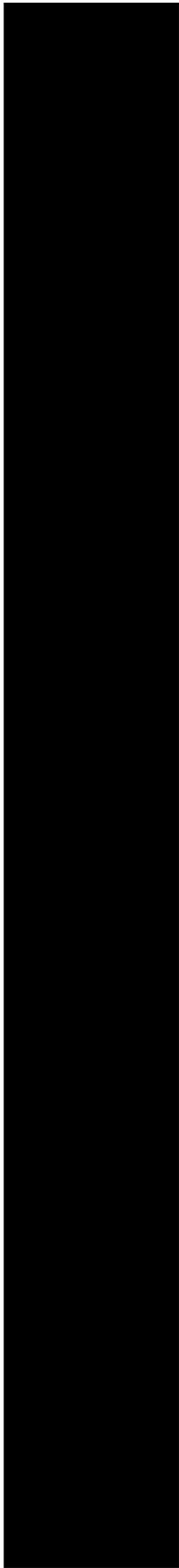
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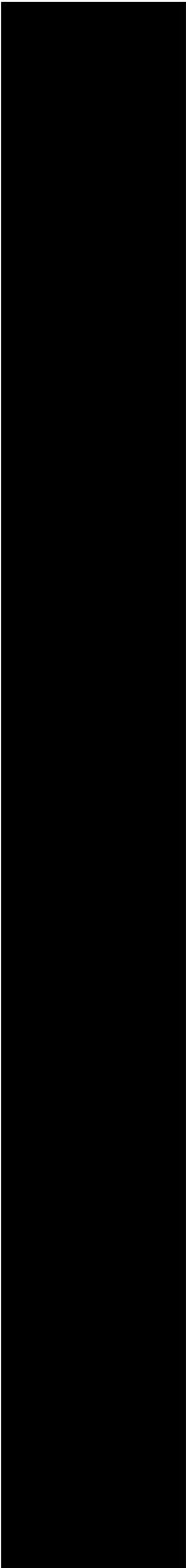
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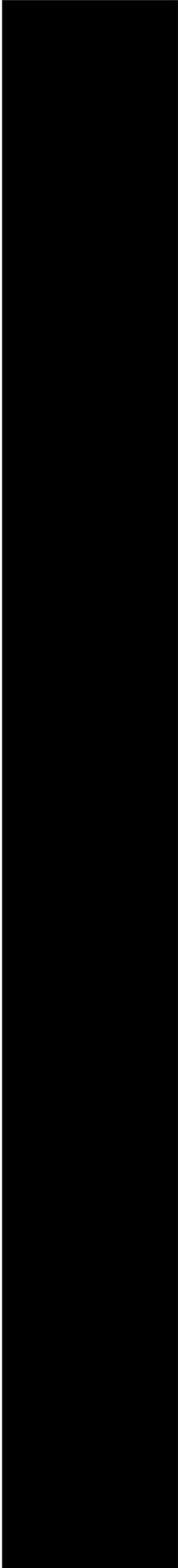


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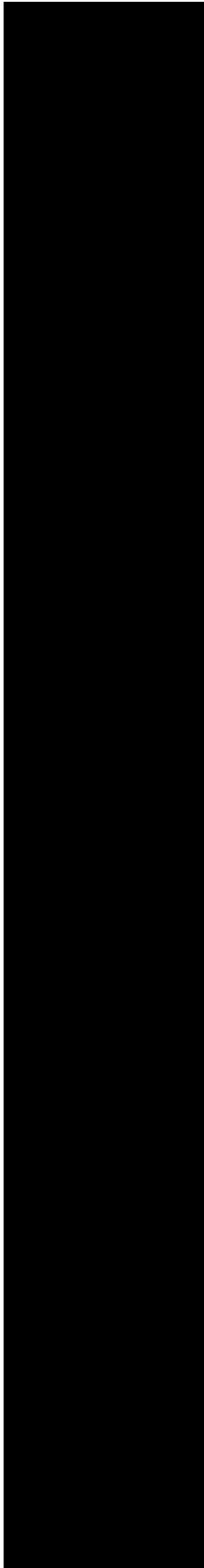
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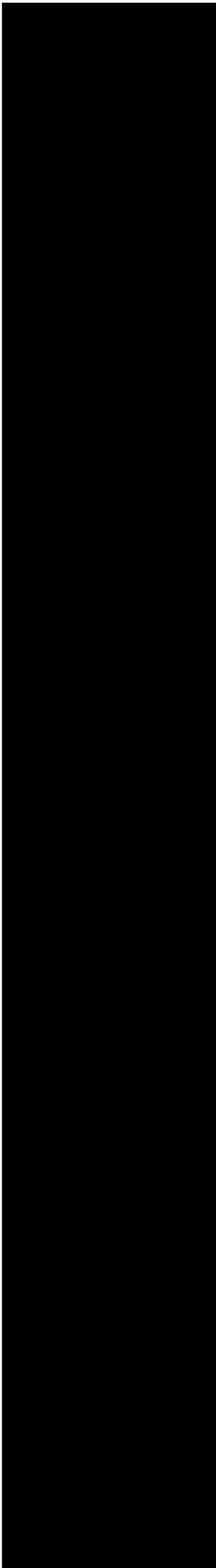


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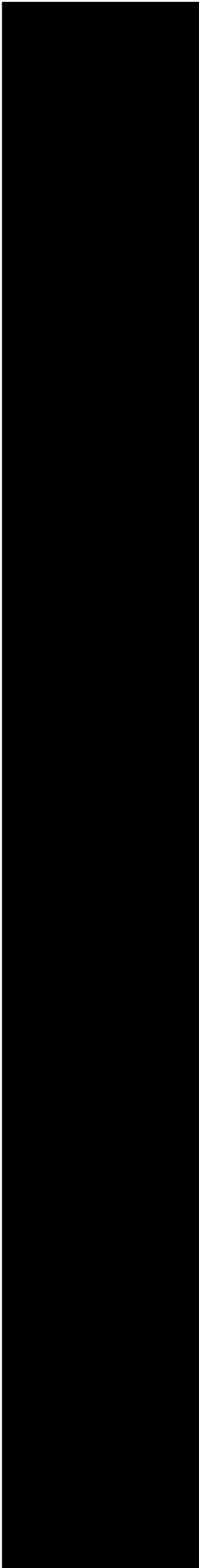


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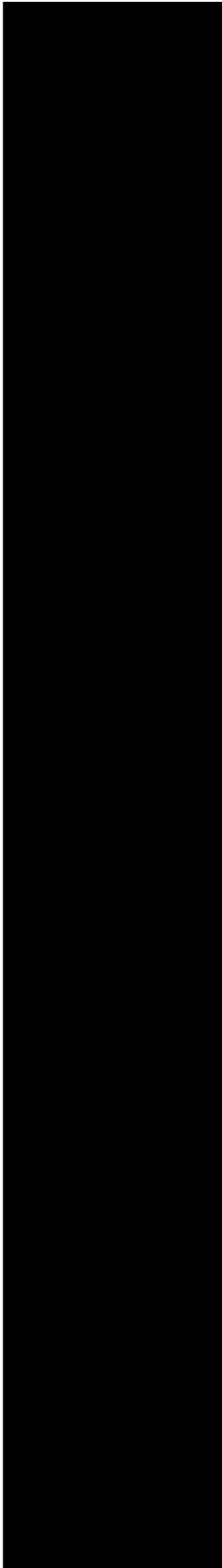


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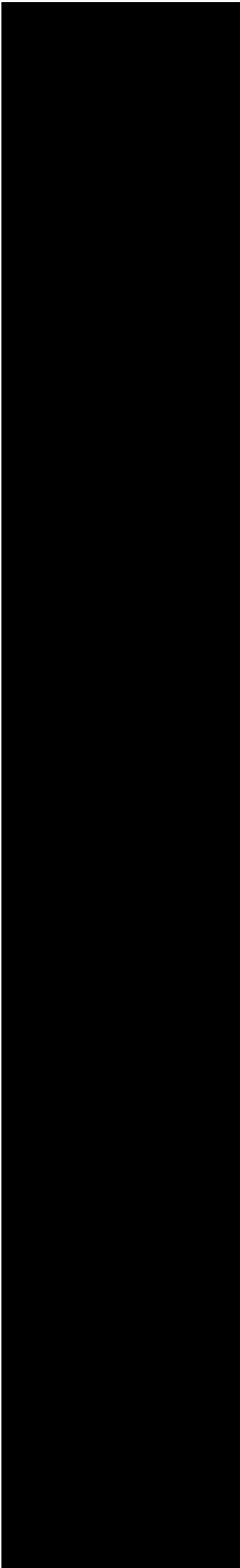
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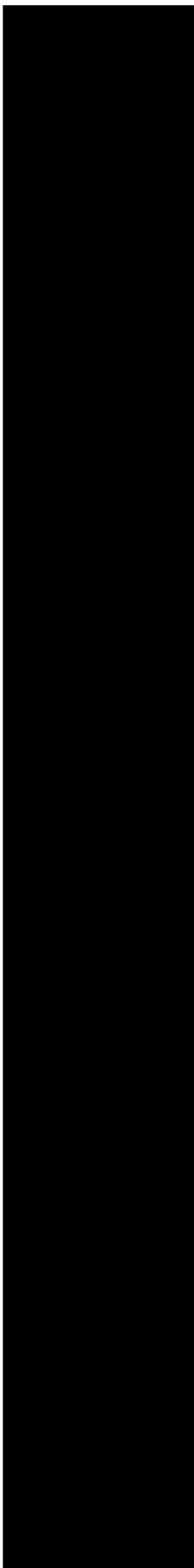
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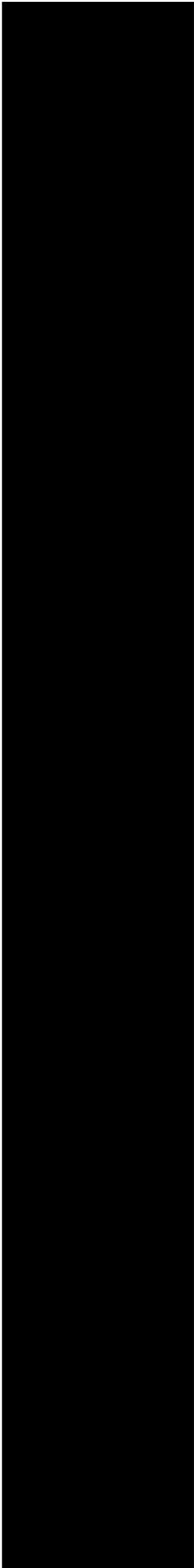


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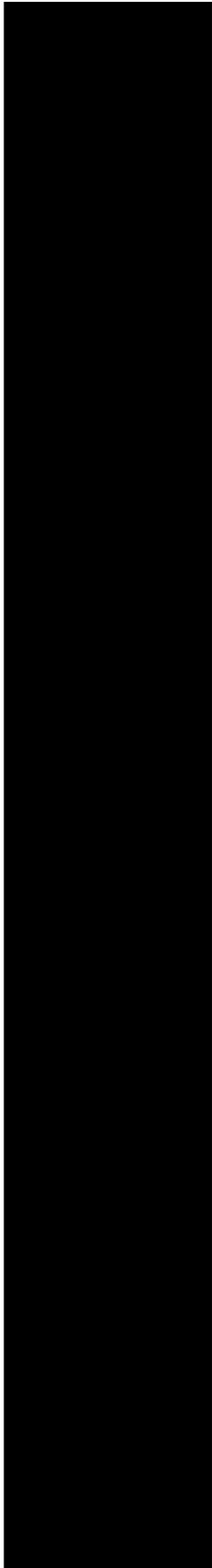


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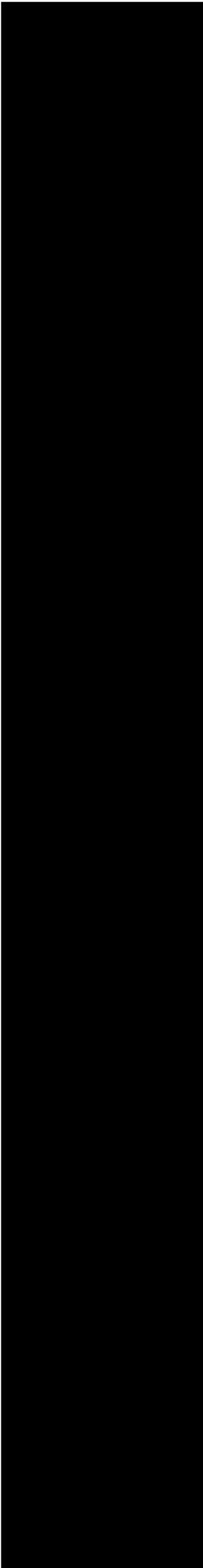
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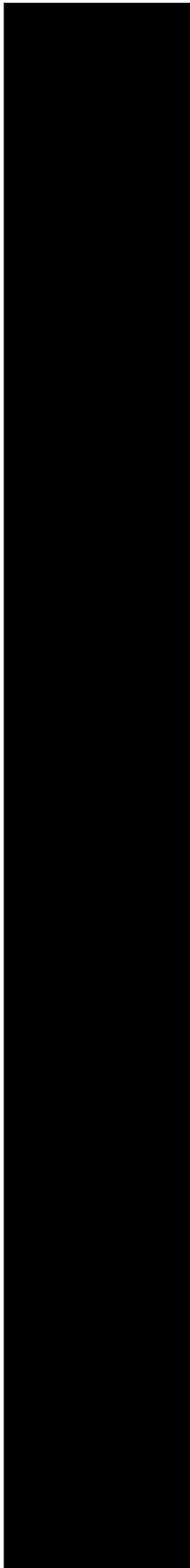


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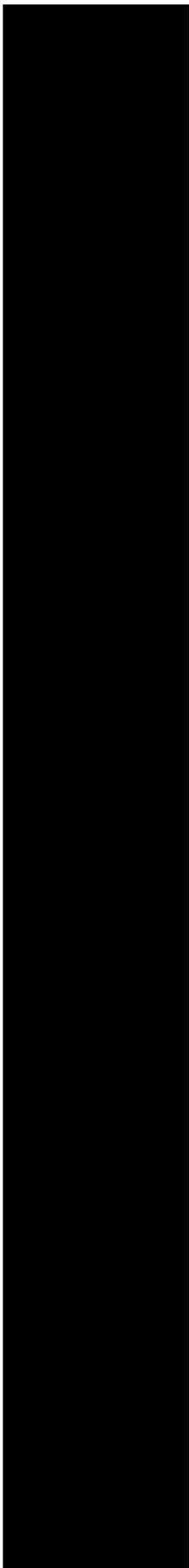
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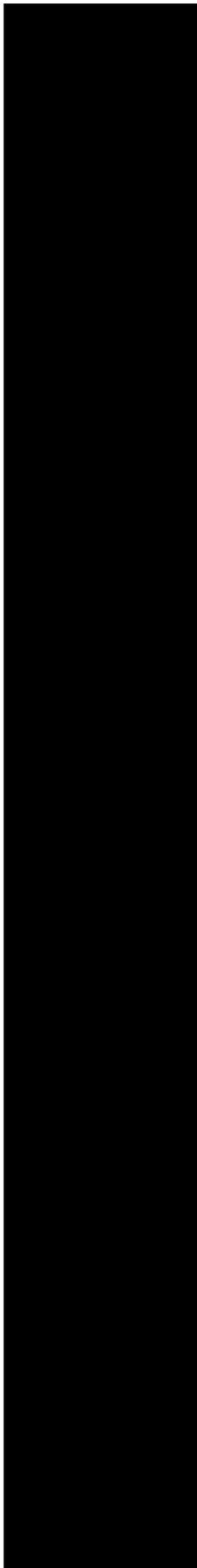


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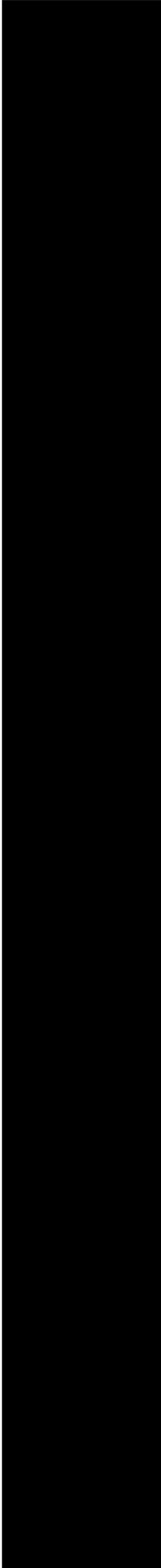
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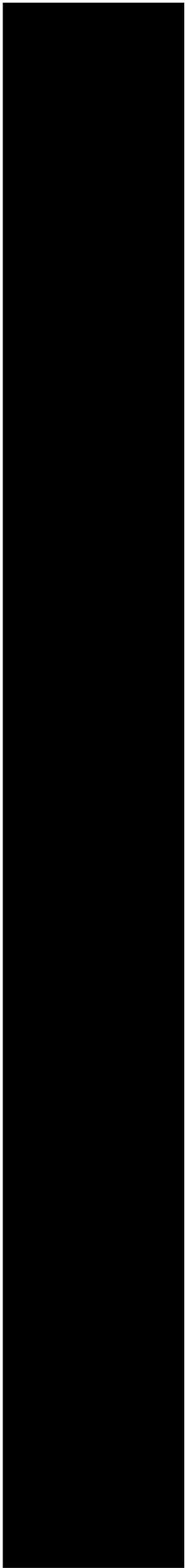


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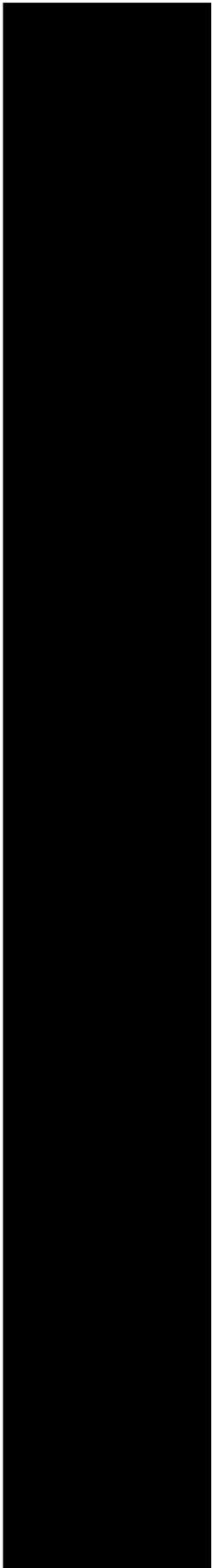
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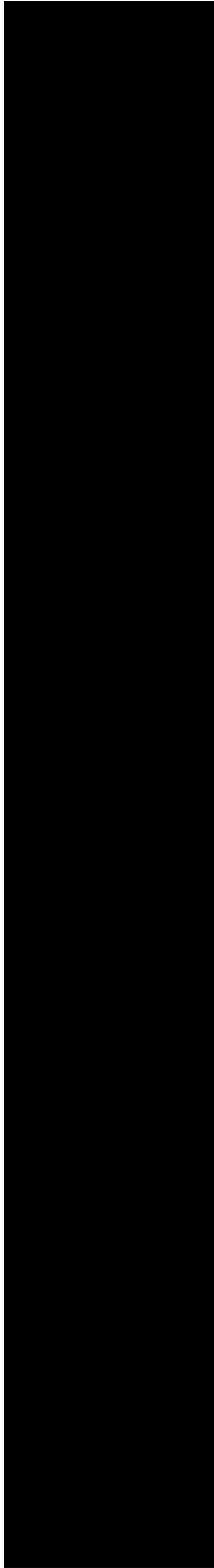


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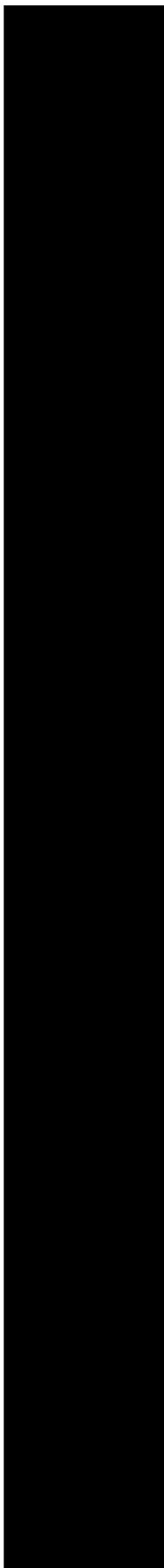


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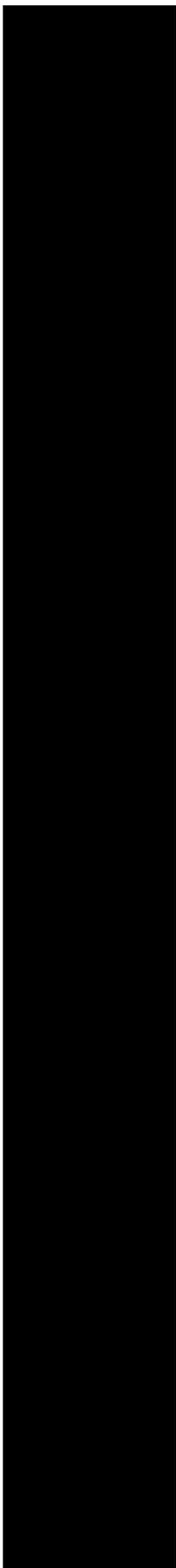


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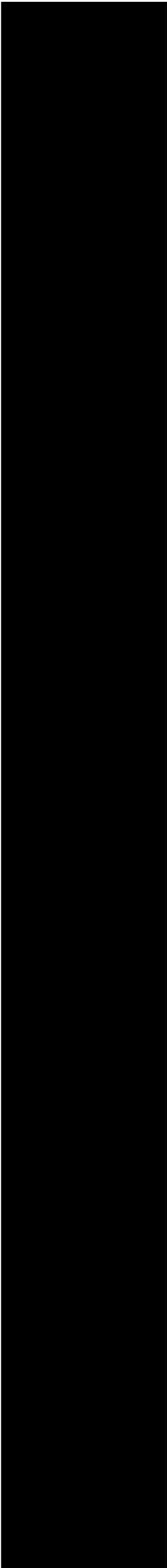


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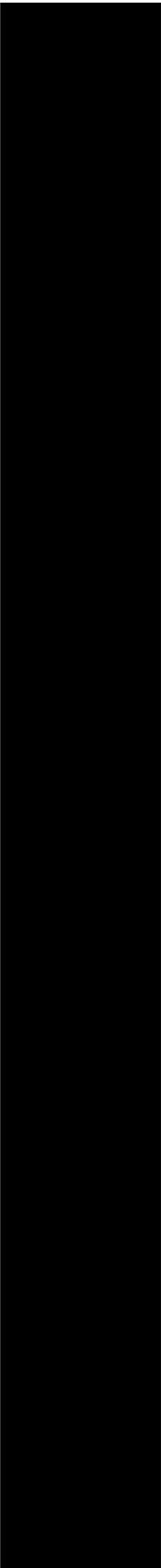


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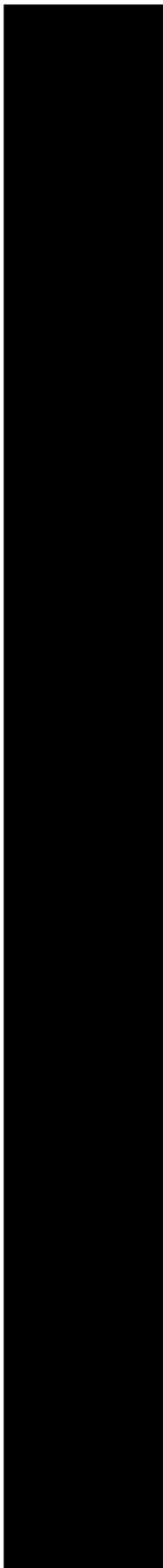


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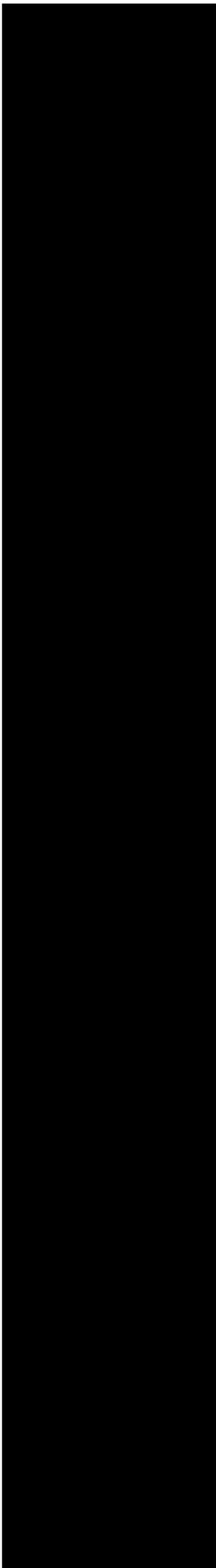
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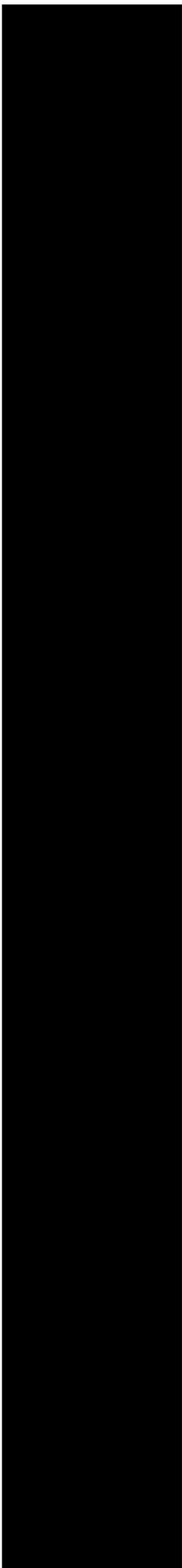
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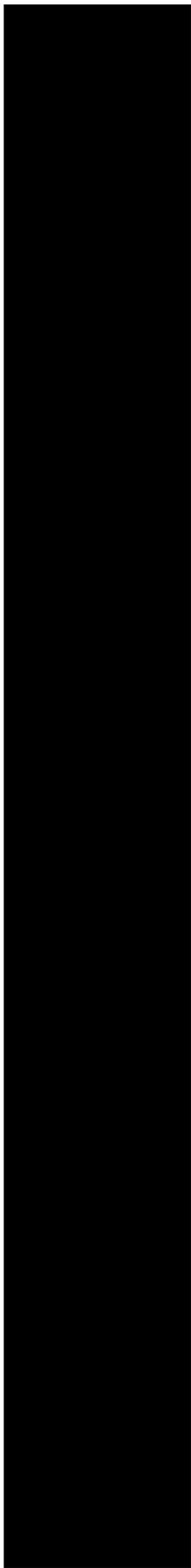
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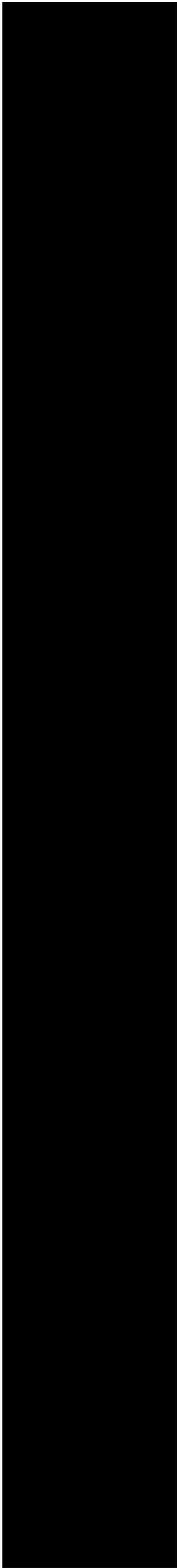


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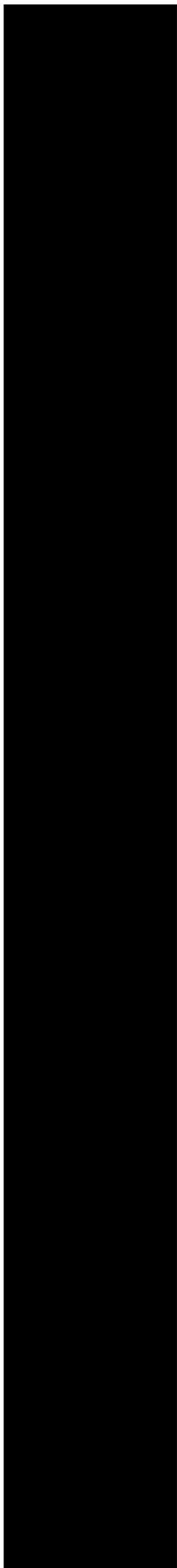
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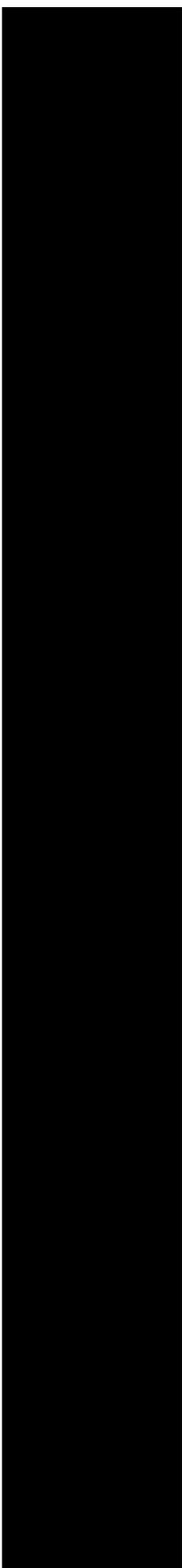


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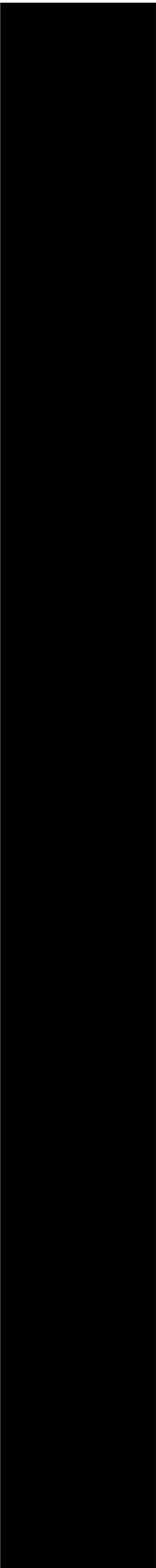
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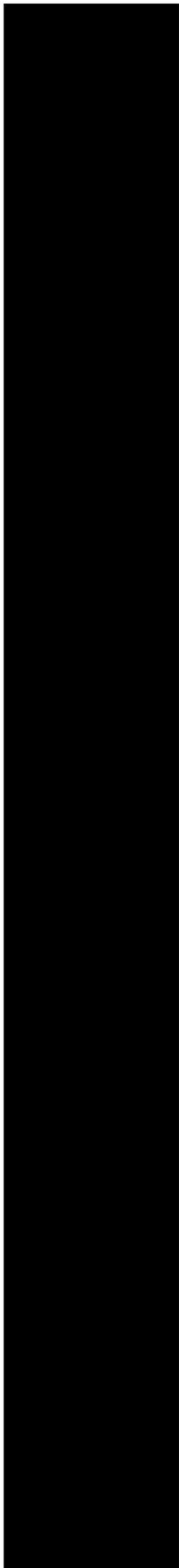
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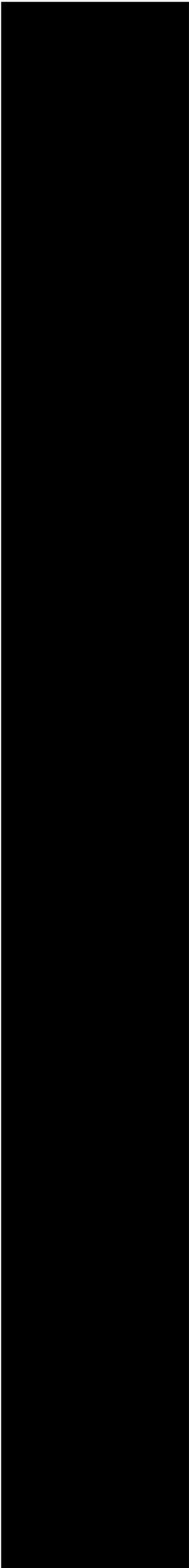
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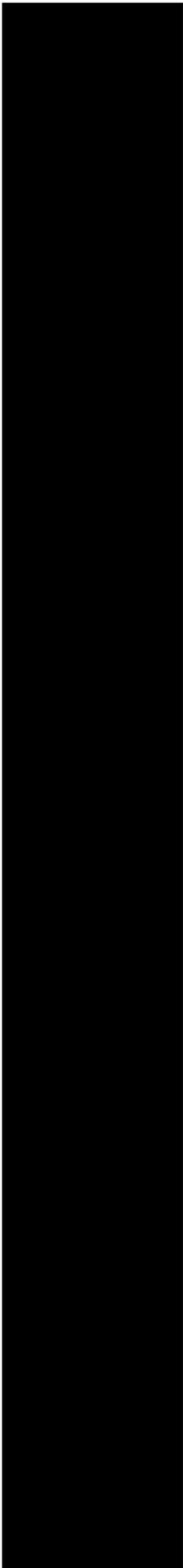


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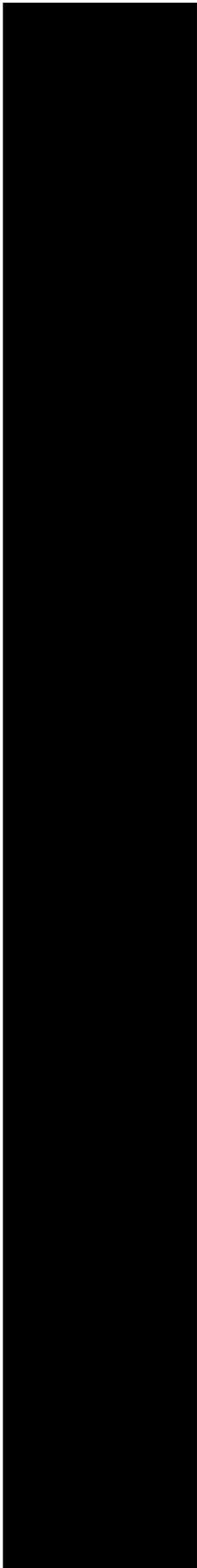


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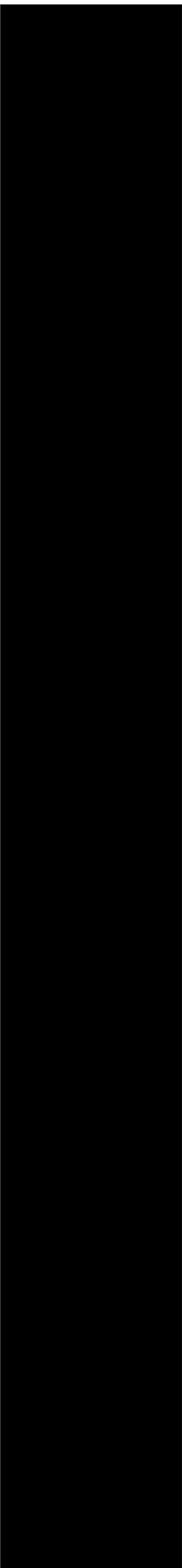
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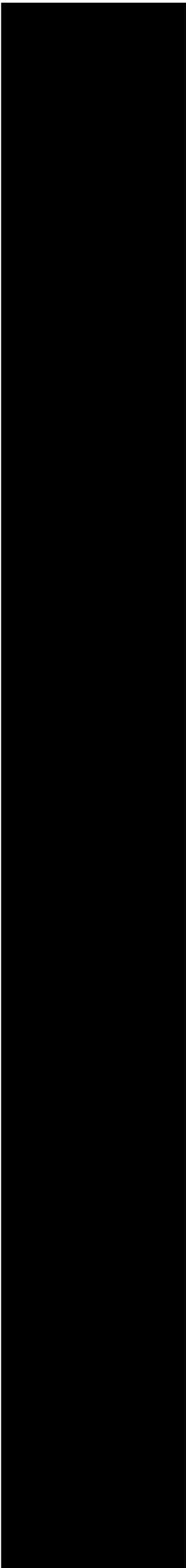


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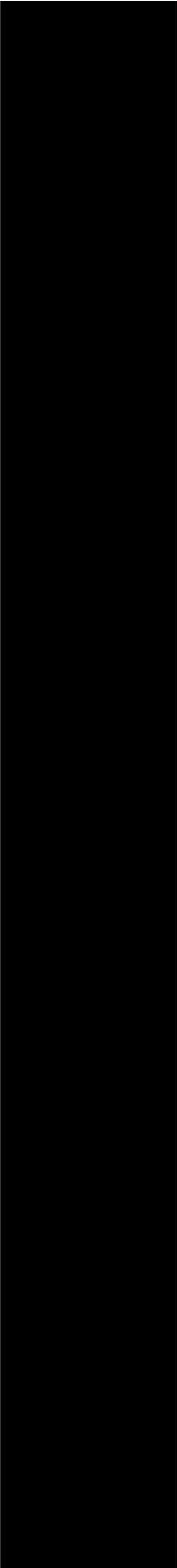


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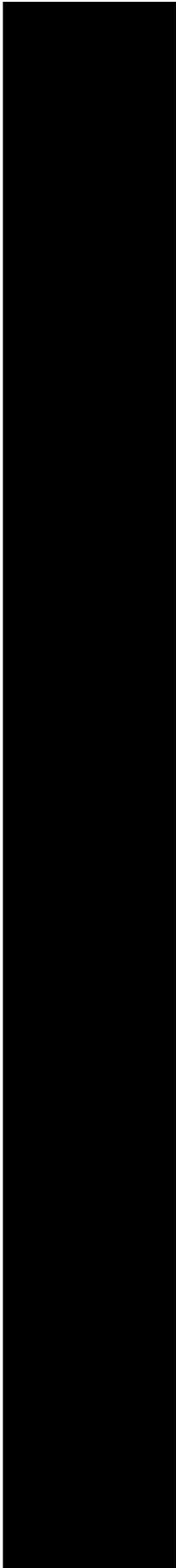


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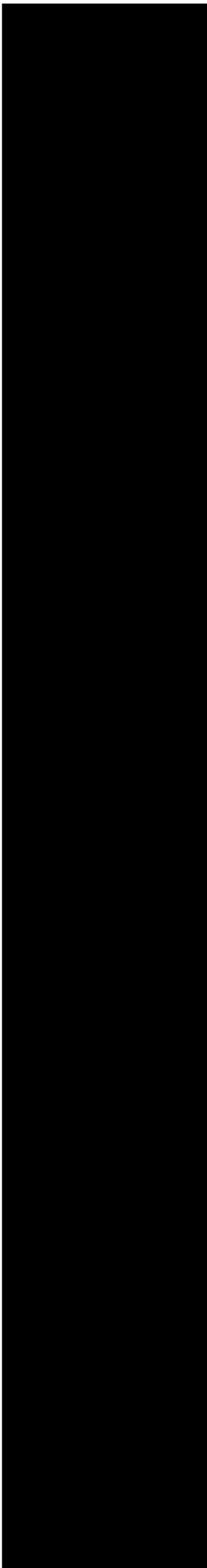
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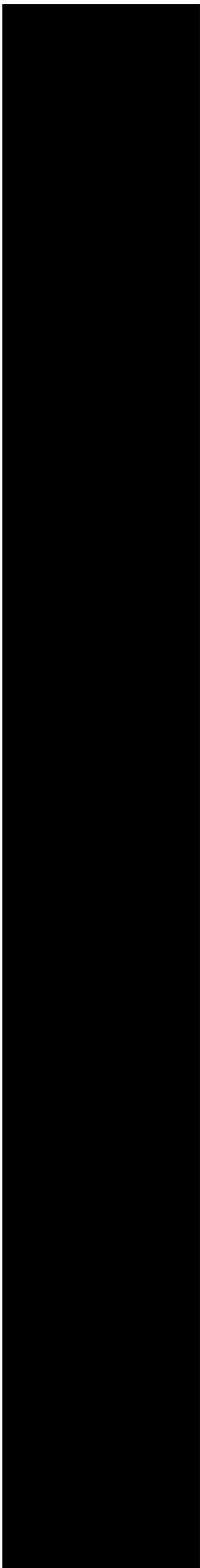
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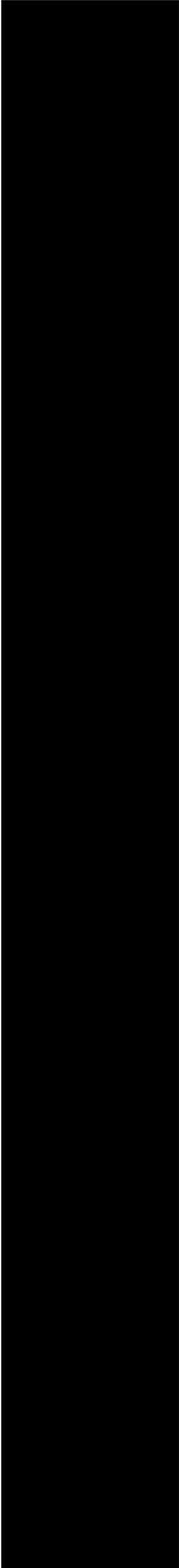
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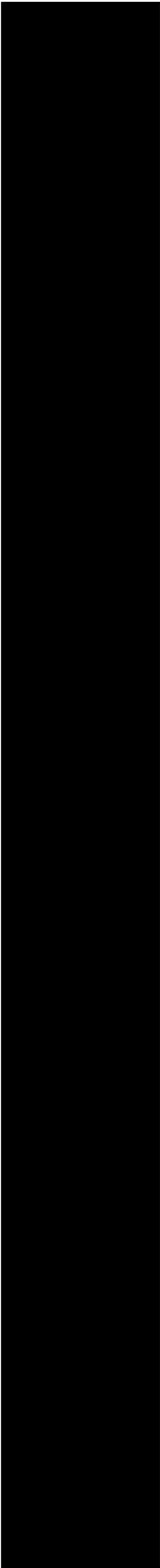


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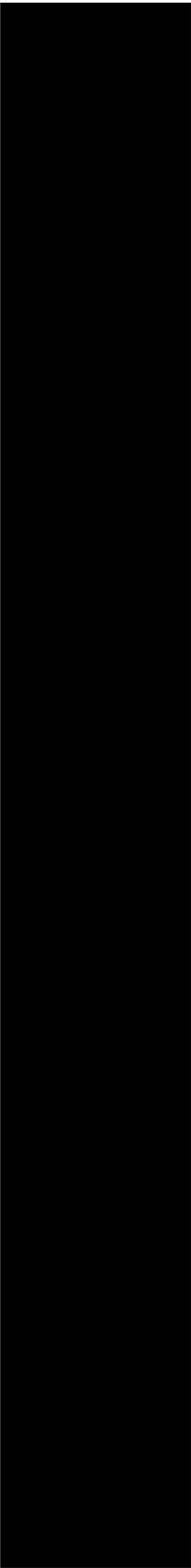


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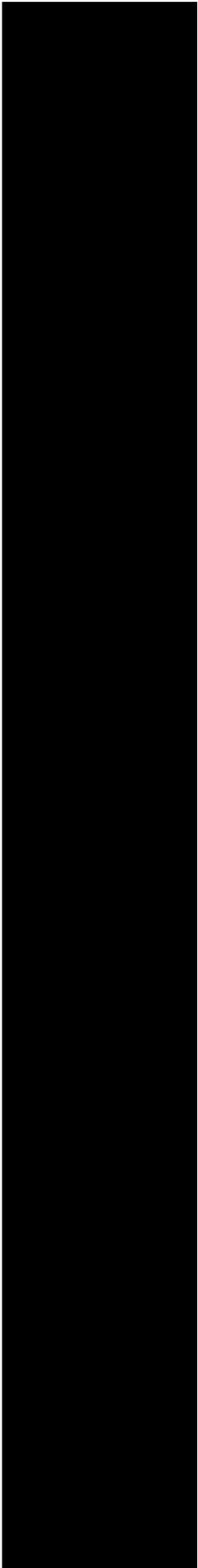


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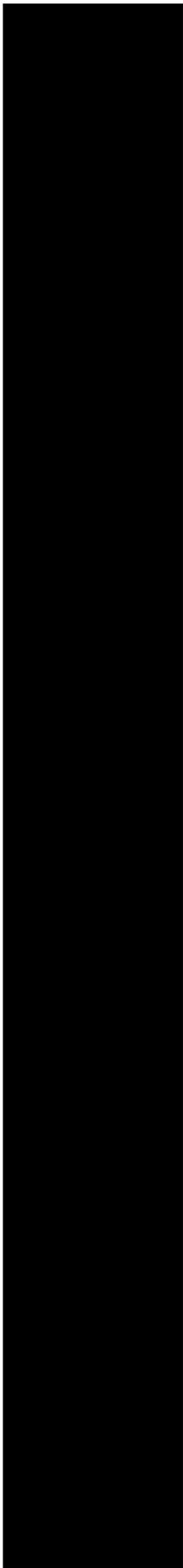


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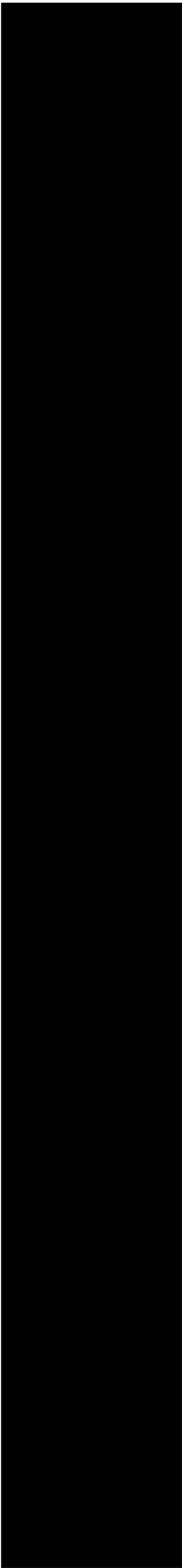


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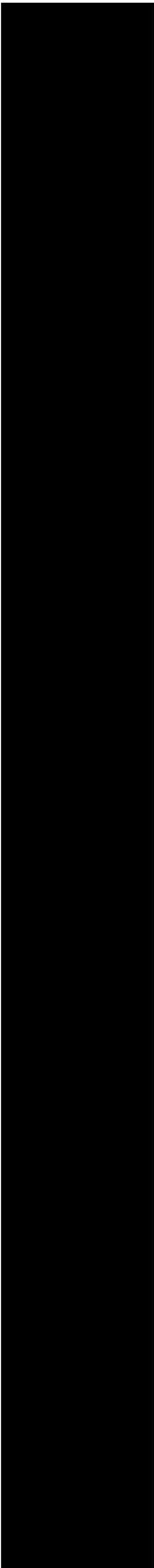


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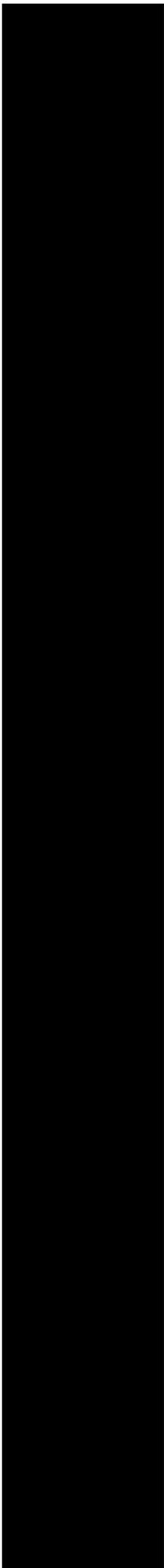
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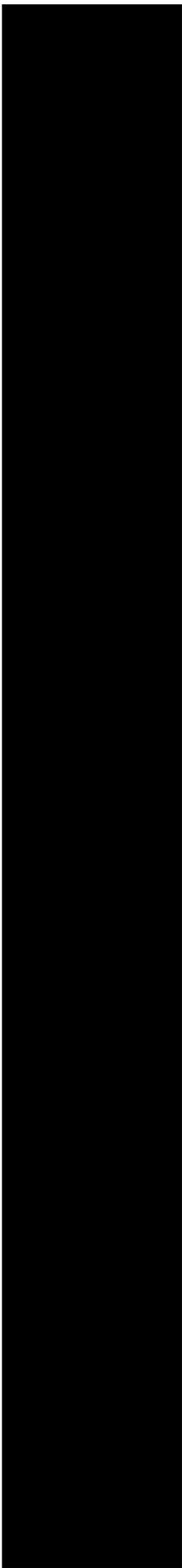


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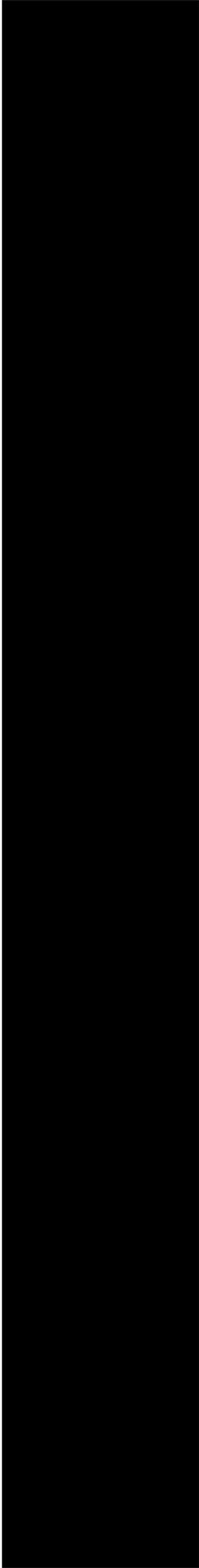


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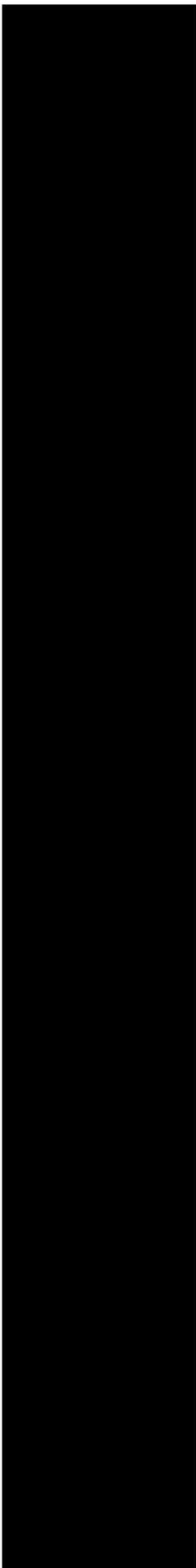
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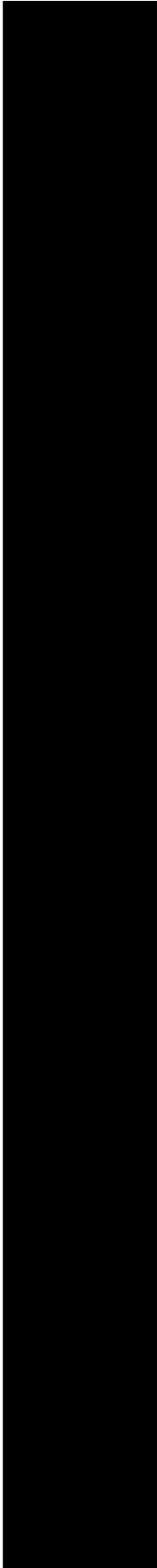


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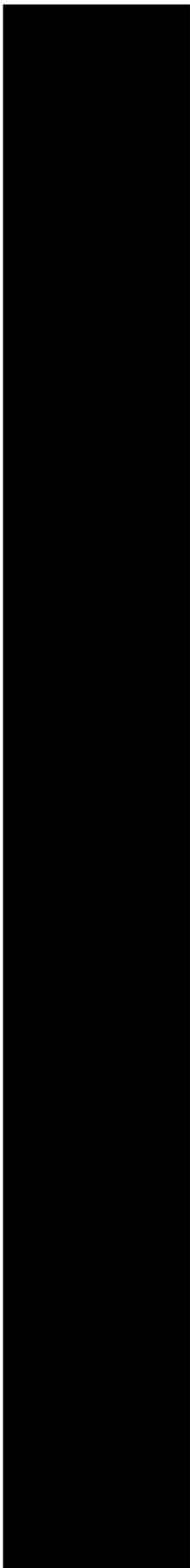


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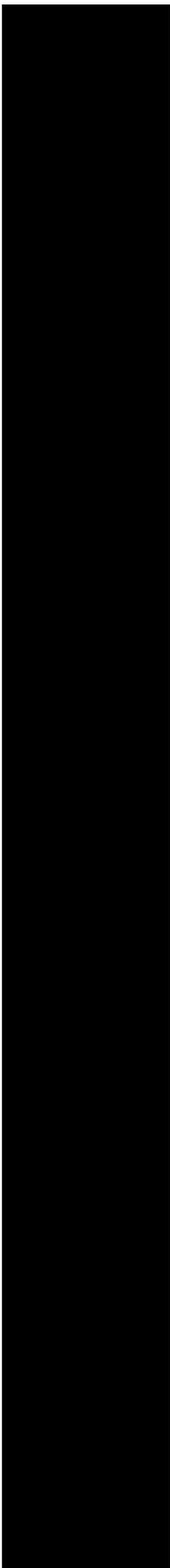
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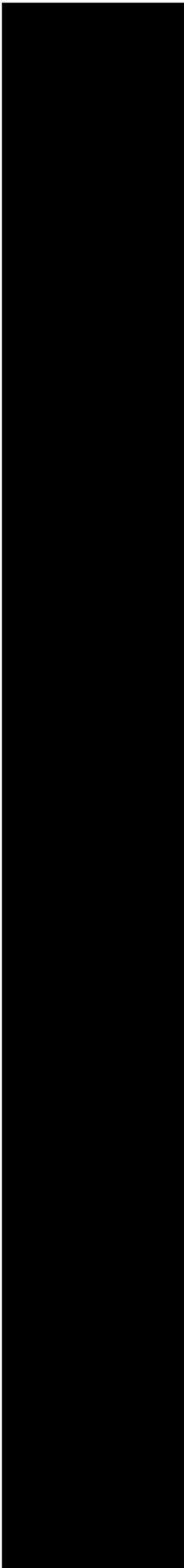
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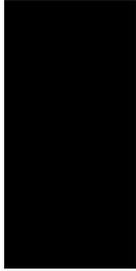
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