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Figueira Decl. Tab
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UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC.,   )
COMEDY PARTNERS, COUNTRY MUSIC   )
TELEVISION, INC., PARAMOUNT   )
PICTURES CORPORATION, and   )
BLACK ENTERTAINMENT TELEVISION   )
LLC,   )
) Civil Action
                   Plaintiffs,   )
        vs.   ) No. 07-CV-2103
)
YOUTUBE, INC., YOUTUBE, LLC, and   )
GOOGLE, INC.,   ) Pages 1 thru 141
                   Defendants.   )
_____)

THE FOOTBALL ASSOCIATION PREMIER   )
LEAGUE LIMITED and BOURNE CO., on   )30(b)(6) Deposition of
behalf of themselves and all others)
similarly situated,   )   CUONG DO
)
                   Plaintiffs,   ) September 12, 2007
        vs.   )   Volume I
YOUTUBE, INC., YOUTUBE, LLC, and   )
GOOGLE, INC.,   )
                   Defendants.   )
_____)

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REPORTING FOR:

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1   A.   I'm sorry. What do you mean?

2   Q.   The full file, not some portion of it.

3   A.   Every single byte in the file, yes.

4   Q.   And just for a layperson can you quickly say

5   what an MD5 Hash is?

6   A.   An MD5 Hash is meant to be I guess

7   cryptographic meaning that it goes in one direction.

8   It's a complex mathematical function that takes whatever

9   arbitrary number amount of data and generates a fixed

10   size I guess representation of that data.

11   It's sort of like a number that basically kind

12   of very approximately sums up that information. And

13   it's meant to be the case that if you change one byte,

14   then the whole task changes.

15   Q.   So you could go from the original video file

16   and apply this and you get the Hash, correct?

17   A.   Yes.

18   Q.   You can't go backwards from the Hash to the

19   video file?

20   A.   That is correct.

21   Q.   And I think you said if you have exactly the

22   same content in another file as the original video file,

23   it would produce the exact same Hash. Is that right?

24   A.   That's right.

25   Q.   But if you change the content one iota, it

11-0003

1   produces a different Hash?

2   A.   That's right.

3   Q.   What about the audio content ID?

4   A.   That is generated using some software provided

5   by the -- some software that is used by the Audible

6   Magic Company.

7   Q.   Audible Magic?

8   A.   Yeah. And we generate that for every video

9   going forward like since the time that we started using

10   it.

11   Q.   Is it also the same that if you change one

12   tiny bit of the video, it creates a whole new ID?

13   MR. HOHENGARTEN: I'm going to object to this.

14   I've given you a pretty broad latitude here, but we

15   really need to stay with the electronically-stored

16   information and not go off into the content of these

17   various identifying technologies.

18   MR. HOHENGARTEN: Well, I'm just trying to

19   figure out what the information is that is being stored

20   and so --

21   MR. HINDERAKER: Well, ask him those questions

22   then. We're getting off into the content of these

23   various systems and not into the storage of data.

24   THE WITNESS: It's --

25   MR. HINDERAKER: Well, wait a minute. Let's