

7/22/2008 Walker, Patrick

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,)
Plaintiffs,)

vs.) Case No. 1:07CV02103

YOUTUBE, INC., YOUTUBE, LLC,)
and GOOGLE, INC.,)
Defendants.)

THE FOOTBALL ASSOCIATION PREMIER)
LEAGUE LIMITED, BOURNE CO., et al.,)
on behalf of themselves and all)
others similarly situated,)
Plaintiffs,)

vs.) Case No. 07CV3582

YOUTUBE, INC., YOUTUBE, LLC, and)
GOOGLE, INC.,)
Defendants.)

DEPOSITION OF PATRICK WALKER
SAN FRANCISCO, CALIFORNIA
TUESDAY, JULY 22, 2008

REPORTED BY:
YVONNE FENNELLY, CRP, CSR NO. 5495
JOB NO. 15375



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answer.

BY MR. SHAFTEL:

Q. I thought you had.

A. I don't know.

Q. And you didn't ask?

A. I don't recall.

MR. INGBER: Object; asked and answered.

THE WITNESS: I don't recall.

BY MR. SHAFTEL:

Q. And if you did ask, you don't recall what the answer was?

MR. INGBER: Objection. He testified already to this question.

MR. SHAFTEL: He has.

BY MR. SHAFTEL:

Q. You said that YouTube makes tools available to content owners to monitor their rights.

What tools are you referring to? Do they have names?

A. There is the standard DMCA notification process, which is submitting either in bulk or on an individual URL basis the content they would like to be removed, which we do remove. And there is the development of a tool that we call CVT or content

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2 verification program, which would allow them to use
3 search tools to pull up clips that had -- that responded
4 to the queries that they insert.

5 Then they would be able to look at those clips
6 that came up in response to their search queries. They
7 would then be able to, within that tool, review those
8 videos and determine whether or not it was, in fact, in
9 their opinion, an unauthorized use. They could tick a
10 box indicating removal, click a button, and we would
11 have a batch list sent to us that would be automatically
12 removed.

13 Q. You refer to that program as CVP; correct?

14 A. Yes.

15 Q. Are you familiar with CMS?

16 A. I'm familiar with the term CMS.

17 Q. What does that refer to?

18 A. Content management system, I think, if
19 that's -- that's my understanding of it.

20 Q. Is there a specific CMS technology that YouTube
21 made available to content owners?

22 A. CMS is a term that we began using as an
23 umbrella term for a suite of tools for rights holders to
24 manage their content on the platform.

25 Q. Now, what is CYC?