

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. )

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, )

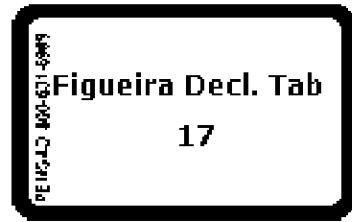
vs. )

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

Defendants. )

VIDEOTAPED DEPOSITION OF MARYROSE DUNTON  
SAN FRANCISCO, CALIFORNIA  
FRIDAY, AUGUST 22, 2008

BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CLR  
CSR LICENSE NO. 9830  
JOB NO. 15500



NO. 07-CV-2203

NO. 07-CV-3582

DUNTON

17-0002

1  
2 10:37:27 Q Okay. The third line reads "Accomplishments:

3 10:37:42 Please summarize your overall performance and most  
4 10:37:46 significant accomplishments this year."

5 10:37:50 Then you responded "From 2006 through first  
6 10:37:53 quarter of 2007 I managed the entire core product  
7 10:37:57 development organization which consisted of roughly 35  
8 10:38:00 product managers, engineers, user experienced  
9 10:38:04 designers and content editors."

10 10:38:08 Is that a correct statement of your duties  
11 10:38:12 from 2006 through the first quarter of 2007?

12 10:38:23 A From 2006 to 2007, I did manage a product  
13 10:38:30 development organization which consisted of product  
14 10:38:33 managers, engineers, designers, and content editors.

15 10:38:39 Q Okay. What do the content editors do?

16 10:38:45 MR. KRAMER: The question is vague.

17 10:38:47 THE WITNESS: Can you be more specific,  
18 10:38:48 please?

19 10:38:48 MR. DESANCTIS: Q. Well, you managed content  
20 10:38:51 editors; correct?

21 10:38:55 A At a certain point in time, I managed people  
22 10:38:59 we referred to as content editors.

23 10:39:02 Q Okay. And I'm asking what the people -- what  
24 10:39:04 were the duties of the people who you referred to as  
25 10:39:07 "content editors"?

DUNTON

17-0003

1  
2 10:39:10 A They were responsible for interacting with  
3 10:39:15 the community. They were generally the voice to the  
4 10:39:21 community. They were also responsible for choosing  
5 10:39:28 videos that would be featured on the YouTube.com  
6 10:39:33 Homepage.

7 10:39:33 Q Okay. It also says -- it also includes  
8 10:39:50 engineers in the list of employees that you managed.  
9 10:39:59 Did you manage all engineers at YouTube  
10 10:40:03 between 2006 and the first quarter of 2007?  
11 10:40:07 A I did not.  
12 10:40:08 Q Okay. Which engineers did you manage?  
13 10:40:12 A I managed the engineers who were on the core  
14 10:40:17 product team.  
15 10:40:19 Q And how many were there?  
16 10:40:22 A I cannot tell you.  
17 10:40:24 Q Did it change over time?  
18 10:40:28 A It -- yes, it changed over time.  
19 10:40:32 Q Was Brad Heilbrun one of them?  
20 10:40:35 A No.  
21 10:40:35 Q Was Matt Rizzo one of them?  
22 10:40:37 A Yes.  
23 10:40:40 Q Brad Heilbrun was an engineer at YouTube;  
24 10:40:43 correct?  
25 10:40:44 A Brad Heilbrun is a system administrator at