UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK VIACOM INTERNATIONAL, INC., COMEDY) PARTNERS, COUNTRY MUSIC ఫ్Figueira Decl. Tab TELEVISION, INC., PARAMOUNT) PICTURES CORPORATION, and BLACK) **17** ENTERTAINMENT TELEVISION, LLC, Plaintiffs,) No. 07-CV-2203 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,) No. 07-CV-3582 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

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 "Erom 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 33 8 10:28:00 product managers, engineers, user experienced 9 10:38:04 designers and content editors." 10 10:38:09 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 2907, I did manage a product 13 10:38:30 development organization which consisted of product 14 10:38:30 development organization which consisted of product 15 10:38:39 Q Okay. What do the content editors. 16 10:38:45 MR. KRAMER: The question is vague. 17 10:38:45 MR. WETNESS; Ean you be more apagific, 18 10:38:49 please? 19 10:38:49 please? 10:38:49 please? 10:38:40 At a certain point in time, I managed content 20 10:38:59 We referred to as content editors. 21 10:39:02 Q Okay. And I'm asking what the people what 22 10:39:04 Were the duties of the people who you befored to as 23 10:39:04 "content editors"? 24 10:39:07 "content editors"?	1		DUNTON 17-0002	<i>x</i>
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	25	10:39:07	"content editors"?	

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2	10:39:10	·A	They were responsible for interacting with
3	10:39:15	the comm	munity. They were generally the voice to the
4	10:39:21	communit	ty. They were also responsible for choosing
5	10:39:28	videos t	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	engineer	rs 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	<u>;</u>	And how many were there?
16	10:40:22	A	I cannot tell you.
17	1.0:40:24	Q	Did it change over time?
18	10:40:28	A	It yes, it changed over time.
19	10:40:32	<u>Q</u>	Was Brad Heilbrun one of them?
20	10:40:35	·A	No.
21	10:40:35	<u>\$</u> .	Was Matt Rizzo one of them?
22	10:40:37	Ą	Ÿes.
23	10:40:40	, Q	Brad Heilbrun was an engineer at YouTube;
2.4	10:40:43	correct'	?
25	10:40:44	A	Brad Heilbrun is a system administrator at