

8/7/2008 Eun, David

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 VIACOM INTERNATIONAL INC., COMEDY)
4 PARTNERS, COUNTRY MUSIC)
5 TELEVISION, INC., PARAMOUNT)
6 PICTURES CORPORATION, and BLACK)
7 ENTERTAINMENT TELEVISION LLC,)

8 Plaintiffs,) Case No. 1

9 vs.) 07CV02103

10 YOUTUBE, INC., YOUTUBE, LLC,)
11 and GOOGLE, INC.,)
12 Defendants.)

13 _____)
14 THE FOOTBALL ASSOCIATION PREMIER)
15 LEAGUE LIMITED, BOURNE CO., et al.,)
16 on behalf of themselves and all)
17 others similarly situated,)

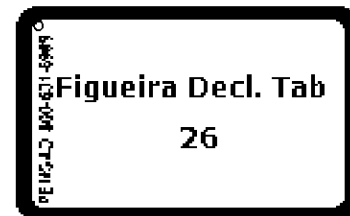
18 Plaintiffs,) Case No. 2

19 vs.) 07CV3582

20 YOUTUBE, INC., YOUTUBE, LLC, and)
21 GOOGLE, INC.,)
22 Defendants.)

23 _____)
24 DEPOSITION OF DAVID EUN
25 NEW YORK, NEW YORK
THURSDAY, AUGUST 7, 2008

26 REPORTED BY:
27 ERICA RUGGIERI, CSR, RPR
28 JOB NO. 15377



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D. EUN

26-0002

A. Yes.

So to be clear, we did do proactive screening of copyright, from what it says here. So -- you had asked me about that earlier, but. I mean I wasn't involved with this, but we obviously did.

Q. Okay. So the existing policy at the time of this draft document was a zero tolerance on copyright as well as porn, violence and hate. And that was enforced with proactive screening before the video went live, correct?

A. Yeah. I have no reason to dispute that what this is is the current policy was not, you know, was not anything but the current policy back then.

Q. Okay. And the proposal is to keep rejecting full works -- to keep rejecting all porn, violence and hate, but to accept partial works up to ten minutes long and respond to take-down requests, correct?

A. That's what it says, yes.

Q. And was that proposal ever