

12/16/2009 Patterson, Jim

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

---oOo---

THE FOOTBALL ASSOCIATION )
PREMIER LEAGUE LIMITED AND )
BOURNE CO., ET AL., ON BEHALF )
OF THEMSELVES AND ALL OTHERS )
SIMILARLY SITUATED,, )

PLAINTIFFS, )

vs. )

YOUTUBE, INC., YOUTUBE, LLC )
AND GOOGLE, INC.,, )

DEFENDANTS. )

VIACOM INTERNATIONAL INC., )
COMEDY PARTNERS, COUNTRY MUSIC )
TELEVISION, INC., PARAMOUNT )
PICTURES CORPORATION, AND )
BLACK ENTERTAINMENT )
TELEVISION, LLC, )

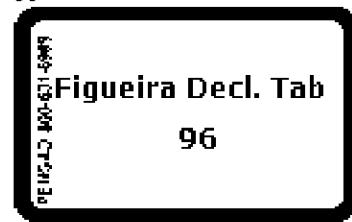
PLAINTIFFS, )

vs. )

YOUTUBE, INC., YOUTUBE, LLC )
AND GOOGLE, INC.,, )

DEFENDANTS. )

VIDEOTAPED DEPOSITION OF JIM PATTERSON
FRIDAY, DECEMBER 18, 2009
SAN FRANCISCO, CALIFORNIA
Job No. 18411



07 CIV. 3582 (LLS)

07 CIV. 2103 (LLS)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 syndicating the YouTube service to mobile carriers, 96-0002  
2 we also made the YouTube service available through  
3 the devices on which -- the consumer electronic  
4 devices on which those were available, even if we  
5 didn't have a contractual relationship with them.

6 9:20 Q. Okay. I think I asked the question wrong.  
7 As you point out, handset devices are consumer  
8 electronic devices too. What I'm asking about are  
9 consumer electronic devices that hook up to  
10 televisions?

11 9:21 A. Okay.

12 9:21 Q. Do you have a term that you want to use to  
13 describe those to make sure that we're using the  
14 same language?

15 9:21 A. Devices that connect to televisions.

16 9:21 Q. Okay.

17 9:21 A. Yeah.

18 9:21 Q. When did YouTube first begin syndicating  
19 content to partners in the devices that connect to  
20 televisions space?

21 9:21 A. So in the most liberal interpretation,  
22 which would be a PC that can connect to a  
23 television, it would be when we started allowing  
24 YouTube videos to be embedded in other websites.

25 9:21 Q. Okay.

1 9:21 A. Or actually even just when we ~~we~~ launched the  
2 YouTube service 'cause you can connect to a PC that  
3 has a browser.

4 9:21 Q. If we exclude PCs from the equation --

5 9:21 A. Okay.

6 9:21 Q. -- and we are talking about things like  
7 set top boxes and gaming consoles and devices of  
8 that category. When did YouTube begin syndicating  
9 content to partners in that space?

10 9:22 A. I believe the first partnership of that  
11 sort was also with Apple, and it was around Apple  
12 TV, and it may have been the exact same agreement  
13 that -- through which we made YouTube service  
14 available on the iPhone.

15 9:22 Q. And --

16 9:22 A. Which was before I joined Google, so it  
17 was a few years ago.

18 9:22 Q. Do you know whether that was in 2006 or  
19 2007?

20 9:22 A. I don't know for sure. If it was in 2007,  
21 then it was in very early 2007.

22 9:22 Q. And who were the early partners in that  
23 line of business?

24 9:22 A. So Apple was the earliest by a lot. And  
25 then the next set of companies I think of in that