

Schapiro Exhibit 286

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VIACOM INTERNATIONAL INC.,)	
COMEDY PARTNERS,)	
COUNTRY MUSIC TELEVISION, INC.,)	
PARAMOUNT PICTURES)	Case No. 1:07-CV-2103-LLS
COPRORATION,)	(Related Case No. 1:07-cv-03582 (LLS))
and BLACK ENTERTAINMENT)	
TELEVISION LLC,)	
)	
Plaintiffs,)	
)	
v.)	
)	
YOUTUBE, INC., YOUTUBE, LLC, and)	
GOOGLE INC.,)	
)	
Defendants.)	
)	

**PLAINTIFFS' CONFIDENTIAL SUPPLEMENTAL AND AMENDED
OBJECTIONS AND RESPONSES TO CERTAIN OF YOUTUBE'S
INTERROGATORIES TO VIACOM INTERNATIONAL, INC. ET AL.**

Plaintiffs Viacom International, Inc., Comedy Partners, Country Music Television, Inc., Paramount Pictures Corporation, and Black Entertainment Television, LLC, by their attorneys Jenner & Block LLP and Shearman & Sterling LLP, hereby supplement and amend their Objections and Responses to the following interrogatories from YouTube's First Set of Interrogatories to Viacom International, Inc. (YouTube's First Set of Interrogatories), YouTube's Second Set of Interrogatories to Viacom International, Inc. (YouTube's Second Set of Interrogatories), and YouTube's Third Set of Interrogatories to Viacom International, Inc. (YouTube's Third Set of Interrogatories), as follows:

GENERAL OBJECTIONS

Plaintiffs incorporate by reference the General Objections set forth in their October 1, 2007 Objections and Responses to YouTube's First Set of Interrogatories to Viacom International, Inc.; their September 8, 2008 Objections and Responses to YouTube's Second Set of Interrogatories; and their January 8, 2010 Objections and Responses to YouTube's Third Set of Interrogatories.

SUPPLEMENTAL AND AMENDED RESPONSES AND OBJECTIONS TO SPECIFIC INTERROGATORIES

Subject to and without waiving any of the foregoing General Objections and the specific objections to each Interrogatory set forth in their January 8, 2010 Amended Objections and Responses to YouTube's First Set of Interrogatories, their January 8, 2010 Amended Objections and Responses to YouTube's Second Set of Interrogatories, or their January 8, 2010 Objections and Responses to YouTube's Third Set of Interrogatories, Plaintiffs provide the following specific supplemental or amended responses and objections:

INTERROGATORY NO. 2:

For each work in suit, describe in detail the basis for Your claim of copyright ownership, including an identification of all evidence on which you base your claim of ownership.

Supplemental Response and Objections to Interrogatory No. 2:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil

Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to identify and describe in detail the basis for ownership claims for each work in suit, especially where that information has been produced in discovery and therefore is equally available to Defendants. Plaintiffs further object that Interrogatory 2 is duplicative of Defendants' document requests, including but not limited to Document Requests 1, 3, and 125. Seeking additional information by interrogatory is redundant, unduly burdensome, and inconsistent with the Scheduling Order and the Local Rule.

Subject to and without waiver of these general and specific objections, Plaintiffs supplement their prior response as follows: Attachment A - Supplemental, attached hereto, identifies by Bates Number additional documents that Viacom has produced in discovery that provide information responsive to this Interrogatory.

INTERROGATORY NO. 5:

For each work in suit, describe in detail the circumstances under which You first became aware of the alleged infringement of those works on or through the YouTube service. Your answer should include, but not be limited to, providing the date and manner in which the alleged infringement came to your attention.

Supplemental Response and Objections to Interrogatory No. 5:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. Plaintiffs further object that Interrogatory 5 is duplicative of Defendants' document requests, including Document

Request No. 25. Seeking additional information by interrogatory is redundant, unduly burdensome, and inconsistent with the Scheduling Order and the Local Rule.

Subject to and without waiver of these general and specific objections, Plaintiffs supplement their prior response as follows: Plaintiffs' January 10, 2010 Amended Objections and Responses to YouTube's First Set of Interrogatories included a chart listing the date that BayTSP recorded detection of the earliest infringing clip for each Work in Suit. Attachment B - Supplemental, attached hereto, amends the dates previously listed for two Works in Suit.

INTERROGATORY NO. 8:

For each Accused Video Clip, state whether the same content is available for viewing on a website operated by You or pursuant to a license agreement with You, and if so, identify the website and state when the clip first became available on that site.

Supplemental Response and Objections to Interrogatory No. 8:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. Plaintiffs also object that this Interrogatory is overbroad, oppressive, harassing and unduly burdensome to the extent it seeks highly detailed information. In addition, Plaintiffs object to the extent this Interrogatory seeks information contained in documents produced in discovery. Such information is already equally and fully accessible to Defendants, and it is unduly burdensome to require Plaintiffs to review the documents to identify particular

information for Defendants. Plaintiffs object further that this Interrogatory is vague. Plaintiffs further object that Interrogatory 8 is duplicative of Defendants' document requests. Seeking additional information by interrogatory is redundant, unduly burdensome, and inconsistent with the Scheduling Order and the Local Rule.

Subject to and without waiver of these general and specific objections, Plaintiffs supplement their prior response as follows:

Availability of Viacom Content on Viacom Websites

As a general matter under present practices, Paramount Pictures does not make full motion pictures available for free viewing on line on Viacom websites. Trailers from Paramount Pictures films generally are made available shortly before the film's theatrical release. At least some of those trailers typically remain on line until after the film's DVD release.

As a general matter under present practices, Black Entertainment Television makes clips from some shows available on line after their broadcast premieres. The content remains available for approximately one year. Among the Works In Suit, Black Entertainment Television made clips from the following shows available at www.bet.com:

College Hill, Episode 406
College Hill, Episode 408
BET Awards, 2006
BET Awards, 2007
BET Hip Hop Awards, 2006
Celebration of Gospel, 2007
Top 25: Hottest Couples
Top 25: Money, Power, Respect

Availability of Viacom Content on Third Party Websites

Attached hereto as Attachment C - Supplemental is a spreadsheet listing Paramount Pictures content made available for viewing on third party websites, as well as the date when each piece of content was first made available on those sites.

Attached hereto as Attachment D - Supplemental is a spreadsheet listing Black Entertainment Television content made available for viewing on third party websites, as well as the date when each piece of content was first made available on those sites.

INTERROGATORY NO. 23:

Identify each Work In Suit uploaded in whole or in part to the YouTube website by Viacom or with Viacom's authorization and the date of each such authorized upload.

Supplemental Response and Objections to Interrogatory No. 23:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, Plaintiffs object to Defendants' definition of "Works in Suit" as encompassing "all works ... as to which [Plaintiffs] have asserted claims of copyright infringement, at any time, in this action" and as encompassing portions of works as to which Plaintiffs have not asserted claims of copyright infringement in this action. This definition is facially overbroad and purports to cover content that is irrelevant to this copyright infringement action. Plaintiffs further object that Interrogatory 23 is unduly burdensome, as the relevant information has been produced in discovery and is therefore equally available to Defendants.

Subject to and without waiver of these general and specific objections, Plaintiffs supplement their prior response as follows: Attached hereto as Attachment E - Supplemental is a chart identifying by Bates number documents produced by Viacom in discovery that contain information responsive to this Interrogatory. This interrogatory response does not include documents and other data produced by Defendants and by third parties subpoenaed by Defendants.

INTERROGATORY NO. 24:

Identify each Work In Suit that Viacom has provided as a reference file to any third party for purposes of creating a digital fingerprint of the work to identify copies of the work on the Internet, the third parties to whom each reference file was provided, and the dates on which it was provided to those third parties.

Amended Response and Objections to Interrogatory No. 24:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, Plaintiffs object that this Interrogatory is overbroad, oppressive, harassing and unduly burdensome to the extent it seeks highly detailed information. Plaintiffs also object that this Interrogatory is unduly burdensome, and seeks information in the possession of third parties, insofar as it seeks information from time periods for which such records are not reasonably available to Plaintiffs, and for which Plaintiffs must obtain records from third parties. Plaintiffs further object to this Interrogatory insofar as it calls for Plaintiffs to identify works supplied to Auditude and to YouTube as reference files for fingerprinting purposes. Defendants have already sought and obtained such

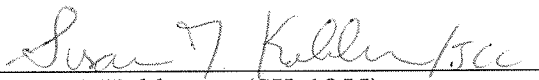
records from Auditude in this litigation, and information concerning works Plaintiffs have supplied to YouTube is equally in Defendants' own possession. Plaintiffs further object to Defendants' definition of "Works in Suit" as encompassing "all works ... as to which [Plaintiffs] have asserted claims of copyright infringement, at any time, in this action" and as encompassing portions of works as to which Plaintiffs have not asserted claims of copyright infringement in this action. This definition is facially overbroad and purports to cover content that is irrelevant to this copyright infringement action. Plaintiffs accordingly shall construe "Works in Suit" to encompass solely those clips listed on the Amended Production of Works in Suit produced to Defendants on October 15, 2009, as modified by Plaintiffs' February 26, 2010 Notice of Dismissal. Subject to that definition and subject to and without waiver of these general and specific objections, and based upon information available to Plaintiffs, Plaintiffs respond as follows:

Attached hereto as Attachment F - Supplemental is a chart listing – to the best of Plaintiffs' ability given available records – each Work in Suit and the date on which Plaintiffs provided Audible Magic, Auditude, and YouTube with either the work, or access to the work, for purposes of creating a digital fingerprint of the work to identify copies of the work on the Internet. In addition, for works in suit belonging to Plaintiff Paramount, Attachment F - Supplemental lists the date on which Paramount provided the work, or access to the work, to BayTSP for purposes of creating a digital fingerprint of the work to identify copies of the work on the Internet. Plaintiffs other than Paramount have not engaged BayTSP for such purpose, and Attachment F - Supplemental therefore omits as irrelevant any BayTSP fingerprinting of non-Paramount works.

In addition, Defendants' February 3, 2010 Letter concerning Defendants' 30(b)(6) Deposition Notice to Viacom sought information regarding the works, other than the Works in Suit, that were provided to Audible Magic and Vobile in 2007 (see Brian Willen's February 3, 2010 Letter to Luke Platzler, at ¶ 4). Plaintiffs provided works to Vobile in 2007 solely for testing purposes, and not for purposes of identifying those works on the Internet. With regard to Audible Magic, attached hereto as Attachment G - Supplemental is a chart listing all works Plaintiffs provided or made available to Audible Magic in 2007 for purposes of creating a digital fingerprint. In addition, Paramount supplied works to Audible Magic in 2007 for purposes of creating digital fingerprints; a list of those works is attached hereto as Attachment H - Supplemental.

Respectfully submitted,

April 16, 2010



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VERIFICATION FOR PLAINTIFFS VIACOM INTERNATIONAL INC., ET AL.

Information in Plaintiffs' Supplemental and Amended Objections and Responses to Certain of YouTube's Interrogatories was provided by me and/or gathered at my direction from corporate records and personnel. I have reviewed the responses. I declare under penalty of perjury under the laws of the United States that the foregoing responses as to Plaintiffs Viacom International Inc. et al. are true and correct to the best of my knowledge and belief, based on my review of such information.

Executed on April 16, 2010, in New York, NY.


Signature:  _____

Name (print): Stanley Pierre-Louis

Title: VP + Associate General Counsel
IP and Content Protection

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 16th day of April 2010, on Defendants' counsel by electronic mail pursuant to an agreement of the parties under Fed. R. Civ. P. 5(b)(2)(D).


James C. Cox

Attachment E - Supplemental

VIA00330130-VIA00330133	VIA01179951-VIA01179952
VIA00330203-VIA00330204	VIA01986346-VIA01986348
VIA00330322	VIA02359230-VIA02359232
VIA00330343	VIA02359310-VIA02359312
VIA00330415-VIA00330415	VIA03021632-VIA03021635
VIA00330494-VIA00330495	VIA03164885-VIA03164893
VIA00346044-VIA00346047	VIA03169246
VIA00346888-VIA00346892	VIA10526547
VIA00347270-VIA00347280	VIA10350444
VIA00347403-VIA00347441	VIA10350452
VIA00347964	VIA10388931-VIA10388932
VIA00356582-VIA00356583	VIA10389617-VIA10389624
VIA00366609-VIA00366611	VIA10390550-VIA10390552
VIA00366904-VIA00366905	VIA10390963-VIA10390964
VIA00369535-VIA00369536	VIA10391785-VIA10391787
VIA00369543-VIA00369544	VIA10392821-VIA10392822
VIA00369594-VIA00369596	VIA10401737
VIA00369779-VIA00369781	VIA10402225
VIA00372241	VIA10402727
VIA00372294	VIA10404875
VIA00373382-VIA00373390	VIA10405142-VIA10405143
VIA00373413-VIA00373421	VIA10405260
VIA00373855-VIA00373859	VIA10405349
VIA00374543-VIA00374544	VIA10405377-VIA10405378
VIA00374792-VIA00374796	VIA10405527-VIA10405528
VIA00376546	VIA10405537-VIA10405538
VIA00376595	VIA10405807
VIA00377960	VIA10405875-VIA10405877
VIA00378149-VIA00378150	VIA10406091-VIA10406092
VIA00378415-VIA00378416	VIA10474343-VIA10474345
VIA00397856-VIA00397862	VIA10474714
VIA00430652	VIA10478816-VIA10478821
VIA00455125	VIA10483206-VIA10483209
VIA00471113	VIA10484480
VIA00471114-VIA00471115	VIA10485349-VIA10485350
VIA00471119-VIA00471120	VIA10485351-VIA10485353
VIA00471163	VIA10485973
VIA00670702	VIA10487876
VIA00670748	VIA10487903
VIA00670749	VIA10495554
VIA00670750	VIA11660417-VIA11660421
VIA00702697-VIA00702698	VIA11786392
VIA00703450	VIA11786495-VIA11786522
VIA00703454-VIA00703460	VIA11787170-VIA11787182
VIA00830842-VIA00830860	VIA11789323-VIA11789325
VIA00830846-VIA00830852	VIA11789331-VIA11789333
VIA00830853-VIA00830860	VIA11789334-VIA11789336

VIA00861835-VIA00861836	VIA11789365-VIA11789367
VIA00862907-VIA00862908	VIA11789368-VIA11789372
VIA00911618-VIA00911619	VIA11789373-VIA11789375
VIA01107876-VIA01107878	VIA12557484
VIA01107971-VIA01107973	VIA14067446-VIA14067449
VIA01127416-VIA01127417	VIA14759662-VIA14759663
VIA01145487-VIA01145488	VIA16074316-VIA16074319
VIA01163976-VIA01163977	

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<div class="receive">11:39:48 AM mattadoor:
<pre class="message">u want me to make a complaint for each on of these?</pre></div>
<div class="send">11:40:53 AM maryrosedunton:
<pre class="message">each one of what?</pre></div>
<div class="receive">11:41:13 AM mattadoor:
<pre class="message">the ones that will be in the email</pre></div>
<div class="receive">11:42:02 AM mattadoor:
<pre class="message">or is that overkill</pre></div>
<div class="send">11:42:16 AM maryrosedunton:
<pre class="message">sorry, what do you mean by a complaint?</pre></div>
<div class="receive">11:42:53 AM mattadoor:
<pre class="message">when you complain about inappropriate/copyright stuff on the
website</pre></div>
<div class="receive">11:43:02 AM mattadoor:
<pre class="message">and you see it in admin_flagged</pre></div>
<div class="receive">11:43:06 AM mattadoor:
<pre class="message">what is that called?</pre></div>
<div class="send">11:43:07 AM maryrosedunton:
<pre class="message">oh duh, right. so, I don't think we need that</pre></div>
<div class="send">11:43:20 AM maryrosedunton:
<pre class="message">because heather and brent will work directly from the email</pre></div>
<div class="send">11:43:25 AM maryrosedunton:
<pre class="message">that gets sent to them</pre></div>
<div class="receive">11:43:29 AM mattadoor:
<pre class="message">ok</pre></div>
<div class="receive">11:43:37 AM mattadoor:
<pre class="message">it is called a complaint?</pre></div>
<div class="send">11:43:51 AM maryrosedunton:
<pre class="message">but, we will want to have some history of the flagging in case we ever need to go
back to it for users that abused the system</pre></div>
<div class="send">11:44:03 AM maryrosedunton:
<pre class="message">ya, a complaint</pre></div>
<div class="receive">11:44:28 AM mattadoor:
<pre class="message">yeah we will have the time they flagged it</pre></div>
<div class="receive">11:44:31 AM mattadoor:
<pre class="message">and w/e</pre></div>
<div class="send">11:44:38 AM maryrosedunton:
<pre class="message">cool</pre></div>
<div class="send">12:04:05 PM maryrosedunton:
<pre class="message">hey question, so could we also do something for these guys where they can get
email alerts sent to them (either like daily or weekly) whenever a video is uploaded with their designated
keyword? </pre></div>
<div class="receive">12:04:40 PM mattadoor:
<pre class="message">yeah, but</pre></div>
<div class="receive">12:04:43 PM mattadoor:
<pre class="message">^^</pre></div>
<div class="receive">12:05:07 PM mattadoor:
<pre class="message">you need to make an interface for them to choose keywords</pre></div>
<div class="send">12:05:25 PM maryrosedunton:
<pre class="message">right, and for them to select how often they want to receive alerts</pre></div>
<div class="receive">12:05:25 PM mattadoor:
<pre class="message">and then have some tool that runs and does that for them</pre></div>
<div class="receive">12:05:39 PM mattadoor:

Schapiro Exhibit 288

To: "Video Team" [REDACTED]
From: "Hunter Walk" <hunter@google.com>
Cc:
Bcc:
Received Date: 2006-05-17 20:38:57 CST
Subject: [Harappa-team] Google Video launches web-based upload, instant live,nav menu + Break-Up movie promotion

[bcc: visible-changes]

Early this morning Google Video rolled out a Web-Based Video Uploader with Instant Live (<http://video.google.com/videouploadform>).

Main User Benefits

* Easy to upload!

Upload your video (up to 100MB) from any page on Google Video. The Uploader Client is still available and can be used for multiple files or videos > 100MB (<https://upload.video.google.com/UploadInfo>)

* Faster to share your video!

After upload completes, we'll give you a URL to your video and make it available for sharing with friends, or posting to a website/blog/MySpace/etc via our embedded player. No more waiting multiple hours for full transcoding.

And we debuted a new navigation menu to help users find popular content in each of the most popular genres (go to <http://video.google.com/> with IE to see menu effects).

Finally, to help promote user-generated content on Google Video we've also launched a promotion with Universal Pictures for The Break-Up (aka the "jennifer aniston, vince vaughn movie"). On video.google.com/breakup.html you'll be able to watch clips from the movie and upload your own best break-up stories.

What about the content review process? Are you changing the types of videos you'll accept to GV?

All videos submitted to Google are still reviewed by our Operations team for policy violations which includes copyright violations, nudity, etc. With Instant Live, the user will have a link to the playable video, but the video will not be added to the Google Video index until it has passed editorial review. This and other features we've implemented will help limit the spread of policy violating content prior to editorial review.

What to do if you find policy violations on Google Video (

<http://t/ckgr> <<http://www.google.com/url?sa=D&q=http%3A%2F%2Ft%2Fckgr>>

<<http://video.google.com/support/bin/answer.py?answer=27737&topic=8706>>=

Post to this sparrow page

(<http://t/ckgs> <<http://www.google.com/url?sa=D&q=http%3A%2F%2Ft%2Fckgs>>

<<http://www.corp.google.com/sparrow/googlevideo/takedown.html#sparrow>>) and it will be reviewed by the Video Ops team

EMERGENCY ESCALATION: If you encounter child porn or extreme violence of a sensitive nature such as terrorist videos, send the video URL (or site url if the video is being played using the Google Video embedded player) to videocontent-oncall@google.com. This will page the Google Video team and

wake people up. Please use this escalation ONLY for these types of content = all other policy violations should be listed on the Sparrow page (<http://t/ckgs><<http://www.google.com/url?sa=D&q=http%3A%2F%2Ft%2Fckgs>> <<http://www.corp.google.com/sparrow/googlevideo/takedown.html#sparrow>>).

For any questions/concerns, please contact Nikhil Bhatla [web-upload, instant live] at nikhil@google.com <bay@google.com> (310.795-0552) or me [content policies, Break-Up promotion] at hunter@google.com <avni@google.com> (650-906-4868). Please send feedback to *harappa-feedback@google.com* <notebook-feedback@google.com> and for Press inquiries, contact Jennifer Hakes: jhakes@google.com <sonya@google.com>

Sincerely,
Hunter Walk on behalf of the Google Video team

Congrats to the Google Video core Upload, Instant Live, Nav Menu team:
Nikhil Bhatla, Billy Biggs, Niko Catania, Eddie Cukierman, Andy Gove,
Brunson Moody

Thanks to the all who helped make this launch happen:
Engineering/PM: Peter Chane, Rod Chavez, Jeremy Doig, Jeff Faust, Jeremy Joslin, Steve Lacy, Aaron Lee, Nick Lee, Dave Marwood, NeilFred Picciotto, Ozzie Sahin, Thien Vu, Bill Yi, Lei Zheng
Marketing: Eva Ho, Jon Steinback
Legal/Support: Glenn Otis Brown
PR: Jennifer Hakes, Megan Lamb
UI/Graphics: Steve Okamoto, Jarod Lam
Production: Rhan Singh, Mike Kenniston
Testing: Thanh Le, Vincent Wong, Jan Carpenter, Kristofer Hall, Tung Nguyen
PSO: Alwin Chi
Ops: Bhanu Narasimhan and the whole Google Video Ops team
