

# **Schapiro Exhibit 297**

To: Video Team [REDACTED]  
From: Hunter Walk <hunter@google.com>  
Cc:  
Bcc:  
Received Date: 2006-04-03 15:53:46 CST  
Subject: [Harappa-team] YouTube's Copyright Tools (compared to Google)

---

YouTube trying to clean up:

1. tools for copyright owners to flag troubled videos (they already have a "flag video" feature and are enabling copyright owners to register w YT and use the "flag" as a DMCA removal request. Don't know if videos come down right away or if they get reviewed.)

Google:

- Nick Lee is working on a similar tool ( <http://wiki/Main/VideoExternalDMCATool> ) for Google. On track for completion this week and subsequent rollout to a few partners for testing.

2. fingerprinting of all videos taken down and reject automatically

Google:

- Brunson Moody is working on fingerprinting that will allow us to recognize dupe files in a similar manner. Then we can alert reviewers or reject automatically. Design doc for integration forthcoming. It's an integration of Michele and Shumeet's code.

3. educate users with info about copyrights (YT suggests most people don't know they're doing something wrong)

Google:

- Perhaps this is something to consider for our uploader pages. A link to a user-friendly "things you might not want to upload" page?

4. 10 min limit on uploaded clips

Google:

- currently no limit

April 03, 2006 - BusinessWeek

YouTube CTO Outlines Copy Protection Tools

Heather Green

Steve Chen, the CTO of YouTube , outlined for me some of the steps the video sharing service is taking to try to provide better copy protection for copyright owners. It comes down to education, better tools for copyright owners, and more sophisticated better back-end tools.

The company recently rolled out tools to simplify the process of identifying copyrighted videos. This process is also automated now and can be done online, Chen says.

YouTube has also implemented a back-end technique that fingerprints each video that's taken down. Videos that have the same fingerprint are rejected automatically and can't be loaded onto the system.

They are also doing more user education. "What we have noticed at YouTube is that many users who have uploaded infringing content are unaware that it's illegal to do so. By augmenting the pages in the upload process with educational text regarding the type of content that can be uploaded to YouTube, we have seen a sharp, overall reduction with users uploading copyrighted materials," Chen says.

These moves come in addition to the new 10-minute limit on clips, which is designed to keep people from uploading entire versions of The Office or Simpsons.

They're reactive steps, which means that any video can be loaded on the service, but will be taken down if a content owner thinks it's copyrighted works. Will that be enough? The MPAA has described YouTube as a "good corporate citizen," but also warned that that service needs to do a better job of policing their network and figure out a way to limit the copyrighted material that ends up on their site.

The big question to me is whether their traffic will suffer as they try to achieve a balance? Chen described these tools to me as a part of a profile I did of him and YouTube co-founder Chad Hurley in the magazine. In that story, I write that "If they cater too much to their users, they risk getting sued for copyright violations and losing the support of content companies. If they're seen as favoring content companies, however, they could lose their millions of fans."

--

Hunter Walk  
Business Product Manager, Google  
hunter@google.com



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Attachments:

ATT03574.txt

# **Schapiro Exhibit 298**

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**Subject:** Colbert Demands Royalties From YouTube  
**From:** "Clayman, Greg" <EX:/O=VIACOM/OU=MTVUSA/CN=RECIPIENTS/CN=ONLINE/  
CN=MTVI/CN=CLAYMAGR>  
**To:** Browning, Nicole - MTVN; Ashendorf, Sandy - MTVN; Lehman,  
Nicholas; Low, Peter - MTVN; Witt, Jason; Matthews, Beth;  
Cunningham, Todd; Keith, Susan - MTVN; Selden, Lisa; Weinstein,  
Caleb  
**Cc:** Date: Mon, 16 Oct 2006 18:44:30 +0000

**Must watch:**

[http://www.youtube.com/watch?v=DjZDM\\_4JKN8](http://www.youtube.com/watch?v=DjZDM_4JKN8)

# **Schapiro Exhibit 299**

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Subject: Viacom v. GooTube on Daily Show  
From: Zweig, Jeremy <EX:/O=VIACOM/OU=MTVUSA/CN=RECIPIENTS/CN=USER  
ACCOUNTS/CN=USER/CN=ZWEIGJ>  
To: Folta, Carl  
Cc: Date: Fri, 23 Mar 2007 18:10:20 +0000

I hope you saw this already, but in the event you didn't, it's from last night's show. Pretty funny.

[http://www.comedycentral.com/motherload/player.jhtml?ml\\_video=84159](http://www.comedycentral.com/motherload/player.jhtml?ml_video=84159)

or

<http://youtube.com/watch?v=WILyl6lt7vU>

# **Schapiro Exhibit 300**



-----  
**From:** Solow, Warren [Warren.Solow@viacom.com]  
**Sent:** Friday, March 30, 2007 6:31 PM  
**To:** Courtney Nieman; Michelena.hallie@mtvn.com  
**Cc:** Mark M. Ishikawa; Evelyn Espinosa; Eric Antze  
**Subject:** [html] Re: Do you consider this enough editing?

Leave it up

----- Original Message -----

From: Courtney Nieman <courtneyni@baytsp.com>  
To: Solow, Warren; Hallie, Michelena  
Cc: Mark M. Ishikawa <marki@baytsp.com>; Evelyn Espinosa <evelyn@baytsp.com>; Eric Antze <erica@baytsp.com>  
Sent: Fri Mar 30 13:28:26 2007  
Subject: FW: Do you consider this enough editing?

Courtney Nieman

-----  
From: Eric Antze  
Sent: Friday, March 30, 2007 8:37 AM  
To: Courtney Nieman  
Subject: Do you consider this enough editing?

<http://www.youtube.com/watch?v=NpqgWW0z7vM>

-----  
Eric Antze

Video Search Team

408-341-2344 (v)

Check our anti-piracy blog at <http://www.baytsp.com/weblog/> <BLOCKED: http://www.baytsp.com/weblog/>

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The information contained in this email message may be confidential and  
is intended only for the parties to whom it is addressed. If you are not

6/13/2008

HIGHLY CONFIDENTIAL

BAYTSP 003719030

the intended recipient or an agent of same, please notify us of the  
mistake by telephone or email and delete the message from your system.  
Please do not copy the message or distribute it to anyone.

No virus found in this incoming message.  
Checked by AVG Free Edition.  
Version: 7.5.516 / Virus Database: 269.17.13/1207 - Release Date: 1/2/2008 11:29 AM

6/13/2008

HIGHLY CONFIDENTIAL

BAYTSP 003719031

# **Schapiro Exhibit 301**

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. )

Case No. 1:07CV02103

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. )

Case No. 07CV3582

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

VIDEOTAPED DEPOSITION OF SHASHI SETH  
New York, New York  
Thursday, July 16th, 2009

REPORTED BY:  
ERICA RUGGIERI, CSR, RPR  
JOB NO: 17168

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July 16, 2009

8:09 a.m.

VIDEOTAPED DEPOSITION OF SHASHI  
SETH, held at the offices of Jenner &  
Block, 919 Third Avenue, New York,  
New York, pursuant to notice, before  
before Erica L. Ruggieri, Registered  
Professional Reporter and Notary Public of  
the State of New York.

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A P P E A R A N C E S

FOR THE PLAINTIFFS:

JENNER & BLOCK, LLP  
BY: SCOTT B. WILKENS, ESQ.  
SARAH A. MAGUIRE, ESQ.  
1099 New York Avenue, NW  
Washington, DC 20001  
(202) 639-6000  
Swilkens@jenner.com

FOR THE DEFENDANTS

MAYER BROWN, LLP  
BY: BRIAN WILLEN, ESQ.  
1675 Broadway  
New York, New York 10019  
(212) 506-2146  
Bwillen@mayerbrown.com

1  
2 A P P E A R A N C E S (Cont'd)  
3 FOR THE LEAD PLAINTIFFS AND PROSPECTIVE  
4 CLASS:

5 PROSKAUER ROSE, LLP  
6 BY: ELIZABETH FIGUEIRA, ESQ.  
7 1585 Broadway  
8 New York, N.Y. 10036-8299  
9 (212) 969-3697  
10 Efigueira@proskauer.com  
11

12 FOR THE WITNESS:

13 PERKINS, COIE, BROWN & BAIN, PA  
14 BY: TIMOTHY J. FRANKS, ESQ.  
15 2901 N. Central Avenue, Suite 2000  
16 Phoenix, Arizona 85012-2788  
17 (602) 351-8390  
18 Tfranks@perkinscoie.com  
19

20  
21 ALSO PRESENT:

22 KELLY TRUELOVE, Viacom Consultant  
23 JUAN ORTIZ, Videographer  
24  
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SETH

A. Right. So this analysis is very different from the other analysis that we did. This is just looking at top 10,000 and just finding patterns in here, right.

10:42:13 There's no algorithm being run here, nothing. It is just picking out some -- if you looked at 10,000 search results for long enough, what are some of the key things that you might be able to pick out, just intuitively.

10:42:27 So all this was trying to say is, hey, given the fact that we have lot of people, for example, looking for regional content, I highlighted some Indian celebrities being searched here to state the fact that, you know, search queries can indicate for you where that person is searching for and, you know, whether they are finding the right kind of content.

10:42:42 Of course, there's some caveats, as I mentioned here, of course, there are lots of individuals outside of India that maybe certainly searching for the content

10:42:58

10:43:09



1 SETH

2 as well. As I indicated, the people are  
3 searching in French and British and  
4 Japanese and Indian content and zone.

5 10:43:25 Freshness is definitely important as well,  
6 as I highlighted here. And zone.

7 So just to summarize it, my  
8 intent was to just pick out a couple of  
9 key things, highlight them and then allow  
10 10:43:39 people to draw conclusions from it on  
11 their own.

12 Q. And so looking at this analysis  
13 in Exhibit 5 and the analysis that we  
14 looked at a minute ago in Exhibit 4,  
15 10:43:53 although different methods are applied to  
16 both, both analyses indicate that music --  
17 that entertainment, including music and TV  
18 shows, is a popular search term, or  
19 popular search terms, correct?

20 10:44:13 A. Yes. It does indicate demand.  
21 It doesn't indicate what people are  
22 watching. Neither of these methods have a  
23 way to find that. But they certainly do  
24 suggest demand.

25 10:44:24 Q. They suggest what the users are

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looking for, correct?

A. Correct.

Q. And if you look at the first  
10:44:33 page of the attachment to Exhibit 5, where  
it lists all -- begins listing all of the  
queries. Just so I understand how this  
works, and maybe we won't pick the first  
one, but maybe the third one, [REDACTED]

10:44:48 [REDACTED], the number that comes after the  
comma, the [REDACTED], what does that  
represent?

A. I believe that [REDACTED] and  
all synonyms related to [REDACTED] were  
10:45:09 looked for, you know, [REDACTED],  
roughly.

Q. I think it might be --

A. Sorry, [REDACTED].

Q. And it appeared --

10:45:28 A. So the ordering here is the top  
query and all synonyms and so on.

Q. We can put that to the side.

THE WITNESS: Can I take a very  
quick bathroom break?

10:45:58 MR. WILKENS: Yes.

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SETH

THE VIDEOGRAPHER: The time is  
10:46 a.m., and we are going off the  
record.

10:46:03 (Whereupon, there is a recess in  
the proceedings.)

THE VIDEOGRAPHER: The time is  
10:56 a.m., and we are back on the  
record.

10:56:36 Q. Hi, Mr. Seth.

If we can go back to Exhibit 4  
for a minute.

A. Yes.

10:56:53 Q. Just looking at the group of  
numbers at the top, maybe the first line,  
which says "[REDACTED],"  
and then it has a [REDACTED] then it has a [REDACTED]  
number.

Can you explain what the [REDACTED]--

10:57:10 A. It's a percentage point.

Q. It's a percentage.

A. The [REDACTED] is, from what I can  
recollect and that I think this e-mail  
suggests as well, is just a classification  
10:57:22 number that reflects that first line.

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Q. Is that the same thing that we were just talking about a moment ago with Exhibit 8, where you would remove from the bucket of UGC content the instances of a, for example, the Shakira video you mentioned, that were not owned by the copyright owner Warner?

A. Correct. So what this is assuming at this point is that -- well, let me just back up.

Do you have an understanding of what the CYC process is?

Q. If you could explain it, that would be great.

A. It's called the Claim Your Content and essentially is giving access to the professional content owners, as well as any partner, to be able to identify that content and say, "This belongs to me, and so all view counts of this video should also belong to me. And all monetization, if they allow it, also belongs to me." So that's called the claiming process, so to speak.

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Yes. So what we were saying with the second bullet point is that if we adjust the UGC pool for own original content, as far as YouTube could know, then do things become different.

(Seth Exhibit 10, document produced by Google, Bates number GO0001-02414976 to 2414980, marked for identification, as of this date.)

MR. WILKENS: This is Seth Exhibit 10. And it's a document produced by Google, beginning with the Bates number GO0001-02414976, ending in 2414980.

A. Okay.

Q. Do you recognize this document?

A. Somewhat, yes.

Q. And at least the last in time e-mail, the very top of the first page it is from you to Jordan Hoffner, Julia Peker and Palash Nandy, correct?

A. Uh-hum.

Q. And it's titled, The First Peek

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SETH

At the Numbers.

Who is Jordan Hoffner?

A. He is the director of business  
12:00:05 development at YouTube.

Q. And why were you sending a first  
peek at the numbers to him?

A. Most likely because we may have  
had a hallway conversation about  
12:00:24 something, and it was in response to that.

I don't remember for sure.

Q. If you look down at sort of the  
middle of the first page, where it's an  
e-mail from Julia Peker that starts with,  
12:00:46 "Hey, Shashi, "and ends with "Let me know  
if you have questions."

Do you see that?

A. Yeah.

Q. And she says that she's  
12:00:54 attaching some numbers and that she's  
analyzing all views for the week of  
May 6th --

A. Right.

Q. -- do you see that?  
12:01:07 Is there any particular reason

1 SETH

2 why that week was selected?

3 A. No. Just a random selection of  
4 one week.

5 12:01:18 Q. The analysis was of all views  
6 for that week?

7 A. One week, yes.

8 Q. That would --

9 A. And then one week period was  
10 12:01:27 chosen, as that was what was possible to  
11 do in a fairly short period of time run.  
12 Running anything more than that would have  
13 taken many days.

14 Q. Is it your understanding that  
15 12:01:41 refers to the week of May 6, 2007?

16 A. Right, yes.

17 Q. And the numbers that she says  
18 she's attaching, those are the numbers  
19 that appear on the last page of this  
20 12:01:55 exhibit; is that right?

21 A. Yes. And I don't understand  
22 everything about this --

23 MR. FRANKS: There's no question  
24 pending. You answered the question.

25 12:02:10 Q. I guess sort of flipping back

1                                            SETH

2                    between the first page and the last page,  
3                    she says she "has total views used for  
4                    premium partners only and views for  
5                    12:02:29    content that was taken down for copyright  
6                    issues (some interesting numbers there)."

7                                       Do you understand why she  
8                    included numbers for total views, views  
9                    for premium partners only and views for  
10                   12:02:49    content that was taken down for copyright  
11                   issues?

12                                      MR. WILLEN:    Objection.    Calls  
13                                      for speculation.

14                                      A.            No, I have no idea.

15                   12:02:54            Q.            Now, if you look at the last  
16                   page, you see on the left where it says,  
17                   "All premium and copyright."

18                                      Is that referring to the three  
19                   categories that Julia Peker mentioned in  
20                   12:03:23    the e-mail that we were just reviewing?

21                                      A.            Yeah.    This is what I don't  
22                   understand.

23                                      MR. FRANKS:    You want to look at  
24                                      this one, so you can see two at the  
25                   12:03:52            same time?



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THE WITNESS: No, this is good.

Q. You may not want to write on the actual exhibit. You just want to see the commas?

12:03:59

A. Yeah.

MR. FRANKS: You can do it on mine. You can write the commas on there.

12:04:14

Q. I had the same desire.

THE WITNESS: Thank you.

MR. WILLEN: Sorry. What was the question?

12:04:33

MR. WILKENS: Yeah, whether -- I asked whether the words on the left, leftmost column of the last page, "all premium and copyrighted," correspond to the categories that are in Julia Peker's e-mail on the first page that we just talked about.

12:04:49

MR. WILLEN: Objection. Calls for speculation.

A. From what I can understand of the document, it breaks down into three buckets of all views of all content for

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that one-week period, views for content  
that came from a list of partners under  
the line item Premium, and then a list  
of -- or views of content that were  
removed from YouTube, for a number of  
reasons.

Q. And Julia says in the first page  
this is for copyright issues, correct?

12:05:45 MR. WILLEN: Objection. The  
document speaks for itself.

Q. You can answer the question.

A. That's what she says, yes.

Q. Now, just moving over a few  
12:06:04 columns to the Count Videos column.

A. Uh-hum, yes.

Q. Is it your understanding that  
that represents the videos that were --  
the number of videos that were viewed with  
12:06:19 the views that are in the, I guess the  
first column of numbers?

MR. WILLEN: Objection to the  
form.

A. It refers to the actual number  
12:06:31 of individual videos.

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Q. In that bucket -- in each bucket?

A. That generated the number of views in the first column.

Q. Okay. And then, if you look one column further to the Average Views Per Video, am I correct that that represents the views -- the number of views in the first column divided by the number of videos in the Count Videos column?

A. That's correct.

Q. So that the average number of views for all videos was approximately [REDACTED] views?

A. Correct.

Q. And that the average number of views for all premium videos was [REDACTED]?

A. Correct.

Q. And that the average number of views per video for the copyrighted bucket is [REDACTED], correct?

A. That is correct.

Q. And you -- and turning back to the first page, you forwarded this to

1 SETH

2 Jordan Hoffner.

3 Do you recall getting any kind  
4 of reaction from him?

5 12:08:03 A. No. I don't even recall the  
6 conversation that prompted me to send it  
7 to him in the first place.

8 Q. Okay. We can put that to one  
9 side.

10 12:08:40 Let me ask you whether you --  
11 when you received that analysis from Julia  
12 Peker, did you discuss it with her or with  
13 Palash Nandy?

14 A. I'm not sure.

15 12:08:57 Q. Do you recall whether you had  
16 any questions about the numbers on the  
17 last page and whether you asked, followed  
18 up on any such questions that you might  
19 have had with her?

20 12:09:15 MR. WILLEN: Objection to the  
21 form. It's a compound question.

22 A. No, I don't recall.

23 Q. If you had questions about the  
24 analysis or the methodology, would you  
25 12:09:34 have asked them before you forwarded the

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SETH

numbers on to Mr. Hoffner?

MR. FRANKS: Objection. Calls  
for speculation. Incomplete  
12:09:42 hypothetical.

A. I think, as I said in that  
e-mail, that this is very early analysis,  
and that's it. I'm guessing from the  
content of the e-mail, I would guess that  
12:10:02 was too early to start even thinking about  
any details at that point.

MR. WILKENS: This is Seth  
Exhibit 11. It's a document produced  
by Google with the Bates number  
12:10:52 G00001-03241189 through 3241192.

(Seth Exhibit 11, document  
produced by Google, Bates numbers  
G00001-03241189 through 3241192,  
marked for identification, as of  
12:11:50 this date.)

A. Yeah.

Q. And do you recognize this  
document, Mr. Seth?

A. Uh-hum.

12:12:01 Q. It's an, at least the top, the

1                                                 SETH

2                                                 first, last-in-time e-mail, the top e-mail  
3                                                 on the first page, is from Julia Peker to  
4                                                 Shashi Seth, with a copy to Jordan Hoffner  
5       12:12:15                                 and Palash Nandy. And in that first  
6                                                 e-mail Julia Peker says that she's sending  
7                                                 the same spreadsheet with numbers for  
8                                                 favorites, comments and subscriptions.

9                                                 Do you see that?

10       12:12:29                                A.       Uh-hum.

11                                                Q.       And then, if you turn to the  
12                                                last -- the last two pages, you see at the  
13                                                top of the Bates numbered page beginning  
14                                                3241191, the top there and extending over  
15       12:12:53                                to the next page, 3241192, the same  
16                                                numbers that we were just discussing in  
17                                                Seth Exhibit 10, correct?

18                                                A.       Correct.

19                                                Q.       And then below that Julia Peker  
20       12:13:11                                has added additional numbers, which she  
21                                                mentions on the first page, right?

22                                                A.       Correct.

23                                                Q.       And I believe these are the  
24                                                signals that we were talking about earlier  
25       12:13:23                                for favorites, UGC content -- favorites

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comments; is that correct?

A. Correct.

Q. And if you look on the -- well,  
12:13:43 the columns of data here under the  
favorites analysis, for example, under  
Premium Content there's a count for the, I  
guess the total number of videos that  
were -- is that the total number of videos  
12:14:08 that were favorited in the Premium Content  
bucket?

MR. WILLEN: Objection. Calls  
for speculation.

A. I believe the way the data is  
12:14:25 laid out is that the first number falls  
under the count of users, that number of  
users. The second number comes from the  
count of videos. So those were the actual  
number of videos that, in this analysis,  
12:14:40 were used.

And then the third number, the  
[REDACTED] number, is the one that reflects  
the number of times that somebody  
favorited that video --

12:14:56 Q. And --

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A. -- those [REDACTED] videos.

Q. So all [REDACTED] videos were  
favorited in an aggregate number of  
12:15:13 [REDACTED] times, correct?

A. That's correct.

Q. The next number, it says Average  
Fave Per Video. I think that means  
average favorite for video?

12:15:21 A. That's correct.

Q. Is the number of videos divided  
by the number of -- the number of  
favorites divided by the number of videos,  
correct?

12:15:29 A. That's correct.

Q. So it's [REDACTED] times favorite per  
video, correct?

A. Correct.

Q. And that's for the Premium  
12:15:37 Content bucket, right?

A. That is correct.

Q. And then, if you go to the next  
bucket, the UGC -- what's called here the  
UGC Content bucket, the average number of  
12:15:49 favorites per video is [REDACTED]; is that



1 SETH

2 correct?

3 A. That is correct.

4 Q. And just going further down to

5 12:16:01 the Comments Analysis, the average  
6 comments per video for premium content is  
7 [REDACTED], and it's -- and the average --

8 MR. WILKENS: Sorry, strike

9 that.

10 12:16:13 Q. If you go down to the Comments  
11 Analysis for the premium content bucket  
12 the average comments per video is [REDACTED],  
13 correct?

14 A. That is correct.

15 12:16:21 Q. And then for the UGC content  
16 bucket, the average comments per video is  
17 [REDACTED], correct?

18 A. Correct.

19 Q. And for -- the very bottom here,  
20 12:16:36 the Subscription Analysis, can you explain  
21 what a subscription is?

22 A. When a user subscribes to a  
23 video, they are subscribing both to the  
24 creator of the video or the user who  
25 12:16:54 uploaded that video as well as the video

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itself. And based on that subscription, they get notifications of what is happening with that user.

12:17:04 So every time a new video is uploaded by that user, you would get a notification, for example, an e-mail, that says, this user has uploaded a new video. Or if it's the video, you may get

12:17:20 notifications of, hey, there's a new comment, et cetera.

So it's a pretty important element as well, in terms of signals of how users interact with the video.

12:17:41 Q. And I guess underneath here there's a Premium Channels heading or subheading.

Do you know if there was any analysis done on any other categories or buckets, like UGC channels?

12:18:00 MR. WILLEN: Objection to the form.

A. I believe this e-mail is -- I believe in this e-mail Julia has left out the word UGC Count Subscribers, but that's

12:18:34

1 SETH

2 what it's meant to be, is that the first  
3 line item under the Subscription Analysis  
4 is meant to be for premium channels, and  
5 12:18:47 the second one is supposed to be for UGC  
6 channels. And she may have left that out,  
7 but that's what it's meant to do, is to  
8 compare those two, much like how she's  
9 done it for the other categories.

10 12:19:04 Q. And do you know whether any  
11 further analysis of, along the lines of  
12 what's an Exhibit 10 and Exhibit 11, was  
13 done after Julia Peker sent Seth  
14 Exhibit 11?

15 12:19:33 MR. WILLEN: Objection to the  
16 form.

17 A. I don't recall.

18 Q. Do you recall reporting these  
19 numbers or -- to anyone at YouTube, other  
20 12:19:54 than Jordan Hoffner?

21 A. No. Unfortunately, I do not  
22 recall.

23 MR. WILLEN: Is this a good time  
24 for lunch, or do you want to --

25 12:20:42 MR. WILKENS: Actually, it is a

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good time for lunch. At least I don't  
have a lot afterward, so I don't know  
how long you want to take, but.

12:20:49

MR. WILLEN: Maybe half hour.

MR. WILKENS: And the lunch  
is -- it's not here yet.

MR. FRANKS: Can we go off the  
record for a second. I can use a  
break, anyway.

12:20:58

THE VIDEOGRAPHER: The time is  
12:21 p.m., and we are going off the  
record.

(Luncheon recess taken at  
12:21 p.m.)

1 SETH

2 A F T E R N O O N S E S S I O N

3 (Time noted: 1:12 p.m.)

4 S H A S H I S E T H , resumed and  
5 testified as follows:

6 EXAMINATION BY (Cont'd.)

7 MR. WILKENS:

8 THE VIDEOGRAPHER: The time is  
9 1:12 p.m., and we are back on the  
10 01:12:42 record.

11 MR. WILKENS: Mark the next  
12 exhibit. This is number 12.

13 (Seth Exhibit 12, document  
14 produced by Google, Bates numbers  
15 01:13:41 G00001-0943950 through 5943959,  
16 marked for identification, as of  
17 this date.)

18 MR. WILKENS: This is a document  
19 produced by Google in the litigation,  
20 01:13:39 beginning with the Bates number  
21 G00001-0943950, ending 5943959.

22 Q. Do you recognize this document,  
23 Mr. Seth?

24 A. Yes.

25 01:14:09 Q. Is this a cover e-mail with a

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presentation that you prepared?

A. Yes.

Q. And does this presentation  
01:14:26 contain or refer to some of the data that  
we were talking about in Seth Exhibits 10  
and 11?

A. Right. Some of that, however, I  
think the methodology for how this was  
01:14:43 done was very different than the  
methodologies referred to in the prior  
exhibits.

Q. And can you explain how the  
methodologies differed?

A. So in this particular version, I  
believe what we did was looked at the  
search terms for a particular day. And  
then, using the algorithm that I described  
to you earlier about classifying search  
01:15:21 terms, broke it down into various  
categories and used that as the baseline  
for figuring out where those buckets or  
categories fell in premium, as I refer to  
it here, where it says "UGC content."

01:15:45 It's based on a lot of

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hypotheses, but that's what we had to go by.

Q. And when you were just talking a minute ago about segmenting the views into different buckets or types of content that's on page 3, on page 3 --

MR. WILKENS: Strike that.

Q. The methodology you were just referring to a moment ago that you applied in this analysis to -- where an algorithm was applied to develop these different breakdowns of content, is that reflected on page 3 of Exhibit 12?

A. That is correct.

Q. And then that same analysis is used on page 4 to indicate what percent of content that's being watched is premium content; is that correct?

A. What I'm referring to here in bullet points 1 and 2 is one of the exhibits that we talked about where Juliet Peker had summarized it in those three lines. The percent points are derived by that, the point 1 and point 2.

1 SETH

2 Q. And if you turn to page 5, where  
3 it says, "[REDACTED]  
4 [REDACTED] n  
5 01:17:23 [REDACTED], " do  
6 you see that?

7 A. I see that.

8 Q. The two bullets below those, the  
9 numbers in those bullets, are those also  
10 01:17:34 derived from the analysis that we were  
11 looking at before from Julia Peker?

12 A. That is correct.

13 Q. So these are results that you --

14 MR. WILKENS: Strike that.

15 01:17:48 Q. So there are portions of Julia  
16 Peker's analysis that you put into this  
17 presentation and then provided to the  
18 individuals listed on the front of Seth  
19 Exhibit 12, correct?

20 01:18:00 A. That is correct.

21 Q. And did you also discuss the  
22 contents of this presentation with them?

23 A. Yes.

24 Q. And did they have questions  
25 01:18:16 about the methodology?



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MR. WILLEN: Objection to the  
form.

01:18:24 A. Not so much questions about the  
methodology, but questions about the  
contents and how should they use this data  
to solve particular problems that they  
were looking at.

01:18:47 Q. And do you know how, if at all,  
this data was used by YouTube after your  
presentation?

01:19:05 A. No. Post my giving them a  
summary and answering any questions that  
they had, I had no further involvement in  
how this data was utilized by various  
teams.

Q. Do you recall what any of their  
questions were?

MR. WILLEN: Objection to form.

01:19:18 A. I don't remember an entire list  
of questions.

01:19:34 The one thing that does stand  
out was this conversation that I brought  
up around the fact that these are some  
ways or, you know, one way of looking at

1                                SETH

2                                the data that drives that demand for, you  
3                                know, different kinds of content. But  
4                                what it does not get at is, is that how  
5                                01:19:50 people are consuming content, right?

6                                                               And I did spend some time  
7                                differentiating between those two, because  
8                                it is an important thing to understand  
9                                that demand and supply may be very  
10                                01:20:03 different. And you might be able to do  
11                                some things to change the demand/supply  
12                                situations, but maybe inherently that is  
13                                what the users do, just how they behave.

14                                                               I think it is also relevant, I  
15                                01:20:26 think people were looking at it as solving  
16                                different problems, and I think I had to  
17                                bring people back to the point that this  
18                                was just one analysis that was met at, you  
19                                know, how the document is titled, which it  
20                                01:20:41 is meant to just give a guidance on what  
21                                kind of partnerships should people pursue.

22                                                               I did not want people to walk  
23                                away that I was drawing conclusions from  
24                                this data any more than what is stated  
25                                01:20:57 here, which is specifically that there are

1 SETH

2 certain areas where the partnership team  
3 could focus on and drive more  
4 partnerships, which they had already  
5 01:21:07 undertaken by this time frame, they  
6 already had significant partnerships with  
7 people like Universal Music, Warner Music  
8 and so on. But this was a further  
9 validation, as well as a guidance, of  
10 01:21:21 where they should focus their efforts.

11 Q. And based on the analysis, where  
12 did this analysis, from your  
13 understanding, suggest that they should be  
14 focusing their partnership efforts?

15 01:21:47 MR. WILLEN: Objection --  
16 objection to the form.

17 THE WITNESS: Sorry.

18 A. As I believe in the last page of  
19 the presentation, I bring it home with  
20 01:22:05 three major bullet points. First one  
21 clearly says there is immense value in  
22 continuing the partnerships. The  
23 subbullet on that is referring to music  
24 representing the highest value and also  
25 01:22:26 the lowest hanging fruit, meaning we

1                                 SETH

2                                 already have partnerships, and there's a  
3                                 few others that can be close.

4                                 The second bullet refers to some  
5         01:22:36         user experience, things that we could fix  
6                                 on the platform, which I don't own or, you  
7                                 know, have no control over.

8                                 And finally, that there is --  
9                                 there are revenue opportunities with  
10         01:22:51         partners that we should get our arms  
11                                 around.

12                                 Q.         And the first bullet, the top of  
13                                 that page, when you say -- when it says  
14                                 "Partnerships in these areas," are you  
15         01:23:06         referring to partnerships in the areas of  
16                                 premium content?

17                                 MR. WILLEN:   Objection to form.

18                                 A.         What I'm referring to are these  
19                                 specific areas.   On page 3 I highlight a  
20         01:23:42         couple of areas like music videos, movies,  
21                                 celebrities, TV programs, et cetera,  
22                                 comics and animae.   That would make sense.

23                                 Q.         Thank you.

24                                 Do you know whether anyone at  
25         01:24:08         YouTube performed any analyses that looked

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at similar questions that you were looking  
at, in terms of whether to prioritize  
premium content partnerships or focus on  
UGC type user partnerships?

01:24:22

MR. WILLEN: Objection.

Mischaracterizes testimony and the  
document.

THE WITNESS: Should I answer?

01:24:38

MR. WILLEN: You can answer.

Q. You can answer.

A. No, I don't.

Q. Do you know if there were any

attempts to further analyze the kinds of

01:24:50

data that were in Seth Exhibits 10 and 11?

A. No, I don't.

Q. Okay. You can put this one

aside.

MR. WILKENS: Can I have this

01:25:23

one marked Seth 13.

(Seth Exhibit 13, document  
produced by Google, Bates number  
G00001-00255239 through 00255242,  
marked for identification, as of  
this date.)

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A. Okay.

MR. WILKENS: This is a document  
produced by Google in the litigation  
01:26:46 with the Bates number GOO 001-00255239  
through 00255242.

Q. And do you recognize this  
document, Mr. Seth?

A. Yes.

01:27:09 Q. I think you see you as a  
recipient listed in the "to" line there  
from Jenny Stefanotti?

A. Uh-hum.

01:27:21 Q. Do you know who -- who is Jenny  
Stefanotti?

A. Jenny Stefanotti used to work in  
the international -- in the YouTube  
international team. I don't remember her  
exact title or role.

01:27:36 Q. And the subject line of this  
e-mail says, "Meeting notes YouTube APLA  
monetization."

Do you know what APLA refers to  
there?

01:27:49 A. Asia Pacific Latin America.

# **Schapiro Exhibit 302**

To: "David Eun" <deun@google.com>, "Jordan Hoffner" <jhoffner@google.com>, "Chris Maxcy" <chris@youtube.com>, "Kevin Yen" <kyen@youtube.com>, "Alex Ellerson" <ellerson@google.com>, "Steve Chen" <steve@youtube.com>, "Chad Hurley" <hurley@google.com>  
From: "Shashi Seth" <shashis@google.com>  
Cc: "Julia Peker" <juliap@google.com>  
Bcc:  
Received Date: 2007-05-23 21:54:37 GMT  
Subject: Really quick and dirty analysis of data

---

Hi:

A couple of weeks back Chad, Steve and David asked me to dig into data and determine the value of premium content versus UGC content on the YouTube platform. I spun that problem slightly differently based on advise from the legal team.

I have a very first cut at a deck that outlines some of the findings over the past 2 weeks. The data essentially suggests that going after some of these deals and partnerships makes absolute sense for us (Music is a given, and we should aggressively move in that direction). However there are couple of things that we need to do in parallel:

- Make discovery of the content better - both in search and browse
- Work with partners to build and follow a business/financial model that works both for them and the user community (the user community because we want users to find and upload content that they find exciting)

I am sure there are many questions that come up, so would be happy to present this (and hopefully it will be more polished by then ;-)) and we can brainstorm around this issue.

Feel free to ping me if you have any questions. Before I forget, Julia has done an amazing job with pulling together these numbers. Thank you Julia!

Shashi

---

Attachments:

Partnership Eval.ppt



# **Schapiro Exhibit 303**



YouTube Help

Try Google's new browser.  
Browse the web faster, safer, and more easily with [Google Chrome](#).

[Hide](#)

### Getting Started: Private videos (and how to share them)

If you'd like to limit the exposure of one of your videos, you can set it to be a "Private" video. If your video is set to "Private" only, you and up to 25 other users whom you invite to view the video will be able to see it. The video will not appear on your channel, in Groups, search results, playlists, etc..

[How to make your uploaded video Private](#)

[Sharing Private videos](#)

[Making a Private video Public](#)



updated 2/11/2010

Was this information helpful?  Yes  No

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# **Schapiro Exhibit 304**

---

Subject: Letter to Eric - Time is Now!  
From: "Cahan, Adam" <EX:/O=VIACOM/OU=MTVUSA/CN=RECIPIENTS/CN=CAHANA>  
To: Wolf, Michael  
Cc: Date: Mon, 09 Oct 2006 22:01:04 +0000

Michael -

I feel very strongly that the time is now for Google to negotiate with us otherwise we need to threaten all content comes down from YouTube. I really feel every minute that goes by the industry is waiting. If we threaten to be public with our content takedown notifications than the ball starts rolling immediately. This is now, not end of week. If we threaten we can use it in negotiations for a better deal.

Eric -

I'm glad we had an opportunity to chat this weekend about the Google-YouTube connection. As you know we have to move quickly to address what our position is going to be with Google/YouTube. The default pressure at the corporate level is that we are going to have to announce that Viacom/MTVN is providing cease and desist for all our content at YouTube. As you know, we believe between SouthPark, Stewart, Colbert along with content from MTV and Nickelodeon we represent 25%+ of all content there.

Here is what I would recommend that we do. This week we need to assemble the team that will negotiate for the following priorities.

1. Google Ad Network deal, we have a proposal for how we can work together to better monetize our sites and enable Google to grow the market overall for online branded advertising. As part of this proposal we have suggested the framework and commitments for a "300x250" ad unit.
2. OnSite Paid search and contextual monetization. Our combined scale across our network represents 137M uniques and 7.2B pageviews. We would like to put together what your proposal is for both monetization and operational improvements.
3. Content licensing to YouTube and the associated economics/ structure. Doing a deal that will represent the framework for how we work together.
4. MusicWiki we had great traction with Marissa and Susan working on the product but in light of YouTube we'll need to better understand how we work together and separate these offerings.

Given the folks we have met with it likely makes sense to have some combination of Susan, Tim and Joan/Marc helping sort through these negotiations.

Looking forward to your response.

# **Schapiro Exhibit 305**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_x

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

Plaintiffs,

vs. NO. 07-CV-2103

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

Defendants.

\_\_\_\_\_x

THE FOOTBALL ASSOCIATION PREMIER  
LEAGUE LIMITED, BOURNE CO., et al.,  
on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs. NO. 07-CV-3582

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

Defendants.

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VIDEOTAPED DEPOSITION OF MICHAEL WOLF  
NEW YORK, NEW YORK  
FRIDAY, APRIL 17, 2009

JOB NO.: 16687

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APRIL 17, 2009  
10:02 a.m.

VIDEOTAPED DEPOSITION OF MICHAEL  
WOLF, held at the offices of CAHILL GORDON &  
REINDEL, LLP, 80 Pine Street, New York, New  
York, pursuant to subpoena, before JENNIFER  
OCAMPO-GUZMAN, a Shorthand Reporter and  
Notary Public of the State of New York.

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A P P E A R A N C E S :

FOR THE PLAINTIFFS VIACOM INTERNATIONAL,  
INC.:

JENNER & BLOCK, LLP

BY: SUSAN J. KOHLMANN, ESQ.

919 Third Avenue, 37th Floor

New York, New York 10022-3908

(212) 891-1690 skohlmann@jenner.com

FOR THE DEFENDANTS YOUTUBE, INC., YOUTUBE,  
LLC and GOOGLE, INC.:

WILSON SONSINI GOODRICH & ROSATI, PC

BY: BART E. VOLKMER, ESQ.

650 Page Mill Road

Palo Alto, California 94304-1050

650-565-3508 bvolkmer@wsgr.com

DAVID FELDMAN WORLDWIDE, INC.  
805 Third Avenue, New York, New York 10022 (212)705-8585



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APPEARANCES (Continued):

FOR THE DEPONENT:

CAHILL GORDON & REINDEL, LLP

BY: ADAM ZUROFSKY, ESQ.

BY: CHRISTOPHER A. GORMAN, ESQ.

80 Pine Street

New York, New York 10005-1702

(212) 701-3137 azurofsky@cahill.com

(212) 701-3119 cgorman@cahill.com

ALSO PRESENT:

CARLOS KING, Videographer

1 Wolf

10:27:03 2 MS. KOHLMANN: Objection.

10:27:04 3 MR. ZUROFSKY: Misstates.

10:27:05 4 A. I never said that there was a  
10:27:07 5 conflict between those two.

10:27:08 6 Q. Okay. The previous question I  
10:27:11 7 asked is, what were the disagreements that  
10:27:12 8 you had with Mr. Dauman? And the answer was  
10:27:18 9 that there were two different viewpoints,  
10:27:22 10 that you were responsible for business  
10:27:23 11 decisions that were reflected in MTV  
10:27:23 12 Network's results, and Mr. Dauman was  
10:27:30 13 responsible for both business and overall  
10:27:31 14 financial stock price objectives, as well as  
10:27:34 15 legal issues, and I'm trying to figure out  
10:27:35 16 where the conflict between those two  
10:27:39 17 viewpoints was.

10:27:40 18 MS. KOHLMANN: Objection to form.

10:27:42 19 MR. ZUROFSKY: Objection to the  
10:27:42 20 form, but you can answer if you can.

10:27:44 21 A. I don't remember specifically those  
10:27:47 22 agreements -- those disagreements, if there  
10:27:51 23 were any.

10:27:57 24 Q. Was there a conflict in the way you  
10:28:00 25 thought the MTVN business should be run and

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10:28:03 2 Mr. Dauman thought the MTVN business should  
10:28:06 3 be run?

10:28:09 4 MS. KOHLMANN: Objection.

10:28:10 5 MR. ZUROFSKY: Objection to form.

10:28:11 6 A. No. I think that as in any case,  
10:28:18 7 the relationship between the head of a  
10:28:19 8 corporation and business unit, they're  
10:28:24 9 naturally gives and takes in terms of how  
10:28:28 10 those relationships exist.

10:28:30 11 Q. And when did you leave MTV  
10:28:41 12 Networks?

10:28:41 13 A. At the beginning of February of  
10:28:44 14 2007.

10:28:45 15 Q. Was there a period where you were  
10:28:52 16 working at MTVN where you had already been  
10:28:55 17 told that you would, that your services were  
10:28:59 18 no longer required?

10:29:01 19 MR. ZUROFSKY: Objection,  
10:29:01 20 foundation, form.

10:29:02 21 A. I was not told that my services  
10:29:04 22 would not be required.

10:29:05 23 Q. Why did you leave MTV Networks?

10:29:18 24 A. There had been a change in  
10:29:21 25 management in the overall Viacom and I

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10:29:27 2 thought that it was a good moment for the new  
10:29:31 3 Viacom team to proceed with the business and  
10:29:34 4 for me to move on.

10:29:35 5 Q. Did you resign?

10:29:40 6 A. Yes.

10:29:41 7 Q. You were not asked to leave?

10:29:45 8 A. No.

10:29:46 9 Q. What were the reasons that you had  
10:29:58 10 for wanting to resign from MTV Networks?

10:30:02 11 MR. ZUROFSKY: Objection, asked and  
10:30:03 12 answered.

10:30:03 13 MS. KOHLMANN: Objection.

10:30:05 14 MR. ZUROFSKY: But you can answer  
10:30:05 15 it again.

10:30:06 16 A. There was a new team at Viacom and  
10:30:11 17 I thought that that team should be able to  
10:30:15 18 pursue its own agenda and, therefore, I  
10:30:20 19 thought it was a good moment for me to move  
10:30:22 20 on.

10:30:22 21 Q. And when you say "the new team,"  
10:30:24 22 are you talking about Mr. Dauman and Mr.  
10:30:26 23 Dooley?

10:30:26 24 A. Yes.

10:30:31 25 Q. And their agenda was in conflict

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13:42:51 2 MR. ZUROFSKY: Objection to form.

13:42:53 3 A. It could be that we were discussing  
13:42:55 4 those deal -- those terms or it could be  
13:42:57 5 that -- that those were the deal terms we  
13:43:00 6 were proposing. I really can't tell by this  
13:43:02 7 memo and I can't remember when I wrote it.

13:43:03 8 Q. Could it also be the case that  
13:43:07 9 those deal terms that we just went over had  
13:43:10 10 not been discussed between the parties as of  
13:43:14 11 October 3, 2006?

13:43:15 12 MR. ZUROFSKY: Objection to form.

13:43:17 13 MS. KOHLMANN: Objection to form.

13:43:18 14 A. It's possible, yes.

13:43:20 15 Q. You're just not sure one way or the  
13:43:22 16 other?

13:43:25 17 A. I'm not sure. Lots of information.  
13:43:26 18 Lots of things that go past what I was doing  
13:43:30 19 as the president of the company and I just  
13:43:33 20 can't remember what happened in each of these  
13:43:36 21 situations.

13:43:36 22 Q. When Viacom and MTVN were  
13:43:46 23 negotiating with YouTube in the summer and  
13:43:49 24 fall of 2006, was it aware of the presence of  
13:43:53 25 Viacom content on the YouTube website?

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13:43:56 2 MR. ZUROFSKY: Objection to form.

13:43:57 3 A. First of all, I don't know if  
13:43:59 4 Viacom was negotiating with YouTube. I was  
13:44:02 5 in charge of MTV Networks. I don't know if  
13:44:05 6 Viacom, there was any other independent of  
13:44:09 7 MTV Networks' negotiation.

13:44:11 8 Q. Okay. So I'll rephrase the  
13:44:12 9 question.

13:44:13 10 When MTVN was negotiating with  
13:44:16 11 YouTube in the summer and fall of 2006, was  
13:44:18 12 it aware of the presence of Viacom content on  
13:44:20 13 the YouTube website?

13:44:22 14 MR. ZUROFSKY: Objection to form.

13:44:24 15 A. I don't recall one way or the  
13:44:26 16 other.

13:44:30 17 Are you asking about this memo or  
13:44:32 18 just in general?

13:44:33 19 Q. I'm not asking about the memo, just  
13:44:36 20 in general. And this goes throughout the  
13:44:38 21 entire period of the negotiations between  
13:44:39 22 YouTube and Google and MTVN, at any time in  
13:44:44 23 those negotiations was MTVN aware of the  
13:44:48 24 presence of Viacom content on the YouTube  
13:44:50 25 website?

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13:44:52 2 MR. ZUROFSKY: Objection to form.

13:44:55 3 MS. KOHLMANN: Objection.

13:44:56 4 A. We were certainly aware that our  
13:45:02 5 content was on YouTube.

13:45:03 6 Q. And during the negotiations did  
13:45:11 7 Viacom allow that content to stay up on  
13:45:13 8 YouTube?

13:45:14 9 MR. ZUROFSKY: Objection to form.

13:45:15 10 MS. KOHLMANN: Objection.

13:45:16 11 A. The decision would have been ours,  
13:45:20 12 not Viacom's. It was going to be -- but MTV  
13:45:26 13 Networks, to the best of my recollection, we  
13:45:28 14 allowed the content to be there.

13:45:30 15 Q. And why did you allow it to be  
13:45:34 16 there?

13:45:35 17 MR. ZUROFSKY: Objection.

13:45:37 18 A. I'd be only speculating today  
13:45:42 19 because I can't remember specifically, but I  
13:45:43 20 would guess that, that we thought that we  
13:45:47 21 could do a deal with YouTube and that also at  
13:45:53 22 the same time we thought that having the  
13:45:55 23 content there was valuable in terms of  
13:45:59 24 helping the ratings of our shows.

13:46:24 25 MR. VOLKMER: Let's go off the

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13:46:25 2 record.

13:46:26 3 THE VIDEOGRAPHER: The time is

13:46:27 4 1:44 p.m., and we're off the record.

13:51:31 5 (A brief recess was taken.)

13:51:31 6 THE VIDEOGRAPHER: The time is

13:51:42 7 1:50 p.m., and we're back on the record.

13:51:44 8 BY MR. VOLKMER:

13:51:44 9 Q. On Monday, October 9, 2006, Google  
13:51:53 10 issued a press release announcing that it was  
13:51:55 11 acquiring YouTube. Do you remember having a  
13:51:58 12 conversation with Eric Schmidt the preceding  
13:52:01 13 weekend in which you discussed Google's  
13:52:03 14 potential acquisition of YouTube?

13:52:06 15 A. I don't remember the exact dates of  
13:52:08 16 the things that you're describing to me, but  
13:52:11 17 I certainly remember having discussion with  
13:52:14 18 Eric Schmidt before, before the potential  
13:52:19 19 acquisition, before the acquisition of  
13:52:21 20 YouTube took place.

13:52:22 21 Q. And what do you recall about that  
13:52:24 22 conversation?

13:52:29 23 A. To the best of my ability to  
13:52:33 24 recall, I remember him telling me that they  
13:52:36 25 were considering acquiring YouTube, that I

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15:06:57 2 message on to Ms. Braddi?

15:07:03 3 A. I did say so, I said I agree, push  
15:07:06 4 the button.

15:07:08 5 Q. Did Mr. Cahan's message to Ms.  
15:07:15 6 Braddi reflect your own viewpoint?

15:07:18 7 MR. ZUROFSKY: Objection.

15:07:22 8 MS. KOHLMANN: Objection.

15:07:24 9 A. I think this was just another step  
15:07:35 10 in the negotiation, back and forth between  
15:07:39 11 our two companies.

15:07:40 12 Q. And do you think that this e-mail  
15:07:48 13 message reflected your viewpoint on how the  
15:07:53 14 negotiation should be conducted or do you  
15:07:56 15 think this is more reflective of Viacom's  
15:07:59 16 senior management?

15:08:01 17 MS. KOHLMANN: Objection.

15:08:03 18 MR. ZUROFSKY: Objection.

15:08:04 19 A. I really don't remember at the  
15:08:08 20 time. Adam Cahan sent this to me. He had  
15:08:14 21 thought this through. To be clear of, I was  
15:08:20 22 running the rest of a \$7 billion business and  
15:08:26 23 I really don't remember where all, you know,  
15:08:31 24 whose desire this was on either side.

15:08:32 25 Q. Okay. In the last sentence of the

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15:08:39 2 first paragraph, Mr. Cahan writes, "Our  
15:08:41 3 senior team has expressed grave concern with  
15:08:44 4 allowing copyright infringement at YouTube to  
15:08:47 5 persist any longer."

15:08:49 6 Is the senior team being referenced  
15:08:51 7 there Mr. Dauman and Mr. Dooley?

15:08:54 8 MR. ZUROFSKY: Objection. Excuse  
15:08:55 9 me, objection.

15:08:56 10 A. Based on my recollection, it would  
15:09:01 11 be, yes.

15:09:06 12 Q. In the next paragraph, Mr. Cahan  
15:09:08 13 writes, "Starting tomorrow the lawsuit will  
15:09:10 14 be announced along with removal of all clips  
15:09:13 15 at YouTube." And "all" is in capital  
15:09:15 16 letters.

15:09:16 17 Do you know if Viacom was preparing  
15:09:17 18 to file an infringement lawsuit against  
15:09:19 19 YouTube and Google around this time frame,  
15:09:22 20 November 27, 2006?

15:09:24 21 MS. KOHLMANN: Objection.

15:09:25 22 MR. ZUROFSKY: Objection.

15:09:27 23 A. Yes, they were preparing.

15:09:29 24 Q. Mr. Cahan also makes reference to  
15:09:46 25 100K plus clips; do you see that reference?

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15:09:50 2 A. I'm trying it find it.

15:09:51 3 Q. It's in the second sentence.

15:09:53 4 A. Yes, I see this. Sorry. Yes, go  
15:09:55 5 ahead.

15:09:55 6 Q. Do you know if Viacom or MTVN had  
15:09:57 7 identified 100,000 clips on the YouTube  
15:10:00 8 service containing its content around this  
15:10:02 9 time frame?

15:10:03 10 MR. ZUROFSKY: Objection.

15:10:04 11 MS. KOHLMANN: Objection.

15:10:06 12 A. I don't know the exact number, but  
15:10:07 13 I know that we had a firm that was engaged  
15:10:11 14 that was, that was looking at the number of  
15:10:18 15 clips that were there.

15:10:20 16 Q. And that firm was BayTSP?

15:10:24 17 A. Yes.

15:10:25 18 Q. Did you have any interactions with  
15:10:27 19 BayTSP?

15:10:29 20 A. No.

15:10:31 21 Q. Did you have any conversations with  
15:10:31 22 any employee of BayTSP?

15:10:34 23 A. Not that I recall.

15:10:37 24 Q. Do you know when BayTSP was engaged  
15:10:41 25 by Viacom or MTVN?

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15:19:33 2 largely, it was both an MTV Networks and a  
15:19:39 3 corporate effort it was hard to distinguish  
15:19:41 4 between what, what was going wrong in the  
15:19:45 5 deal, what was going right. Once again, I  
15:19:49 6 continued to be optimistic that we would get  
15:19:51 7 a deal done, that these kinds of deals are  
15:19:53 8 very complex and that there's a lot of  
15:19:56 9 different parties. In the same way, by the  
15:19:59 10 way, that Google had a lot of different  
15:20:01 11 objectives.

15:20:01 12 Q. But you thought that Google was  
15:20:20 13 negotiating in good faith, didn't you?

15:20:23 14 MR. ZUROFSKY: Objection.

15:20:24 15 MS. KOHLMANN: Objection.

15:20:25 16 A. I think that -- that this was an  
15:20:28 17 intense negotiation. There were times when  
15:20:32 18 Google changed the terms of what it was  
15:20:35 19 offering, especially as different people at  
15:20:41 20 Google, the deal was passed to different  
15:20:45 21 people at Google, and at the same time, MTV  
15:20:49 22 Networks and really Viacom's expectations and  
15:20:51 23 demands for a deal changed also. So these  
15:20:54 24 are the kinds of things that happen in the  
15:20:58 25 normal course of a deal.

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15:20:58 2 Q. So you would say that, from a  
15:21:04 3 generally accepted business perspective,  
15:21:10 4 Google was negotiating in good faith?

15:21:13 5 MR. ZUROFSKY: Objection.

15:21:14 6 MS. KOHLMANN: Objection.

15:21:14 7 A. I would say that both parties were  
15:21:17 8 negotiating in good faith.

15:21:18 9 Q. Including Google?

15:21:19 10 A. Yes.

15:21:21 11 Q. Ms. McGrath says, "This is exactly  
15:21:23 12 how we lost MySpace."

15:21:24 13 Do you know what that's referring  
15:21:26 14 to?

15:21:27 15 MR. ZUROFSKY: Objection, asked and  
15:21:29 16 answered.

15:21:29 17 A. That Viacom did not complete the  
15:21:35 18 acquisitions of MySpace or IGN.

15:21:38 19 Q. And she's comparing those failed  
15:21:53 20 acquisitions to the failure to get a deal  
15:21:56 21 done with Google?

15:21:58 22 MS. KOHLMANN: Objection.

15:21:58 23 MR. ZUROFSKY: Objection.

15:21:59 24 A. That's what -- that appears what's  
15:22:02 25 happening and she's saying in this e-mail.

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15:22:12 2 MR. VOLKMER: I would like to mark  
15:22:13 3 Exhibit 19.

15:22:14 4 (Exhibit Wolf-19, E-mails dated  
15:22:14 5 12/15/06, Bates Nos. VIA02073145 and  
15:22:14 6 VIA02073146, marked for identification,  
15:22:35 7 this date.)

15:22:35 8 Q. This is a document produced by  
15:23:04 9 Viacom in this litigation. The last in time  
15:23:07 10 e-mail, a message from Michael Wolf to Eric  
15:23:10 11 Schmidt dated December 15th and Mr. Schmidt's  
15:23:13 12 response is the next in time e-mail and then  
15:23:16 13 Mr. Wolf forwards the message to Mr. Cahan.

15:23:25 14 A. Yes.

15:23:25 15 MR. ZUROFSKY: Actually, the last  
15:23:26 16 in time is the forward. The first in  
15:23:29 17 time you said.

15:23:31 18 MR. VOLKMER: The first in time.

15:23:32 19 MR. ZUROFSKY: You said the last in  
15:23:34 20 time.

15:23:34 21 MR. VOLKMER: Misspoke.

15:23:37 22 Q. And if you could --

15:23:38 23 A. Could I just have -- this is a long  
15:23:41 24 memo --

15:23:42 25 Q. Sure, yeah, take a look.

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15:31:05 2 A. Yes.

15:31:09 3 Q. And is that 20 percent figure also  
15:31:11 4 based on a back-of-the-envelope calculation  
15:31:15 5 as opposed to a scientific study?

15:31:18 6 MS. KOHLMANN: Objection.

15:31:19 7 A. I don't recall at that point. By  
15:31:22 8 then we were looking at the number of clips.  
15:31:24 9 We were looking at the number of views for  
15:31:27 10 top clips and -- and it did appear that MTV  
15:31:37 11 Networks' content was -- was a large  
15:31:40 12 percentage or was a significant percentage of  
15:31:43 13 YouTube consumption.

15:31:46 14 Q. And had MTVN or Viacom undertaken a  
15:31:53 15 scientific study to make that determination?

15:31:56 16 MR. ZUROFSKY: Objection.

15:31:57 17 MS. KOHLMANN: Objection.

15:31:58 18 A. I'm not sure how scientific either  
15:32:05 19 ratings on the internet or television, that  
15:32:09 20 kind of analysis is. I do know one way or  
15:32:13 21 the other, that we had engaged our research  
15:32:20 22 people to examine and analyze the YouTube,  
15:32:28 23 the consumption of YouTube clips, that it's  
15:32:32 24 reflected here or not, I don't remember.

15:32:33 25 Q. And in this message, you say that

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15:32:37 2 MTVN had undertaken a very quick analysis and  
15:32:40 3 it was back of the envelope. Does that lead  
15:32:46 4 to the conclusion that this was more along  
15:32:48 5 the lines of a nonscientific study?

15:32:50 6 MS. KOHLMANN: Objection.

15:32:52 7 MR. ZUROFSKY: Objection.

15:32:52 8 A. It could be, it could not be. I  
15:32:54 9 just don't remember at the time.

15:32:55 10 Q. But you wrote this message to  
15:33:06 11 Mr. Schmidt saying that this was a  
15:33:07 12 back-of-the-envelope calculation, right?

15:33:09 13 A. Yes, I did.

15:33:10 14 Q. And that was an accurate statement  
15:33:12 15 as far as you were concerned, correct?

15:33:15 16 MR. ZUROFSKY: Objection.

15:33:17 17 MS. KOHLMANN: Objection.

15:33:18 18 A. Yes.

15:33:54 19 Q. If you can turn to the second to  
15:33:57 20 last paragraph, the one that starts, "As you  
15:34:01 21 can imagine," and the second sentence is, "As  
15:34:06 22 importantly we're drawing increasingly  
15:34:11 23 uncomfortable with the time passing and feel  
15:34:13 24 that we cannot allow our content to be at  
15:34:15 25 YouTube in its current form."

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1 Wolf

15:34:18 2 A. Yes.

15:34:19 3 Q. Are you telling Mr. Schmidt there  
15:34:21 4 that to date Viacom and MTVN had been  
15:34:24 5 allowing its content to be on YouTube?

15:34:28 6 MR. ZUROFSKY: Objection.

15:34:29 7 MS. KOHLMANN: Objection.

15:34:30 8 A. While we were issuing takedown  
15:34:42 9 notices against some of the content, there  
15:34:44 10 was other content which we were allowing to  
15:34:46 11 continue to be on YouTube.

15:34:49 12 MR. VOLKMER: Okay. We need to  
15:34:51 13 change the tape.

15:34:52 14 THE VIDEOGRAPHER: The time is  
15:34:53 15 3:33, and this ends tape number 2 in the  
15:34:55 16 videotaped deposition of Michael Wolf.

15:34:58 17 (A brief recess was taken.)

15:40:56 18 THE VIDEOGRAPHER: The time is  
15:42:10 19 3:40 p.m., and this begins tape number 3  
15:42:13 20 in the videotaped deposition of Michael  
15:42:16 21 Wolf.

15:42:16 22 MR. VOLKMER: I would like to mark  
15:42:17 23 Exhibit 20.

15:42:26 24 (Exhibit Wolf-20, E-mail dated  
15:42:26 25 12/19/06, Bates No. VIA00174505, marked

1 Wolf

15:42:27 2 for identification, this date.)

15:42:27 3 Q. This is an e-mail exchange that

15:42:37 4 Viacom produced in this litigation between

15:42:39 5 Michael Wolf and Adam Cahan on December 19,

15:42:46 6 2006, and in the last in time e-mail Mr.

15:42:49 7 Cahan writes, "I think when we issue the

15:42:52 8 takedown we will hear from them."

15:42:55 9 Did you take this to mean that

15:42:58 10 Mr. Cahan suspected that when Viacom issued a

15:43:02 11 mass takedown to YouTube that Google would

15:43:04 12 come back to the negotiating table?

15:43:07 13 MR. ZUROFSKY: Objection.

15:43:09 14 A. Yes.

15:43:15 15 Q. And was that part of the

15:43:17 16 negotiating strategy?

15:43:19 17 MR. ZUROFSKY: Objection.

15:43:19 18 MS. KOHLMANN: Objection.

15:43:20 19 A. Yes.

15:43:31 20 Q. And what were the reasons that MTVN

15:43:34 21 employed that strategy of issuing a massive

15:43:37 22 takedown to YouTube in order to get Google to

15:43:40 23 come back to the negotiating table?

15:43:41 24 MR. ZUROFSKY: Objection.

15:43:42 25 MS. KOHLMANN: Objection.

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15:46:29 2 and --

15:46:31 3 MS. KOHLMANN: I'm going to just  
15:46:33 4 caution you not to disclose any  
15:46:35 5 attorney-client privileged information.

15:46:37 6 THE WITNESS: Okay.

15:46:37 7 MR. ZUROFSKY: You said that that  
15:46:38 8 lawyer was acting on your behalf of MTV  
15:46:40 9 Networks, that is an attorney-client  
15:46:43 10 relationship with them.

15:46:44 11 A. Okay. Then --

15:46:53 12 Q. Setting aside any communications  
15:46:56 13 you had with MTV or Viacom lawyers, do you  
15:47:00 14 have any independent recollection of Viacom  
15:47:02 15 or MTVN accumulating clips to send to YouTube  
15:47:07 16 in one massive takedown notice instead of  
15:47:10 17 sending notices as they became aware of the  
15:47:12 18 content?

15:47:13 19 MR. ZUROFSKY: Objection.

15:47:14 20 MS. KOHLMANN: Objection.

15:47:15 21 A. In general we identified the clips  
15:47:22 22 and then had a sense for how many clips would  
15:47:27 23 be available so that we could decide when and  
15:47:31 24 if we sent a takedown notice, what would be  
15:47:35 25 the number of clips and in what shows.

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15:47:38 2 Q. Do you recall there being certain  
15:47:49 3 criteria that MTVN applied in making  
15:47:53 4 determinations about whether to send takedown  
15:47:56 5 notices or clips?

15:48:00 6 MS. KOHLMANN: Objection.

15:48:01 7 A. I don't recall specifically. There  
15:48:03 8 may have been some. I just don't remember.

15:48:05 9 Q. Do you remember there being any  
15:48:08 10 criteria that were based on length of the  
15:48:11 11 clip in determining whether or not MTVN  
15:48:17 12 should issue takedown notices?

15:48:19 13 MS. KOHLMANN: Objection.

15:48:20 14 MR. ZUROFSKY: Objection.

15:48:21 15 A. I don't recall.

15:48:21 16 Q. What about particular networks or  
15:48:31 17 franchises, do you remember whether a  
15:48:34 18 particular clip was associated with a network  
15:48:37 19 or franchise being a factor in whether Viacom  
15:48:41 20 would issue a takedown notice?

15:48:43 21 MS. KOHLMANN: Objection.

15:48:43 22 A. And, again, I'm really -- it's very  
15:48:51 23 difficult to remember these things. I  
15:48:54 24 believe that there were clips that we did not  
15:48:56 25 want to take down, for example, clips from

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1 Wolf

15:49:01 2 John Stewart and Steven Colbert, and that  
15:49:04 3 there were other clips that we felt we should  
15:49:09 4 take down. I just don't remember what were  
15:49:11 5 the types of clips that we took down and not.

15:49:14 6 Q. And why do you think that Viacom  
15:49:16 7 wanted the John Stewart and Steven Colbert  
15:49:19 8 clips to stay up on the YouTube site?

15:49:21 9 MR. ZUROFSKY: Objection.

15:49:22 10 MS. KOHLMANN: Objection.

15:49:23 11 A. This was an MTV Networks' decision.

15:49:25 12 Q. Okay. I'll restate the question.

15:49:26 13 Thank you.

15:49:27 14 Why do you think that MTVN wanted  
15:49:29 15 the John Stewart and Steven Colbert clips to  
15:49:32 16 stay up on the YouTube website?

15:49:35 17 MR. ZUROFSKY: Objection.

15:49:36 18 MS. KOHLMANN: Objection.

15:49:36 19 A. And so I'm really giving you my  
15:49:42 20 speculation today.

15:49:42 21 Q. Sure.

15:49:42 22 A. But we were concerned that both  
15:49:49 23 John Stewart and Steven Colbert believed that  
15:49:53 24 their presence on YouTube was important for  
15:49:58 25 their ratings as well as for their

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1 Wolf

15:50:00 2 relationship with their audiences, and -- and  
15:50:06 3 to a large extent the MTV Networks senior  
15:50:10 4 team shared that belief.

15:50:12 5 Q. And did you share that belief?

15:50:15 6 A. I did.

15:50:15 7 Q. Can you think of any other programs  
15:50:18 8 that fell under that category you just  
15:50:20 9 discussed other than Mr. John Stewart's show  
15:50:24 10 and Mr. Colbert's show?

15:50:28 11 A. There are probably others. I  
15:50:32 12 can't, you know, I can't remember which ones  
15:50:34 13 specifically, but overall in a company where  
15:50:38 14 the networks are aimed at a younger audience  
15:50:42 15 which would tend to be the same audience as  
15:50:44 16 YouTube, we need to strike the right balance  
15:50:47 17 between clips that we left up and clips that  
15:50:50 18 we decided to take down.

15:51:50 19 MR. VOLKMER: I am going to mark  
15:51:52 20 Exhibit 21.

15:51:52 21 (Exhibit Wolf-21, E-mail dated  
15:51:52 22 12/23/06, Bates No. VIA00173284, marked  
15:52:14 23 for identification, this date.)

15:52:14 24 Q. This is an e-mail that Viacom  
15:52:50 25 produced in this litigation, it's from Adam

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1 Wolf

15:52:53 2 Cahan to Judy McGrath and Michael Wolf dated  
15:52:57 3 December 23, 2006.

15:52:58 4 In the first paragraph, Mr. Cahan  
15:53:01 5 writes, "As you know, we are gearing up for a  
15:53:03 6 very significant takedown at YouTube by  
15:53:07 7 January 2nd, 3rd, by last count the number  
15:53:09 8 was 50 to 70,000 clips, I suspect that number  
15:53:14 9 will grow before we are complete."

15:53:16 10 So is it your understanding that  
15:53:21 11 Viacom was continuing the project of  
15:53:23 12 identifying clips and not asking that they be  
15:53:27 13 removed so that there could be one massive  
15:53:29 14 takedown notice sent?

15:53:31 15 MS. KOHLMANN: Objection.

15:53:31 16 A. I don't know if it was MTV  
15:53:34 17 Networks. I'm sorry. I don't know if it was  
15:53:36 18 MTV Networks or Viacom. Could you repeat  
15:53:40 19 your question?

15:53:40 20 Q. Sure. Was it your understanding  
15:53:42 21 that either Viacom or MTVN was continuing a  
15:53:46 22 project of identifying clips and not asking  
15:53:49 23 that they be removed so that there would be  
15:53:52 24 one massive takedown notice sent to YouTube?

15:53:55 25 MR. ZUROFSKY: Objection.

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1 Wolf

15:57:49 2 Q. What were your suspicions that that  
15:57:53 3 would bring them back to the table or that it  
15:57:55 4 would not?

15:57:56 5 MR. ZUROFSKY: Objection.

15:57:57 6 MS. KOHLMANN: Objection.

15:57:58 7 A. You know, I don't remember what I  
15:58:01 8 suspected at the time. I mean this reflects  
15:58:08 9 Mr. Cahan's suspicion, not mine.

15:58:12 10 Q. Mr. Cahan says, "That said it is  
15:58:22 11 absolutely critical that we play two facets  
15:58:25 12 of this strategy." And the first one is "The  
15:58:27 13 takedown" -- "The takedowns in one dramatic  
15:58:31 14 event (as opposed to drips)."

15:58:33 15 Did you agree with that strategy?

15:58:35 16 MR. ZUROFSKY: Objection.

15:58:36 17 MS. KOHLMANN: Objection.

15:58:37 18 A. I don't recall. I think that -- I  
15:58:48 19 don't recall.

15:58:48 20 Q. Do you know if you responded to  
15:59:11 21 this e-mail?

15:59:14 22 A. I don't recall.

15:59:15 23 Q. Do you currently have in your  
15:59:30 24 possession the e-mails that you sent and  
15:59:32 25 received while at MTVN related to the Google

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1 Wolf

15:59:35 2 negotiations that we've been discussing  
15:59:37 3 today?

15:59:38 4 MR. ZUROFSKY: Objection.

15:59:38 5 A. I'm not sure I understand the  
15:59:42 6 question.

15:59:42 7 Q. Sure. I'll try to make it more  
15:59:46 8 clear.

15:59:46 9 The e-mails that we've been  
15:59:48 10 discussing today, that you were -- that  
15:59:50 11 you've sent and received pertaining to the  
15:59:51 12 Google negotiations, do you still have those  
15:59:53 13 e-mails in your possession?

15:59:54 14 A. Some of the e-mails you've shown me  
15:59:58 15 I've never seen before.

15:59:59 16 Q. Sure.

16:00:00 17 A. When I was asked for the documents  
16:00:05 18 in this case, I used Google desktop to  
16:00:10 19 uncover files that were on my computer that  
16:00:14 20 had been, had been deleted after I left  
16:00:18 21 Viacom, and so was able to go through my  
16:00:21 22 computer and retrieve those files through a  
16:00:25 23 Google desktop search.

16:00:27 24 Q. You said the files had been deleted  
16:00:34 25 after you left Viacom, by whom were they

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1 Wolf

16:00:38 2 deleted?

16:00:38 3 A. I deleted them. When I left  
16:00:48 4 Viacom, there were lots of things I didn't  
16:00:49 5 need and I kept my computer from Viacom for a  
16:00:59 6 couple of weeks and got a new computer and  
16:01:02 7 transferred the files that I had from my old  
16:01:08 8 computer that I needed and trashed the  
16:01:10 9 others.

16:01:11 10 Q. Do you remember ever receiving from  
16:01:27 11 anyone at Viacom a notice that you were to  
16:01:30 12 preserve evidence that related to this  
16:01:33 13 litigation?

16:01:34 14 A. No.

16:01:34 15 Q. The e-mails that you were able to  
16:01:54 16 find using the Google desktop program, were  
16:01:58 17 those all of the e-mails that you had  
16:02:00 18 previously had in your possession when you  
16:02:03 19 left Viacom?

16:02:04 20 A. All the e-mails that I had were the  
16:02:12 21 ones on my computer that, I guess, were  
16:02:15 22 stored locally and whatever I found with  
16:02:20 23 Google desktop was all there was.

16:02:23 24 Q. And do you think that the, do you  
16:02:27 25 think the e-mails that you were able to find

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1 Wolf

16:02:29 2 using Google desktop represented all of the  
16:02:31 3 e-mails that you previously had in your  
16:02:33 4 possession before you had deleted them?

16:02:35 5 MR. ZUROFSKY: Objection.

16:02:43 6 A. Yeah, I don't know.

16:02:44 7 Q. When you left Viacom, did you take  
16:02:54 8 a laptop with you?

16:02:59 9 A. I continued to use my Viacom laptop  
16:03:04 10 for a couple of weeks and then I transferred  
16:03:10 11 all of my computer to a new computer, gave  
16:03:14 12 Viacom back my computer.

16:03:15 13 Q. And then after that period of time,  
16:03:24 14 you deleted some of the e-mails and you were  
16:03:28 15 able to find them again using Google desktop;  
16:03:28 16 is that right?

16:03:32 17 A. Yeah, I transferred --

16:03:32 18 MR. ZUROFSKY: Objection.

16:03:33 19 THE WITNESS: I'm sorry.

16:03:35 20 MR. ZUROFSKY: Go ahead.

16:03:35 21 A. I transferred everything over from  
16:03:37 22 my old computer to my new one. I had already  
16:03:40 23 deleted the, all of the e-mail, literally all  
16:03:43 24 of the Viacom e-mails that I had, not just  
16:03:46 25 the ones related to anything in particular,

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1 Wolf

16:03:49 2 somehow when I transferred them over,  
16:03:51 3 transferred the hard drives over, even though  
16:03:53 4 they were deleted, they -- Google desktop can  
16:03:57 5 find stuff that you deleted.

16:03:59 6 Q. So after you left Viacom, you still  
16:04:06 7 had a Viacom-issued laptop in your possession  
16:04:09 8 and before you returned it to Viacom you  
16:04:11 9 deleted all of the Viacom e-mails; is that  
16:04:14 10 right?

16:04:14 11 A. I deleted everything, my entire,  
16:04:18 12 all of the e-mails in my Outlook folder.

16:04:21 13 Q. When you stopped working at Viacom,  
16:04:45 14 did you have just one laptop or did you have  
16:04:47 15 any other computers?

16:04:50 16 A. I had two other computers.

16:04:52 17 Q. And what were those? Were they  
16:04:54 18 desktops or were they also laptops?

16:04:58 19 A. Desktops.

16:04:59 20 Q. And did you take them with you when  
16:05:00 21 you left Viacom or did they remain at Viacom?

16:05:03 22 MR. ZUROFSKY: Objection.

16:05:05 23 Go ahead.

16:05:05 24 A. One of the computers was at Viacom,  
16:05:08 25 was my desktop at Viacom. The other computer

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1 Wolf

16:05:11 2 was a computer that Viacom had installed in  
16:05:16 3 my home. I immediately returned that  
16:05:20 4 computer to Viacom. I left my office  
16:05:25 5 computer at the office.

16:05:25 6 Q. And did you have a BlackBerry or  
16:05:33 7 other PDA that had been Viacom issued when  
16:05:37 8 you left Viacom employment?

16:05:40 9 A. Yes.

16:05:40 10 Q. And what did you do with that  
16:05:43 11 device?

16:05:43 12 A. I returned it to Viacom.

16:05:47 13 Q. Concurrently with the termination  
16:05:50 14 of your employment?

16:05:51 15 A. Yes.

16:06:08 16 Q. And, Mr. Wolf, do you have a  
16:06:09 17 YouTube account?

16:06:12 18 A. Yes.

16:06:12 19 Q. And what is your user name?

16:06:16 20 A. I really --

16:06:18 21 MS. KOHLMANN: Objection.

16:06:19 22 A. I don't remember it. I'm sure I  
16:06:22 23 could check.

16:06:23 24 Q. Have you ever uploaded videos to  
16:06:25 25 YouTube?

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# **Schapiro Exhibit 306**

---

**From:** Cahan, Adam [Adam.Cahan@mtvn.com]  
**Sent:** Saturday, January 20, 2007 8:32 PM  
**To:** Chris Schmalz; Michelena.hallie@mtvn.com  
**Cc:** Mark M. Ishikawa; Courtney Nieman; Evelyn Espinosa; Travis Hill; Deana Arizala  
**Subject:** Re: YouTube Infringement Update as of 1100 20Jan07 \*\*\*Infringement count - 97,332\*\*\*

Perfect. Thanks. This is great.

----- Original Message -----

From: Chris Schmalz <chriss@baytsp.com>  
To: Cahan, Adam; Hallie, Michelena  
Cc: Mark M. Ishikawa <marki@baytsp.com>; Courtney Nieman <courtneyni@baytsp.com>; Evelyn Espinosa <evelyn@baytsp.com>; Travis Hill <travish@baytsp.com>; Deana Arizala <deanaa@baytsp.com>  
Sent: Sat Jan 20 15:20:54 2007  
Subject: RE: YouTube Infringement Update as of 1100 20Jan07 \*\*\*Infringement count - 97,332\*\*\*

Yes, all music videos being approved contain MTV, CMT, BET or other MTV Network Station bugs.

-----  
Chris Schmalz

Team RADAR

BayTSP, Inc.

Phone: (408) 341-2371

AIM: BayTSP Chris S  
-----

Be sure to visit [www.baytsp.com/weblog](http://www.baytsp.com/weblog) <outbind://47-000000089EF563C23D976419ADEFDE8378007AC80700DD1ADF5F6447A749A9D8B0667CBDA27E000001C9D41B0000034C5155B7C5> for the latest P2P news...

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From: Cahan, Adam [<mailto:Adam.Cahan@mtvn.com>]  
Sent: Saturday, January 20, 2007 12:13 PM  
To: Chris Schmalz; Michelena.hallie@mtvn.com  
Cc: Mark M. Ishikawa; Courtney Nieman; Evelyn Espinosa; Travis Hill; Deana Arizala  
Subject: Re: YouTube Infringement Update as of 1100 20Jan07 \*\*\*Infringement count - 97,332\*\*\*

This is great. Just to reconfirm. All artists must contain an mtvn bug to be removed.

We are certain these do, correct?

----- Original Message -----

From: Chris Schmalz <chriss@baytsp.com>  
To: Hallie, Michelena; Cahan, Adam  
Cc: Mark M. Ishikawa <marki@baytsp.com>; Courtney Nieman <courtneyni@baytsp.com>; Evelyn Espinosa <evelyn@baytsp.com>; Travis Hill <travish@baytsp.com>; Chris Schmalz <chriss@baytsp.com>; Deana Arizala <deanaa@baytsp.com>  
Sent: Sat Jan 20 15:09:19 2007

6/11/2008

Subject: YouTube Infringement Update as of 1100 20Jan07 \*\*\*Infringement count - 97,332\*\*\*

Michelena & Adam,

Enclosed is the updated count as of 1100 hours 20Jan07. We had an increase in count from 73K to 97K. This extremely large jump in count is largely due to the new Artist searches, which are very effective. I have also added a column to this report which shows the increase in count for the current day.

Pending Notices

December 18, 2006 - January 20, 2007

YouTube

| Asset                     | YouTube | Added Today |
|---------------------------|---------|-------------|
| 51 - Celebrity Paranormal | 38      | 12          |
| 51 - Flavor of Love       | 734     | 332         |
| 51 - My Fair Brady        | 9       | 4           |
| 51 - Strange Love         | 32      | 2           |
| 51 - Surreal Life         | 199     | 88          |
| Artist - Bow Wow          | 0       | 0           |
| Artist - Britney Spears   | 0       | 0           |
| Artist - Chamillionare    | 0       | 0           |
| Artist - Ciara            | 0       | 0           |
| Artist - Courtney Love    | 0       | 0           |
| Artist - Danity Kane      | 74      | 74          |
| Artist - Dave Matthews    | 0       | 0           |
| Artist - Evanescence      | 0       | 0           |
| Artist - Green Day        | 3       | 3           |
| Artist - Gwen Stefani     | 378     | 378         |
| Artist - Gym Class Heroes | 0       | 0           |
| Artist - Hole             | 0       | 0           |
| Artist - Janet Jackson    | 0       | 0           |
| Artist - Jibbs            | 0       | 0           |

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|                                 |     |        |
|---------------------------------|-----|--------|
| Artist - Jim Jones              | 0   | 0      |
| Artist - Lil' Jon               | 0   | 0      |
| Artist - Ludacris               | 63  | 63     |
| Artist - Mariah Carey           | 61  | 61     |
| Artist - No Doubt               | 0   | 0      |
| Artist - Pussycat Dolls         | 129 | 129    |
| Artist - Radiohead              | 0   | 0      |
| Artist - Rihanna                | 0   | 0      |
| Artist - Snoop Dogg             | 112 | 112    |
| Artist - The Game               | 0   | 0      |
| Artist - Tupac / 2pac           | 0   | 0      |
| Artist - U2                     | 0   | 0      |
| Artist - Ying Yang Twins        | 0   | 0      |
| ATM - Angry Kid                 | 497 | 170    |
| ATM - Star Wars Gangsta Rap     |     | 15 6   |
| BET - 106 and Park              | 253 | 104    |
| BET - Access Granted            | 155 | 68     |
| BET - BET Awards                | 275 | 131    |
| BET - BET Hip Hop Awards        |     | 136 49 |
| BET - Black Carpet              | 21  | 0      |
| BET - Bobby Jones Gospel        |     | 50 0   |
| BET - College Hill              | 5   | 0      |
| BET - Comic View                | 61  | 27     |
| BET - Hotwyred                  | 2   | 0      |
| BET - Rap City                  | 578 | 255    |
| BET - Rip The Runway            | 0   | 0      |
| BET - Spring Bling              | 64  | 30     |
| BET - The Student Center        | 3   | 0      |
| CMT - Country Fried Home Videos |     | 9 2    |
| CMT - Cowboy U                  | 3   | 0      |
| CMT - Crossroads                | 148 | 8      |
| CMT - Foxworthys Big Night Out  |     | 3 1    |
| CMT - Trick My Truck            | 2   | 1      |
| Com - Baxter & Meguire          | 5   | 0      |

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|                                        |       |       |    |
|----------------------------------------|-------|-------|----|
| Com - Chappelle Show                   | 2,598 | 622   |    |
| Com - Colbert Report                   | 843   | 347   |    |
| Com - Colin Quinn Tough Crowd          |       | 72    | 26 |
| Com - Comedy Central Presents          | 1,555 | 106   |    |
| Com - Crank Yankers                    | 62    | 28    |    |
| Com - Dog Bites Man                    | 47    | 23    |    |
| Com - Drawn Together                   | 588   | 250   |    |
| Com - Freak Show                       | 190   | 28    |    |
| Com - Golden Age                       | 39    | 14    |    |
| Com - Lewis Black: Taxed Beyond Belief |       | 83    | 0  |
| Com - Live at Gotham                   | 43    | 19    |    |
| Com - Meet The Creeps                  | 30    | 14    |    |
| Com - Mind of Mencia                   | 471   | 88    |    |
| Com - Night of too many stars          | 35    | 6     |    |
| Com - Odd Todd                         | 15    | 6     |    |
| Com - Premium Blend                    | 77    | 28    |    |
| Com - Reno 911!                        | 642   | 303   |    |
| Com - Shadow Rock                      | 3     | 1     |    |
| Com - Shorties Watchin Shorties        | 168   | 84    |    |
| Com - Showbiz Show w/ David Spade      |       | 121   | 53 |
| Com - South Park                       | 5,362 | 1,221 |    |
| Com - Stella                           | 175   | 40    |    |
| Com - Strangers With Candy             | 344   | 150   |    |
| Com - Thats My Bush                    | 44    | 14    |    |
| Com - The Colbert Report               | 781   | 105   |    |
| Com - The Daily Show                   | 1,377 | 459   |    |
| Com - Tiny Hands                       | 27    | 6     |    |
| Com - Upright Citizens Brigade         | 91    | 35    |    |
| Com - Wanda Sykes: Tongue Untied       |       | 30    | 0  |
| Logo - Noahs Arc                       | 74    | 37    |    |
| Logo - Open Bar                        | 434   | 0     |    |
| Logo - The Ride                        | 11    | 0     |    |
| Logo - US of Ant                       | 10    | 5     |    |
| Logo - Wisecrack                       | 5     | 0     |    |

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|                                   |       |        |
|-----------------------------------|-------|--------|
| MTV - 2 A Days                    | 40    | 9      |
| MTV - 24/7                        | 31    | 0      |
| MTV - 8th & Ocean                 | 26    | 9      |
| MTV - A Cut                       | 16    | 7      |
| MTV - Adventures of Chico & Guapo |       | 14 7   |
| MTV - Aeon Flux                   | 104   | 46     |
| MTV - All Eyes On                 | 94    | 41     |
| MTV - Amo a Laura                 | 125   | 3      |
| MTV - Andy Milonakis              | 558   | 265    |
| MTV - Barrio 19                   | 24    | 9      |
| MTV - Beavis & Butthead           | 1,192 | 455    |
| MTV - Boiling Points              | 65    | 27     |
| MTV - Bust A Move                 | 6     | 3      |
| MTV - Call to Greatness           | 18    | 4      |
| MTV - Celebrity Death Match       | 104   | 41     |
| MTV - Cheyenne                    | 138   | 63     |
| MTV - Cribs                       | 738   | 266    |
| MTV - Daria                       | 770   | 348    |
| MTV - Dirty Sanchez               | 311   | 129    |
| MTV - European Music Awards       |       | 175 55 |
| MTV - Footballers Cribs           | 18    | 6      |
| MTV - Fur TV                      | 13    | 2      |
| MTV - Goal                        | 772   | 25     |
| MTV - Headbangers Ball            | 395   | 193    |
| MTV - Homewreckers                | 4     | 1      |
| MTV - India Productions           | 134   | 59     |
| MTV - Jackass                     | 2,527 | 211    |
| MTV - Jamie Kennedy's Blowin Up   |       | 97 30  |
| MTV - Laguna Beach                | 369   | 65     |
| MTV - Made                        | 136   | 4      |
| MTV - Meet the Barkers            | 131   | 63     |
| MTV - Movie Awards                | 1,124 | 491    |
| MTV - MTV News Week in Rock       |       | 31 8   |
| MTV - MTV Unplugged               | 1,271 | 547    |

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|                                 |       |       |
|---------------------------------|-------|-------|
| MTV - My Super Sweet 16         | 31    | 2     |
| MTV - Newlyweds: Nick & Jessica | 426   | 49    |
| MTV - Pimp Intl                 | 8     | 3     |
| MTV - Pimp My Ride              | 123   | 14    |
| MTV - Pimp UK                   | 8     | 2     |
| MTV - Punkd                     | 204   | 61    |
| MTV - Real World                | 186   | 22    |
| MTV - Rob & Big                 | 41    | 0     |
| MTV - Runs House                | 395   | 147   |
| MTV - Senseless                 | 7     | 0     |
| MTV - Staying Alive             | 86    | 0     |
| MTV - Strutter                  | 50    | 21    |
| MTV - The Hills                 | 105   | 0     |
| MTV - The State                 | 339   | 130   |
| MTV - Totally Boy Band          | 8     | 1     |
| MTV - Totally Scott Lee         | 3     | 1     |
| MTV - Transit                   | 23    | 2     |
| MTV - TRL                       | 3,766 | 1,649 |
| MTV - UK Productions            | 366   | 100   |
| MTV - Virgin Diaries            | 4     | 0     |
| MTV - Viva La Bam               | 675   | 217   |
| MTV - VMA Awards                | 1,808 | 301   |
| MTV - Where My Dogs At          | 34    | 16    |
| MTV - Wildboyz                  | 212   | 80    |
| MTV - Wonder Showzen            | 207   | 0     |
| MTV - Yo Mama                   | 119   | 7     |
| MTV - Yo MTV Raps               | 362   | 164   |
| MTV - You Hear it First         | 140   | 37    |
| MTVN - BET                      | 662   | 26    |
| MTVN - CMT                      | 250   | 0     |
| MTVN - Comedy Central           | 512   | 4     |
| MTVN - Generic                  | 1,553 | 15    |
| MTVN - MTV                      | 8,900 | 571   |
| MTVN - Music Videos             | 4,398 | 860   |

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|                                    |       |       |
|------------------------------------|-------|-------|
| MTVN - NICK                        | 1,080 | 76    |
| MTVN - VH1                         | 2,231 | 96    |
| Nick - AAAHH! Real Monsters        | 46    | 12    |
| Nick - Action League Now           | 62    | 25    |
| Nick - All Grown Up                | 80    | 38    |
| Nick - Allegras Window             | 7     | 2     |
| Nick - Amanda Show                 | 33    | 13    |
| Nick - Angry Beavers               | 198   | 91    |
| Nick - As Told By Ginger           | 67    | 29    |
| Nick - Avatar the Last Airbender   | 7,485 | 297   |
| Nick - Backyardigans               | 227   | 108   |
| Nick - Blues room                  | 51    | 1     |
| Nick - CatDog                      | 41    | 5     |
| Nick - Catscratch                  | 13    | 5     |
| Nick - Danny Phantom               | 2,940 | 236   |
| Nick - Degrassi                    | 6,804 | 2,923 |
| Nick - Dora the Explorer           | 213   | 75    |
| Nick - Double Dare 2000            | 63    | 2     |
| Nick - Doug                        | 215   | 87    |
| Nick - Drake & Josh                | 215   | 0     |
| Nick - Fairly Odd Parents          | 485   | 137   |
| Nick - Figure It Out               | 15    | 0     |
| Nick - Global GUTS                 | 53    | 11    |
| Nick - Hey Arnold                  | 1,211 | 411   |
| Nick - Invader Zim                 | 4,169 | 1,447 |
| Nick - Jimmy Neutron               | 676   | 321   |
| Nick - Just for Kicks              | 11    | 0     |
| Nick - Legend of the Hidden Temple | 352   | 166   |
| Nick - Miracles Boys               | 7     | 0     |
| Nick - Mr. Meaty                   | 46    | 20    |
| Nick - My Life as a Teenage Robot  | 270   | 132   |
| Nick - Naked Brothers Band         | 137   | 59    |
| Nick - Nickelodeon GUTS            | 19    | 3     |
| Nick - Ren and Stimpy              | 363   | 0     |

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|                                             |       |       |   |
|---------------------------------------------|-------|-------|---|
| Nick - Rugrats                              | 95    | 30    |   |
| Nick - South of Nowhere                     | 2,372 | 1,018 |   |
| Nick - Spongebob Squarepants                | 2,214 | 311   |   |
| Nick - The Journey of Allen Strange         | 1     | 0     |   |
| Nick - The Wild Thornberries                | 12    | 3     |   |
| Nick - Unfabulous                           | 144   | 50    |   |
| Nick - What Goes On                         | 2     | 0     |   |
| Nick - Xs                                   | 12    | 3     |   |
| Nick - Zoey 101                             | 39    | 0     |   |
| Spk - 10 Things Every Guy Should Experience |       | 0     | 0 |
| Spk - 52 Greatest Action Sports Athletes    |       | 0     | 0 |
| Spk - AutoRox                               | 0     | 0     |   |
| Spk - Boom                                  | 0     | 0     |   |
| Spk - Boston PD F/K/A Beyond the Badge      |       | 0     | 0 |
| Spk - By the Numbers                        | 0     | 0     |   |
| Spk - California Youth Authority            |       | 0     | 0 |
| Spk - Carpocalypse                          | 0     | 0     |   |
| Spk - Casino Cinema                         | 1     | 0     |   |
| Spk - Disorderly Conduct                    | 23    | 0     |   |
| Spk - Enduro at Erzberg                     | 0     | 0     |   |
| Spk - Extreme 4x4                           | 2     | 1     |   |
| Spk - Extreme Sports Athletes               |       | 0     | 0 |
| Spk - Films of Fury                         | 1     | 0     |   |
| Spk - Fresh Baked Video Games               |       | 17    | 0 |
| Spk - Gamehead                              | 0     | 0     |   |
| Spk - Gary the Rat                          | 0     | 0     |   |
| Spk - Geek Ray Vision                       | 0     | 0     |   |
| Spk - GQ Man of the Year Awards             |       | 0     | 0 |
| Spk - Horsepower                            | 13    | 6     |   |
| Spk - I Hate My Job                         | 0     | 0     |   |
| Spk - Invasion Iowa                         | 0     | 0     |   |
| Spk - Joe Schmo                             | 2     | 1     |   |
| Spk - Joc Schmo 2                           | 0     | 0     |   |
| Spk - King of Vegas                         | 0     | 0     |   |

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|                                                              |     |    |     |     |
|--------------------------------------------------------------|-----|----|-----|-----|
| Spk - Lance Krall Show                                       | 0   | 0  |     |     |
| Spk - Muscle Car                                             | 0   | 0  |     |     |
| Spk - Playbook                                               | 0   | 0  |     |     |
| Spk - Pros v Joes                                            | 0   | 0  |     |     |
| Spk - Raising the Roofs                                      | 0   | 0  |     |     |
| Spk - Rattlesnake Raceway                                    | 0   | 0  |     |     |
| Spk - Ren & Stimpy                                           | 0   | 0  |     |     |
| Spk - Scream Awards 2006                                     | 107 | 38 |     |     |
| Spk - Spike TV's Video Game Awards 2003, 2004, 2005 and 2006 | 0   | 0  |     |     |
| Spk - Spike's Most Irresistible Women                        | 0   | 0  |     |     |
| Spk - Spike's Perfect 10                                     | 0   | 0  |     |     |
| Spk - Spike's Sexiest: NYC Bartenders                        | 0   | 0  |     |     |
| Spk - SportsFan                                              | 0   | 0  |     |     |
| Spk - Stripperella                                           | 0   | 0  |     |     |
| Spk - Stuck                                                  | 0   | 0  |     |     |
| Spk - The John Henson Show                                   | 0   | 0  |     |     |
| Spk - This Just In                                           | 0   | 0  |     |     |
| Spk - Trucks                                                 | 0   | 0  |     |     |
| Spk - True Dads                                              | 0   | 0  |     |     |
| Spk - True to the Game                                       | 0   | 0  |     |     |
| Spk - Ultimate Guy Vacation                                  | 0   | 0  |     |     |
| Spk - Untold Series                                          | 0   | 0  |     |     |
| Spk - Viva Baseball                                          | 0   | 0  |     |     |
| TVLa - Fatherhood                                            | 5   | 2  |     |     |
| TVLa - HiJinks                                               | 0   | 0  |     |     |
| TVLa - Nick At Nite Funniest Mom In America                  |     |    | 1   | 0   |
| TVLa - Sit Down with David Steinberg                         |     |    | 0   | 0   |
| TVLa - TV Land Present the 100                               |     |    | 2   | 1   |
| VH1 - 100 Greatest Countdowns                                |     |    | 77  | 8   |
| VH1 - 40 Greatest Countdowns                                 |     |    | 10  | 0   |
| VH1 - And You Don't Stop...                                  |     |    | 52  | 26  |
| VH1 - Behind the Music                                       |     |    | 360 | 86  |
| VH1 - Best Week Ever                                         |     |    | 214 | 100 |
| VH1 - Best Year Ever                                         |     |    | 5   | 0   |

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|                                                           |       |     |   |
|-----------------------------------------------------------|-------|-----|---|
| VH1 - Big In 2006 Awards                                  | 23    | 6   |   |
| VH1 - Black In the 80s                                    | 4     | 1   |   |
| VH1 - Breaking Bonaduce                                   | 6     | 1   |   |
| VH1 - Cable In the Classroom                              | 2     | 1   |   |
| VH1 - Can?t Get A Date                                    | 30    | 2   |   |
| VH1 - Celebrity Eye Candy                                 | 6     | 3   |   |
| VH1 - Celebrity Fit Club                                  | 127   | 6   |   |
| VH1 - Confessions                                         | 22    | 10  |   |
| VH1 - Driven                                              | 109   | 44  |   |
| VH1 - Drug Years                                          | 37    | 8   |   |
| VH1 - Heavy: The Story of Metal                           | 21    | 7   |   |
| VH1 - Hip Hop Honors 2006                                 | 96    | 26  |   |
| VH1 - Hogan Knows Best                                    | 9     | 4   |   |
| VH1 - I Love the                                          | 311   | 92  |   |
| VH1 - I Married...                                        | 46    | 3   |   |
| VH1 - Ice T?s Rap School                                  | 8     | 0   |   |
| VH1 - Legends                                             | 149   | 28  |   |
| VH1 - Meet the Family                                     | 358   | 178 |   |
| VH1 - Movies That Rock!                                   | 15    | 2   |   |
| VH1 - Music Awards                                        | 1,199 | 490 |   |
| VH1 - Race O Rama                                         | 2     | 1   |   |
| VH1 - Remaking...                                         | 47    | 33  |   |
| VH1 - Rock Honors                                         | 66    | 0   |   |
| VH1 - Rock Honors 2006                                    | 12    | 6   |   |
| VH1 - So Notorious                                        | 40    | 13  |   |
| VH1 - Storytellers                                        | 290   | 109 |   |
| VH1 - Supergroup                                          | 234   | 11  |   |
| VH1 - The Fabulous Life Of...                             | 35    | 5   |   |
| VH1 - The Fabulous Life Presents: Really Rich Real Estate |       | 0   | 0 |
| VH1 - VH1 All Access                                      | 60    | 21  |   |
| VH1 - VH1 News Presents                                   | 2     | 0   |   |
| VH1 - VH1 News Specials                                   | 126   | 1   |   |
| VH1 - VH1 Rock Docs                                       | 2     | 1   |   |
| VH1 - When __ Ruled the World                             | 22    | 11  |   |

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VH1 - World Series of Pop Culture 2 1

Total 97,332 23,859

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Chris Schmalz

Team RADAR

BayTSP, Inc.

Phone: (408) 341-2371

AIM: BayTSP Chris S

-----  
Be sure to visit [www.baytsp.com/weblog](http://www.baytsp.com/weblog) <outbind://47-0000000089EF563C23D976419ADEDE8378007AC80700DD1ADF5F6447A749A9D8B0667CBDA27E000001C9D41B0000034C5155B7C5> for the latest P2P news...

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BAYTSP 004378433

# **Schapiro Exhibit 307**

---

Subject: Re: Haven't heard from Chris Maxcy.  
From: "Cahan, Adam" <EX:/O=VIACOM/OU=MTVUSA/CN=RECIPIENTS/CN=CAHANA>  
To: Areton, Lana  
Cc: Date: Mon, 05 Feb 2007 22:19:34 +0000

Nope

----- Original Message -----

From: Areton, Lana  
To: Cahan, Adam  
Sent: Mon Feb 05 17:15:23 2007  
Subject: Haven't heard from Chris Maxcy.

Did he get a hold of you?

# **Schapiro Exhibit 308**

---

Subject: today's call - youTube tool  
From: "Cahan, Adam" <EX:/O=VIACOM/OU=MTVUSA/CN=RECIPIENTS/CN=CAHANA>  
To: Chris Maxcy (chris@youtube.com)  
Cc: Date: Mon, 05 Feb 2007 22:19:41 +0000

Chris -

Pretty urgent that we get on the phone to discuss your proposed solution. Have a very large team that is waiting on our end.

Give me a call when you can. thanks - Adam

# **Schapiro Exhibit 309**

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**From:** Phil Lines  
**Sent:** Thursday, January 24, 2008 11:33 AM  
**To:** 'Anthony Zameczkowski'  
**Cc:** Tammy Knox; Oliver Weingarten  
**Subject:** RE: Meeting request

Anthony

I'm afraid not.

Rgds

Phil

-----Original Message-----

From: Anthony Zameczkowski [mailto:anthonyz@google.com]  
Sent: 24 January 2008 11:25  
To: Phil Lines; Anthony Zameczkowski  
Cc: Tammy Knox; Oliver Weingarten  
Subject: Re: Meeting request

Phil,

Unfortunately, David King and Franck Chastagnol are only available this afternoon. Is there someone that can do the meeting on your behalf?


Many thanks

Regards

Anthony

-----  
Anthony Zameczkowski  
Strategic Partner Development Manager, YouTube EMEA

Google  
Belgrave House  
76 Buckingham Palace Road  
SW1W 9TO London

  
Anthonyz@google.com

----- Message d'origine -----

De : Phil Lines <PLines@premierleague.com> À : Anthony Zameczkowski Cc : Tammy Knox <TKnox@premierleague.com>; Oliver Weingarten <OWeingarten@premierleague.com> Envoyé : Thu Jan 24 01:10:53 2008 Objet : RE: Meeting request

Anthony

I'm sorry, I cannot make this afternoon. I have asked Tammy to fix a date.

Rgds

Phil

-----Original Message-----

From: Anthony Zameczkowski [mailto:anthonyz@google.com]  
Sent: 24 January 2008 08:58  
To: Phil Lines  
Cc: Patrick Walker  
Subject: Re: Meeting request

Phil

Can please confirm of is it fine for you to come to our offices at 4pm today?

Thanks


Regards,

Anthony

-----

Anthony Zameczkowski  
Strategic Partner Development Manager, YouTube EMEA

Google  
Belgrave House  
76 Buckingham Palace Road  
SW1W 9TO London

  
Anthonyz@google.com

----- Message d'origine -----

De : Anthony Zameczkowski  
À : 'plines@premierleague.com' <plines@premierleague.com> Cc : Patrick Walker Envoyé : Wed  
Jan 23 07:24:02 2008 Objet : Re: Meeting request

Phil

Are you available to come to our offices tomorrow at 4pm?

Thanks


Regards

Anthony

-----

Anthony Zameczkowski  
Strategic Partner Development Manager, YouTube EMEA

Google  
Belgrave House  
76 Buckingham Palace Road  
SW1W 9TO London

  
Anthonyz@google.com

----- Message d'origine -----

De : Phil Lines <PLines@premierleague.com> À : Anthony Zameczkowski Envoyé : Tue Jan 22  
23:54:07 2008 Objet : Re: Meeting request

Anthony



Yes thanks, got your email. Sorry not to have replied yesterday but given the outstanding case we're both involved in I needed to check with our lawyers that it would be ok to meet.

They have now responded, saying it is ok to meet on condition nothing in the meeting can be used in evidence in the litigation and that Olly Weingarten attends.

Is this ok with you? If so please suggest some dates that work for you.

Rgds

Phil

-----  
Phil

-----Original Message-----

From: Anthony Zameczkowski <anthonyz@google.com>

To: Phil Lines <PLines@premierleague.com>

CC: Patrick Walker <pjwalker@google.com>

Sent: Tue Jan 22 17:38:49 2008

Subject: Re: Meeting request

Dear Phil,

Did you receive my e-mail?

Thanks

Regards

Anthony

-----

Anthony Zameczkowski

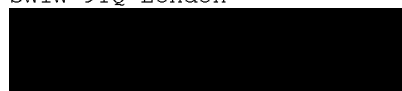
Strategic Partner Development Manager, YouTube EMEA

Google

Belgrave House

76 Buckingham Palace Road

SW1W 9TQ London

  
Anthonyz@google.com

----- Message d'origine -----

De : Anthony Zameczkowski

À : 'plines@premierleague.com' <plines@premierleague.com> Cc : Patrick Walker Envoyé : Mon

Jan 21 15:05:22 2008 Objet : Meeting request

Dear Phil,

Hope this e-mail finds you well.

David King and Franck Chastagnol who are two product managers/engineers from YouTube in California and responsible of the development of the rights protection technologies are going to be in town on Wednesday and Thursday this week. I think it would be a good opportunity to present you our new video identification technology and exchange some views.

When are you available to meet them?

What about Thursday at 9am or 4pm?

Many thanks,


Kindest regards,

Anthony

----

Anthony Zameczkowski  
Strategic Partner Development Manager, YouTube EMEA

Google  
Belgrave House  
76 Buckingham Palace Road  
SW1W 9TO London

  
Anthonyz@google.com

The Football Association Premier League Limited.  
Registered Office: 30 Gloucester Place, London W1U 8PL. No. 2719699 England

# **Schapiro Exhibit 310**

---

**From:** Martin Dare  
**Sent:** Tuesday, March 20, 2007 2:41 AM  
**To:** Courtney Nieman; Evelyn Espinosa  
**Cc:** ASTMgr; Eric Antze; Travis Hill; Mark M. Ishikawa; dc  
**Subject:** [DC Request] - MTVN infringements/URLs and usernames still online after notice sent sent (FOR 03/20) - DC Log 17518

**Attachments:** 20070320\_MTVN\_URL\_still\_online.xls



20070320\_MTVN\_U  
RL\_still\_online..

- 1) INFRINGEMENTS/URLS W/ NOTICE SENT < 03/18/07 8:00 AM
  - a) NUMBER OF INFRINGEMENTS/URLS WITH NOTICE SENT = 154895
  - b) NUMBER OF INFRINGEMENTS/URLS WITH NOTICE SENT STILL ONLINE = 912
- 2) Info attached

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.516 / Virus Database: 269.17.13/1207 - Release Date: 1/2/2008 11:29 AM

| infringementid | assetid | URL                                         | username             | infringementstatus | noticecount |
|----------------|---------|---------------------------------------------|----------------------|--------------------|-------------|
| 2211266        | 10986   | http://www.youtube.com/watch?v=-59VNgAxNQI  | greenbird283         | 1                  | 1           |
| 2210614        | 10984   | http://www.youtube.com/watch?v=-Craj7a_P8A  | indiecisa            | 1                  | 1           |
| 2215882        | 10985   | http://www.youtube.com/watch?v=-DKoUqFRRxA  | singlekhan           | 1                  | 1           |
| 2211939        | 10985   | http://www.youtube.com/watch?v=-dXlrp980PA  | Caz211984            | 1                  | 1           |
| 2215609        | 10985   | http://www.youtube.com/watch?v=-f1tUgsaNJs  | josetheodore1        | 1                  | 1           |
| 2209296        | 10685   | http://www.youtube.com/watch?v=-j3rVPd8KIM  | gaboxz               | 1                  | 1           |
| 2205841        | 10985   | http://www.youtube.com/watch?v=-PcmH5NATlo  | xDaveyxHavokxRocksx  | 1                  | 1           |
| 2215520        | 10985   | http://www.youtube.com/watch?v=-rttMDBO5Dk  | blommar93            | 1                  | 1           |
| 2214673        | 10985   | http://www.youtube.com/watch?v=-sadDO-6aKQ  | swedeengirl          | 1                  | 1           |
| 2206868        | 10985   | http://www.youtube.com/watch?v=-wVjpV-bvXc  | ikkibodjacob         | 1                  | 1           |
| 2215603        | 10985   | http://www.youtube.com/watch?v=-XeA9yQ2JJU  | Olivia16             | 1                  | 1           |
| 2215193        | 10985   | http://www.youtube.com/watch?v=-yVhGO0CjUI  | DutchOresama         | 1                  | 1           |
| 2214104        | 10985   | http://www.youtube.com/watch?v=-ZSNQbO607s  | Encell1              | 1                  | 1           |
| 2206887        | 10985   | http://www.youtube.com/watch?v=-_xaP7izgVWM | japadamus            | 1                  | 1           |
| 2215755        | 10985   | http://www.youtube.com/watch?v=-_YHMkX439I  | cesaritogay          | 1                  | 1           |
| 2215883        | 10985   | http://www.youtube.com/watch?v=013ImKVM-Aw  | dracx333             | 1                  | 1           |
| 2214446        | 10985   | http://www.youtube.com/watch?v=04CivMoEX50  | aphrodia12           | 1                  | 1           |
| 2215588        | 10985   | http://www.youtube.com/watch?v=04OPd6I56dU  | snailsoup            | 1                  | 1           |
| 2210641        | 10985   | http://www.youtube.com/watch?v=062Ruk1uDUI  | xdodax               | 1                  | 1           |
| 2214705        | 10985   | http://www.youtube.com/watch?v=08vg2Zn_99k  | emjay4u              | 1                  | 1           |
| 2210702        | 10985   | http://www.youtube.com/watch?v=0akTWEFadyU  | bollyboy0001         | 1                  | 1           |
| 2205852        | 10985   | http://www.youtube.com/watch?v=0b09kq9wpXl  | B7L7A7C7K7L7A7G7O07N | 1                  | 1           |
| 2216700        | 10985   | http://www.youtube.com/watch?v=0dmM5CpUHBs  | hugommoreira         | 1                  | 1           |
| 2209346        | 10685   | http://www.youtube.com/watch?v=0Eqs5ln2aJc  | PandaMusic           | 1                  | 1           |
| 2214660        | 10985   | http://www.youtube.com/watch?v=0ew81rQzPSg  | berkgun              | 1                  | 1           |
| 2207056        | 10985   | http://www.youtube.com/watch?v=0ezBEqNOZjY  | hristos76            | 1                  | 1           |
| 2205840        | 10985   | http://www.youtube.com/watch?v=0GNsq_UenIM  | brutalomance2        | 1                  | 1           |
| 2214668        | 10985   | http://www.youtube.com/watch?v=0hOMh3zsvMI  | lan712               | 1                  | 1           |
| 2211289        | 10986   | http://www.youtube.com/watch?v=0i-hBwprBj4  | deadstar11           | 1                  | 1           |
| 2214679        | 10985   | http://www.youtube.com/watch?v=0iQJfBPGgA   | notsuicide           | 1                  | 1           |
| 2216707        | 10985   | http://www.youtube.com/watch?v=0MqfVwyvSNg  | kyo84                | 1                  | 1           |
| 2210980        | 10985   | http://www.youtube.com/watch?v=0pJ67AryYXs  | noxcrosscount        | 1                  | 1           |
| 2215780        | 10985   | http://www.youtube.com/watch?v=0pVW_wkGKctU | wellwisher5          | 1                  | 1           |
| 2210766        | 10985   | http://www.youtube.com/watch?v=0qOs10ET9Ww  | Defwe                | 1                  | 1           |
| 2213440        | 10985   | http://www.youtube.com/watch?v=0robgHB34_4  | METALLICO201         | 1                  | 1           |
| 2210636        | 10985   | http://www.youtube.com/watch?v=0S5d7EbjLWI  | Coldasdeath          | 1                  | 1           |
| 2215630        | 10985   | http://www.youtube.com/watch?v=0sVL2wh_Eco  | beatmasterz          | 1                  | 1           |
| 2210861        | 10985   | http://www.youtube.com/watch?v=0TB0tI8IRsl  | madferit123          | 1                  | 1           |
| 2206842        | 10985   | http://www.youtube.com/watch?v=0wns-exRXYA  | kattytaxxx           | 1                  | 1           |
| 2206367        | 10985   | http://www.youtube.com/watch?v=11g-tB62KeE  | golfmikelover        | 1                  | 1           |
| 2215783        | 10985   | http://www.youtube.com/watch?v=18QnQvodmuM  | beatroc              | 1                  | 1           |
| 2215965        | 10985   | http://www.youtube.com/watch?v=1CG_SY8nxiQ  | mimisi666            | 1                  | 1           |
| 2216713        | 10985   | http://www.youtube.com/watch?v=1fcCSSs3hIY  | rastas2x1            | 1                  | 1           |
| 2211242        | 10986   | http://www.youtube.com/watch?v=1fyKpsGIUGA  | Frankfz66            | 1                  | 1           |
| 2214680        | 10985   | http://www.youtube.com/watch?v=1hUBKztht4Q  | affiq92              | 1                  | 1           |
| 2210700        | 10985   | http://www.youtube.com/watch?v=1kSZGRMmR40  | RESPECTmyHOOD        | 1                  | 1           |
| 2215684        | 10985   | http://www.youtube.com/watch?v=1ZCyQSh0Btl  | 69modelcitraends     | 1                  | 1           |
| 2214708        | 10985   | http://www.youtube.com/watch?v=26xnnkmT38c  | acaptake             | 1                  | 1           |
| 2205709        | 10985   | http://www.youtube.com/watch?v=2aq3oAm0e4M  | tukmol259            | 1                  | 1           |
| 2206608        | 10985   | http://www.youtube.com/watch?v=2bGqoY7H2Vc  | fai19                | 1                  | 1           |
| 2210939        | 10985   | http://www.youtube.com/watch?v=2cAdpC3b5BQ  | avriilthdotcom       | 1                  | 1           |
| 2210756        | 10985   | http://www.youtube.com/watch?v=2D8M7zD9YoY  | Hisoka973            | 1                  | 1           |
| 2214695        | 10985   | http://www.youtube.com/watch?v=2dzQ-ugK2L4  | darkanbu             | 1                  | 1           |
| 2215587        | 10985   | http://www.youtube.com/watch?v=2HIT8q7VDnM  | snailsoup            | 1                  | 1           |
| 2211234        | 10986   | http://www.youtube.com/watch?v=2K3FK2vVITg  | AmyHalliwell         | 1                  | 1           |
| 2215793        | 10985   | http://www.youtube.com/watch?v=2kdXU2eoOyM  | linkinkohl02         | 1                  | 1           |
| 2216740        | 10985   | http://www.youtube.com/watch?v=2KgXAdMJS_A  | katamariroller22     | 1                  | 1           |
| 2215200        | 10985   | http://www.youtube.com/watch?v=2r7rre11O38  | PsykoticAnimeFrk     | 1                  | 1           |
| 2213415        | 10985   | http://www.youtube.com/watch?v=2rJ-V0QoQDY  | HallandOates         | 1                  | 1           |
| 2211298        | 10986   | http://www.youtube.com/watch?v=2sc7OQFayNg  | stellacottonn        | 1                  | 1           |
| 2215206        | 10985   | http://www.youtube.com/watch?v=2uc3NmEXN_4  | gnomocent            | 1                  | 1           |
| 2209343        | 10685   | http://www.youtube.com/watch?v=2Zrd4Y-xCgk  | Vinceth89            | 1                  | 1           |
| 2214696        | 10985   | http://www.youtube.com/watch?v=3-EW42Jcgco  | applebee             | 1                  | 1           |
| 2215693        | 10985   | http://www.youtube.com/watch?v=34nTDCmVDPw  | Suu100               | 1                  | 1           |
| 2214674        | 10985   | http://www.youtube.com/watch?v=38R5CbK9Xoo  | nikhillav            | 1                  | 1           |
| 2213626        | 10985   | http://www.youtube.com/watch?v=3by_2XA54W0  | Jack6390             | 1                  | 1           |
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