

HIGHLY CONFIDENTIAL -- OUTSIDE
COUNSEL'S EYES ONLY

1/8/2010 Kacholia, Varun

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
ATTORNEYS EYES ONLY

VIACOM INTERNATIONAL INC., COMEDY)
PARTNERS, COUNTRY MUSIC)
TELEVISION, INC., PARAMOUNT)
PICTURES CORPORATION, and BLACK)
ENTERTAINMENT TELEVISION, LLC,)
Plaintiffs,)
vs.)
YOUTUBE, INC., YOUTUBE, LLC,)
and GOOGLE, INC.,)
Defendants.)

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Figueira Decl. Tab
58

Redacted Pursuant to
Protective Order at
Request of Defendants

THE FOOTBALL ASSOCIATION PREMIER)
LEAGUE LIMITED, BOURNE CO., et al.)
on behalf of themselves and all)
others similarly situated,)
Plaintiffs,)
vs.)
YOUTUBE, INC., YOUTUBE LLC, and)
GOOGLE, INC.,)
Defendants.)

Deposition of VARUN KACHOLIA
Palo Alto, California
Friday, January 8, 2010

JOB NO. 18544

1 16:00:00 filtered for duplicates at all. Now, ~~the~~ search
2 engine -- I'm speaking in very layman's terms here.

3 MR. GALDSTON: Please.

4 THE WITNESS: The search engine now goes
5 through these results, looks at which ones it has
6 already seen earlier in the list. And, if it has
7 already seen earlier in the list, then it filters them
8 out.

9 Is that more simpler?

10 MR. GALDSTON: It is. I'm still a little
11 unclear as to whether there's any way other than the
12 search engine algorithm that --

13 Let me withdraw the question. It's poorly --
14 It's poorly-phrased. The -- and let me back up just one
15 16:00:00 other foundational question.

16 Q The way that the search engine determines that
17 it has returned duplicate videos, I believe you
18 testified was by matching fingerprints of the videos; is
19 that accurate?

20 A Yes.

21 Q Who generates the fingerprints to the videos?

22 MR. RUBIN: Objection, vague.

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