

1/8/2010 Kacholia, Varun

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

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

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

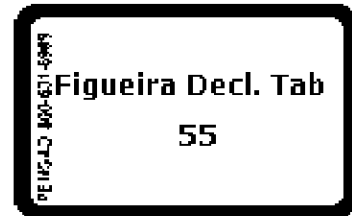
14 _____)
15 THE FOOTBALL ASSOCIATION PREMIER)
16 LEAGUE LIMITED, BOURNE CO., et al.)
17 on behalf of themselves and all)
18 others similarly situated,)
19 Plaintiffs,)

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

24 _____)
25

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

JOB NO. 18544



Case No 1:07CV02103

Case No. 07CV03582

1 10:48:18

A Yes.

55-0002

2 Q Are you familiar with this functionality?

3 A Yes.

4 Q Can you tell me what that means?

5 MR. RUBIN: Objection, vague, and document
6 speaks for itself.

7 THE WITNESS: Some search results were omitted
8 because they were considered duplicate to what was
9 already shown.

10 MS. MAGUIRE:

11 Q How does the search engine identify
12 duplicates?

13 MR. RUBIN: Objection, vague, calls for a
14 narrative.

15 10:49:05 THE WITNESS: Based on a fingerprint of the
16 video.

17 MS. MAGUIRE: Okay.

18 Q For the purposes of this functionality, what is
19 a duplicate?

20 MR. RUBIN: Vague.

21 THE WITNESS: Any video which the automated
22 system considers very similar to what is already listed
23 here.

24 MS. MAGUIRE: Very similar. Okay.

25 Q Does it mean that if multiple videos have the