

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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

Plaintiffs,

vs.

No. 07-CV-2203

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

Defendants.

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

Plaintiffs,

vs.

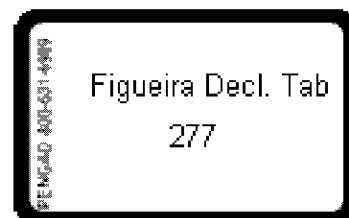
No. 07-CV-3582

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

Defendants.

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HIGHLY CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF DAVID DRUMMOND  
SAN FRANCISCO, CALIFORNIA  
THURSDAY, FEBRUARY 12, 2009  
Job No.: 16392



1 DAVID DRUMMOND

2 16:36:53 A. Well, I -- as I sit here today, I don't  
3 16:36:55 have any reason to take issue with it or validate  
4 16:37:00 it.

5 16:37:04 Q. Now, if a member -- if the runner of one  
6 16:37:07 of these private sites or the owner of one of these  
7 16:37:10 private sites -- I'm not sure what the proper  
8 16:37:12 terminology is. Do you know what it is?

9 16:37:14 A. No, I don't.

10 16:37:16 Q. Well, why don't we agree on "operator" of  
11 16:37:19 one of the private sites? Is that --

12 16:37:21 A. That's fine.

13 16:37:22 Q. Okay. If the operator of one of these  
14 16:37:25 private sites decides to upload entire movies or  
15 16:37:33 television shows onto the private sites, is there  
16 16:37:39 any way a content owner can access these private  
17 16:37:45 accounts to take down those movies or TV --  
18 16:37:48 television shows?

19 16:37:50 A. I'm not aware of ways in which they could  
20 16:37:53 do that.

21 16:37:56 Q. Now, does YouTube today use its CYC-type  
22 16:38:31 technology to scan private accounts for violations  
23 16:38:40 of either policy or copyright?

24 16:38:42 A. You know, I'm not -- I'm not -- I don't  
25 16:38:46 actually know whether we do that or not.