

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.)

NO. 07-CV-2203)

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.)

NO. 07-CV-3582)

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

Defendants.)

VIDEOTAPED DEPOSITION OF JAWED KARIM
PALO ALTO, CALIFORNIA
TUESDAY, JUNE 9, 2009

JOB NO. 16798



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

1 KARIM, JAWED

14:19:19 2 particular e-mail.

14:19:20 3 BY MR. BASKIN:

14:19:20 4 Q. Well, towards the bottom of Exhibit 29,
14:19:30 5 there's a sentence that begins, "If videos get
14:19:31 6 flooded with porn" -- and then it goes on to talk
14:19:32 7 about -- "we could always approve videos first
14:19:36 8 before they are shown anywhere. That's a one-line
14:19:40 9 code change."

14:19:41 10 Do you see that, sir?

14:19:42 11 A. Uh-huh.

14:19:43 12 Q. Is that the sentence that you're telling us
14:19:46 13 is now a simplification?

14:19:49 14 A. I mean, you know, most changes are not
14:19:53 15 one-line code changes. It's used as an expression
14:19:56 16 to say that something is fairly simple, but it may
14:20:00 17 not be one line.

14:20:01 18 Q. But as I understand it, to make this change
14:20:05 19 would have been -- for someone like you, would have
14:20:08 20 been a very simple thing to undertake; right?

14:20:13 21 MR. INGBER: Objection, vague and
14:20:15 22 ambiguous.

14:20:15 23 THE WITNESS: It would have been a pretty
14:20:17 24 simple change.

14:20:18 25 BY MR. BASKIN:

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KARIM, JAWED

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Q. Now, was there a decision made within YouTube in and around April of 2005 not to permit the administrative interface to block videos from going -- from being viewed prior to review?

MR. PAGE: Objection, vague and ambiguous.

THE WITNESS: Um, so this was discussed before the Web site launched. So actually, everything we discuss at this point is really subject to, you know, changing, and we were considering different possibilities.

BY MR. BASKIN:

Q. My question is: Was a decision made -- when the administrative interface went live, was a decision made not to write the code to permit review of videos by the interface prior to their being displayed to the public?

A. Um, I don't know if -- so you're asking me about the initial kind of implementation of the -- of this interface?

I think it probably varied. I think, you know -- this is before the Web site launched. I think we probably tried out different approaches. So I wouldn't be surprised if we had tried both of those approaches.

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KARIM, JAWED

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Q. Well, one possibility was to review videos before they became publicly available; correct?

A. That's one of the possibilities.

Q. And was that possibility ever adopted by YouTube, to your knowledge?

MR. INGBER: Objection, vague.

THE WITNESS: I don't remember, but I think it's very possible that we used both approaches.

BY MR. BASKIN:

Q. When did you use both approaches, Mr. Karim?

MR. PAGE: Objection, misstates his prior testimony.

MR. INGBER: Same objection.

THE WITNESS: I don't remember exactly when but these -- the approaches changed, I'm pretty sure.

BY MR. BASKIN:

Q. Can you tell us any period of time when the interface was set up to review videos before they became publicly available?

A. I don't know the time frame. I think it's very likely that that was the case for some time.

Q. What time, sir?