

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.)

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.)

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

Defendants.)

VIDEOTAPED DEPOSITION OF MARYROSE DUNTON
SAN FRANCISCO, CALIFORNIA
FRIDAY, AUGUST 22, 2008

BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CLR
CSR LICENSE NO. 9830
JOB NO. 15500



NO. 07-CV-2203

NO. 07-CV-3582

DUNTON

1
2 18:01:27 are you familiar with something called Copyright Cop?
3 18:01:34 A Yes. I believe Copyright Cop was what we
4 18:01:38 internally called the first iteration of the CVP Tool.
5 18:01:45 Q Okay.
6 18:01:47 A Verification Program, or something like that.
7 18:01:49 Q What is the CVP Tool?
8 18:01:52 A It allowed content owners to -- I'm trying to
9 18:02:03 remember this correct -- to search the YouTube website
10 18:02:06 and send us automated DMCA takedown notifications.
11 18:02:14 Q And you said that Copyright Cop was the first
12 18:02:18 iteration of that?
13 18:02:19 A I think we used Copyright Cop internally to
14 18:02:23 refer to that -- to that functionality.
15 18:02:29 Q Okay. Can you -- were you involved with the
16 18:02:36 creation of Copyright Cop?
17 18:02:42 A I was involved in the implementation of the
18 18:02:47 initial CVP Tool, yes.
19 18:02:50 Q And is that something -- that's something
20 18:02:53 that YouTube developed on its own?
21 18:02:57 A As opposed to --
22 18:02:58 Q It wasn't like software you purchased --
23 18:03:01 A Oh, I don't --
24 18:03:02 Q -- somewhere?
25 18:03:02 A -- I don't believe so, no. We developed it.