

9/10/2009 Ikezoye, Vance



1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

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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. )

NO. 07-CV-2103

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. )

NO. 07-CV-3582

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

23 Defendants. )

24 VIDEOTAPED DEPOSITION OF VANCE IKEZOYE  
25 PALO ALTO, CALIFORNIA  
THURSDAY, SEPTEMBER 10, 2009

JOB NO. 17619

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2 Q Direct your attention to paragraph 18 of the  
3 exhibit, which is on page five. The last sentence of

4 that paragraph states, "The Audible Magic iMesh filter  
5 has scaled seamlessly to 5 million lookups per day and  
6 easily could scale to meet the needs of any network in  
7 use today."

8 Can you first explain what the Audible Magic  
9 iMesh filter was that you were talking about here in  
10 this paragraph?

11 A We had provided iMesh a -- software and  
12 services that they integrated in their software  
13 application that users used, and so the service was to  
14 identify content that was being uploaded or downloaded  
15 within this network.

16 Q And iMesh -- is iMesh an example of one of  
17 the Web 2.0 sites that we were talking about earlier  
18 this morning?

19 A No, it's a peer-to-peer network, file sharing  
20 network provider.

21 Q Okay. And what does it mean or what did you  
22 mean when you said "the filter has scaled seamlessly  
23 to 5 million lookups per day"?

24 Actually, let me break that down. Let's  
25 start with, what does "5 million lookups per

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2 show, those would each be unique titles in our  
3 database.

4 Q Okay. Let's go back to the libraries we were  
5 discussing a moment ago.

6 When did Audible Magic first create the  
7 commercial music library?

8 A It probably started in -- where we acquired  
9 most of the content in 2002 or 2003.

10 Q And when did Audible Magic begin populating  
11 the TV movie database?

12 A Probably, early 2006 we started with -- we  
13 started that effort.

14 Q Can you describe how that effort was started.

15 A We were working on a video fingerprinting  
16 technology and needed some sample files to begin to  
17 use to -- for testing, and so we used DVDs to generate  
18 some of the fingerprints.

19 (Document marked Ikezoye Exhibit 4  
20 for identification.)

21 MR. DESANCTIS: Let me show you, Mr. Ikezoye,  
22 what has been marked as Ikezoye Exhibit 4.

23 MR. BLY: Michael, if I could interrupt here  
24 for a moment. When we were prepping for the  
25 deposition yesterday, we realized that there were a