

4/22/2009 Hurley, Chad



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

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

7 vs. ) NO. 07-CV-2203  
8 )

YOUTUBE, INC., YOUTUBE, LLC, )  
9 and GOOGLE, INC., )  
10 Defendants. )

11 )  
THE FOOTBALL ASSOCIATION PREMIER )  
12 LEAGUE LIMITED, BOURNE CO., et al., )  
on behalf of themselves and all )  
13 others similarly situated, )

14 Plaintiffs, )  
15 vs. ) NO. 07-CV-3582  
16 )

YOUTUBE, INC., YOUTUBE, LLC, and )  
16 GOOGLE, INC., )  
17 Defendants. )

18 VIDEOTAPED DEPOSITION OF CHAD HURLEY  
SAN FRANCISCO, CALIFORNIA  
19 WEDNESDAY, APRIL 22, 2009

20 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CLR  
JOB NO. 16789  
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2 they -- they thought about the clip, I guess. You  
3 know, one through five. One being bad and five being  
4 great.

5 Q Does that five stars there indicate that the  
6 people were rank -- ranking it as five stars, or does  
7 that indicate something else?

8 A It looks like I can't -- I can't tell the --  
9 the color. It's either zero stars or all five stars.

10 Q Oh, okay. I have just one question about  
11 this.

12 On the bottom right-hand corner it says  
13 "featured videos."

14 How did it come to be that those particular  
15 videos are featured on this Watch Page with the  
16 Arsenal versus Manchester United video clip?

17 A Again, with -- with the name changes  
18 recently, I'm not sure. I think -- well, it looks  
19 like they're all partners. Expert Village, Blooms --  
20 Bloomberg, Beyonce. They're all partner videos that  
21 have been randomly selected.

22 Q And YouTube generates revenue from its  
23 partner deals; right?

24 A Yeah, potentially, yes.

25 Q Now, the re- -- the related video -- I'm

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2 sorry.

3 On the right-hand corner, it also says  
4 "related videos"; do you see that?

5 A Yep.

6 Q What -- what -- and then -- and then I think  
7 it has a list of similar videos?

8 A Uh-huh.

9 Q How did that list come to be generated?

10 A Again, I think it's -- well, it's a technical  
11 question that I don't know the answer for. Somehow  
12 some kind of algorithm choosing what -- what's  
13 appropriate to show.

14 Q So there's some algorithm at YouTube that --  
15 that determined that the videos in this block were  
16 related to the video that's playing on the watch  
17 block?

18 MR. SCHAPIRO: Objection; calls for  
19 speculation.

20 THE WITNESS: Yeah, I -- I -- again, I don't  
21 know the details of how that actually works, but it's  
22 trying to show related videos, however that is  
23 determined.

24 MR. BROWNE: Okay. I have just one document  
25 and then I'm done.