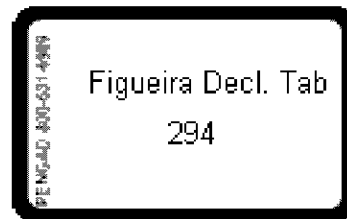


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COUNSEL'S EYES ONLY

11/13/2009 Liu, Matthew

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



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 _____)
25 VIDEOTAPED DEPOSITION OF MATTHEW LIU
SAN FRANCISCO, CALIFORNIA
FRIDAY, NOVEMBER 13, 2009

JOB NO. 17826

1 LIU, MATTHEW

2 use to target in Search PVAs?

3 A YouTube does not actually target --

4 Q Okay.

5 A -- on behalf of advertisers, but it offers
6 targeting abilities to advertisers.

7 Q Okay. So the advertiser selects how they
8 want to do the targeting; is that correct?

9 A Yes.

10 Q Okay. What options does YouTube provide for
11 targeting?

12 A On the Search PVA?

13 Q Uh-huh, correct.

14 A The targeting options an advertiser has are
15 run of site, which is show on any search pages, or
16 they can do, again, a technical term called vertical
17 targeting, and there's also geographic targeting.
18 There's demographic targeting, and it is possible to
19 do more than one of these at one time.

20 Q Okay. Can you define what "run of
21 site" means?

22 A Run of site essentially means the advertiser
23 just wants to run the ad, and they also specify the
24 number of impressions, and this information goes to
25 the ad server that the -- in this case, YouTube is

1 LIU, MATTHEW

2 using, and the ad server sees these ads as ads that it
3 can run on untargeted inventory.

4 Inventory is also a trade term, and these ads
5 can then run, I guess, in whatever instance the ad
6 server sees availability for inventory.

7 Q Okay.

8 MR. MANCINI: Just to be clear, we are
9 talking about present tense; correct?

10 MS. MAGUIRE: Correct.

11 Q Mr. Liu, can I ask, did you say the ad server
12 sees these ads that it can run on targeted inventory
13 or untargeted inventory?

14 A Sorry. That was a poor description.

15 That is what I said, but it's a little hard
16 to describe.

17 Q What is inventory?

18 A Inventory, again, is a term used. It's a
19 technical term. It's an industry term, but it refers
20 to areas where -- where a publisher, also a technical
21 term, can run advertising on behalf of advertisers, so
22 it's the location.

23 Q Okay. And who's the publisher?

24 A The publisher is a technical term, and in
25 this case, YouTube is the publisher.

1 LIU, MATTHEW

2 Q Okay. Thank you.

3 You used the term "vertical" earlier.

4 What is a "vertical"?

5 A Vertical, once again, is a very specific
6 technical term. In this case, we defined it as a -- a
7 category of search queries that have been classified.

8 Q What is a search query? What do you mean by
9 that?

10 A A search query is an industry term that,
11 again, there's a very specific definition, but my
12 definition is a -- it's the string of keywords, one or
13 more keywords that a user enters into a search bar --

14 Q Okay.

15 A -- in order to run a search query --

16 Q Okay.

17 A -- on a search engine.

18 Q Okay. And how do you run -- how do you run a
19 search query in a search engine?

20 A I'm not the best person to answer that
21 question.

22 Q Okay. A vertical -- Mr. Liu, you testified
23 earlier that a vertical is defined in this case as a
24 category of search queries that have been classified.

25 What is a category of search query?