

10/3/2008 Reider, Suzanne



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

2 VIACOM INTERNATIONAL, INC., COMEDY )  
3 PARTNERS, COUNTRY MUSIC. )  
TELEVISION, INC., PARAMOUNT )  
4 PICTURES CORPORATION, and BLACK )  
ENTERTAINMENT TELEVISION, LLC, )

5 )  
6 Plaintiffs, )

7 vs. )

NO. 07-CV-2203

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

9 Defendants. )  
10 \_\_\_\_\_ )

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

13 Plaintiffs, )

14 vs. )

NO. 07-CV-3582

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

16 Defendants. )  
17 \_\_\_\_\_ )

18 VIDEOTAPED DEPOSITION OF SUZANNE REIDER  
SAN FRANCISCO, CALIFORNIA  
19 FRIDAY, OCTOBER 3, 2008  
20

21 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CLR  
CSR LICENSE NO. 9830  
JOB NO. 15910  
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24  
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1 REIDER

2 ambiguous.

3 THE WITNESS: Which I'll answer with, every  
4 campaign is set up in a different way.

5 MR. BROWNE: Q. Well, have there been  
6 instances that you have told advertisers that there  
7 can be an indirect link between their advertisements  
8 and the particular searches that YouTube users do on  
9 the YouTube search page?

10 A If you go back to that piece of collateral  
11 that you had printed out from Videocracy and think  
12 about that for a minute, at the -- that where we  
13 highlight that we have content partners in news or in  
14 sports or in wherever, that we tell advertisers that  
15 if you want to buy against music content, you can buy  
16 against music content.

17 Q And that would be, if we're thinking back to  
18 Exhibit 9 when we -- which was the online media kit  
19 and it referenced search and category pages, that,  
20 what you just gave me an example of, will be a  
21 category search category?

22 A InVideo. Actually, I was thinking about the  
23 InVideo that we were looking at first.

24 Q When a -- when an advertiser has the ability  
25 to or when YouTube has the ability to link

1 REIDER

2 advertisements to, as you put it, sports and  
3 music --

4 A Uh-huh.

5 Q -- isn't that -- correct me if I'm wrong, but  
6 isn't that what you call a -- a -- a category?

7 A So I don't know how this was set up in the  
8 system. I don't know exactly what the -- what this  
9 is, other than what we're looking at. But if somebody  
10 searches for "auto," then it's possible -- or for  
11 "fast cars," then it's possible that an automotive  
12 manufacturer would be able to serve an automotive ad.

13 Q Do -- do you mind just flipping back  
14 to -- through that stack to Reider Exhibit 9, which  
15 was the one-page --

16 A Yeah.

17 Q -- document called "YouTube Video Ads." And  
18 the second bullet point up from the word "features,"  
19 it says there "Search and category pages present  
20 content related to user interest at the moment of  
21 relevance" and then it goes on.

22 A Uh-huh.

23 Q Do you see that?

24 A "Features"; where am I?

25 Q I'm sorry.