

10/3/2008 Reider, Suzanne



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

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

8 Plaintiffs,)

9 vs.)

NO. 07-CV-2203

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

12 Defendants.)

13 _____)
14 THE FOOTBALL ASSOCIATION PREMIER)
15 LEAGUE LIMITED, BOURNE CO., et al.,)
16 on behalf of themselves and all)
17 others similarly situated,)

18 Plaintiffs,)

19 vs.)

NO. 07-CV-3582

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

22 Defendants.)

23 VIDEOTAPED DEPOSITION OF SUZANNE REIDER
24 SAN FRANCISCO, CALIFORNIA
25 FRIDAY, OCTOBER 3, 2008

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

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.