

12/12/2008 King, David



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 HIGHLY CONFIDENTIAL
VIDEOTAPED DEPOSITION OF DAVID KING
SAN FRANCISCO, CALIFORNIA
19 FRIDAY, DECEMBER 12, 2008
20

21 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
CSR LICENSE NO. 9830
JOB NO. 16211
22
23
24
25

1 KING

2 MS. LACAVERA: Catherine Lacavera for Google.

3 MR. HART: Bill Hart, Proskauer Rose,
4 plaintiffs.

5 MR. DESANCTIS: Michael DeSanctis, Jenner &
6 Block, for the Viacom plaintiffs.

7 MS. MAGUIRE: Sarah Maguire, Jenner & Block,
8 for the Viacom plaintiffs.

9 MR. TRUELOVE: Kelly Truelove, consultant for
10 the Viacom plaintiffs.

11 THE VIDEOGRAPHER: Thank you.

12 Would the court reporter please swear in the
13 witness.

14 DAVID KING,
15 having been sworn as a witness,
16 testified as follows:

17
18 EXAMINATION BY MR. HART

19 MR. HART: Q. Good morning, Mr. King.

20 A Good morning.

21 Q Are you employed?

22 A I am.

23 Q By whom?

24 A By Google.

25 Q How long have you been employed by Google?

1 KING

2 A Since January 2007.

3 Q How did you come to work for Google?

4 A I called up some people I knew that were
5 working there and -- and said that I was interested in
6 exploring employment opportunities.

7 Q And what were you told?

8 A I was told that they were interested, and I
9 went by their office and met with them and we
10 proceeded from there.

11 Q And "them" is who?

12 A So the people I met with -- you would like --

13 Q Yes, please.

14 A -- a complete list of names or --

15 Q Who did you meet with?

16 A Who did I meet with?

17 Okay. I met with Franck Chastagnol, and with
18 Zahavah Levine, and with Chris Maxcy, and with Steve
19 Chen, and with Yi-Ling Su, and those are the names I
20 recall at this moment.

21 Q Okay. And all the folks you just mentioned,
22 did you meet with them at one meeting or was this
23 through a series of meetings?

24 A It was, you know, in an interview situation.
25 So typically I met with people individually, and then