EXHIBIT P

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2	UNITED STATES DISTRICT COURT
3	WESTERN DISTRICT OF NEW YORK
4	
5	PAUL D. CEGLIA,)
)
6	Plaintiff,)
)
7	vs.) No. 1:10-cv-00569
) (RJA)
8	MARK ELLIOT ZUCKERBERG,)
	Individually, and)
9	FACEBOOK, INC.,)
)
10	Defendants.)
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16	July 25, 2012
17	10:14 a.m.
18	
19	Deposition of JAMES A. BLANCO, held at
20	the offices of Gibson, Dunn & Crutcher LLP,
21	200 Park Avenue, New York, New York, pursuant
22	to court order, before Laurie A. Collins, a
23	Registered Professional Reporter and Notary
24	Public of the State of New York.
25	

	Page 2
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2	APPEARANCES:
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16	SRIPRIYA NARASIMHAN, ESQ.
17	MATTHEW BENJAMIN, ESQ.
18	AMANDA AYCOCK, ESQ.
19	
20	ALSO PRESENT:
21	CODY DETWEILER
22	JERRY LaPORTE
23	GUS LESNEVICH
24	PETER TYTELL
25	DMITRY ZVONKOV, Videographer

1	Blanco
2	document with VSC?
3	A. No. That's kind of the same question
4	as UV and infrared. But no, I did not.
5	Q. You did not use a VSC?
6	A. No, I did not bring one.
7	Q. You have a portable VSC; correct?
8	A. Well, I have a I have a VSC 4 plus.
9	I wouldn't really call that portable. I do have a
10	portable system that I've developed.
11	Q. I see. But you did not bring that to
12	this inspection; correct?
13	A. Correct, because it was my
14	understanding Mr. Stewart was going to do those
15	analyses.
16	Q. You did not use a stereomicroscope in
17	your examination; correct?
18	A. Well, not a stereomicroscope. I used
19	my close-up lens on my camera, which is better
20	than a lot of portable microscopes.
21	Q. I see. And what's the make and model
22	of the camera?
23	A. Well, it's a Canon camera, but what's
24	significant is the lens. It's an \$1100 lens, a

very good lens.

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Q. My question was, as you have
acknowledged, which you just did a few moments
ago, when the "work for hire" document was
provided for inspection on July 14th, the ink
could have been faded; right? You just
acknowledged that a few minutes prior.

I'm not talking about your declaration;
I'm talking about what we were just talking about,
because you weren't in fact there.

- A. All right.
- Q. Am I correct that on that morning of the 14th the ink could very well have been faded?
- A. When it appeared and was unveiled, you're asking me.
 - Q. Right, yes.
- A. Yes, some fading, some damage, some typical -- actually probably a little beyond typical damage just in as much as there were pretty extreme environmental storage conditions.
- Q. Right. And that could have led -well, for whatever reasons, there could have been
 faded ink on the morning of July 14th, as
 Mr. Tytell put in his declaration; correct?
 - A. Well, I'd say yes.

1	Blanco
2	Q. Do you think that Mr. Tytell is lying?
3	A. No, no. But it's a judgment call what
4	he's looking at. So he when he
5	Q. But my question is do you think he's
6	lying. You answered that.
7	MR. BOLAND: Objection. You're
8	interrupting his question response.
9	MR. SOUTHWELL: No, his response.
10	MR. BOLAND: You have done that several
11	times now, Alex.
12	A. I don't think he's lying, but to finish
13	my answer
14	Q. My question is do you think he's lying
15	or not.
16	A. I think you rolled out of another
17	question. Can we read it back, go back a couple?
18	Q. I'll read it to you. I'll ask the
19	court reporter to read it to you at line 121.
20	(Discussion off the record.)
21	(Record read as follows: Right. And
22	that could have led well, for whatever
23	reasons, there could have been faded ink on
24	the morning of July 14th, as Mr. Tytell put in
25	his doglaration: correct?)

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A. That's what I want to answer, and so, no, I'm not saying he's lying. I have no reason to believe he's lying.

But when a person is looking at something and then they report that I see fading or deterioration, well, what level was that?

That's the question I'm -- I'm confronted with is did he see a little and he reported that or did it -- was there a lot. And so that -- and even if he says there's a lot, what does that really mean to him.

So that's where there's a bit of confusion on my part in trying to assess that.

Again, I'm trying to assess that without getting native format production of your experts' documents and imagery. When I say "documents," I just mean imagery.

- Q. If Mr. Tytell testified that the appearance of the ink did not change between July 14th and July 15th, would he be lying then?
- A. No, it doesn't mean he's lying. He could be wrong. It doesn't mean he's lying. To be wrong doesn't mean you're lying.
 - Q. And if he were to testify to that, you

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- 2 that Mr. Rantanen did.
- Am I pronouncing that right, Rantanen?
- Q. No, but that's okay.
- 5 A. Okay.

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- O. We won't tell?
- A. That's what I've been saying the whole time. That's what I thought it was.
- Q. But right. You make certain assertions about his results. Those are among the additional opinions that you have, including handwriting and staple analysis, the impression analysis, all of which go to support your general opinion, as you set out in your report, that the Facebook contract, the "work for hire" contract, is an authentic, unaltered document; right?
 - A. Yes.
- Q. And with the exception of the handwriting analysis, which we will talk about momentarily. But with the exception of the handwriting analysis, all of the other additional opinions which you set out in your report are completely consistent with the hypothetical that Mr. Ceglia forged both pages of the "work for hire" document at the same time; correct?

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- 2 3
- Α. It would be consistent -- to be clear, that's not my opinion, but you gave me the hypothetical --
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Ο. Yeah.

Q.

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Α. -- and in that hypothetical, irrespective of the handwriting, as you said, then that would be consistent, yes.

Now, you understand best practices in

Yes, to the extent that you can perform

To the extent that you can have time to

So by "accompaniments," something like

- 9 10
- conducting forensic examination of documents, and 11 one tenet of that would be that all portions of a
- 12
- questioned document are important to consider in
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- rendering an evaluation; right?
- 15
- detailed analysis of everything that you can, yes.
- 16
- So that would be all writings, Ο. markings, and accompaniments to a document?

write about them in a report, yes.

- 17

an envelope in which a document was found or

- 18 19
- examine them, explore them, consider them, and
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However, I've done this and I've seen When I was at government crime labs, we would use other things, anything handy to hold down a document, even a penny, a couple of dimes, a quarter, whatever was handy to place on the document to hold it down.

So it is common practice to do something -- to use something.

- So your basis for asserting this Q. possibility is that you believe it's common practice, but you don't actually have any factual basis for suggesting that this theory occurred with respect to this "work for hire" document; correct?
 - Α. Correct.
- The other possible explanation you Q. speculate about with respect to the fluorescent tabs is that an ungloved hand wearing suntan lotion or something similar may have touched the document and left deposits of suntan lotion in those particular locations; right?
- Yes, or something else, such as talcum Α. powder.
 - Now, do you have any specific factual Q.

1	Blanco
2	basis that this in fact affected this "work for
3	hire" document?
4	A. No.
5	Q. This is, again, just speculation about
6	a possibility; correct?
7	A. It is.
8	Q. Now, in your report at page 76, you
9	include copies of some of the images taken by
10	Mr. Tytell of the "work for hire" document on July
11	14th, 2011; right?
12	A. Yes.
13	Q. Those images show the fluorescent tabs
14	that we've just been talking about that both you
15	and defendants' experts described in your reports?
16	A. Yes.
17	Q. Mr. Tytell was the first expert to
18	examine the document; right?
19	A. Yes.
20	Q. And Mr. Tytell's images here clearly
21	show that the fluorescent tabs exist; correct?
22	A. I'm trying to get located here.
23	Q. Paragraph 201, page 76.
24	A. I'm with you, yes.

Your Figure 14.

Q.

	Tuge 201
1	Blanco
2	A. Yes, go ahead.
3	Q. Those images clearly show the
4	fluorescent tabs exist; right?
5	A. Yes.
6	Q. So, Mr. Blanco, you have no reason to
7	believe the fluorescent tabs were not present on
8	the document at 9:11 a.m. on July 14th when
9	Mr. Tytell took the first images of the "work for
10	hire" document, do you?
11	A. I don't have any factual basis for
12	that, to believe that, no.
13	Q. You have no basis to know when the
14	fluorescent tabs appeared on the "work for hire"
15	document; right?
16	A. Right. And I think I said towards the
17	end of this discussion, the truth is none of the
18	experts really know where these came from.
19	Q. And you note in your report that the
20	"work for hire" document was stored in such a way
21	that it had to endure extreme variations in
22	temperature and changes in humidity over the
23	years; right?
24	A. Yes.

You mentioned in your report these

Q.