FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX.
FT. WORTH DIVISION

2009 AUG 21 PM 3: 00

CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,	§
Plaintiff,	§
	§
V.	§ Civil Action No. 4-08-CV-626-A
	§
YAHOO! INC., and	§
OVERTURE SERVICES, INC. d/b/a	§
YAHOO! SEARCH MARKETING,	§
	§
Defendants.	§

DECLARATION OF JYOTHI SUNNADKAL
PURSUANT TO AUGUST 11, 2009 ORDER REGARDING YAHOO!'S
ELECTRONICALLY STORED INFORMATION

Defendants Yahoo!, Inc. and Overture Services, Inc. (collectively "Yahoo!") file

the attached copy of the Declaration of Jyothi Sunnadkal pursuant to the Court's August

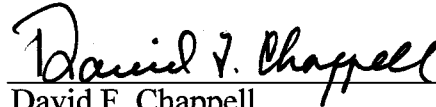11, 2009 Order regarding Yahoo!'s electronically stored information.

Dated: August 21, 2009

Respectfully submitted,

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and OVERTURE SERVICES, INC. d/b/a
YAHOO! SEARCH MARKETING

CERTIFICATE OF SERVICE

The undersigned attorney certifies that a true copy of the foregoing document has been served on counsel of record as follows:

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Date: August 21, 2009

David F. Chappell

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,

.Plaintiff,

. -v.-

YAHOO! INC. and OVERTURE SERVICES,
INC. d/b/a YAHOO! SEARCH MARKETING,

Defendants.

Case No. 4:08-CV-626-A

DECLARATION OF JYOTHI SUNNADKAL PURSUANT TO AUGUST 11, 2009 ORDER REGARDING YAHOO!'S ELECTRONICALLY STORED INFORMATION

REDACTED VERSION

sf-2730344

I, Jyothi Sunnadkal, declare as follows:

1.   I am the Manager of Service Engineering at Yahoo! Inc. My responsibilities include processing, maintaining, and accessing data stored within Yahoo!'s Sage Data Warehouse. I have been employed at Yahoo! in a data operations capacity since July 2002. I hold a B.S. in Electronics and Communications from NITK Surathkal in Mangalore, India.

2.   I make this declaration pursuant to the Court's August 11, 2009 Order regarding Yahoo!'s electronically stored information. I have personal knowledge of the facts set forth herein, and if called upon to do so, I could and would competently testify thereto.

3.   I have reviewed the questions posed by American Airlines in the August 18, 2009 letter from American's counsel. The answers that I provide herein are based on my personal knowledge, as well as information obtained from several engineers on my team. In each of the paragraphs below, I have included the question in italics, together with the answer.

4.   *"1. What backup software is used to backup the Sage database?"*

5.   *"2. What tape type is used (SDLT, LTO, etc.) to backup the Sage database?"*

6.   *"3. Please describe in detail the backup methodology used to backup the Sage database. In addition to identifying the general type of backup (i.e., full image, full file-level, incremental, differential, etc.), please provide detail as to how the backup process is implemented and documented."*

7.   *"4. How many discrete backup sets contain the data requested by American ("Requested Data") for the target time period of January 2007 through September 2007. If a given backup spans multiple tapes, please identify the number of individual tapes contained within each discrete backup set."*
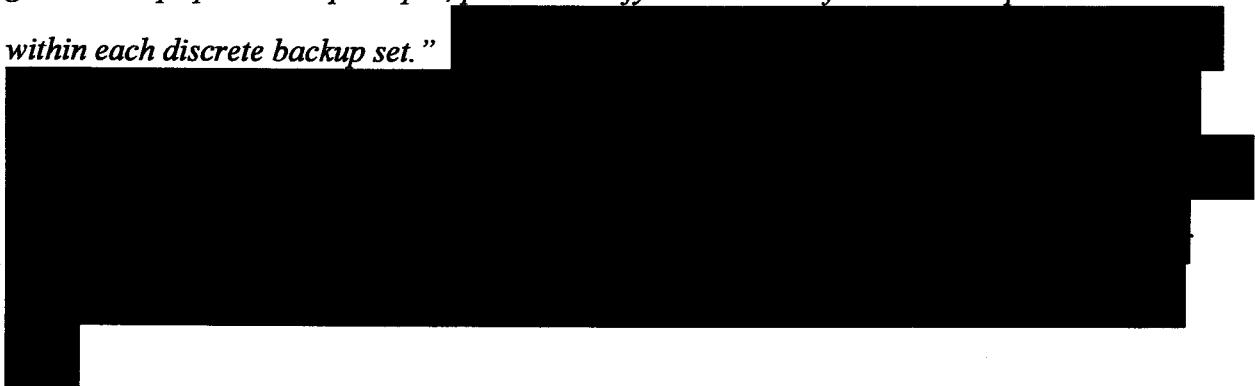
8.   *"5. What type, and how many, tape drive units are currently being used to restore the Requested Data from the target time period?"*
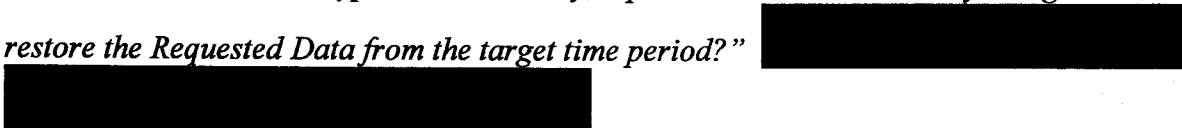
9.   *"6. What type, and how many, tape drive units are currently being used for the estimate provided to restore the Requested Data from the target time period?"* ███████

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10.   *"7. What is the current throughput in MB/s for the restore of the Requested Data for each tape drive unit currently being used?"* ████████████████████████

██████████████████

11.   *"8. How many technicians are currently working on the restore of the Requested Data and what is their daily schedule?"* ████████████████████

████████████████████████████████

12.   *"9. How many technicians are anticipated in the estimate provided to restore the Requested Data from the target time period?"* ██████████████████████

███

13.   *"10. Is there a limit to the number of tapes that can be restored at one time? If yes, please provide detail as to why this is."* ████████████████████████

██

14.   *"11. Please describe the process under which the expired data (older than 18 months) was rolled-off of the Sage database. Please provide as much detail as possible as to how data was identified for roll-off and the specific steps taken to physically roll off that data. Please describe the manner in which the roll-off occurred (i.e., full backup of the database,*

creation of a new set of tables with just the identified data, structured export of identified data, etc.)."

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16.   "12. Please describe what scripts, processes or other actions were applied to the "rolled off" data that remained in the live Sage database after being rolled off in order to delete it from the live system." See Paragraph 14.

16.   "13. Is a backup of the expired data created prior to deleting the data from the Sage database? If so, where is that backup maintained and where does it reside and how much effort is required to restore it?" ████████████████████████████

17.   "14. How many roll-off events were run to delete the January 2007 to September 22nd, 2007 Requested Data from the live Sage database? What was the frequency of the roll-off events?" ███████████████████████████

18.   "15. Are there other live databases or other data sources maintained by Yahoo or others that contained or contain some or all of the portions of the Requested Data captured during the January 2007 to September 2007 timeframe? If so, please describe in detail whether or not this data is still online." █

19. *"16. Are there subsidiary, related or other databases that maintain or maintained summaries and/or analyses of the Requested Data captured during the January 2007 to September 2007 timeframe? If so, please describe and identify whether or not this data is still online?"* ██

20. *"17. For each live, subsidiary, related or other databases identified in questions 15 or 16, please identify the date(s) the Requested Data was deleted or transferred to back up media."* ████████████████████████████████████

21. *"18. Please describe the manner in which the master Sage database and the mirrored copies in the CoLo facilities are related. For example, are the systems identical with real-time mirroring or are batch processes run periodically to update the CoLo copies? Do the CoLo copies presently contain or did they ever contain any of the Requested Data that the master Sage database does not contain? If so, please describe any such differences."* ████

██

22. *"19. Was any Requested Data also removed from the database maintained at the CoLo facility?"* ████████████████████████████

23. *"20. Please describe in detail the full process of restoration from backup tape to the live database."* ████████████████████

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24.   *"21. Can backed up data be restored in any selective manner (i.e., certain days, certain time periods, certain key terms)?"* ████████████████████

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25.   *"22. Please describe all documentation and/or manuals used to define how data is to be rolled off of the Sage database, how the actual backup/rolling-off procedure is to be performed, and how restoration of said data is to be performed."* ████████████

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26.   *"23. Please identify any notes, checklists, records and/or other documentation that identifies data rolled off of the Sage database during the January 2007 to September 2007 timeframe."* ███

27.   *"24. The date(s) the Requested Data was taken from the Sage database and placed on back-up tapes."* ████████████████████

██

28.   *"25. The date Yahoo first discovered that the Requested Data was not on the Sage database."*

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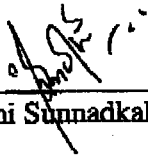
29.   *"26. The names of the employees responsible for allowing the Requested Data to be placed on back up tapes after litigation was threatened or filed."*

██

I declare under penalty of perjury that the foregoing is true and correct. Executed this

21st day of August, 2009.

_____

Jyothi Sunnadkal