

Exhibit G

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IN THE UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK

NETWORK-1 TECHNOLOGIES, INC.,)
)
Plaintiff,)
)
vs.) Case Nos.
) 14 Civ. 2396 (PGG)
GOOGLE, INC., and YOUTUBE LLC,) 14 Civ. 9558 (PGG)
)
Defendants.)

London, United Kingdom,
Wednesday, October 30th, 2019

****Highly Confidential - Outside Counsels' Eyes Only****
****Prosecution/Acquisition Bar Materials****

Videotaped deposition of MATTHIAS KONRAD, in
the above-entitled action, by and before, AUDREY
SHIRLEY, Qualified Real-time Reporter, Accredited,
Court Reporter and Member of the British Institute
of Verbatim Reporters, at the offices of Wilmer
Hale, 49 Park Lane, London, W1K 1PS, United
Kingdom, commencing at 9:08 a.m.

1 that need to be able to utilize this capacity. For
2 some teams, it's important to have their services
3 run in certain locales, other teams just need the
4 resources. I would say ContentID is a team that
10:53 5 just needs the resources, so we don't put too many
6 constraints.

7 There are maybe considerations to not
8 have everything in just one data center because of
9 the potential of power outages and other things and
10:54 10 having higher redundancy to be able to have better
11 reliability. But I don't believe we ever had
12 a conversation as to it should be all in the US or
13 not in the US as part of any such consideration for
14 reliability.

10:54 15 Q. Do you have any understanding of what
16 would be required to, for example, not have any in
17 the US?

18 A. I believe that would be -- the first
19 thing that we would be doing is we would contact
10:54 20 the resource planners, Christine Moor's team, to
21 make sure we have enough provisioning in other data
22 centers. I guess there would be other teams that
23 could be locating their services out of non-US data
24 centers into US data centers and we could get those
10:55 25 resources there and, once we would have that, it

1 would be as simple as pushing a couple of
2 configuration to bring it up in non-US data
3 centers, yes.

4 Q. Have there been any discussions about
10:55 5 whether that's feasible and under what
6 circumstances Google would be able to do that?

7 A. I have been in conversations about
8 this yesterday as part of the preparation to this
9 meeting. We have never otherwise discussed this.

10:55 10 Q. And when you say you were in
11 conversations yesterday, what do you mean? What
12 are you referring to?

13 A. As part of the preparation of this
14 deposition we discussed whether it would be
10:55 15 difficult to operate ContentID just in data centers
16 exclusively outside of the United States.

17 Q. And that was the first time any
18 analysis had been done of that type to your
19 knowledge?

10:55 20 A. I do not recollect that otherwise we
21 have ever done any analysis, like other people
22 might have. And I wouldn't say we did very
23 specific analysis but, like, the experts on that --
24 like, this would be Oleg again on the team --
10:56 25 sounded very solid that it would be a -- not

1 a heavy amount of work to get that done.

2 Q. Why hasn't Google done it already?

3 MR. HARDY: Objection to form.

4 THE WITNESS: I mean, yeah, so going
10:56 5 back to my previous answer, I don't -- I could
6 neither tell you why Google hasn't moved ContentID
7 fully to the US versus fully to the non-US.

8 BY MR. LEDAHL:

9 Q. You mentioned that it would require
10:56 10 adjustment or re-provisioning of some services to
11 different data centers. What other services would
12 have to move to make that accommodation?

13 A. So the -- I mean, this would be one
14 solution how -- like, if you look at, like, what
10:57 15 our resource use is compared to YouTube's total
16 resource usage or Google's total resource usage,
17 it's a very, very small fraction. So, I would
18 believe that, even without moving any services, we
19 could -- we could operate all of ContentID, I'm
10:57 20 sure we could operate all of ContentID with today's
21 resources outside of the US.

22 In general, the more flexibility you
23 have, the higher utilization can be for these kinds
24 of systems. So, whenever a service can run
10:57 25 everywhere, there is some advantages in overall

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