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Vol. IX, Tab 41 - Ex. D - Chiang Deposition (Google AdWords Product Manager)

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Google

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSETTA STONE, LTD.,

Plaintiff,

vs.

CASE NO.

1:09-cv-00736 (GBL/TCB)

GOOGLE, INC.,

Defendant.

HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

DEPOSITION OF

EDWARD CHIANG

PALO ALTO, CALIFORNIA

FEBRUARY 24, 2010

Reported by Katherine E. Lauster, CSR No. 1894

1 Q. What is a keyword tool?

2 MS. PENNYPACKER: Objection. Vague.

3 THE WITNESS: A keyword tool in AdWords is
4 used to generate new keyword ideas.

5 BY MR. SHEK:

6 Q. Who are these new keywords generated for?

7 A. Advertisers.

8 Q. So the keyword tool generates new keyword
9 ideas for advertisers --

10 A. Yes.

11 Q. -- is that correct?

12 The keyword -- is the keyword tool maintained
13 and operated by Google?

14 A. Yes.

15 Q. Is it -- is there a special name for the --
16 the keyword tool, or is it just called "keyword tool"?

17 A. It's just called "keyword tool."

18 Q. Is there more than one keyword tool that is
19 used in the AdWords program?

20 A. Yes.

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22 **REDACTED**
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REDACTED

A. I know the -- the new keyword tool the best, because my job is to transition the other tool into the new tool, and the only knowledge I have of the other tool is just what I need to know to transition users over to the new one.

Q. Have you worked with the original keyword tool?

MS. PENNYPACKER: Objection. Vague.

THE WITNESS: I have worked with it. I've learned what I needed to learn about that tool in order to build the features into the new tool and improve upon the old tool.

BY MR. SHEK:

Q. Have you used the original keyword tool?

A. Yes.

Q. Have you used the search-based keyword tool?

A. Yes.

Q. Are there any other -- strike that.

Is the original keyword tool still being used?

A. Yes, in -- the keyword tool shows up in a number of places. When you log into AdWords there's a

1 login version of the keyword tool, and there's also a
2 logout version of the keyword tool that you can get to
3 without signing into AdWords.

4 We've transitioned 100 percent of users that
5 have logged into AdWords from the old keyword tool to
6 the updated keyword tool, and have given them the option
7 of reverting back to the old one. The logged out
8 version hasn't been transitioned yet, so it's still --

9 Q. Is -- is the logged out version publicly
10 available?

11 A. Yes.

12 Q. Do you know if that -- the logged out version
13 is also referred to as the "external keyword tool"?

14 A. Yes.

15 Q. All right. The search-based keyword tool is
16 also still in operation; is that correct?

17 A. Yes.

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REDACTED

A. Yes, they've had the option of using it if they want.

Q. And they've had the option of using that in connection with providing keyword ideas to advertisers?

MS. PENNYPACKER: Objection. Foundation.

THE WITNESS: They can use it as a place to look for keyword ideas.

BY MR. SHEK:

Q. Are they allowed to take those keyword ideas and include them in proposals to advertisers?

MS. PENNYPACKER: Lacks foundation.

THE WITNESS: Yes. Yes.

BY MR. SHEK:

Q. You also identified another tool that was

1 rolled out in the beginning of Q3 2009. I think you
2 called it the "placement tool"; is that right?

3 A. Yes.

4 Q. What is the placement tool?

5 A. The placement tool is a tool used to search
6 through the inventory on our Google content network.

7 Q. What is the Google content network?

8 A. It's a network of publisher sites that can opt
9 into the Google content network and also serve Google
10 ads on them.

11 Q. Can you give me an example of a publisher
12 site?

13 A. Sure. A specific one, or just an example of
14 the use case?

15 Q. Just -- just can you identify one public site,
16 so -- one publisher site as an example?

17 A. YouTube.com is an example.

18 Q. I think in your earlier example you referred
19 to inventory.

20 A. Yes.

21 Q. What are you referring to when you refer to
22 inventory?

23 A. Inventory is available in slots that we can
24 put ads in.

25 **REDACTED**