

EXHIBIT E

1 12/17/2024 - MARK ZUCKERBERG

2 UNOFFICIAL DRAFT TRANSCRIPT

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23 quoted in any pleading, or for any other purpose,

8 little bit more.

9 For example, YouTube, I think, may end up
10 hosting some stuff that people pirate for some
11 period of time, but YouTube is trying to take that
12 stuff down. And the vast majority of the stuff on
13 YouTube, I would assume, is kind of good and they
14 have the license to do. So would I want to have a
15 policy against people using YouTube because some of
16 the content may be copyrighted? No, that doesn't
17 seem reasonable. But I understand the question that
18 you're asking.

19 BY ATTORNEY BOIES:

20 Q. Yeah. The question I'm asking really is
21 if you have a website or source that contains
22 copyrighted materials that they do not have a
23 license for and they intentionally are making
24 unlicensed copyrighted materials available to the
25 public, would you agree, as the CEO of Meta, that

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1 Meta should not be downloading materials from
2 websites like that?

3 ATTORNEY GHAJAR: Objection. Vague. Also

4 an incomplete hypothetical. Assumes facts.

5 THE WITNESS: Yeah, I mean, it's -- I

6 think it's -- it's --

7 You know, I mean the way that you frame

8 it, it seems like that's something that we should be

9 pretty careful about, but I think when you get into

10 the nuances, it's hard to assess what people's

11 intent is.

12 You know, I mean, going back to the

13 YouTube example before, where I think that there's

14 some percent of the content is probably stuff that

15 they don't have copyright or don't have the license

16 to distribute. Early on, I think that people did

17 make some assertions about YouTube's intent on this,

18 and they were less mature about developing their IP

19 rights management.

20 But even then, I don't think that I

21 would've said that I wouldn't want people at Meta

22 not to use YouTube, at that point. So -- so I don't

23 know.

24 I just think it's -- I think what you're

25 saying -- I think it kind of -- the way you're



1 characterizing it, it sort of broadly seems like,
2 yes, that seems like a bad thing. But I just am --
3 I want to be caution about making a blanket
4 statement about policies, and this is why we have
5 teams who think through this carefully because there
6 are often more nuances than is kind of apparent the
7 first -- in, like, when you just think about it, at
8 first blush.

9 BY ATTORNEY BOIES:

10 Q. When you say "that seems like a bad
11 thing," what are you referring to?

12 A. Your characterization of it. You know,
13 if -- if there's a -- somebody who's providing a
14 website and they're intentionally trying to violate
15 people's rights, than, yeah. I mean, I think that
16 the behavior that you're describing, obviously,
17 seems like it's something that we would want to be
18 cautious about or careful about how we engaged with
19 it or maybe prevent our teams from engaging with it.

20 But I just think it requires a little bit
21 further analysis before I can issue sort of like a
22 blanket assessment of what our policy should be,
23 because I think -- you know, this is the example I
24 was giving around YouTube right now.

25 I think even just a couple minutes of

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1 thinking through what's cases might be around that
2 highlights why there are cases where having such a
3 blanket ban might not be the right thing to do.

4 Q. I'm trying to focus not on YouTube, which
5 you keep coming back to. I'm trying to focus on
6 websites like LibGen, and I'm trying to talk about
7 it generally, because you say you've never heard of
8 LibGen.

9 And what I'm asking about is, if you've
10 got a website that, on its face, purports to
11 distribute copyrighted materials for which there is
12 no license -- which, obviously, is not what YouTube
13 does -- would you agree that either as a matter of
14 law or ethics, you would not want Meta trafficking
15 with that website?

16 ATTORNEY GHAJAR: Objection. The
17 question's vague. Incomplete hypothetical.

18 THE WITNESS: Yeah, I mean, I get that
19 you're trying to get me to give an opinion on
20 LibGen, which I haven't really heard of.

21 BY ATTORNEY BOIES:

22 Q. No I'm saying you haven't heard of

23 LibGen --

24 A. No, things like it. Things like it. I

25 understand what you're saying. It's just a little

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1 hard for me to weigh in on that without looking at

2 the nuances of that case.

3 And the YouTube example, I just keep

4 raising because it's an example of a thing that --

5 of a product that over time I think people have

6 alleged have been potentially willful and not doing

7 enough to suppress or kind of clean up copyrighted

8 content and -- so I'm just trying to be careful,

9 because rather than having a conversation in some

10 sort of like absolute about how we would handle that

11 kind of case, I think I'd -- I just would want to

12 have some more time to think through it. I'd want

13 our policy team to think through it. And I also

14 think it makes sense to look at the specifics of the

15 case because -- I mean, I think some people may

16 allege that YouTube fits the characteristics of what

17 you're saying too, and that's an example of the type

18 of website that I would probably not think that we

19 should bend from using.

20 But I get that you're trying to ask about
21 something different. It's just that I don't have
22 knowledge of that specific thing.

23 Q. I am asking a different question, and you
24 know perfectly well that YouTube does not purport to
25 be in the business of distributing copyrighted

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1 materials for which it has no license; correct, sir?

2 A. Yes. So you're saying that another
3 website goes out of its way to communicate that it's
4 distributing illegal materials?

5 Q. Yes, sir.

6 And you certainly agree you don't want to
7 do business with somebody like that; right?

8 ATTORNEY GHAJAR: Objection. Assumes
9 facts and incomplete hypothetical.

10 THE WITNESS: I mean, in general if
11 someone is broadcasting loudly that they're doing
12 something that is illegal, that would be a pretty
13 big red flag that I'd want us to look at carefully
14 before engaging with them in any way.