

APPENDIX A

Deposition Excerpts Showing Daily Chats Use

Deposition	Excerpt
<p>██████████ Dep. Tr. 73:20-22</p>	<p>20 Q. Do you use Google Chat to discuss Google 21 business on a daily basis? 22 A. Yes.</p>
<p>Jayaram Dep. Tr. 86:7-16</p>	<p>7 Q. Do you often use chat in your business at 8 Google? 9 MR. BITTON: Objection to scope. 10 THE WITNESS: I do use chat often. 11 BY MR. HILLEGAS: 12 Q. About how many chats would you say you send 13 a day? 14 MR. BITTON: Objection to scope. 15 THE WITNESS: The number would vary widely. 16 It could range anywhere from 10 to 100 maybe.</p>
<p>██████████ Dep. Tr. 304:8-19.</p>	<p>8 Q. Have you communicated with people 9 from Google on the buy-side over Google Chat? 10 A. I have communicated over chat with 11 my colleague on the buy-side; that's correct. 12 Q. How frequently do you use Google 13 Chat? 14 A. I use it daily. 15 Q. How many chat messages do you 16 approximately send on a daily basis? 17 A. Ms. Young, it depends on the day. 18 On an active day, 10 to 20. In a nonactive 19 day, maybe a couple, one or two.</p>
<p>Korula Dep. Tr. 297:6-19</p>	<p>6 Q. How about -- how about chats, 7 how many chats do you -- would you say you 8 send or receive on a daily basis? 9 A. Do you mean individual messages 10 or chat threads? 11 Q. Well, maybe both. 12 Individual messages let's start, 13 how many? 14 MR. MAHR: Objection; scope. 15 A. I mean, this is a very rough 16 number. I never actually tried to 17 quantify this. 18 I would guess 500 individual</p>

Deposition	Excerpt
	19 messages maybe.
<p>██████ Dep. Tr. 37:7-12</p>	<p>7 Q. How often do Google employees 8 use Chat? 9 A. I can speak for myself. 10 Q. Okay. 11 A. For myself, I use it every 12 single day.</p>
<p>██████ Dep. Tr. 92:25-93:4</p>	<p>25 Q. How often do you use Google Chat in a given day? 1 MR. HUNSBERGER: Object to the form. 2 THE WITNESS: I use it throughout the day. I 3 would describe it as very frequently. It depends on -- 4 I don't know how to quantify the usage.</p>
<p>██████ Dep. Tr. 205:2-206:5</p>	<p>2 Q. Do you have any idea of 3 approximately how many chat messages you get 4 a day? 5 A. It's hard for me to estimate. 6 I would say I'm a member of maybe a couple 7 dozen chat rooms. Not all of them are active 8 consistently. But I would say -- so it 9 depends a lot on the day, and is it, like, 10 holiday in one country or another. 11 It could easily be that I 12 have -- on some days I have a hard time 13 keeping up between messages and e-mails and 14 meetings, just keeping up with all the 15 information streaming in to me. 16 Q. And so I want to ask you, do 17 you have an order of magnitude idea? Do you 18 get like a hundred messages? A thousand? 19 10,000 a day? 20 A. So I would say in some of these 21 chat rooms there could be very technical 22 discussions of a certain topic that maybe I'm 23 only marginally involved in, so I wouldn't 24 even read those messages. So they 25 technically come to me and are available to 1 me for review, but maybe I didn't 2 participate. 3 I would say it's in the dozens 4 to maybe hundreds messages a day on a busy 5 day.</p>

Deposition	Excerpt
<p>██████ Dep. Tr. 184:18-185:2</p>	<p>18 Q. Would you communicate with your team 19 using Google Chat? 20 A. Oh, yes. 21 Q. Did you communicate with your 22 supervisors using Google Chat? 23 A. Yes. 24 Q. How often did you use it? 25 A. Throughout the day. 1 Q. You would say every day? 2 A. Yes. Every day.</p>
<p>██████ Dep. Tr. 308:13-18</p>	<p>13 Q. Do you use Google Chats as part 14 of your job? 15 A. Yes, I use Google Chat as part 16 of my job. 17 Q. How often? 18 A. Multiple times a day.</p>
<p>██████ Dep. Tr. 247:21-22</p>	<p>21 Q. How often do you use Chat? 22 A. I use Chat on a daily basis.</p>
<p>██████ Dep. Tr. 78:19-23</p>	<p>19 Q. How often do you use Chat to 20 communicate with colleagues? 21 A. Frequently. 22 Q. Daily? 23 A. Yes, sir.</p>
<p>██████ Dep. Tr. 47:8-10</p>	<p>8 Q. So you use chats daily? 9 MR. PEARL: Objection. Scope. 10 THE WITNESS: In general, yes.</p>
<p>██████ Dep. Tr. 65:15-25</p>	<p>16 Q. Do you use chats on a daily 17 basis for your work? 18 A. Yes. 19 Q. Can you give us an estimate of 20 how many individual chats you send a day? So 21 that would just be one line. 22 A. It depends on the day. I 23 could -- I could not begin to estimate. 24 Q. Would it be over a hundred? 25 A. Some days. Some days not.</p>