

APPENDIX B

Deposition Excerpts Showing Business Chats Use

Deposition	Excerpt
<p>██████████ Dep. Tr. 72:14-75:5</p>	<p>14 Q. So you use Google Chat to conduct 15 business, correct? 16 A. Yes. 17 Q. You communicate with your roughly 20 team 18 members using Google Chat? 19 A. Yes. 20 Q. Do you communicate with other teams using 21 Google Chat? 22 A. Sorry, was it other teams? 23 Q. Do you communicate with other teams using 24 Google Chat? 1 A. Yes. 2 Q. What other teams? 3 A. Other communications teams, other product 4 teams. I would say I've talked to a lot of 5 individuals across Google over Chat.</p>
<p>Jayaram Dep. Tr. 86:7-10</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.</p>
<p>██████████ Dep. Tr. 88:20-22</p>	<p>20 Q Okay. Do you use Google Chat for your job? 21 MR. HUNSBERGER: Object to the form. 22 THE WITNESS: Yes.</p>
<p>██████████ Dep. Tr. 184:13-23</p>	<p>13 ██████████, when you were at 14 Google, who did you most often communicate with 15 using Google Chat? 16 A. It was a number of employees. 17 Everyone could use Chat. 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.</p>

Deposition	Excerpt
██████ Dep. Tr. 309:9-310:1	9 Q. Do you communicate with your 10 team using Google Chat? 11 A. Only logistical information and 12 to point them to something. Not -- nothing 13 material in terms of, like, things they need 14 to read or hang on to. We tend to use e-mail 15 for that, or Documents. 16 Q. But you do talk about work? 17 A. Sure. An example would be, 18 reminder, we have a team meeting tomorrow, 19 does anyone have any topics. Logistic-type 20 of information. 21 Q. You had some conversations that 22 were more substantive than that, wouldn't you 23 say? 24 A. At times, it's likely we have 25 conversations that were more substantive than 1 what I -- the example that I gave, yes.
██████ Dep. Tr. 251:20-252:1	20 Q. So in the ordinary course of 21 your business of directing product -- 22 global product sales and strategy, you 23 send chats, right? 24 MS. SALEM: Object to the form. 25 A. I use Chats to communicate about 1 [blank line] 2 the ordinary course of my business, but I 3 don't use Chat as an exclusive 4 conversation -- or as exclusive 5 communication form for the business.
██████ Dep. Tr. 376:3-6	3 Q. And you discuss -- you have 4 business conversations with your 5 colleagues by Chat, right? 6 A. Yes, sir.
██████ Dep. Tr. 62:23-63:5	23 Q. ████████, you talked about 24 the process for preparing these comm docs, 25 that the sales team would discuss them over 1 e-mail and the PubHub page. 2 Would there also be discussions 3 in chats or instant messaging about the comms 4 docs? 5 A. Yes.