

APPENDIX C

Deposition Excerpts Showing No Attempt To Change History Settings While on Hold

Deposition	Excerpt
██████ Dep. Tr. 326:22-327:11	22 Q. And so Google employees can 23 choose whether or not they wanted the 24 history to be turned on or off? 25 A. They could. 1 I think that in the last five 2 years, at least, I don't think I've ever 3 changed the default, or very rarely. Before 4 that I might have done it a few more times. 5 But, yes, I use the defaults for the most 6 part. 7 Q. Is that because you've been 8 placed on a litigation hold by Google? 9 A. It's just -- it's easy for me 10 not to mess with defaults. That's how people 11 want to set it, and so I just do that.
██████ Dep. Tr. 33:21-34:1	21 Q. A little while ago we talked about 22 preserving documents. 23 Did you preserve any Chats in relation to 24 this case? 25 A. I did not do anything to preserve or not to 1 preserve Chats.
██████ Dep. Tr. 188:11-189:1	11 Q. Did you turn Google Chat history on 12 for any chats you sent or received that pertained 13 to this case? 14 A. Not that I recall. 15 Q. While under a litigation hold for 16 this case, did you ever forward a message from 17 Google Chat to your e-mail to preserve it in 18 compliance with the litigation hold? 19 A. To move it from -- could you repeat 20 the question? 21 Q. Sure. 22 While under a litigation hold for 23 this case, did you ever forward a message from 24 Google Chat to your e-mail to preserve it in 25 compliance with the litigation hold? 1 A. No.