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Rosetta Stone v. Google (Joint Appendix)


Research Projects and Empirical Data

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# Vol. IX, Tab 41 - Ex. R - Wojcicki Deposition (Google Vice-President Product Management)

Susan Wojcicki  
*Google*

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CONFIDENTIAL

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

4                   --oOo--

5                   ROSETTA STONE, LTD.,

6   Plaintiff,

7                   vs.

Case No.

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

8                   GOOGLE, INC.,

9   Defendant.

10                   \_\_\_\_\_ /

11  
12   CONFIDENTIAL

13  
14   DEPOSITION OF  
15   SUSAN WOJCICKI

16  
17   March 18, 2010

18   9:22 A.M.

19  
20   525 University Avenue, Suite 900

21   Palo Alto, California

22  
23  
24  
25                   Michelle L. Archuletta, CSR No. 11028

1 to become a member of the Operating Committee?

2 A I wasn't there when they discussed it. I can  
3 say that given that I have responsibility for all of our  
4 advertising products, there wanted to be focus on the  
5 operations of the company and good understanding of the  
6 revenue and how the company is being managed, and so I  
7 think they wanted me to join. But I wasn't there when  
8 they discussed it and I only know that I was selected to  
9 be on it.

10 Q Google's advertising revenue accounts for more  
11 than 90 percent of Google's total revenue, right?

12 A Yes.

13 Q That's always been the case, right?

14 A No.

15 Q When was it not the case?

16 A When we didn't have an advertising program and  
17 we just licensed our Web search.

18 Q Since about 2001, has Google's advertising  
19 revenue accounted for more than 90 percent of Google's  
20 total revenue?

21 A So I don't remember the exact details of our  
22 revenue breakdown, but I know that since early 2000 most  
23 of our -- almost -- most of our revenue has come from  
24 advertising and in recent years it's definitely been  
25 above 90 percent. But if it's 2001, 2002, I don't

1 really remember.

2 Q Early 2000s is what you recall?

3 A Early 2000s is what I remember.

4 Q Do you know whether you replaced some outgoing  
5 member of the Operating Committee when you joined?

6 A I don't believe I replaced anybody. I think it  
7 was an expansion of the committee. Other people were  
8 added on the committee besides just me.

9 Q Who do you report to?

10 A Jonathan Rosenberg.

11 (Exhibit 1 marked)

12 BY MR. SHEK:

13 Q You've been handed a document that's been  
14 marked as Wojcicki 1. It is a portion of the Web page  
15 on Google.com for Corporate Information Google  
16 Management. There's a heading halfway down that says  
17 "Operating Committee."

18 Do you see that?

19 A Yes.

20 Q And then there's a list of various individuals,  
21 including yourself down at the bottom.

22 A Yes.

23 Q Are these all of the current members of  
24 Google's Operating Committee?

25 A Yes.

1 Q You could have replaced digital cameras with  
2 some other subject matter and the sentence would be the  
3 same, right?

4 MS. CARUSO: Objection.

5 BY MR. SHEK:

6 Q I mean, the point of the sentence would be the  
7 same; that is, if you searched for a particular subject  
8 matter on Google, you'll get ads related to that subject  
9 matter, right?

10 A If you typed in "guns," that wouldn't be true.

11 Q If you searched for Rosetta Stone on Google,  
12 you'll get ads related to Rosetta Stone, right?

13 MS. CARUSO: Objection. Vague.

14 THE WITNESS: If there are advertisers for that  
15 keyword and our system determines that they're relevant,  
16 then yes.

17 BY MR. SHEK:

18 Q Down towards the bottom of the first page  
19 the -- the purpose of this blog post was to talk about  
20 interest-based advertising, right?

21 A Correct.

22 Q And so in the last sentence before the bullet  
23 point down at the bottom you wrote, "For our part, we're  
24 launching interest-based advertising with three  
25 important features that demonstrate our commitment to