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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

_____)	
IO GROUP, INC., a)	
California Corporation,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. C-06-3926(HRL)
)	
VEOH NETWORKS, INC., a)	
California Corporation,)	
)	
Defendant.)	
_____)	

DEPOSITION OF JOHN STYN
SAN DIEGO, CALIFORNIA
MAY 31, 2007

REPORTED BY REGINA L. GARRISON, CSR NO. 12921

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UNITED STATES DISTRICT COURT
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IO GROUP, INC., a)	
California Corporation,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. C-06-3926(HRL)
)	
VEOH NETWORKS, INC., a)	
California Corporation,)	
)	
Defendant.)	
_____)	

DEPOSITION OF JOHN STYN, taken on behalf of
the Plaintiff, at 530 B Street, Suite 350, San Diego,
California, on Thursday, May 31, 2007, at 9:57 a.m.,
before Regina L. Garrison, Certified Shorthand
Reporter, in and for the County of San Diego, State of
California.

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A P P E A R A N C E S

FOR THE PLAINTIFF:

THE LAW OFFICES OF GILL SPERLEIN
BY GILL SPERLEIN
69 Converse Street
San Francisco, California 94103
(415) 487-1211, Ext. 32

FOR THE DEFENDANT:

WINSTON & STRAWN LLP
BY JENNIFER A. GOLINVEAUX
101 California Street
San Francisco, California 94111-5894
(415) 591-1506

1 When you got involved with VEOH, when you
2 talked about VEOH with Dmitry, were you aware of
3 whether or not video clips containing sexual explicit
4 material would be allowed on VEOH.com?

5 A. Yes.

6 Q. And at the time that you made that
7 realization, did you think to yourself as to whether or
8 not there may be issues regarding 2257?

9 A. My client that I work with is not US based,
10 so I don't have a good understanding. But I do
11 remember thinking that it was -- it should be an issue.
12 And -- and, yeah, I remember thinking that that is
13 something that VEOH will have to address.

14 Q. So after you had those thoughts, did you
15 bring that topic up with Dmitry?

16 A. Yes.

17 Q. And do you remember when you had that
18 conversation?

19 A. Not specifically. I know it was before there
20 was any 2257 prosecutions or actions. It was still a
21 theoretical idea, and I remember just mentioning it as,
22 definitely, it was the "sky is falling" hot button of
23 the adult industry.

24 Q. How did you know that there weren't any
25 prosecutions or actions?

1 A. I'm active on the adult message boards.

2 Q. Earlier, I asked if you had any conversations
3 about 2257. Did you actively read up on 2257 on the
4 adult message boards?

5 A. No.

6 Q. But did you read to some degree? I mean, you
7 just said that you learned there were no legal
8 prosecutions through adult message boards; is that
9 accurate?

10 A. Yes.

11 MS. GOLINVEAUX: I'll object to the form.
12 It's compound.

13 BY MR. SPERLEIN:

14 Q. Was the part accurate where you said you
15 learned about the lack of prosecutions through message
16 boards?

17 A. Yes. I tried to stay informed enough that
18 it -- what degrees is it an issue.

19 Q. And then at some point, you had at least one
20 conversation with Dmitry about your concerns as far as
21 the applicability of 2257 to VEOH; is that accurate?

22 A. Yes.

23 Q. Did you have more than one conversation with
24 Dmitry?

25 A. No.

1 STATE OF CALIFORNIA
2 COUNTY OF SAN DIEGO

3
4 I, REGINA L. GARRISON, a Certified Shorthand
5 Reporter for the State of California, CSR No. 12921, do
6 hereby certify: That the proceedings were taken before
7 me at the time and place herein named; that the said
8 proceedings were reported by me in shorthand and
9 transcribed through computer-aided transcription, under
10 my direction; and that the foregoing is a true record
11 of the testimony elicited at proceedings had at said
12 proceedings to the best of my ability.

13 I do further certify that I am a disinterested
14 person and am in no way interested in the outcome of
15 this action or connected with or related to any of the
16 parties in this action or to their respective counsel.

17 In witness whereof, I have hereunto set my hand
18 this 21st day of June, 2007.

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Regina L. Garrison

REGINA L. GARRISON, CSR NO. 12921