

# EXHIBIT 52

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

MDY INDUSTRIES, LLC,	)	
	)	
Plaintiff and	)	
Counterclaim Defendant,	)	
	)	
vs.	)	No. CV06-2555
	)	PHX DGC
BLIZZARD ENTERTAINMENT, INC.,	)	
et al.,	)	
	)	
Defendants and	)	
Counterclaim Plaintiffs.	)	
	)	
AND ALL RELATED ACTIONS.	)	
	)	

**DEPOSITION OF MATTHEW VERSLUYS**

**November 14, 2007**

**253931**



**BARKLEY**  
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1           A.    Yes.

2           Q.    So what exactly -- can you describe what  
3 methods that Warden uses to scan for unapproved  
4 third-party software?

5           A.    The primary method is to look at the  
6 memory of the World of Warcraft process to  
7 determine if any of it has been modified.

8           Q.    I'm sorry, say that -- can you repeat  
9 that. I didn't...

10          A.    The memory for the World of Warcraft  
11 process, when the process is running, is checked to  
12 see if any knowing modifications have been made by  
13 third parties.

14          Q.    The user's RAM memory?

15          A.    Yes. And so the user's memory -- so the  
16 portion of the user's memory which is occupied by  
17 the World of Warcraft process.

18          Q.    Does it check anything on someone's hard  
19 drive?

20          A.    No.

21          Q.    Does it check to see if there is anything  
22 running in a user's media player, like a CD or DVD  
23 player?

24          A.    No.

25          Q.    Anything else?

1           A.    Early versions of Warden to detect a  
2 specific third-party module, they tested -- they --  
3 it looked at the window titles of windows that were  
4 up. It hashed the window titles, compared them  
5 against a known hash to see if, basically, a  
6 specific program was running.

7                   In the event that a specific program was  
8 running, a flag was sent to the server indicating  
9 that that specific program had been found.

10          Q.    Before I go on, I am going to follow up  
11 with those questions.

12                   What is a hash?

13          A.    A hash, it's a -- it's a cryptographic  
14 term where you take source data, you put it through  
15 a hashing function, and you have a hash on the  
16 other side.

17                   Typically, the hashes that we use are  
18 called one-way hashes or one-way cryptographic  
19 hashes. You would take a large amount of data, put  
20 it through the hashing function, and on the other  
21 side you have a hash value which is typically  
22 anywhere from 64 to, like, 512 bytes these days.

23                   And then that hash -- the purpose of the  
24 hash is that you can uniquely identify the source  
25 data. It's extremely unlikely that two pieces of

1 source data will have the same hash.

2 Q. Let's assume that Warden detects what  
3 Blizzard would be considered a third-party program,  
4 something running on the computer, the client  
5 computer, that it doesn't like.

6 What does Warden do once it detects that,  
7 something that it doesn't like?

8 A. It notifies the game server that an  
9 infraction has been found.

10 Q. Then what happens next?

11 A. It will -- the server will process a  
12 series of rules to determine what action needs to  
13 be taken.

14 In all cases the -- the infraction is  
15 written to a log file so it can be reviewed in the  
16 future, and depending on the rules, action may be  
17 taken against the client and/or account directly.

18 Q. Does Warden do anything automatically  
19 after it receives this information?

20 A. It -- in telling the game server, yes.

21 Q. Does it -- okay, let's say, for instance,  
22 that it sent something to the game server, that  
23 information has been logged, what happens next?

24 A. The game server -- and depending upon the  
25 rules, the game server may decide to kick the

1 client off of the service immediately, or it may  
2 send something to the account system which can  
3 result in a temporary or permanent suspension of  
4 the account.

5 Q. So does Warden prevent the -- or I should  
6 say, does Warden kick the user off, as you said,  
7 automatically?

8 A. If the rules have been set for that  
9 specific infraction to do so.

10 Q. So Warden has the ability to  
11 automatically kick the person off of the computer;  
12 is that correct?

13 A. Kick them off of the server, yes.

14 Q. Kick them off of the server.

15 Is that the same as banning an account?

16 A. No.

17 Q. I assume that if -- well, let me ask you  
18 this: I mean, does Warden ban a user's account  
19 under any circumstances that you are aware of?

20 A. Yes.

21 Q. What would those circumstances be?

22 A. It would be that, if we have identified  
23 the particular infraction to be worthy of account  
24 suspension or banning.

25 Q. But Warden, itself, doesn't actually ban