

EXHIBIT B

(MDY's SDF)

1 A. I would say more than 50 hours.
2 Probably for a period of about a month or so,
3 I spent most of my free time trying to play
4 this and become familiar with what occurred
5 in the game.

6 Q. And what was the highest level
7 you achieved with any character?

8 A. I believe I reached level 35.

9 Q. Are there any other documents
10 or information, other than what we've
11 discussed this morning and what's cited in
12 your report, that you relied upon in reaching
13 your opinions?

14 A. None come to mind.

15 Q. Let's discuss specifically your
16 first opinion with regard to making a copy of
17 World of Warcraft. If we can look at your
18 report -- unfortunately, it doesn't have page
19 numbers, although I've written them on there.

20 A. Oh, I should have placed them
21 on there.

22 Q. I believe when you summarized
23 your opinions earlier, you stated, first,
24 that your opinion that no copy is made of
25 World of Warcraft when the World of Warcraft

1 program is launched into random access memory
2 or RAM?

3 A. Correct, in a copyright sense.
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4 Q. And how do you distinguish in a
5 copyright sense from another sense of copy?

6 A. Well, so, for me a copyright
7 sense would be that -- that it isn't just
8 simply a performance optimization. The
9 movement of data would actually have to be
10 for some other use, as opposed to simply
11 adding another storage structure within --
12 within a machine that enables it, perhaps, to
13 run faster, but that doesn't produce any
14 copy, say, that could be used by anyone else,
15 or that could be used by the same user on
16 another machine.

17 Q. And what's -- what's your basis
18 for that opinion?

19 A. My basis would just be my -- my
20 intuitions as an expert in the field and in
21 general how this material is treated within
22 textbooks in the area.

23 Q. And did the textbooks and
24 discussions in the field discuss the meaning
25 of "copy" in a copyright sense, as opposed to

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1 other senses?

2 A. No, they don't directly speak
3 to that, but they do speak to the purpose,
4 say, of having these multiple levels of
5 memory within a machine.

6 Q. And you have intuited from the
7 discussions of the purpose of a program being

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8 in RAM or another portion of a machine, from
9 that you've concluded that loading a program
10 into RAM does not constitute copying in a
11 copyright sense?

12 MR. VENABLE: Objection to the
13 form of the question.

14 A. That would be the intuition
15 that I had reached.

16 Q. Do you disagree with the
17 statement that copying for purposes of
18 copyright law occurs when a program is
19 transferred from a permanent storage device
20 to a computer's random access memory or RAM?

21 MR. VENABLE: Object to the
22 form of the question. Vague and ambiguous.

23 A. Yes, I do disagree with that.

24 Q. And is your disagreement with
25 that statement the basis for your opinion

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1 that Glider users who launch world of
2 Warcraft into RAM, using Glider, do not
3 create a copy of the world of Warcraft
4 software?

5 A. Yes, that would be the primary
6 basis.

7 Q. What other bases are there for
8 that opinion?

9 A. Actually, you had specified
10 that so users who do this do not make a copy.
11 So, actually, in terms of how the question
12 was phrased, yes, I would agree with that.

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13 Q. I'd ask you to look at what
14 I've written on the bottom as page 4 of the
15 report, so count, page 4.

16 A. It's the page directly after
17 the one with the image on it, correct?

18 Q. Yes.

19 A. Okay.

20 Q. And if you'll look at the first
21 full paragraph about halfway down, there's a
22 sentence that begins, "Therefore"?

23 A. I see it.

24 Q. And that sentence reads,
25 "Therefore, to refer to the movement of data

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1 between various levels of this hierarchy as
2 'copying' is misleading without further
3 explanation."

4 You've placed "copying" in
5 quotes in that sentence. What's your
6 understanding of the term "copying" as you're
7 using it in this report?

8 A. Could you please clarify that a
9 little bit further?

10 Q. Sure.

11 In this sentence, as I read it
12 and correct me if I'm reading it wrong, you
13 seem to be saying that referring to a certain
14 type of movement of data within a computer as
15 copying is misleading?

16 A. Yes.

17 Q. And I'm trying to understand
18 how you're defining "copying." You've placed
19 it in quotes in the report.

20 A. Okay.

21 Q. Can you give me what your
22 understanding of the definition of copying,
23 as you're using it in the report, is?

24 A. As I'm using it in the report,
25 would be transferring data to some removable

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1 medium or to another device. And also I note
2 that I don't necessarily disagree with using
3 the term "copying" to refer to this movement
4 of data, but I simply am stating that it's
5 misleading to use this without the additional
6 explanation of what really is occurring here.

7 Q. So you don't disagree that
8 copying may be an accurate description of
9 what's occurring, but what's occurring may be
10 different than the common understanding of
11 copying?

12 A. Yes. Actually, what's
13 occurring may, in fact, be different than the
14 common understanding of copying. I even
15 might use the term -- or might accidentally use
16 the term "copying" during the course of this
17 deposition, just because informally it might
18 be appropriate -- or it might seem
19 appropriate to use that term or even
20 intuitive, but that doesn't necessarily mean
21 that there isn't a different connotation when

22 we're referring to it in terms of the
23 movement of data between various levels of
24 this hierarchy.

25 Q. And I believe you said for your

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1 purposes when you're being specific in your
2 definition of copying in this report, you
3 mean copying -- you understand copying to
4 mean transferring from one storage device to
5 a removable medium or another storage device?

6 A. Yes. Also, if there's anything
7 at all within a single storage device
8 potentially that's not an optimization, that
9 could be a little bit more hazy, but within a
10 single hierarchy I wouldn't consider it to be
11 a copy.

12 Q. Can you give some examples of
13 -- some common examples of transfers of a
14 computer program or data that you would
15 consider copying under your definition as
16 used in the report?

17 A. Certainly. If you were to
18 write it to a CD or a DVD and then whether
19 you leave it in the machine or remove it from
20 the machine, that would constitute a copy to
21 me. If you were to send it over a network to
22 another -- to another machine or to any other
23 device that would produce a reproduction of
24 that code.

25 Q. So an upload or a download?

1 A. Yes, exactly.

2 Q. And so is it fair to say that
3 you are excluding from the definition of
4 copying you're using in the report any
5 internal transfer of a program from one
6 portion of a computer to another, of the same
7 computer to another portion?

8 A. I believe that that would be a
9 generalization of what I'm saying, but I
10 don't know that I would actually jump to that
11 conclusion without at least giving it greater
12 thought. My -- my basic belief is that
13 within this memory hierarchy, this is all
14 essentially part of one piece of memory
15 within the machine, so moving it within that
16 is not copying.

17 Q. If we can look at the prior
18 page, which I think actually has a depiction
19 of the hierarchy?

20 A. Yes.

21 Q. Is this the hierarchy you've
22 been referring to?

23 A. Yes. Except within a single
24 machine you typically are referring to
25 registers; cache, that's C-A-C-H-E; main

1 memory, which typically includes random
2 access memory; and the magnetic disk, which
3 is your hard drive. Anything at all below
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4 that is typically outside of the hierarchy of
5 a single machine, and an electronic disk is
6 not necessarily that common.

7 Q. And I believe you just
8 testified that random access memory is
9 included in the main memory portion of that
10 hierarchy?

11 A. Yes.

12 Q. What else is included in the
13 main memory portion of the hierarchy?

14 A. Actually, main memory typically
15 refers to just the random access memory.

16 Q. Do computer scientists and
17 computer programmers understand what it means
18 when a program is loaded into RAM?

19 A. Yes, they would.

20 Q. Do they understand loading a
21 program into RAM to be something distinct
22 from data moving into a cache or a register?

23 A. Well, there are different
24 operations that can occur when it's moved
25 into RAM versus when it's moved into a cache,

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1 but I believe that they typically are seen as
2 being part of the same memory hierarchy.

3 Q. What different functions does
4 RAM perform than -- than, let's say, the
5 cache?

6 A. Okay. So the cache is actually
7 going to essentially store the most common

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8 data that's been used within memory. So, for
9 example, if I just used one instruction
10 within a program, then there's a good chance
11 that I'm going to use that one again. So the
12 fact that the computer used that -- that
13 piece of memory that was stored in main
14 memory would most likely cause it to remain
15 in the cache, depending on the algorithms
16 that you're using for determining what is
17 stored in the cache.

18 Q. Before anything can -- before
19 any part of a program or any data is loaded
20 into cache, does it necessarily have to have
21 already been loaded into random access
22 memory?

23 A. In most common architectures,
24 yes, I believe that it would.

25 Q. So the cache and the register

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1 in your view are higher levels that retain
2 smaller portions of data that is contained in
3 the random access memory?

4 A. Yes. It tends to be sort of
5 what's going to be most useful to the
6 processor later on, and these tend to be
7 faster and closer, if not necessarily
8 spatially closer, but at the very least data
9 can transfer more quickly from this medium to
10 the processor being able to use it.

11 Q. What types of data are
12 typically sent to the register?

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13 A. So there could be instruction
14 data and then actual program -- actual data
15 that's going to be operated on. So the
16 instructions are more just what this program
17 is actually doing, versus the data being what
18 it's doing those operations on. And there
19 are also registers that store, for example,
20 where you are within the program.

21 Q. And how would you describe the
22 main function of random access memory?

23 A. The main function of random
24 access memory is -- it's a far faster form of
25 memory than what the magnetic disk would be,

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1 and it tends to store programs, or data for
2 programs, that are currently running and that
3 the operator might be -- or that the
4 processor might currently be performing
5 operations with. There also can be data in
6 there that just is data from programs that
7 had been loaded in the past, but just has
8 remained in there, as nothing else is needed
9 to use that space yet.

10 Q. Is your distinction of copying,
11 as used in this report, as including
12 transfers to removable medium or other
13 storage devices, but not including the
14 transfer of a program from a storage device
15 to RAM, is that your opinion, or is it a more
16 widely-held opinion?

17 CALADRINO
MR. VENABLE: Objection to the
18 form of the question. It's compound.

19 A. Okay. I believe that it's a
20 more widely-held opinion than that.

21 Q. And I believe in your report
22 you cite that the technical community would
23 agree with your opinion?

24 A. I believe that many within the
25 technical community would -- if presented

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1 with this case and with the details of it and
2 with my statement would feel -- or would
3 likely agree with the conclusions that I had
4 reached.

5 Q. And what's your -- your basis
6 for that belief?

7 A. My understanding of the
8 material within the -- or of this material
9 that relates to this case, in addition just
10 earlier conversations, for example, with Alex
11 Halderman or with Professor Felten.

12 Q. And here, just to be clear, I
13 want to -- I'm limiting these questions
14 simply to your opinion that copying does not
15 include the loading of a computer program
16 from a storage device into RAM, and copying
17 only includes the transfer from one storage
18 device to a removable storage device or
19 another storage device --

20 A. Okay.

21 Q. -- not the broader opinions

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22 you've reached in the case; is that clear?

23 A. That's clear. But I also just
24 want to clarify quickly that I'm speaking
25 strictly to the movement of data from the

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1 hard drive to RAM. I'm not necessarily
2 speaking to any other movement that might
3 occur between any other medium within a
4 machine or even if you were to load a CD into
5 a machine, and then it's technically inside
6 the machine, and you copy it into this memory
7 hierarchy. So I'm simply speaking within
8 this memory hierarchy.

9 Q. Would you consider loading a
10 computer program from a CD into RAM to be
11 copying?

12 A. Yes, I would.

13 Q. But you would not consider the
14 loading of that same program from a
15 computer's hard drive to RAM to be a copy?

16 A. Yes, provided that it's a
17 permanent hard drive that stays within the
18 machine. It's not just some removable hard
19 drive that you attach to whichever machines
20 you want.

21 Q. So if the program were stored
22 on a hard drive that connected via a USB
23 cable or some other port to a computer and
24 the program was stored on that external drive
25 and loaded from that drive into RAM, you

1 would consider that a copy?

2 A. I haven't thought strongly
3 enough about that to really form -- to form a
4 strong opinion one way or the other, but if
5 it's the same hard drive within a machine,
6 then I would not consider it to be a copy.

7 Q. So going back to the basis for
8 your opinion of drawing this distinction
9 between copying, not including from the same
10 computer storage device to RAM, I believe you
11 testified that your prior conversations with
12 Mr. Halderman and Professor Felten may have
13 informed -- been part of the basis that your
14 opinion would be shared by those in the
15 technical community; is that right?

16 A. Yes, that's correct.

17 Q. Is there any other basis for
18 your belief that your opinion would be shared
19 by many in the technical community?

20 A. I haven't spoken to others
21 within the technical community, but based
22 upon my understanding of the material I feel
23 as though they would agree that the
24 conclusions that I've reached are logical
25 based upon past interactions with them and

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1 papers that I've read or anything else.

2 Q. How do you define the
3 "technical community" that you're speaking of
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4 in this context?

5 A. The technical community, I'm
6 primarily referring to computer scientists,
7 and even within that field you could somewhat
8 say academic computer scientists because
9 those are the ones with whom I've had -- with
10 whom I've had the most interactions and the
11 ones that would most likely have thought
12 these issues through most thoroughly.

13 Q. Did you conduct any survey of
14 members of this technical community to elicit
15 their agreement or disagreement with the
16 opinion?

17 A. No, I did not.

18 Q. Did you conduct any studies of
19 members of the technical community to
20 determine whether they would agree with this
21 opinion?

22 A. No, I did not.

23 Q. Did you consult any
24 previously-conducted surveys or studies
25 performed by others in the community as to

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1 this issue?

2 A. I don't believe that I -- that
3 I looked into any previous studies. I've
4 looked at -- for instance, when I've gone
5 through websites when I was initially
6 checking out this case, there were certain
7 ones that spoke about various interpretations

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8 of the law that had been made in previous
9 cases. And some -- and some of those may
10 have contained remarks that may have
11 indirectly led me to believe that this belief
12 is more widely shared than just the people
13 that I've directly spoken to.

14 Q. Did you review any materials
15 that would lead you to believe that there
16 were others within the community who would
17 disagree with your opinion as to what
18 constitutes copying?

19 A. I can't -- I don't know that
20 I've seen any material from technical experts
21 that would lead me to believe that anybody
22 has disagreed. I know that informally in
23 books you might see this referred to -- the
24 movement of data referred to as copying, but
25 as I mentioned before, that has a very

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1 specific connotation within the technical
2 community, I believe. So nothing that would
3 have strongly contradicted my own opinion.

4 Q. In reaching your opinion that
5 loading a program into RAM does not
6 constitute copying, did you consider whether
7 loading a program into RAM permits the
8 program to be perceived for more than a brief
9 moment of transition?

10 MR. VENABLE: Objection to the
11 form of the question. It's vague and
12 ambiguous.

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13 A. Could you actually clarify the
14 technical details of that? I'm not entirely
15 clear --

16 Q. I'll give it a shot.

17 A. -- on what you're asking.

18 Q. When world of Warcraft, say, is
19 loaded into -- into RAM, is the content of
20 the program able to be perceived by the user?

21 MR. VENABLE: Objection to the
22 form of the question. Vague and ambiguous.

23 A. After it's loaded to memory,
24 then following that point, it's able to be
25 used to, say, perform any renderings that the

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1 code might have made that would lead, say, to
2 the screen -- to things on the screen that
3 the user might see or interactions that the
4 user might have with the program.

5 MR. VENABLE: I just want to
6 make the point that the reason why I was
7 objecting, you said it's loaded into RAM, but
8 you don't say from where.

9 MR. GENETSKI: Okay. I'm happy
10 --

11 MR. VENABLE: Could you
12 clarify?

13 MR. GENETSKI: I'm happy to
14 clarify that. Sure. Thank you.

15 Q. So going back to the last
16 question, would your answer apply equally if

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17 the world of warcraft was loaded directly
18 from the computer's hard drive into RAM?
19 would that -- would those -- that same
20 functionality be available from the program
21 from wow loaded in RAM?
22 (whereupon, discussion is held
23 off the record.)
24 MR. VENABLE: we'll come back
25 to it.

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1 THE VIDEOGRAPHER: The time is
2 10:44 a.m. Off the record.
3 (whereupon, a brief recess is
4 taken.)
5 THE VIDEOGRAPHER: The time is
6 10:59 a.m. We are back on the record.
7 Q. Mr. Calandrino, just a quick
8 reminder that you are still under oath.
9 A. Sure.
10 Q. Before the break, we were
11 discussing your opinion that transferring a
12 computer program from a computer's hard drive
13 to that computer's random access memory does
14 not constitute copying for copyright law
15 purposes.
16 A. Yes.
17 Q. Is that a fair summary of your
18 opinion that we were discussing?
19 A. Yes, that sounds like a fair
20 summary.
21 Q. In reaching that opinion, did

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22 you consider whether, when world of warcraft
23 is loaded into RAM, the content of the
24 program is able to be perceived?

25 A. Yes, I had thought about that.

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1 Q. And how did you incorporate
2 that consideration into forming your opinion?

3 A. I had taken it into account in
4 that I had considered whether or not it would
5 be able to be perceived at other levels of
6 this hierarchy, so, for example, whether or
7 not you could do the same thing just using
8 the hard drive without even this intermediate
9 level of memory.

10 Q. And what was your conclusion?

11 A. My conclusion was that if you
12 wanted to design a system such that it ran
13 without this main -- or without this random
14 access memory, then you could do so.

15 Q. And what would be the
16 disadvantages of such a system?

17 A. It would be -- the primary
18 disadvantage would be that it would be
19 extremely slow. The hard drive is orders of
20 magnitude slower than accessing the same data
21 in random access memory.

22 Q. And though you considered
23 whether it was necessary to load the -- a
24 program and let's say world of warcraft -- to
25 load world of warcraft into RAM in order to

1 be able to perceive it, and concluded it
2 wouldn't be necessary.

3 A. Given a dif -- given a
4 different system design, it would not be
5 necessary.

6 Q. I'm sorry. Can you repeat that
7 answer?

8 A. Given a change in how systems
9 are designed today, it would not be
10 necessary.

11 Q. But, in fact, in the normal
12 operation of the world of Warcraft program,
13 is the -- is the content of World of Warcraft
14 able to be perceived while it's loaded in
15 RAM?

16 A. While it's loaded in RAM, yes,
17 then at that point it's able to be perceived.

18 Q. And are -- are you able to
19 communicate with World of Warcraft when it is
20 loaded into RAM?

21 A. Could you clarify a little bit
22 on what you mean by "communicate"?

23 Q. Sure. For example, does -- is
24 one of the functionalities of the Glider
25 program to communicate back and forth with

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1 the world of Warcraft program?

2 A. Okay. So you mean, say, supply
3 input?

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4 Q. Sure.
5 A. Yes. Once it's loaded into
6 RAM, then you can communicate with the
7 program in that manner.
8 Q. So when -- just to clarify, so
9 when World of Warcraft is loaded from a
10 computer's hard drive into RAM, that World of
11 Warcraft program in RAM is able to
12 communicate with other programs, send and
13 receive?
14 A. Yes. At that point Glider is
15 able to have its interactions with that
16 program.
17 Q. And did you consider that
18 ability to communicate with World of Warcraft
19 while it is in RAM in reaching your opinion
20 that loading into RAM is not copying?
21 A. No, not heavily, just because
22 you could do the same thing with the hard
23 drive, given a similar redesign of the
24 system.
25 Q. So in your view is the ability

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1 to -- to use a program directly from a hard
2 drive, as opposed to loading it into RAM, one
3 of the primary reasons for your conclusion
4 that it's not a copy to move it from a hard
5 drive to RAM?
6 A. Yes, I would consider that to
7 be one of the primary reasons, along with the

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8 fact that I believe that when random access
9 memory was initially added to a machine, it
10 was added as an optimization, without thought
11 to whether lawyers might later on consider
12 this to be a copy.

13 Q. In what segment of the memory
14 hierarchy do software programs typically run?

15 A. Typically, they're going to be
16 in random access memory, but the data that
17 you actually are using most frequently will
18 often be in the cache level, and the
19 actual -- the actual instruction that you're
20 using at that given point will generally be
21 within the registers.

22 Q. Can the data get into the cache
23 or the register without being loaded first
24 into RAM?

25 A. You could design a system that

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1 way. I don't believe that common systems
2 operate that way.

3 Q. If you'll look at page 4 of
4 your report, which, again, is the page after
5 the image, at the end of the first full
6 paragraph, the last sentence before the block
7 quote --

8 A. Okay.

9 Q. -- you seem to present a
10 hypothetical suggesting that if loading a
11 program from a hard drive to RAM is
12 considered a copy, that Blizzard's own end

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13 user license agreement or EULA, E-U-L-A,
14 would appear to prevent a user from even
15 running the world of warcraft software.

16 A. Okay.

17 Q. Can you explain what you mean
18 by that hypothetical?

19 A. Okay. I believe that the
20 statement in question is "Subject to the
21 license granted hereunder, you may not in
22 whole or in part copy," and then there is a
23 couple of other things that you're not
24 allowed to do, based on the game. So my
25 understanding is that if you consider the

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1 movement of data to this random access memory
2 to be a copy, then based upon the license
3 you're not allowed to move that data to
4 random access memory.

5 Q. What's your understanding of
6 the prefatory clause there, "subject to the
7 license granted hereunder"?

8 A. That I was a little bit
9 ambiguous on, just because it's not clear
10 whether it's indicating that if you're
11 abiding by this license, then you may not do
12 that, or whether subject to perhaps other
13 terms within that license you're not allowed
14 to do that. But I just -- if you take that
15 on its own, it would appear to exclude the
16 ability to run the program.

17 Q. Are -- you're familiar with
18 software generally?

19 A. Yes, I am.

20 Q. You've purchased a lot of
21 software in your day?

22 A. Yes, plenty of software.

23 Q. And is it fair to say that most
24 software is subject to license agreements
25 that restrict the types of uses that can be

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1 made of the software?

2 A. Yes. Most software that you
3 would typically purchase, as opposed to --
4 even open-source tends to be subject to
5 license -- open-source software which is a
6 type of software that you can have that
7 typically is freely distributed, but has
8 certain licenses on its use.

9 Q. And is it your understanding
10 that license agreements typically grant users
11 rights to do certain actions and exclude
12 their right to take other actions with that
13 software?

14 A. That sounds like a fair
15 characterization.

16 Q. And so reading again the block
17 quote from the world of Warcraft EULA on page
18 4, is it a fair characterization that that
19 sentence permits users to make copies by
20 loading it to RAM, provided that they do so
21 subject to the terms of the license?

22 A. I'm not necessarily a legal
23 expert, so I'm not going to really try
24 strongly to interpret what that means. I
25 simply was attempting to provide an example

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1 of, at least at face value, not trying to
2 form the legal implications, it would appear
3 to -- to ban this, but -- and I saw nothing
4 else in the license that would lead me to
5 believe that you're allowed to make copies
6 for this purpose, for example. So -- but in
7 terms of the actual legal implications, I'm
8 not certain that I feel even qualified to
9 make that judgment.

10 Q. So is it fair to say that in
11 your presentation of this hypothetical, you
12 did not consider whether there might be a
13 distinction between a user's ability to load
14 a -- load the program into RAM consistent
15 with the terms of the license, as opposed to
16 loading the program into RAM outside the
17 terms of the license?

18 A. I did not think too heavily
19 about that possibility.

20 Q. If you'll look a little bit
21 further down on page 4, the full paragraph
22 that begins "Blizzard essentially argues."

23 A. Okay.

24 Q. And here you present another
25 hypothetical?

1 A. Yes.

2 Q. Is it fair to characterize your

3 discussion in this hypothetical as dealing

4 exclusively with the movement of data between

5 RAM and registers and cache?

6 A. Yes. In this example I believe

7 that I had focused on the transition between

8 levels of the memory hierarchy higher than

9 the hard drive.

10 Q. So you're not discussing in

11 this hypothetical the transfer of data from a

12 hard drive into RAM?

13 A. No, I am not.

14 Q. I believe your report also

15 discusses in some detail the Glider program's

16 launcher functionality.

17 A. Okay.

18 Q. Is that right?

19 A. Yes.

20 Q. And I suppose I should --

21 probably should have some time ago

22 established a little bit of foundation.

23 You're familiar with the software program,

24 Glider?

25 A. Yes, I am.

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1 Q. Can you give me your brief

2 description of what you understand that

3 program to be?

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4 A. I believe that it's a program
5 that controls or that is able to perform
6 certain actions within the game context using
7 a user's character on behalf of that user
8 without further user interaction.

9 Q. In the world of Warcraft?

10 A. Yes, within the world of
11 Warcraft game specifically.

12 Q. What did you do to review the
13 Glider's launcher code?

14 A. I actually reviewed the code,
15 virtually, I would say, almost every line of
16 it.

17 Q. And what language is it written
18 in?

19 A. It's written in -- it's in .net
20 so it would be in C#, I believe.

21 Q. And are you proficient in C#?

22 A. Yes, I am -- I wouldn't
23 consider myself to be heavily proficient in
24 it, but I've used it before.

25 Q. Do you agree that the Glider

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1 launcher initiates the loading of world of
2 Warcraft into RAM on the user's computer?

3 A. If the user chooses to have it
4 do so, yes.

5 Q. So when -- when a user relies
6 on Glider to launch world of Warcraft, in
7 that case world of Warcraft is loaded from

8 the user's hard drive into the user's RAM
9 with Glider running in conjunction with world
10 of Warcraft?

11 A. That sounds correct.

12 Q. What's your understanding of
13 the purpose for Glider users to launch world
14 of Warcraft using Glider?

15 A. I believe that the -- the basic
16 purpose of that initially was to help evade
17 detection by the Warden component of World of
18 Warcraft.

19 Q. Did it later have a different
20 purpose?

21 A. I think that in some cases now
22 it's seen as a convenience for users. I know
23 that now -- I believe that even recently
24 they've -- they might have a version of it
25 that doesn't require you to use this launcher

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1 Q. If you know.

2 A. It simply might be a
3 convenience, where you might say, all right,
4 I'm going to need to open this other program
5 anyway, why don't I just open it now, do any
6 configuration that I need to do and then have
7 it -- launch the World of Warcraft program.

8 Q. So you only have to launch --
9 hit one launch button, as opposed to
10 launching wow independently and then

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11 launching Glider independently.

12 A. And also, for example, the
13 world of Warcraft program typically takes up
14 your full screen, so you would have to get
15 out of that full screen mode and then go back
16 and open up another program.

17 Q. Is it your understanding that
18 if a user loads world of Warcraft into RAM
19 and subsequently launches Glider, that user's
20 use of Glider is more likely to be detected
21 by Blizzard's cheat detection?

22 A. It's slightly more likely. It
23 also depends on exactly -- on the exact
24 details of Warden - of what Warden is doing.
25 So it might only be a marginal increase in