

EXHIBIT W

(MDY's SDF)

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.)
and VIVENDI GAMES, INC.,)
)
Defendants and)
Counterclaim Plaintiffs.)
_____)
)
BLIZZARD ENTERTAINMENT, INC.)
and VIVENDI GAMES, INC.,)
)
Third-Party Plaintiffs,)
)
vs.)
)
MICHAEL DONNELLY,)
)
Third-Party Defendant.)
_____)

Videotaped Deposition of MATTHEW VERSLUYS,
taken on behalf of the Plaintiff/Counterclaim
Defendant, at 601 South Figueroa Street,
Suite 2500, Los Angeles, California,
commencing at 11:11 a.m. on Wednesday,
November 14, 2007, before LorRae D. Nelson,
Certified Shorthand Reporter No. 7384.

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

1 a user's account; correct?

2 A. No. But it's part of an overall system
3 that does.

4 Q. Okay, but --

5 A. Sorry.

6 Q. -- what or who is ultimately in charge of
7 banning a user's account?

8 A. The rules which are in the game server
9 base. So the rules in the game server determine if
10 the information provided by Warden should result in
11 an account ban.

12 Q. So the account ban does not actually
13 happen by Warden itself; correct?

14 A. Correct.

15 Q. It requires somebody at Blizzard to make
16 that decision; correct?

17 A. No. The rules on the server -- and,
18 again, it depends on the rules.

19 The rules on the server may determine
20 that action is taken against the account
21 automatically, or it may just be logged and then be
22 reviewed later.

23 Q. Well, I guess I'm a little confused
24 because I think you said that Warden doesn't
25 physically ban someone's account, that it might