

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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DONGXIAO YUE,

Plaintiff,

vs.

No. C15-3463-HSG

GAOGAO HAN, an individual,
HANSHAN.CO, HANSHAN.INFO and
DOES 1-10,

Defendants.

_____ /

DEPOSITION OF GAOGAO HAN

VIA WEBCAM

Monday, December 19, 2016

2:35 PM

Taken in the offices of:

California Deposition Reporters
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Stockton, California 95207

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MONDAY, DECEMBER 19, 2016, STOCKTON, CALIFORNIA

2:35 PM

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GAOGAO HAN,

having been first duly sworn, was examined and testified
as follows:

EXAMINATION

BY MR. YUE: Q. So this is a deposition in the
case I filed, Yue vs. Han, in the U.S. District Court.
This is the plaintiff, Dongxiao Yue.

Mr. Han, could you state your name, please?

A. Yes. My name is Gaogao Han.

Q. Good morning -- I should say good morning,
Mr. Han. You are in Beijing right now; right?

A. Yes. Good morning.

Q. Thank you. So you've just taken an oath. Do you
understand the oath; correct? Correct?

A. Yeah.

Q. So the oath is under penalty of perjury that you
tell the truth and the whole truth?

A. Yes.

Q. Good, good. So let's start just by asking some
preliminary questions. Did you receive my request for

1 come -- if MP3 working or not.

2 Q. Can you see the time for that message?

3 A. The time is September 12.

4 Q. Which year?

5 A. Huh?

6 Q. Which is 2014; right?

7 A. Yes. September 12, 2014. Correct.

8 Q. Okay. So you were trying to add features and you
9 were telling your users that you don't know where to
10 start; right? At that time.

11 A. That's -- yes, that's a general answer. That's
12 just my philosophy. I don't intended to do something to
13 improve the software. I just follow the suggestion from
14 other people. If you can resolve some feature, I will
15 try -- I will try to spend very little time to do that by
16 my knowledge.

17 Q. Okay. That's good.

18 A. So MP3, I cannot remember. I have to go back to
19 the code to see what time I add it.

20 Q. Okay. We're going to look through the code
21 later. Okay?

22 A. Okay. The code may be period -- the code may be
23 September.

24 Q. Okay. Yes. Let's move on to -- can you have a
25 look at 935?

1 Q. Would you translate that into English for us, for
2 the court reporter, the whole message?

3 A. Okay. So you want me to read the code?

4 Q. Yes. Not the code. But for the code you have --
5 just say -- you wrote some text in Chinese; right?

6 A. So you want me to read this part?

7 Q. Yeah. But translating into English.

8 A. Okay. Play a game. One key do everything. The
9 code, something like the key code, that's a copy and paste
10 tool, editing editor, including microblog. The response
11 of microblog, the response of the blog, (speaking Chinese)
12 and something like private message. Then creek return.
13 You will see the picture.

14 Okay. I know this part work. This must be from
15 you. This is from your code.

16 Q. So you are basically saying you can post a gift
17 image to anyone on -- including the microblog. It applies
18 to microblogs, applies to blogs, foreigners, foreign
19 replies, albums.

20 A. Yes.

21 Q. Message and then item publish?

22 A. Yes.

23 Q. And you see the gift image; right?

24 A. Yes. That's testing.

25 Q. So you are using the tube.js code; right?

1 A. Okay. I cannot hear clear. I need to -- I make
2 some changes of what?

3 Q. You made some changes to the tube.js code?

4 A. Okay. Actually, at the very beginning I pass the
5 code and the code just said looking for the gift and that
6 -- also I think that's working for the MP3. The logo is
7 still a ZZB logo. After this I change the -- I change the
8 logo. I change the ZZB to some other folder. I did not
9 go into the code, but I just search predator change.
10 Correct.

11 Q. So you are saying you changed the ZZB logo to
12 something else?

13 A. Yes, correct.

14 Q. Why did you do that?

15 A. Because I can show that -- MP3 logo show that --
16 MP3 shows something else, so show that logo what I am at.
17 And also I can go through the ZZB first. Because I -- the
18 code, I cannot read it. That is red box. That's music.
19 That's a free software. I just use it. And the result
20 not good. Not as I expected. So I just tried to go
21 problem and make three changes. Then the problem is gone.

22 Q. So you were having a problem with the code before
23 you make the change?

24 A. Repeat your question.

25 Q. So when you change the ZZB logo -- before you

1 change the ZZB logo, you have problems with the code?

2 A. Has problem? What do you mean "problem"?

3 Q. You just said you had -- the problem went away,
4 and I was asking what you mean by the problem.

5 A. You know, it also has some feature, gift files.
6 That's no problem. And then I test maybe -- you know,
7 that's too long time. I cannot remember. I only coding
8 to refresh my memory. So I believe I change some -- I got
9 some problems with MP3, and then I change three predator.
10 That's only changes I made to the code.

11 Q. Okay. Let's move on. Then after you got the
12 message, you said that you went on to writing your own
13 code; right?

14 A. No, no. In discovery I saw the procedure. If
15 you see my discovery, I drew the code, the one-line code
16 from, I believe -- okay. Give me one second. Code.
17 Okay. Actually, I don't have the technology. I just try
18 to make it as little as possible the NEG to make a little
19 bit of changes to the Web user. The technology, my
20 technology I used. If you will see, I can use that more.
21 Actually that's nothing. I just look to use in September
22 22nd. If you see the code I sent to you, you will see --

23 Q. Okay. Mr. Han, we'll talk about the code later.
24 We'll just --

25 A. No, not later. The same technology. In the

1 A. Okay.

2 Q. Can you go to page 4 of the document?

3 A. Yes.

4 Q. You see the highlighted portion? Can you
5 translate the highlighted portion in English for Vickie,
6 for the court reporter?

7 A. Okay. I saw the code. The tube is a part of the
8 jQuery because I saw the similar code, jquery.tube.js.
9 And I test the new code here, and the code is not very
10 good. And I use the code in the microblog to show the
11 photos. I can use it. No problem. If I show the MP3,
12 something like that, or if I show the photo, I need to
13 change the jQuery to change the logo. If I don't change
14 it, it's no problem.

15 Then for replace this program, go complete photo,
16 the technology of the photo, I load one-line code in the
17 backend. I said comparing to the code tube.js and my
18 code, I need to write one line. Of that code I just use
19 it without writing anything. So that's the reason I use
20 the code tube.js.

21 Q. Mr. Han, in the translation of the paragraph
22 above, you said --

23 A. Yes. In my position, I said your code is very
24 good.

25 Q. Let me -- you need to follow my -- you know, only

1 I ask you questions. Okay.

2 So the paragraph right above you said, "Not only
3 this image but also the audio and video"; right? Is that
4 correct?

5 A. What's that?

6 Q. Where you were talking about the tube.js post,
7 you mentioned images.

8 A. Yes.

9 Q. Audio and the video; right?

10 A. Let me see. I didn't mention here. I only
11 mention the photo and audio. I didn't mention the video.
12 I did not mention video here, but I think I use it.

13 Q. (Speaking Chinese.) Do you see that one?

14 A. Yeah, yeah, right. Photo and video, yes.
15 Correct.

16 Q. So you were saying to -- you were saying that my
17 code was able to display images, audio, and video;
18 correct?

19 A. Yes. You can -- your program can play the photo,
20 audio, and video, yes. Correct.

21 Q. And in all those areas of the Web site, right, we
22 mentioned before like blog, microblog, foreign, albums?

23 A. Yes, yes. But later I realize that your program
24 can make the photo, audio, and video at least for some
25 type of them for the video in the different area, yes.

1 Q. You are referring to my popular new friends'
2 names; right?

3 A. I didn't refer to anything here in the word. I
4 just talk about in general because other people talk about
5 something like this. I didn't mention to you.

6 Q. Okay. Mr. Han, let's now go over to your -- that
7 you produced. Look at the Document D1. That's a
8 confidential exhibit, **Exhibit 2**.

9 (Exhibit No. 2 marked for identification.)

10 THE WITNESS: Goes where?

11 MR. YUE: Q. Document D1.

12 A. Document D what?

13 Q. D1. D1.

14 A. D1.

15 Q. Yes.

16 A. Okay. So that's a code, I believe.

17 Q. So can you tell me what is this called?

18 A. Okay. This called -- I believe I don't use the
19 code. This is the first time I send to you. Later I sent
20 letter -- okay.

21 Q. Let's go to page 2 -- page 1 of the code. Okay.
22 Look at page 1.

23 A. Okay.

24 Q. Of line 33.

25 A. Yes.

1 Q. There's some comments; right?

2 A. Yes.

3 Q. "Adding one line for showing each photo on
4 October 11th, 2014."

5 A. Yes.

6 Q. That's what -- a comment that you wrote?

7 A. Yes.

8 Q. On October 11th, 2014?

9 A. Yes. October 11th, yes. Correct.

10 Q. So the last line, line 34, there is -- could you
11 explain to me what is that line trying to do?

12 A. Which one?

13 Q. Line 34.

14 A. 34, so that's -- basically that's --

15 Q. So let's ask you, what is the language for this
16 program?

17 A. Give me one second. Okay. I saw it. 34 -- 34
18 is -- okay. The two features. One feature is if there is
19 a .png file, it will catch it. It will catch the code.
20 And then place some code you put to make the picture.

21 Q. Let me -- this photo, can you tell me the
22 language?

23 A. I believe that's .php.

24 Q. Have you study PHP photo in your language?

25 A. No, nothing. Never.

1 Q. So you don't know anything about PHP?
2 A. I know nothing about that before and then now.
3 Q. What is "preg replace"?
4 A. Okay. That's very simple. Let me tell you the
5 story.
6 Q. Mr. Han, let me -- let's do this. As I said,
7 I'll ask you questions and you give answers. Okay. If
8 you keep swaying off, you know, off and talking, it will
9 take us too long to finish the deposition.
10 So do you know what does -- you see there is a
11 function of "preg"; right?
12 A. Pardon me? What?
13 Q. Line 34, you see there's a function called --
14 A. Yes.
15 Q. -- "preg replace." Do you know what that
16 function do?
17 A. I don't know. I never go into it. I don't -- I
18 don't ask about that.
19 Q. You don't know about what the code does?
20 A. No. I know nothing.
21 Q. So you know this jQuery; right?
22 A. Pardon me? What?
23 Q. You know the jQuery language; right?
24 A. Yes. I have seen -- okay. Let me tell you the
25 truth. I didn't read the code. I do not need to read the

1 code. I just test. I just gave the input and proceed.
2 That's it. I don't need to see, just like your code. I
3 never read your code.
4 Q. So, sir, are you saying you don't understand what
5 this code does?
6 A. Okay. This is very simple. You know, give the
7 input and take out the output. That's it. If you go to
8 the line --
9 Q. Mr. Han, let me --
10 A. Give me one second. If you see the line 56, you
11 can see what as to my knowledge it look from here.
12 September 22 --
13 Q. No, no. Mr. Han, I'm not asking you how you --
14 how you get the code working. I'm just asking whether you
15 understand this code.
16 A. Okay. Let me tell you. I do not understand the
17 code you send. I do not understand the section you send
18 because I never see it. But I didn't just use the code.
19 I can make it work. This is the -- you are the
20 programming work. The programming work. We don't need to
21 know the section you had.
22 Q. So do you understand what a regular expression
23 is?
24 A. I know the concept. That's very simple. Also
25 check the dictionary, check the code, but I tried the --

1 Q. Let me ask you. You need to answer my questions.
2 A. Okay.
3 Q. This function called preg_replace; right?
4 A. What?
5 Q. Our name is preg_replace; correct?
6 A. Yes.
7 Q. Was there many of this function?
8 A. I don't care. I don't remember. I just know
9 when that input, if you input including some feature, then
10 a code and replace something.
11 Q. Okay. Let's do this. You can see this function
12 has three arguments. Let me see. Two arguments -- three
13 arguments; right?
14 A. Yes, three arguments.
15 Q. The first argument leaves a string; right?
16 A. The first argument -- okay. The first argument I
17 believe is under the -- before the camera, the first
18 argument is 12, catch the code. For example, okay, if
19 you'll go to the page 4 -- give me one second. Go to 34.
20 You can see there is .png file. So this is the first
21 argument. This argument is --
22 Q. Let me ask you. Okay. So there's a double code.
23 Is there a double code slash with a forward slash;
24 correct?
25 A. Yes. A double code. The first feature is double

1 code, yes.
2 Q. And then there is a parentheses and there is
3 "a-z0-9"?
4 A. Yes.
5 Q. Do you understand what those two are?
6 A. I don't care. I don't care. I don't try it. I
7 don't try it. This is very work. If I try to picture I
8 can know the meaning. I don't care. I don't know the
9 meaning.
10 Q. You don't know the meaning?
11 A. I don't care the meaning. I just use it. That's
12 correct.
13 Q. So do you copy this code somewhere -- from
14 somewhere?
15 A. Yes, you are right. I told you. I told you,
16 you'll see the band 66, you see the line 56, you can see
17 the 57. You see 57, that's -- okay. You can see the 58.
18 I believe 58, that's -- that's something. Okay. There is
19 a mark in line 57. Give me one second. In the portion 3
20 from the 2 in the blog, that's -- but you go to the blog.
21 If the people click it more than once, the link, the
22 hyperlink will not work correctly. I just fix the back to
23 make it work correctly. The back is a code. The back
24 will turn the code into the hyperlink.
25 Q. Mr. Han, I'm not on line 56 yet. I'm still on

1 line 34. So you are saying you don't understand what's in
2 the --

3 A. Okay. I get the code from -- I get the code from
4 the -- from somewhere.

5 Q. Where?

6 A. September 22.

7 Q. Where did you get the code? So you copy the
8 code?

9 A. Okay. If you ask me -- okay. Give me one
10 second. I have a paper to this part. I think maybe only
11 myself can see the paper, the technology. Let me tell
12 you. I got the code from -- from the Discuz!, the
13 software, from the blog.

14 Q. So you copy the -- so you copied this line of
15 code from Discuz! software?

16 A. From the Discuz! software, the same software.

17 Q. Where? Which one?

18 A. From the section .php. One section.

19 Q. So basically this line of code you actually --
20 you just copied from Discuz!; correct?

21 A. I copied this similar code from somewhere. At
22 the very beginning I use the code to make the URL
23 hyperlink, the user hyperlink. That's the same
24 technology.

25 Q. So the first argument was -- I can tell you the

1 first argument is regular expression, but you don't
2 know --

3 A. I don't care. I do not care. I do not -- I
4 don't know nothing about that. I can make my work. I can
5 make the statement. And also for this line I use the last
6 portion, maybe the March 2006, and make this part, three
7 of them, different -- a little bit different. That's just
8 testing issue. When I make a line code, I already one or
9 two hours and that works by the hours for the code.

10 Q. So you use -- you spend one or two hours for one
11 line of code?

12 A. Yes, correct. And that rate more than one unit
13 of time. The unit can be maybe one or two hours or five
14 to six hours because I only need to read the code. I
15 don't understand the code. I just make it.

16 Q. So you are saying you don't understand this code.
17 You copy the code from this line, and you spent two hours
18 working on this one line?

19 A. That's a possibility. Plus the testing, that's
20 maybe the photo file, five to six hours. Nothing more
21 than one unit time. Nothing more than five to six hours
22 make one line of code. For example, Mr. Yue, we can do
23 again. We can go to another --

24 Q. No. We don't need to. You know I have a degree
25 in computer science, and so we don't need to do --

1 A. If you cannot understand this, you may not -- you
2 know, you have the computer degree. You may not be a good
3 programmer. This is very simple. The programmer --

4 Q. Mr. Han, that does not --

5 A. It does not mean you have to understand them.

6 Q. I just need to get you to say -- so you copied
7 this code from this person and you don't understand it;
8 correct?

9 A. I did the code. You said the section, so you are
10 right. I didn't -- I know what the output give the
11 parameter to catch the feature and change the video to
12 output. That's it. I know the functionality, but I don't
13 know the user. My program, you will know the information
14 hiding. You will see the contact browser user
15 information.

16 Q. Let's move on. And so line 34, you are replace
17 -- you were trying to replace PNG file; right?

18 A. Pardon me? What? 44 what?

19 Q. 34. You are trying to replace -- you are trying
20 to destroy the PNG image; correct?

21 A. Yes, correct.

22 Q. On line 34, you are trying to do for the JPG
23 file; correct?

24 A. Yes, correct.

25 Q. And what are you trying to do in line 36?

1 A. The line 36, on line 37, and line 38, that's
2 one-line file. That's to try to replace the P active
3 file. This only has three lines, but you program it that
4 one line. That's a one programming line.

5 Q. So does this line work for all the situations?
6 Does it work in all scenarios or only work in some cases?

7 A. This is just for the microblog. It's a space of
8 CP --

9 Q. Let me ask you. What does line 36 do?

10 A. Line 26. Let me tell you line 26 --

11 Q. Line 36.

12 A. Line 36. Okay. The pfile, if you use -- just
13 use replace for the pfile -- if the pfile working, if the
14 people use the pfile and the motion together, there will
15 be some error. So this condition make this condition that
16 I will not type in. That's it.

17 Q. So you are trying to compare --

18 A. You ask me -- you ask me, and I said, "Look, I
19 don't care. I just make it work."

20 Q. So you don't know --

21 A. And now this condition there will be no payroll.
22 That's it.

23 Q. So you don't understand this code. That's what
24 you are saying?

25 A. That's in the condition. That's something --

1 that's -- when I tried to make it, I made the Autotask so
2 that all the protection STRPOS. I may copy from somewhere
3 else. I may try to test. Actually, it just working.
4 That's it.

5 Q. So you remember that you had the problem with
6 gift images; correct?

7 A. Yes, you are right. At the very beginning I be
8 able to problem solve. I made the condition.

9 Q. So you mentioned in your previous -- you remember
10 when you previously -- the features you use in tube.js,
11 you mentioned that the gift images work; right? Do you
12 remember that?

13 A. Could you repeat? I didn't hear you clearly.

14 Q. Previously we had -- I had you translate one
15 message written by you; right? You said using the tube.js
16 gets the gift images working in all these areas; right?

17 A. Yes. When I used your code, that's true. I
18 didn't know there was a problem or not. I didn't find the
19 problem.

20 Q. So here you have a problem with the gift images;
21 correct?

22 A. There's a very simple back. This is a back. The
23 programmer will face this kind of back every day. That's
24 regular work. That's not a big deal.

25 Q. But you don't understand this code at all?

1 A. I don't need -- I can -- okay. You know as a
2 programmer -- okay. As I said in the very beginning, we
3 use the programs, we use the mainframe, we use computer,
4 we use Macintosh, we use a PC. We cannot understand all
5 of them, but we just use that as a tool. We just make
6 something easier. That's it.

7 Q. How many hours you spend on fixing the gift bud
8 that you mentioned?

9 A. Let me tell you the truth. I have never spent
10 more than seven hours.

11 Q. Seven hours work for one line of code?

12 A. One-line code, that's just maybe one or two hours
13 or maybe three to four hours, at most five to six hours.
14 I have never spent more than one unit of time. More than
15 seven hours, no. Because, as I mentioned several times,
16 this Web page is free for the Web user. I didn't donate
17 the time -- my time and my image. I just want to make the
18 working for people. Let me typing. That's it. I don't
19 want to make any profit. I don't want to make more
20 improvement, and I don't -- the article said, I don't just
21 read one-line code to take feature or to some parameter.
22 I change one parameter from ten to 20, and if the page 20
23 lines --

24 Q. So you copy the codes from somewhere else. You
25 copy the code from yourself; correct?

1 A. I copy the code from another page from section
2 .php. I remember. If you want, I can go there.

3 Q. You got the code --

4 A. I copy the code from the Discuz! software.
5 Another place. This is not my invention, no. I am not
6 smart. I am not pay attention for the programming. I
7 just make some little bit of fix. Just make something
8 happen. That's it. Okay?

9 Q. Okay. Let's go to -- let's jump to one -- line
10 164.

11 A. 164?

12 Q. Yes.

13 A. 164.

14 Q. On this same document. Okay. So one line for
15 youtube October 11, 2014; correct?

16 A. Yes.

17 Q. Okay. So do you understand that line of code at
18 all?

19 A. I told you, the first parameter between the top
20 of the code, that's a feature to catch HTTPS or HTTP, and
21 that -- this part of the link. The second part is the
22 output, bum, bum, bum, something like that. That's it.

23 Q. You see the -- do you see before that HTTPS, do
24 you see there is another parentheses with a question mark?
25 Do you understand what that is?

1 A. Where?

2 Q. On line 164; right? Do you see the HTTPS?

3 A. I do not care. I do not understand. I just
4 make.

5 Q. You don't understand? You copy it from where?
6 You copy it from somewhere; right?

7 A. This is just multiplication of the 34, the line
8 34. That's for .png. This is just multiplication. Make
9 the parameter.

10 Q. You see on this line there is -- you see in the
11 "preg replace," there is a question mark and there's a
12 less-than sign and then an equal sign. Do you see that?

13 A. I do not care. This is just -- when I test the
14 programming, I take care of that. I want the input go to
15 output. After testing, I don't care. I don't remember.
16 I don't know nothing about it. That's it.

17 Q. So right now you are saying you don't understand
18 any of this code?

19 A. I don't understand the code from very beginning,
20 but I just try to make the test. I try to make the test.
21 That's it.

22 Q. Before you said that you didn't know where to
23 start, so how do you know -- now how do you know where to
24 start? How do you know how to put this code right here?

25 A. That's a good question. Let me tell you how

1 to -- how to be a good programmer. If you are programming
2 and have some problem, the first one you want to know:
3 What's the problem? If you know the problem, the second
4 one you have to know where is the problem. You have to
5 get the code. You have to get location. The third thing,
6 you know how to fix it. The last thing is do something.

7 Q. No. My questions were simple. So we understood
8 that you didn't know where to start?

9 A. Okay. Let me tell you. Let me tell you. Now
10 the problem is the people want to see the photo in the
11 microblog. That's one problem we need to fix. Okay. How
12 to fix it? I don't know. When I can fix it? I found in
13 one place I -- if I had one-line code, I continue that. I
14 got the location. I figure out how to fix it. I know,
15 use the line 34. I can fix the problem.

16 Q. Mr. Han, there are hundreds of files.

17 A. Please, higher. I cannot see you. Please.
18 Thank you.

19 Q. There are thousands of files in this and maybe
20 one million lines of code; right? How did you know -- how
21 did you find out you can put the code to make the change?

22 A. Yeah. That's a very good question. You ask me
23 how to be a programmer. If you want, I can tell you. I
24 can teach you.

25 Q. No. Stop there.

1 A. You got to try the area the problem is. This is
2 what --

3 Q. Let's move on.

4 A. Okay.

5 Q. So you don't understand this code at all?

6 A. I don't need to understand the --

7 Q. Stop. You don't need to understand. Okay.

8 A. Yeah. I just do the testing. Okay. I give you
9 example. For example, now I do not have a lawyer. I
10 don't understand the law or maybe all of the law --

11 Q. Mr. Han, we don't need to continue on your
12 irrelevant topics. Let's -- we need to move on. Let me
13 see.

14 A. Okay.

15 Q. So you don't remember whether you were on the
16 bian-wang.com Web site; right? Bian-wang.com?

17 A. Okay. You're on the Web site, if it Hanshan,
18 Hanshan is mine. Is my id. But for others, you know --

19 Q. But the image we showed you before didn't refresh
20 your recollection?

21 A. Which one?

22 Q. The image asked you about the Web site
23 bian-wang.com; right? I asked you whether you have
24 registered on that Web site; correct?

25 A. I cannot remember.

1 Q. You cannot remember?

2 A. I said I cannot remember because, you know,
3 too -- the Web site, for me that's just a game. I don't
4 want to make any money from anywhere.

5 Q. That's a whole different question. Okay.

6 So let's see. Let's open the -- another
7 document. Let's see here.

8 A. Which one?

9 Q. Just a minute here. So can you open D3. So this
10 will be -- I'll use it as D3. That's a confidential
11 document.

12 A. Okay. The connection not good.

13 Q. D3.

14 A. You are not moving.

15 Q. D3.

16 A. Oh.

17 Q. Document D3.

18 A. Okay. Come back.

19 Q. D3. Can you see -- have you opened D3?

20 Document D3, this will be Exhibit 3 for the
21 deposition.

22 (Exhibit No. 3 marked for identification.)

23 MR. YUE: Q. So this is a newer version since we
24 had newer version of the code that we just saw; correct?

25 A. Okay. You know the connection not good. Could

1 Q. It's fine. I just need to -- if you copy it from
2 elsewhere, you need to produce the code. Okay. So if you
3 remember you copy from Version 3.2 or 3.1 or 3.0, you need
4 to give me the code. Okay? That's the code you copy.

5 A. Okay. That's no problem.

6 Q. So you are going to produce the code that you
7 copied; right?

8 A. Give me just one second. Let me see. Yes, yes.

9 Q. Okay. So you'll give me the place where you
10 copied the code. Okay?

11 A. Okay.

12 MR. YUE: So, Vickie, which exhibit number are we
13 on?

14 THE REPORTER: Well, you had skipped from 7 to
15 10.

16 MR. YUE: 7 to 10.

17 THE REPORTER: You didn't have an 8 and 9.

18 THE WITNESS: You ask a lot of question not
19 related. Care about where I got the code. That's my
20 business. I just wrote one-line code.

21 MR. YUE: Q. We just get facts here. Just a
22 minute here.

23 A. Okay.

24 Q. Defamation in this case. So, you know, it's very
25 pertinent in this case. Okay?

1 A. Here said the technology of Hanshan Web site is
2 no part of Hanshan. Here I said only the (speaking
3 Chinese) can do it, to make his support. Other, the
4 technology is not good. But if Hanshan do not let them
5 know the code of technology, they will not know.

6 Q. The way you say, "they" -- basically the last
7 sentence you say --

8 A. I said that if -- if Hanshan doesn't teach them,
9 doesn't let them know the technology, they will not know
10 the code part of the Hanshan technology, the one-line
11 code.

12 Q. What did you mean by "them"? What did you mean
13 by "they" in this sentence? You mention they without the
14 technology -- you said without the teaching of Hanshan,
15 they wouldn't know the core technology of Hanshan.

16 A. This is anybody.

17 Q. Who?

18 A. For anybody.

19 Q. "They" means that include the person you mention?

20 A. This is for anybody. Because it's a code. It's
21 a backend code. If I don't let other people know, other
22 people will not know that. This is for anybody.

23 Q. So you -- but you admit you copy the code from
24 Discuz!; right?

25 A. Pardon me?

1 Q. You copy the code from Discuz!; right?

2 A. I got the idea and copy some code from the
3 Discuz!, and I make my change. I make my invention, my
4 modification. Okay. I did a test. I'm a programmer. I
5 make the thing happen.

6 Q. But you don't understand what the code was doing?

7 A. I don't -- I don't understand the function. I do
8 function. One function is black box. I did put -- I got
9 output. That's it. I don't need -- I know the function
10 to take input to something else, the article. That's it.
11 You said how it work.

12 Q. So basically you mention just to -- you add some
13 additions to the blog and the microblog; right? Correct?

14 A. Yes. I made some changes. I made changes to the
15 microblog and the blog, yes.

16 Q. Did you write code for the other areas of the Web
17 site like we mentioned before?

18 A. For this one-line code, no. For this one-line
19 code I only use microblog and the blog.

20 Q. So you didn't do any other areas of the Web site;
21 right?

22 A. So this one-line code. I didn't --

23 Q. You mention you only talk about the tube.js. You
24 cannot work for a lot of the areas of the Web site; right?

25 Blogs? Microblog?

1 STATE OF CALIFORNIA,)
2) ss.
3 COUNTY OF SAN JOAQUIN.)

4 I, Victoria R. Martin, Certified Shorthand
5 Reporter, do hereby certify:

6 That prior to being examined, the witness in the
7 foregoing proceedings was by me duly sworn to testify to
8 the truth, the whole truth, and nothing but the truth;

9 That said proceedings were taken before me at the
10 time and place therein set forth and were taken down by me
11 in shorthand and thereafter transcribed into typewriting
12 under my direction and supervision;

13 I further certify that I am neither counsel for,
14 nor related to, any parties to said proceedings, nor in
15 any way interested in the outcome thereof.

16 In witness whereof, I have hereunto subscribed my
17 name.

18
19
20 _____
21 VICTORIA R. MARTIN, CSR NO. 12322
22
23
24
25