

# Exhibit 3

9/19/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Todor Mihaylov, Ph.D.  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE MATTER OF: )  
 RICHARD KADREY, et al., )  
 Plaintiff, )  
 vs. ) C.A. NO.:  
 META PLATFORMS, INC., ) 3:23-cv-03417-VC  
 Defendant. )  
 )

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\*\* HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY \*\*  
 UNDER THE PROTECTIVE ORDER  
 VIDEOTAPED DEPOSITION OF TODOR MIHAYLOV, Ph.D.  
 Palo Alto, California  
 Thursday, September 19, 2024

Stenographically Reported by:  
 HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR  
 Realtime Systems Administrator  
 California CSR License #11600  
 Oregon CSR License #21-0005  
 Washington License #21009491  
 Nevada CCR License #980  
 Texas CSR License #10725

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1 THE WITNESS: It's -- my guess. That would  
2 be my guess.

3 Q. (By Ms. Poueymirou) Okay.

4 A. I don't know.

5 Q. And so what's being removed in the  
6 copyright section?

7 A. I don't know.

8 Q. Does it look like ISBN numbers?

9 A. It says that it might be ISBN numbers.

10 Q. Okay.

11 When you just jump down to the November  
12 17th, 2023, and these are obviously going in maybe  
13 reverse chrono, it says, "There are new" --

14 (Stenographer clarification.)

15 Q. (By Ms. Poueymirou) "There are few  
16 improvements we can make to LibGen after the manual  
17 inspection of the data sets," and you go one, two,  
18 three, four, the fifth bullet point, "Remove rows  
19 containing copyright in the first and last 25  
20 percent of the book. Rows containing any of these  
21 words 'ISBN, copyright, copyright signal, all rights  
22 reserved, and DOI.'"

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1 What do you take that to mean?

2 MR. WEINSTEIN: Object to form.

3 THE WITNESS: So I can only interpret,  
4 like, what is written here; that it is removing  
5 codes that are containing copyright in the first or  
6 the last 20 percent -- 25 percent of the book.

7 Q. (By Ms. Poueymirou) Did -- did you ever  
8 process data and remove copyright from data when you  
9 were preparing data?

10 A. I personally, no.

11 Q. Do you know folks that did and, if so, who?

12 A. Yeah, so it seems that Nikolay did that if  
13 he is now the author of the document.

14 Q. Do you have any idea why Meta would want  
15 copyright removed from books?

16 A. I don't know.

17 Q. Do you know how copyright would have been  
18 removed from books?

19 MR. WEINSTEIN: Object to form.

20 THE WITNESS: I mean, I can guess what is  
21 written here.

22 Q. (By Ms. Poueymirou) Yeah.

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1           How would it be removed? Would it be  
2 removed through a script?

3           MR. WEINSTEIN: Object to form.

4           THE WITNESS: I guess.

5           Q. (By Ms. Poueymirou) Okay.

6           If you go to the next page, and it says  
7 "Copyright and PII, rows removed inside the  
8 documents." And then you have this image here.

9           Is that showing us the rows that were  
10 removed from the documents; is that how to read this  
11 document?

12          MR. WEINSTEIN: Object to form.

13          THE WITNESS: I guess.

14          (Stenographer clarification.)

15          THE WITNESS: I guess I would read it like  
16 this.

17          Q. (By Ms. Poueymirou) Okay.

18          If you go to Page 00065258.

19          A. Which number again?

20          Q. 0065258.

21          A. Okay.

22          Q. This page states, "The new mig shows