EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al., Individual and Representative Plaintiffs,	
-against-	CASE NO. 3:23-cv-03417-VC
Meta Platforms, Inc., Defendant.	

*** HIGHLY CONFIDENTIAL ***
ATTORNEYS' EYES ONLY
VIDEO-RECORDED DEPOSITION OF
MELANIE KAMBADUR

Cooley, LLP
55 Hudson Yards
New York, New York 10001

09/17/2024
9:07 a.m. (EDT)

REPORTED BY: MONIQUE CABRERA

DIGITAL EVIDENCE GROUP
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Q. Is it also known as Libgen?
A. Yes.
Q. What do you understand that to be?
A. A dataset that contains books and scientific articles.
Q. Was Libgen used to pre-train any of the Llama models?
A. Yes.
Q. Which ones?
A. I know of it being used for Llama 3. It was not used for Llama 1 and Llama 2.
Q. Llama 3.1 is from the paper. Is Llama 3 different from Llama 3.1?
A. Llama 3.1, yes, it's different.
Q. Was Libgen used to pre-train the Llama 3 series of models?
A. Yes.
Q. So you mentioned that you had a high level of understanding of what Libgen was. Do you know specifically what type of media are included in Library Genesis?
A. No, I don't know specifically.

Q. But you know it contains books?
A. Yes.
Q. Do you know if it contains copyrighted books?
A. I don't know the specific books on Libgen.
Q. Have you ever examined what was in the Libgen dataset?
MR. WEINSTEIN: Object to form.
A. I recall seeing some high level summary statistics.
BY MR. YOUNG:
Q. Do you know if there are any books that are written in the last 50 years on Libgen?
A. I believe so. But, again, I haven't directly seen -- I don't directly recall any books titles.
Q. Was there someone at Meta who was responsible for the implementation of Libgen as pre-training data for the Llama 3 models?
A. What do you mean "the implementation of Libgen"?