EXHIBIT B

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

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

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

VIDEOTAPED DEPOSITION OF JOELLE PINEAU

Montreal, Quebec, Canada

Wednesday, November 6, 2024

Stenographically Reported by:

ANGELA JANSSEN, CSR,

Commissioner of Oaths

DIGITAL EVIDENCE GROUP

1730 M Street, NW, Suite 812

Washington, D.C. 20036

(202) 232-0646

probably come up with an answer.

Q. Now LLaMA 1 was previously known as Genesis, right?

MS. HARTNETT: Objection to form.

A. We used that name internally for a short period, yes.

BY MR. YOUNG

Q. And eventually the decision was made to release the model as LLaMA as opposed to Genesis, right?

MS. HARTNETT: Objection to form.

A. Yes.

BY MR. YOUNG

Q. Was it due to association with a crypto platform released by the Winklevoss twins that was undergoing SEC investigation around that time?

MS. HARTNETT: Objection to form.

A. I don't remember that being a deciding factor in the name.

BY MR. YOUNG

Q. Okay.

A. LLaMA is just a better name.

Q. Not everyone at Meta agreed with you though?

A. I'm well aware.

Q. Now, when LLaMA 1 was released, it was released -- well, before we get to that.

Do you recall when this lawsuit was first filed against Meta?

MS. HARTNETT: Objection to form.

A. You mentioned it earlier, but I don't remember exactly. Summer of 2023?

BY MR. YOUNG

Q. Do you know what the term "shadow library" means?

A. No.

Q. Have you ever heard of dataset known as Library Genesis or LibGen?

A. LibGen rings a bell, but I don't know the specifics.

Q. What about Sci-Hub? Have you heard of a dataset known as Sci-Hub?

A. Sci-Hub, no.

Q. Do you recall if Dr. Presani ever expressed concerns about the use of pirated datasets to others in FAIR to train Generative AI models?

MS. HARTNETT: Objection to the form.

A. I don't remember Dr. Presani expressing concerns about the use of specific datasets in training models.

BY MR. YOUNG

Q. Do you remember if Dr. Presani ever expressed to you the concerns about using LibGen to train Generative AI models at Meta?

MS. HARTNETT: Objection to the form.

A. I don't remember them expressing concern about that.

BY MR. YOUNG

Q. Have you ever used with WhatsApp to discuss details about datasets used to train Generative AI models at Meta?

A. I don't remember using WhatsApp to discuss this with anyone.

Q. Have you ever used WhatsApp to