EXHIBIT C

12/17/2024 - MARK ZUCKERBERG

UNOFFICIAL DRAFT TRANSCRIPT

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raised to me or -- you know, I would assume that there probably were at other levels of the organization, but perhaps we were able to place the appropriate mitigations such that it never got escalated to me.

BY ATTORNEY BOIES:

Q. My only question was whether any issue regarding the use of copyrighted materials in connection with your AI models ever got escalated to you.

ATTORNEY GHAJAR: Same objection.

To the extent your answer would refer or relate to privileged communications, I'd caution you not to.

THE WITNESS: Sure. And my answer's the same, although I'll keep it shorter this time, that I don't remember any specific conversations about that.

BY ATTORNEY BOIES:

Q. Do you remember any general conversations about that?

A. No, no.

Q. You are familiar with a group of works referred to as "Library Genesis" or "LibGen"; correct, sir?

A. No.

Q. You've never heard of LibGen? Is that your testimony?

A. I don't think I had, no.

I might have -- it might have come up during prep for the deposition with my lawyers, but I don't think I'd heard of it before then. And I'm not sure that was an example that came up during prep for this deposition; so I do not remember having heard of that.

Q. What about Books3? Have you ever heard of Books3?

A. That, I think, came up in the deposition prep, but I don't think I -- when it came up, I don't recall having been aware of it before.

Q. Have you ever -- other than in deposition prep, have you ever been aware of Anna's Archives?

A. No, I don't think so.

Q. How about "z-lit" or "Z Literature"?

A. No.

Q. Have you ever heard of shadow libraries?

A. No. I don't think I've ever heard that

term before.

Q. Have you ever heard of torrents or torrent or torrenting?

A. Yes.

Q. What is your understanding of that?

A. Basically, people can -- torrent, I think it's basically an online protocol and system where people can upload files to a distributed network, and then other people can download them from the network.

Q. And has Meta ever used that protocol, that torrent protocol, to acquire works used to train Meta's AI models?

ATTORNEY GHAJAR: Objection. Lacks foundation. Calls for speculation. Also vague.

THE WITNESS: I'm not sure.

BY ATTORNEY BOIES:

Q. Do you have any information about that at all?

ATTORNEY GHAJAR: Same objection. Lacks foundation. Calls for speculation. Also vague.