EXHIBIT 74

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al., Individual and Representative Plaintiffs,	
v.	Case No.: 3:23-cv-03417-VC
META PLATFORMS, INC., Defendant.	

** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **
Videotaped 30(b)(1) deposition of
NIKOLAY BASHLYKOV
Volume II

Friday, December 6, 2024

London, England
United Kingdom

Reported stenographically by:
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Q. Do you have an understanding that torrenting or seeding from datasets from Facebook servers is also a risk, sitting here today? And I would like to exclude from the answer any discussions or conversations you may have had with counsel.

MR. WEINSTEIN: Object to form, lacks foundation.

And with his caveat, you can answer his question. Obviously exclude from your answer any communications you may have had with counsel, if any.

THE WITNESS: Sorry. Could you repeat the question?

BY MR. YOUNG:

Q. Yeah. I am asking if, sitting here today, you understand that torrenting or seeding datasets from Facebook servers carries risk, and I would like you to exclude from your answer any discussions or conversations you may have had with counsel?

MR. WEINSTEIN: Same objection --

THE WITNESS: I -- sorry. Yeah.

MR. WEINSTEIN: Same objection.

And, again, don't reveal the communications with counsel. If you can answer the question without revealing communications with counsel, you can go ahead and do so.

THE WITNESS: So yeah, my understanding at this point in time, that seeding and downloading can involve risk, but I don't have -- like, I can't estimate it or anyhow provide details on the risk.

BY MR. YOUNG:

Q. Okay, thank you.

And is that the same -- is that risk the same risk that you're referring to when you were saying -- do you recall yesterday we -- actually, let me start that over.

Do you recall yesterday we saw a document wherein you described torrenting LibGen as potentially being legally not okay?

A. I remember.

Q. Okay. Is that the same risk that you are describing sitting here today?

A. So that is what I was referring to right now, yes.

CERTIFICATE OF COURT REPORTER

I, LEAH M. WILLERSDORF, Registered Merit Reporter, Certified Realtime Reporter, Fellow of the British Institute of Verbatim Reporters, Qualified Realtime Reporter Level 2, and Certified LiveNote Reporter, do hereby certify that:

NIKOLAY BASHLYKOV appeared before me on Friday, December 06, 2024, was sworn by me and was thereupon examined by counsel; that the testimony of said witness was taken by me stenographically; that the foregoing is a true and accurate record to the best of my knowledge, skill and ability; that I am neither a relative nor employee of any party to the action in which this testimony was taken; that I am neither relative nor employee of any attorney or counsel employed by any party thereto; and, further, I am not financially or otherwise interested in the outcome of the action.



LEAH M. WILLERSDORF

RMR, CRR, FBIVR, ACR, QRR2, CLR

(December 08, 2024)