

EXHIBIT 51

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

MDY INDUSTRIES, LLC,)
)
 Plaintiff and)
 Counterclaim Defendant,)
)
 vs.) NO. CV06-2555 PHX DGC
)
 BLIZZARD ENTERTAINMENT, INC.,)
 et al.,)
)
 Defendants and)
 Counterclaim Plaintiffs.)
)
)
)
 AND ALL RELATED ACTIONS.)
)
)

VOLUME I

DEPOSITION OF GREG ASHE

November 13, 2007

253438



BARKLEY
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1 leveling curve so players who are already 60 could
2 advance even further.

3 Q. So let's talk about if someone doesn't
4 have the Burning Crusade expansion.

5 A. Uh-huh.

6 Q. When someone plays with enough experience
7 to get to level 60, what happens at that point?

8 A. They stop accumulating experience in the
9 game but they can still accumulate in-game wealth.
10 They can still complete different quests in the
11 game.

12 Most people feel -- a lot of people,
13 actually, feel the game starts at level 60 when
14 you can start having access to all that high end
15 content, specifically, you know, the rating
16 content. The epic mount, people can get to level
17 60 and then an epic flying mount at level 70, you
18 know, are two of the most prized possessions in the
19 game.

20 There is quite a bit of content to be
21 consumed after you maxed your character level.

22 Q. Is there ever a point where you, let's
23 say again you don't have the expansion pack.

24 Is there ever a point once you get to
25 level 60, that somebody runs out of things to do in

1 by Warden, we would go through and do our due
2 diligence on the actual -- the actual detections,
3 make sure those are working correctly, in which
4 case once we had verified that, we would go ahead
5 and close the list of detected accounts.

6 Q. Okay.

7 A. Yeah. And one other important facet
8 there is the scan.dll portion of the anti-cheat
9 package doesn't send any data back to us. It just
10 blocks the user.

11 So if someone is detected with that and
12 never able to access the game, we never know about
13 it. It just physically blocks them from accessing
14 the game.

15 MR. VENABLE: I am going to hand you what
16 I would like to have marked as Exhibit No. 3.

17 (Plaintiff's Exhibit 3 was marked for
18 identification by the court reporter.)

19 BY MR. VENABLE:

20 Q. Can you just take a look at that really
21 quick.

22 A. Uh-huh.

23 Q. Have you ever seen this document and...

24 A. Um, I've seen these types of account
25 notes. I -- I don't know if I have ever