

# EXHIBIT 11

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

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APPLE INC., a California )  
corporation, )

Plaintiff, )

vs. )

Case No.  
4:11-cv-01846-LB

SAMSUNG ELECTRONICS CO., LTD, a )  
Korean business entity, SAMSUNG )  
ELECTRONICS AMERICA, INC., a )  
New York Corporation, and SAMSUNG )  
TELECOMMUNICATIONS AMERICA, LLC, )  
a Delaware limited liability )  
company, )

Defendants. )

\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF  
SANG-RYUL PARK

\_\_\_\_\_  
Friday, November 18, 2011

Volume

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HIGHLY CONFIDENTIAL

REPORTED BY: ANA M. DUB, RMR, CRR, CSR 7445

1 e-mails?

2 MS. DUCCA: Objection; vague, asked and  
3 answered, calls for a legal conclusion.

4 THE WITNESS: As I answered earlier, that  
5 also is going to be hard for me to explain or  
6 define.

7 MS. WHELAN: Q. You did not invent  
8 e-mail; correct?

9 MS. DUCCA: Objection; calls for a legal  
10 conclusion.

11 THE WITNESS: Can you -- can you ask the  
12 question more specifically, please?

13 MS. WHELAN: Q. I'm not sure how else to  
14 ask it.

15 A. So you're asking me about e-mail outside  
16 this claim; right? It's just --

17 Q. In general.

18 A. -- a personal --

19 In general, I did not invent e-mail.

20 Since the existing portable phones could  
21 not send e-mails, if we're talking limited to the  
22 portable phones, I believe my answer would be yes.

23 Q. So you invented e-mail on portable phones?

24 A. Since the existing phones, or the old  
25 phones, did not have that function and, also, as

1 this patent says, I would say yes, if I can say  
2 personally.

3 Q. You were not the first to invent attaching  
4 a photo to an e-mail; correct?

5 MS. DUCCA: Objection; calls for expert  
6 testimony.

7 THE WITNESS: There are three  
8 co-inventors. I don't believe I've seen that prior  
9 to this time.

10 MS. WHELAN: Q. Do you believe that you  
11 and your co-inventors were the first to invent  
12 attaching a photo to an e-mail?

13 A. In the cell phones, yes, portable phones.

14 Q. You and your co-inventors were not the  
15 first to invent sending images electronically from a  
16 camera; correct?

17 MS. DUCCA: Objection; calls for expert  
18 testimony and a legal conclusion.

19 THE WITNESS: Personally speaking, I don't  
20 believe I've seen that before this time.

21 MS. WHELAN: Q. Do you believe that you  
22 and your co-inventors invented the first device or,  
23 let's say, the first portable phone that could send  
24 e-mail messages and images?

25 A. Personally speaking, yes.

1 Q. More than --

2 A. I don't remember. I don't remember how  
3 long it took.

4 Q. Did it take more than a year?

5 A. Less than two years, I believe.

6 Q. Was it between one year and two years?

7 A. No. I'm not sure if it was over a year or  
8 less than a year. I don't remember.

9 Q. Were you working on any other projects in  
10 the 1998 and 1999 time period?

11 A. I was working on this project.

12 Q. Were you working on any other projects at  
13 that time?

14 A. After I finished this project, I moved on  
15 to a different project.

16 Q. But at the time you worked on this  
17 project, it was your only project at Samsung?

18 A. This was the only project when I was  
19 working on this.

20 Q. What was your personal contribution to the  
21 '460 patent?

22 A. Well, we're working together, jointly on  
23 this project. So I think it would be hard for me to  
24 say specifically what it was.

25 Q. What work did you do in 1998 and 1999 that

1 related to the invention described in the '460  
2 patent?

3 A. Since I was working in the system side,  
4 I was handling camera side and LCD side and display  
5 side.

6 Q. Jae-Min Kim is also listed as a  
7 co-inventor on the '460 patent; correct?

8 A. Yes, that is correct.

9 Q. Who is Jae-Min Kim?

10 MS. DUCCA: Objection; vague.

11 THE WITNESS: What do you mean? What do  
12 you mean by who he is?

13 MS. WHELAN: Q. Did Mr. Kim work with you  
14 at Samsung at the time of the invention?

15 A. Yes.

16 Q. What was his position at Samsung?

17 A. At that time, he was a manager.

18 THE CHECK INTERPRETER: Assistant manager.

19 THE INTERPRETER: The Korean title is  
20 "Gwa Jang," G-w-a, J-a-n-g. Literal translation  
21 would be department head.

22 THE CHECK INTERPRETER: Section head.

23 THE INTERPRETER: Section head, department  
24 head.

25 MS. WHELAN: Q. Was Mr. Kim your

1 supervisor at the time of the invention?

2 A. Yes.

3 Q. Does Mr. Kim still work at Samsung?

4 A. No, he's not, to my knowledge.

5 Q. When did he leave?

6 MS. DUCCA: Objection; calls for  
7 speculation.

8 THE WITNESS: I'm not sure.

9 MS. WHELAN: Q. Do you know where Mr. Kim  
10 works today?

11 MS. DUCCA: Objection; calls for  
12 speculation.

13 THE WITNESS: I've never met him since  
14 then, so I don't know.

15 MS. WHELAN: Q. And Mr. Jeong-Seok Oh is  
16 also a co-inventor of the '460 patent; correct?

17 A. Correct.

18 Q. What work did Mr. Oh do on your project  
19 that's described in the '460 patent?

20 MS. DUCCA: Objection; calls for  
21 speculation.

22 THE WITNESS: It's been so long, I don't  
23 remember exactly, but I think we work in -- we work  
24 on the same parts.

25 MS. WHELAN: Q. So Mr. Oh worked on the

1 same things that you described that you were working  
2 on?

3 A. Yes, that is my recollection.

4 Q. And what work did Mr. Kim do relating to  
5 the project described in the '460 patent?

6 MS. DUCCA: Objection; calls for  
7 speculation.

8 THE WITNESS: To my recollection, he was a  
9 project leader.

10 MS. WHELAN: Q. Did you say earlier that  
11 you worked on the camera and the LCD aspects?

12 MS. DUCCA: Objection; misstates the  
13 witness's prior testimony.

14 THE WITNESS: Yes, that's what I said.  
15 Yes.

16 MS. WHELAN: Q. Okay. Who worked on the  
17 portable phone aspects?

18 MS. DUCCA: Objection; vague, calls for  
19 speculation.

20 THE WITNESS: We worked together on the  
21 system side that is connected -- well, system side  
22 of the phone that is connected to camera and LCD  
23 part, but we received support on RF part.

24 THE CHECK INTERPRETER: Just one  
25 interjection.

1            "We worked together on the system side, on  
2 the parts that is connected to the phone from the  
3 camera and the LCD."

4            That's it.

5            THE INTERPRETER: Well, this interpreter  
6 stands by her translation.

7            THE CHECK INTERPRETER: And I also stand  
8 by my correction.

9            MS. WHELAN: Q. Who provided support on  
10 the RF part?

11           A. I don't -- I don't know who supported --  
12 I don't remember.

13           Q. Who worked on the e-mail function  
14 described in the '460 patent?

15           MS. DUCCA: Objection; vague, calls for  
16 speculation.

17           THE WITNESS: Because we worked together,  
18 I don't know who worked on that side.

19           MS. WHELAN: Q. Did anyone else besides  
20 you, Mr. Kim, and Mr. Oh work on the project that's  
21 described in the '460 patent?

22           MS. DUCCA: Objection; vague.

23           THE WITNESS: Not that I remember.

24           MS. WHELAN: Okay. I'm going to mark  
25 Exhibit 2, which is a document with Bates

1 CERTIFICATE OF REPORTER

2 I, ANA M. DUB, a Certified Shorthand Reporter,  
3 hereby certify that the witness in the foregoing  
4 deposition was by me duly sworn to tell the truth,  
5 the whole truth, and nothing but the truth in the  
6 within-entitled cause;

7 That said deposition was taken down in  
8 shorthand by me, a disinterested person, at the time  
9 and place therein stated, and that the testimony of  
10 the said witness was thereafter reduced to  
11 typewriting, by computer, under my direction and  
12 supervision;

13 That before completion of the deposition,  
14 review of the transcript [X] was [ ] was not  
15 requested. If requested, any changes made by the  
16 deponent (and provided to the reporter) during the  
17 period allowed are appended hereto.

18 I further certify that I am not of counsel or  
19 attorney for either or any of the parties to the  
20 said deposition, nor in any way interested in the  
21 event of this cause, and that I am not related to  
22 any of the parties thereto.

23 DATED: December 2, 2011.

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ANA M. DUB, RMR, CRR, CSR No. 7445