

# EXHIBIT 14

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE INC. a California Corporation )  
 )  
 )  
Plaintiff )  
 )  
Vs. ) 11-cv-01846-LHK  
 )  
SAMSUNG ELECTRONICS CO., LTD., a Korean corporation; )  
SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; )  
and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware Limited liability company, )  
 )  
Defendants )  
----- )

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
DEPOSITION OF WOODWARD YANG, Ph.D.

MAY 9, 2012, 8:08 a.m.

VOLUME II, (Pages )

REPORTED BY: DEBORAH ROTH, CSR/RPR

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37       ALSO PRESENT: Shawn Budd, Videographer

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|    |                               |                                    |
|----|-------------------------------|------------------------------------|
| 1  | INDEX                         |                                    |
| 2  | WITNESS: WOODWARD YANG, Ph.D. |                                    |
| 3  | EXAMINATION                   | PAGE                               |
| 4  | By                            |                                    |
| 5  |                               |                                    |
| 6  | EXHIBITS                      | PAGE                               |
| 7  | Exhibit 23                    | Digital Camera Connectivity with   |
| 8  |                               | Nokia 9110 Communicator            |
| 9  |                               | (APLNDC-WH0000005318 - 0000005321) |
| 10 | Exhibit 24                    | Notice of Invention Form           |
| 11 |                               | (translation)                      |
| 12 |                               | (SAMNDCA00019787 - 00019797)       |
| 13 | Exhibit 25                    | Notice of Invention Form           |
| 14 |                               | (in Korean)                        |
| 15 | Exhibit 26                    | Expert Report of J. Paul Dourish,  |
| 16 |                               | Ph.D., regarding invalidity of     |
| 17 |                               | the asserted claims of U.S.        |
| 18 |                               | Patent No. 7,456,893               |
| 19 | Exhibit 27                    | Japanese Unexamined Patent         |
| 20 |                               | Application (translated)           |
| 21 |                               | (APLNDC-WH0000021189 - 0000021199) |
| 22 | Exhibit 28                    | Japanese Unexamined Patent         |
| 23 |                               | Application (in Japanese)          |
| 24 |                               | (APLNDC-WH0000021200 - 0000021210) |
| 25 |                               |                                    |

1 reproduction mode you're going to look and  
2 you're going to check if the reproduction file  
3 index has been set to zero that's a null state  
4 then that's going to say well go find it but  
5 otherwise if it's not set to zero then  
6 reproduce the image that you saw last time.

7           So there is an implication that this  
8 reproduction file index \*available is still  
9 alive and this is only a specification so it's  
10 only talking about one possible embodiment of  
11 this invention.

12           Q. Just is a moment, please.

13           A. I believe you can also find a little  
14 more support in column 8, about line 5, where  
15 it mentions that the DCP, device, the  
16 apparatus sets a reproduction file index.

17           Q. Doctor, I would like to direct your  
18 attention to claim 10 of the '893 patent. And  
19 if you look at the preamble of claim 10, would  
20 you agree with me that this is an apparatus  
21 claim?

22           A. Yes. It's a digital image processing  
23 apparatus claim.

24           Q. Unlike for instance claim 1 which was a  
25 method claim, correct, is a method claim?

1           A. Correct.

2           Q. Could you agree with me that in claim  
3 10, the last clause starts where in upon a  
4 user performing, that that -- to practice the  
5 claim that's -- the language of claim 10  
6 requires the user to take some action?

7                   MR. STRETCH: Objection. Calls for  
8 a legal conclusion.

9           A. Well I'm not really a lawyer and I'm  
10 not that familiar with the law, but let me try  
11 to describe it this way.

12                   It's like a switch, mode switching  
13 is a switch. So you flip a switch and then  
14 it's describing how device has -- or the  
15 apparatus has to operate or behave. So it's  
16 really talking about there switch if you flip  
17 the switch this is what going to happen. So I  
18 think it's apparatus. I'm not a lawyer. So I  
19 don't know exactly how that boils down, but do  
20 me it's still apparatus it's a switch and I'm  
21 telling you what happens.

22           Q. I'm not trying to ask you a lawyer  
23 question?

24           A. Okay.

25           Q. I'm asking is your understanding of

1       this language, does the wherein upon a user  
2       performing a mode switching operation, does  
3       that require some action by the user?

4                   MR. STRETCH:   Same objection.

5           A.   There's clearly the implication that  
6       the user going to do -- flip a switch do  
7       something and then it's describing the  
8       remainder of that is describing what that --  
9       what the device has to do.

10          Q.   Thank you?

11          A.   But that's initiated by the user.

12          Q.   Thank you.

13                   MR. BASSETT:   Why don't we take a  
14       short break I might be close to being done.

15                   MR. STRETCH:   Thank you.

16                   (A recess was taken.)

17                   THE VIDEOGRAPHER:   Okay.   Stand by.  
18       Okay we're back on the record the time is  
19       10:46.

20                   MR. BASSETT:   I have no further  
21       questions for this witness thank you.

22                   MR. STRETCH:   I just have a couple.

23                   THE VIDEOGRAPHER:   Do you have your  
24       mike on.

25                   MR. STRETCH:   Of course not.