Exhibit 11

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Page 1
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                   UNITED STATES DISTRICT COURT
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        NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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    APPLE INC., a California
    corporation,
5
                Plaintiff,
                                 ) Case No. 11-cv-01846-LHK
    VS.
7
    SAMSUNG ELECTRONICS CO.,
    LTD., a Korean business
    entity; SAMSUNG ELECTRONICS )
    AMERICA, INC., a New York
    corporation; SAMSUNG
    TELECOMMUNICATIONS AMERICA, )
10
    LLC, a Delaware limited
    liability company,
11
                Defendants.
12
13
14
               HIGHLY CONFIDENTIAL
15
               ATTORNEYS' EYES ONLY
16
17
              VIDEOTAPED DEPOSITION OF STEPHEN GRAY
18
                      Palo Alto, California
19
                       Friday, May, 4, 2012
20
21
22
         HEIDI BELTON, CSR, RPR, CRR, CCRR
23
    CSR LICENSE NO. 12885
24
    JOB NO. 49273
25
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1	A. Okay.	10:29:20
2	Q. What errors have you identified in reviewing	
3	your invalidity report?	
4	A. There is one error having to do with the	
5	with the date of a prior art reference. I can't	10:29:35
6	remember I'm not recollecting the date, but it was	
7	it was incorrectly identified as January 20 let me	
8	see if I can find it.	
9	So on paragraph 305, page 86 of my invalidity	
10	report, Exhibit 1, the date a date it says, "On	10:30:54
11	January 20, 2011, the examiner issued a notice of	
12	allowability." That date's incorrect. I have to go	
13	back to the file. Oh, this is with regard to oh,	
14	this is with regard to the '163. And the date's wrong.	
15	I'm not sure what that date is. I'd have to go back to	10:31:31
16	the excuse me. I'd have to go back to the file	
17	history to determine what that date should have been.	
18	But the first date, the January 20th, 2011 date, is	
19	incorrect.	
20	Q. Are you aware, as you sit here today, of any	10:31:46
21	other errors in your invalidity report?	
22	A. Yes. There's another error in the	
23	indefiniteness section pertaining to the '915 patent,	
24	paragraph 266 on page 75. There's a sentence the	
25	paragraph 266 doesn't make sense. Something	10:32:29

Page 53 something happened in the drafting or something. But it 10:32:37 2 doesn't -- it doesn't make sense. 3 The first sentence reads -- well, let's start with the second sentence. The second sentence says, 5 "Each of the independent claims recites 'the event 10:32:48 object invokes a...operation.' In my 35 years of 7 systems experience, I have never observed a system where 8 an event object invoked a method." That's not true. That's the inaccuracy. It 10 goes on to say that -- it goes on to make some claim 10:33:10 11 about it. 12 Then there is a reference to a Platzer 13 deposition that -- the sentence leading into that says, 14 "Additionally, one of the inventors of the '915 patent, 15 Mr. Platzer, agreed with me at his deposition." And 10:33:30 16 there's a quote. And it doesn't follow the rest of the 17 paragraph in 266. I saw this over the last couple of 18 days when I was rereading my report. And it -- it is 19 inaccurate. 20 Q. What should it say? 10:33:49 21 Well, I don't -- I'm not sure -- I don't 22 have -- I'm not sure exactly what it -- but what I think 23 it should have said is that -- something to the effect 24 that "In my 35 years of experience, I've never observed 25 a system where an event object invoked a method that 10:34:05

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1	performed scrolling or zooming operations" would be an	10:34:12
2	accurate statement. But the way it's phrased there is	
3	just not accurate. And factually I don't think it's	
4	correct. So 266 I think is needs some revision. And	
5	if asked by the attorneys for Samsung, I'll update it.	10:34:31
6	Q. Are there any other errors in your invalidity	
7	report that you're aware of today?	
8	A. Those two errors I discovered over the last	
9	couple of days in reviewing the report; and those are	
10	the two that I know about now. There may be others, but	10:34:50
11	those are the two that I've come across now.	
12	Q. All right. Let's turn to your	
13	non-infringement rebuttal report, Deposition Exhibit 2.	
14	As you sit here today, does that report	
15	accurately express all of the opinions on	10:35:10
16	non-infringement that you may offer at trial, given what	
17	you know today?	
18	A. Given what I know today, sitting here, I	
19	believe that Exhibit 2, my rebuttal report regarding	
20	non-infringement, contains the opinions of that I'm	10:35:40
21	aware of today.	
22	Again, as facts emerge and other information	
23	comes to light, I do want to make sure I reserve the	
24	right to modify it should something occur that	
25	changes materially changes my opinion about	10:36:02