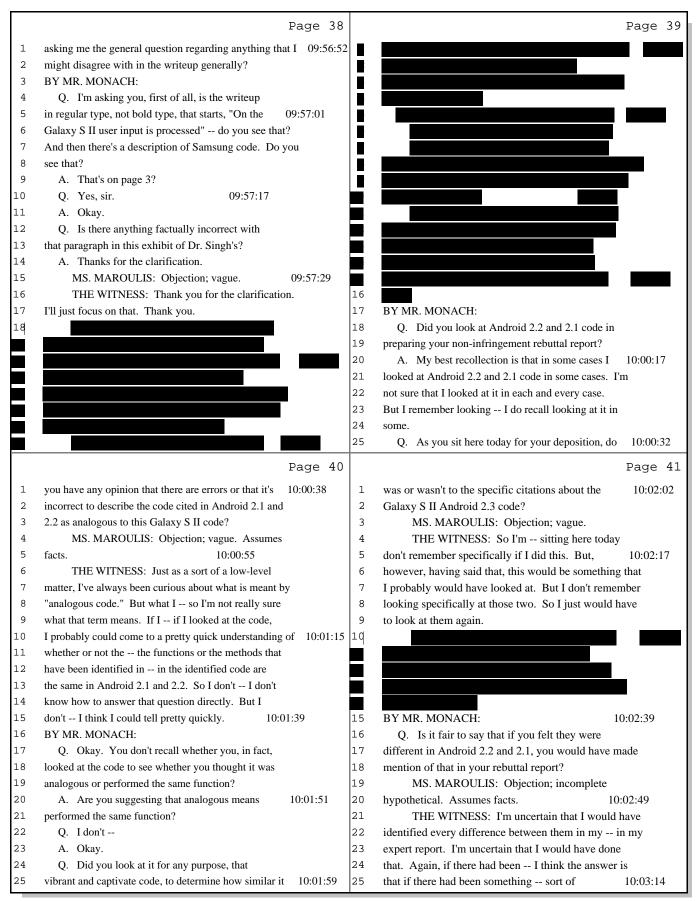
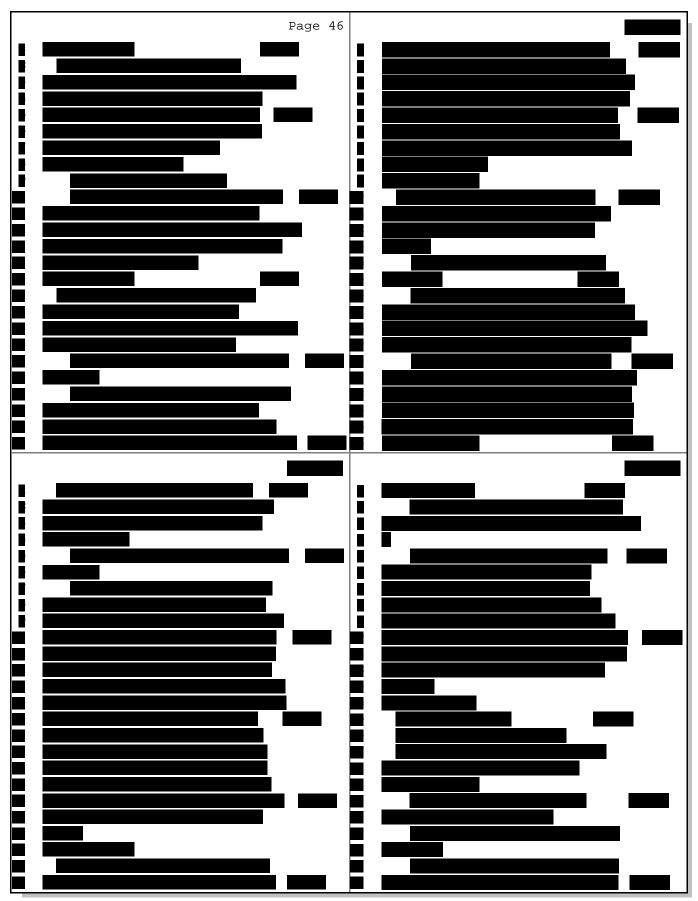
Exhibit 30 (Submitted Under Seal)

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Page 1
1
                   UNITED STATES DISTRICT COURT
        NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
4
    APPLE INC., a California
    corporation,
                                )
5
                Plaintiff,
6
                                ) Case No. 11-cv-01846-LHK
    VS.
7
    SAMSUNG ELECTRONICS CO.,
    LTD., a Korean business
    entity; SAMSUNG ELECTRONICS )
    AMERICA, INC., a New York
9
    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
    BY: HEIDI BELTON, CSR, RPR, CRR, CCRR
23
    CSR LICENSE NO. 12885
24
    JOB NO. 49273
```

	Page 2		Page 3
1	May, 5, 2012	1	APPEARANCES:
2	8:57 a.m.	2	
3		3	FOR THE PLAINTIFF APPLE INC.:
4	Videotaped deposition of STEPHEN GRAY, held	4	MORRISON & FOERSTER
5	at the offices of Morrison & Foerster, LLP,	5	425 Market Street
6	755 Page Mill Road, Palo Alto, California,	6	San Francisco, California 94105
7	before Heidi Belton, CSR, RPR, CRR, CCRR.	7	By: Andrew E. Monach, Esq.
8	CSR License No. 12885	8	Mark E. Melahn, Esq.
9	CSIX Electise 130. 12003	9	. 1
10		10	
11		11	
12		12	
13		13	FOR DEFENDANT: SAMSUNG ELECTRONICS CO., LTD.
14		14	QUINN EMANUEL URQUHART & SULLIVAN
15		15	555 Twin Dolphin Drive
16		16	Redwood Shores, California 94065
17		17	By: Victoria F. Maroulis, Esq.
18		18	2)
19		19	
20		20	and
21		21	QUINN EMANUEL URQUHART & SULLIVAN
22		22	51 Madison Avenue
23		23	New York, New York 10010
24		24	By: Guy Eddon, Esq.
25		25	By. Guy Ludon, Esq.
	Page 4		Page 5
1		1	PALO ALTO, CALIFORNIA
1	APPEARANCES CONT'D:	2	FRIDAY, MAY 4, 2012
2	and	3	8:57 a.m.
	QUINN EMANUEL URQUHART & SULLIVAN 865 S. Figueroa Street	4	(Whereupon Exhibit 1 marked
4	•	5	for identification.)
5	Los Angeles, California 90017	6	THE VIDEOGRAPHER: This is the start of tape
6	By: Patrick Schmidt, Esq.	7	
7		8	labeled number 1 of the videotaped deposition of Steven
8		9	Gray. In the matter Apple, Incorporated versus Samsung Electronics Company, Limited, et al., in the
	Also Duosenti Choven Dhilling video cuenhou	10	United States District Court, Northern District of 08:56:57
10 11	Also Present: Shawn Phillips, videographer	11	California, San Jose Division. Number 12-CV-00630-LHK
12		12	[sic].
		13	This deposition is being held at 755 Page Mill
		1-3	
13		1.4	Road Palo Alto California on May 4, 2012 at
14		14	Road, Palo Alto, California on May 4, 2012 at
14 15		15	approximately 8:57 a.m. 08:57:19
14 15 16		15 16	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video
14 15 16 17		15 16 17	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated,
14 15 16 17 18		15 16 17 18	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York.
14 15 16 17 18 19		15 16 17 18 19	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York. The court reporter is Heidi Belton, in association with
14 15 16 17 18 19		15 16 17 18 19 20	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York. The court reporter is Heidi Belton, in association with TSG Reporting. 08:57:38
14 15 16 17 18 19 20 21		15 16 17 18 19 20 21	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York. The court reporter is Heidi Belton, in association with TSG Reporting. 08:57:38 Will counsel please introduce yourself.
14 15 16 17 18 19 20 21		15 16 17 18 19 20 21 22	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York. The court reporter is Heidi Belton, in association with TSG Reporting. 08:57:38 Will counsel please introduce yourself. MR. MONACH: Andrew Monach, representing
14 15 16 17 18 19 20 21 22 23		15 16 17 18 19 20 21 22 23	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York. The court reporter is Heidi Belton, in association with TSG Reporting. 08:57:38 Will counsel please introduce yourself. MR. MONACH: Andrew Monach, representing Apple.
14 15 16 17 18 19 20 21		15 16 17 18 19 20 21 22	approximately 8:57 a.m. 08:57:19 My name is Sean Phillips. I'm the legal video specialist from TSG Reporting, Incorporated, headquartered at 747 Third Avenue, New York, New York. The court reporter is Heidi Belton, in association with TSG Reporting. 08:57:38 Will counsel please introduce yourself. MR. MONACH: Andrew Monach, representing







	Page 50		Page 51
		1	other things that I'm asked to consider or other 10:27:58
		2	opinions may emerge as facts emerge or deposition
		3	testimony occurs, which could alter those opinions. So
		4	I don't know if I'll have any other opinions or not.
		5	
		6	, ,,,,
7	MS MADOLILIS: Counsel welve been soing on	7	facts you're aware of, any deposition testimony that you're aware of, does Exhibit 1, your invalidity report,
8	MS. MAROULIS: Counsel, we've been going on for about an hour and 15 minutes. Do you want to take a		
	•	8	reflect all the opinions that you're aware of at this
9	five-minute break?	9	time that you may offer on invalidity of the '915 and
10	MR. MONACH: Sure. 10:16:00	10	'163? 10:28:37
11	THE VIDEOGRAPHER: The time is 10:16 a.m. And	11	A. I believe, sitting here today, I'm unaware of
12	we are off the record. I'm going to mark this as the	12	any other opinions that I have that aren't reflected in
13	end of disk 1 in the deposition of Stephen Gray.	13	the in my rebuttal report. I might mention that
14	(Recess taken from 10:16 a.m. to 10:26 a.m.)	14	Q. I'm sorry. I asked you about your opening
15	THE VIDEOGRAPHER: This marks the beginning of 10:27:04		report. 10:28:58
16	disk 2 in the deposition of Stephen Gray. The time is	16	A. I'm sorry. My opening report, my invalidity
17	10:27 a.m. And we are back on the record.	17	report.
18	BY MR. MONACH:	18	Q. Okay.
19	Q. Mr. Gray, does Exhibit 1, your invalidity	19	A. One thing I would mention, though, and I
20	report, reflect all of the opinions you intend to offer 10:27:19	20	should have mentioned this when you first introduced the 10:29:04
21	or may offer in this case on the validity of the or	21	exhibit, in reading through my report over the last
22	invalidity of the '915 and '163 patents?	22	couple of days, I've identified an error or two that I
23	A. My invalidity report was my invalidity	23	need to clean up when you get a chance. Doesn't have to
24	report reflects reflected opinions that I held at the	24	be now.
25	time that I wrote the invalidity report. There may be 10:27:52	25	Q. Why don't we do that now. 10:29:19
	Page 52		Page 53
1	A. Okay. 10:29:20	1	something happened in the drafting or something. But it 10:32:37
2	Q. What errors have you identified in reviewing	2	doesn't it doesn't make sense.
3	your invalidity report?	3	The first sentence reads well, let's start
4	A. There is one error having to do with the	4	with the second sentence. The second sentence says,
5	with the date of a prior art reference. I can't 10:29:35	5	"Each of the independent claims recites 'the event 10:32:48
6	remember I'm not recollecting the date, but it was	6	object invokes aoperation.' In my 35 years of
7	it was incorrectly identified as January 20 let me	7	systems experience, I have never observed a system where
8	see if I can find it.	8	an event object invoked a method."
9	So on paragraph 305, page 86 of my invalidity	9	That's not true. That's the inaccuracy. It
10	report, Exhibit 1, the date a date it says, "On 10:30:54		-
	-	10	
11	January 20, 2011, the examiner issued a notice of	11	about it. Then there is a reference to a Pletzer.
12	allowability." That date's incorrect. I have to go	12	Then there is a reference to a Platzer
13	back to the file. Oh, this is with regard to oh,	13	deposition that the sentence leading into that says,
14	this is with regard to the '163. And the date's wrong.	14	"Additionally, one of the inventors of the '915 patent,
15	I'm not sure what that date is. I'd have to go back to 10:31:31	15	Mr. Platzer, agreed with me at his deposition." And 10:33:30
16	the excuse me. I'd have to go back to the file	16	there's a quote. And it doesn't follow the rest of the
17	history to determine what that date should have been.	17	paragraph in 266. I saw this over the last couple of
18	But the first date, the January 20th, 2011 date, is	18	days when I was rereading my report. And it it is
19	incorrect.	19	inaccurate.
20	Q. Are you aware, as you sit here today, of any 10:31:46	20	Q. What should it say? 10:33:49
21	other errors in your invalidity report?	21	A. Well, I don't I'm not sure I don't
22	A. Yes. There's another error in the	22	have I'm not sure exactly what it but what I think
23	indefiniteness section pertaining to the '915 patent,	23	it should have said is that something to the effect
24 25	paragraph 266 on page 75. There's a sentence the paragraph 266 doesn't make sense. Something 10:32:29	24 25	that "In my 35 years of experience, I've never observed a system where an event object invoked a method that 10:34:05

	Page 202		Page 203
1	separate structured electronic documents distinct from a 16:28:19	1	corresponds to the detected location of the first 16:33:46
2	structured electronic document in which they're	2	gesture, traversing up the render tree from the first
3	contained?	3	node to the closest parent node that contains a logical
4	MS. MAROULIS: Objection; vague. Please feel	4	grouping of content and identifying content
5	free to refer to Exhibit 15. 16:28:30	5	corresponding to the closest parent node as the first 16:34:00
6	THE WITNESS: Let me take a look.	6	box. In some embodiments, the logical grouping of
7	So what I'm two things. I looked for in	7	content comprises a paragraph, an image, a plug-in
8	the specification any evidence to suggest that the	8	object, or a table. In some embodiments the closest
9	boxes of content could not be a structured electronic	9	parent node is replaced inline, a block, an inline block
10	document. And I find nothing in here that suggests that 16:32:31	10	or an inline table." 16:34:19
11	the boxes of content couldn't be structured electronic	11	In those embodiments that we're talking about,
12	documents on their own. But further, on column 19	12	this logical grouping containing a paragraph, an image,
13	yeah. On column 19, line starting at line 17, it's a	13	a plug-in, or a table, at least all of those could be
14	discussion about a render tree, and about the nodes on	14	can be could clearly be structured electronic
15	the render tree, and about the various kinds of nodes 16:33:05	15	documents. There's no preclusion about that. 16:34:35
16	that that the render tree could contain in it. The	16	Paragraphs have structure. Images can be
17	render tree in the specification is used as a mechanism	17	configured. A JPEG image, for example, has structure.
18	for identifying the boxes of content and being able to	18	A plug-in object I'm not sure what they mean by a
19	traverse to get to the boxes of content.	19	"plug-in object," but certainly tables have structure.
20	So let me put this into the record. "In some 16:33:26	20	So all in all of those instances, the render tree 16:34:55
21	embodiments, the structured electronic document has an	21	nodes enable structured electronic documents to be part
22	associated render tree with the plurality of nodes and	22	of the the the system.
23	determining the first box at the location of the first	23	So to answer your question, there is support
24	gesture comprises: Traversing down the render tree to	24	for it and nothing to preclude it.
25	determine a first node in the plurality of nodes that 16:33:43	25	BY MR. MONACH: 16:35:09
	Page 204		Page 205
1	Q. In your Appendix 7, depo Exhibit 17, on page 4 16:35:10	1	enlarged in the zone view. 16:37:05
2	you show the a transition from the world view of 36	2	Q. Does would you agree that Claim 50
3	tiles to what's called a "zone view" of four tiles,	3	requires I'm looking at the sort of the middle of
4	right?	4	the claim near line 32 that what is required is
5	A. That's correct. 16:35:35	5	enlarging and translating the structured electronic 16:37:22
6	Q. Are you asserting that that change in the	6	document so that the first box is substantially
7	display is meets the enlarging, translating, and	7	centered?
8	substantially centering a first-box limitation as	8	MS. MAROULIS: Objection; vague. Calls for
9	recited in Claim 50 of the '163 patent?	9	legal conclusion.
10	A. The with respect to claim 2B, there is a 16:36:04	10	THE WITNESS: I think you have with the 16:37:37
11	a first box which is selected from the world view that	11	proviso there maybe alterations in the language. But I
12	then is is enlarged and substantially centered. The	12	think you've you've correctly read the limitation
	world view is a collection of four boxes surrounding	13	starting at line 31.
13		1 1	MS. MAROULIS: We've been going for over an
13 14	what they call the "blue dot."	14	5-2-5-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-
	what they call the "blue dot." Q. Do you mean I'm sorry. Did you mean zone 16:36:28	15	hour. 16:37:53
14	Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view?	l	5 5
14 15 16 17	Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say	15 16 17	hour. 16:37:53 THE WITNESS: Would you like to take a break soon?
14 15 16	 Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say Q. You said "world view." 	15 16	hour. 16:37:53 THE WITNESS: Would you like to take a break
14 15 16 17 18	 Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say Q. You said "world view." A. Did I say "world view" too many times? The 	15 16 17 18	hour. 16:37:53 THE WITNESS: Would you like to take a break soon? MR. MONACH: Let me just finish up with this. MS. MAROULIS: Okay.
14 15 16 17 18 19 20	Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say Q. You said "world view." A. Did I say "world view" too many times? The world view is the 6-by-6 matrix. The selection of one 16:36:37	15 16 17 18 19 20	hour. 16:37:53 THE WITNESS: Would you like to take a break soon? MR. MONACH: Let me just finish up with this. MS. MAROULIS: Okay. BY MR. MONACH: 16:37:57
14 15 16 17 18 19 20 21	Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say Q. You said "world view." A. Did I say "world view" too many times? The world view is the 6-by-6 matrix. The selection of one of the one of the boxes within a four-box matrix	15 16 17 18 19 20 21	hour. 16:37:53 THE WITNESS: Would you like to take a break soon? MR. MONACH: Let me just finish up with this. MS. MAROULIS: Okay. BY MR. MONACH: 16:37:57 Q. Is it your opinion that in the transition from
14 15 16 17 18 19 20 21	Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say Q. You said "world view." A. Did I say "world view" too many times? The world view is the 6-by-6 matrix. The selection of one of the one of the boxes within a four-box matrix surrounding the blue dot in the world view creates a	15 16 17 18 19 20 21 22	hour. 16:37:53 THE WITNESS: Would you like to take a break soon? MR. MONACH: Let me just finish up with this. MS. MAROULIS: Okay. BY MR. MONACH: 16:37:57 Q. Is it your opinion that in the transition from the world view to the zone view shown on page 4 of your
14 15 16 17 18 19 20 21 22 23	Q. Do you mean I'm sorry. Did you mean zone view? A. Sorry. Did I say Q. You said "world view." A. Did I say "world view" too many times? The world view is the 6-by-6 matrix. The selection of one of the one of the boxes within a four-box matrix surrounding the blue dot in the world view creates a zone view. The zone view is what gets enlarged and	15 16 17 18 19 20 21 22 23	hour. 16:37:53 THE WITNESS: Would you like to take a break soon? MR. MONACH: Let me just finish up with this. MS. MAROULIS: Okay. BY MR. MONACH: 16:37:57 Q. Is it your opinion that in the transition from the world view to the zone view shown on page 4 of your Appendix 7, that what has been enlarged and translated
14 15 16 17 18 19 20 21 22	Q. Do you mean I'm sorry. Did you mean zone 16:36:28 view? A. Sorry. Did I say Q. You said "world view." A. Did I say "world view" too many times? The world view is the 6-by-6 matrix. The selection of one of the one of the boxes within a four-box matrix surrounding the blue dot in the world view creates a	15 16 17 18 19 20 21 22 23 24	hour. 16:37:53 THE WITNESS: Would you like to take a break soon? MR. MONACH: Let me just finish up with this. MS. MAROULIS: Okay. BY MR. MONACH: 16:37:57 Q. Is it your opinion that in the transition from the world view to the zone view shown on page 4 of your

Page 206 1 A. No. The document which is being shown in the 16:38:32 2 zone view on page 4 is a box of content from the 3 structured electronic document shown in the world view. 4 Q. Which is so the thing shown on the right is 5 a different structured electronic document than the 16:39:00 6 structured electronic document shown in the world view, 7 right? 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 10 The selection of of the box shown in 10 okay. In the world view on the left, there is 1 A. I believe that the enlarged and center view is a box of content found on the world view is a box of content found on the world comprised of individual tiles or structured of documents on their own. But it is from in or created from an enlargement of the world view or created from an enlargement of the world structured electronic document into the zone and the content into the zone of the world view electronic document into the	1 view. It is electronic t is derived d view 16:40:29 ne view.
2 zone view on page 4 is a box of content from the 3 structured electronic document shown in the world view. 4 Q. Which is so the thing shown on the right is 5 a different structured electronic document than the 16:39:00 6 structured electronic document shown in the world view, 7 right? 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 2 view is a box of content found on the world of comprised of individual tiles or structured of documents on their own. But it is from in the world of comprised of individual tiles or structured of documents on their own. But it is from in the world of the world of the world occument in the world occ	1 view. It is electronic t is derived d view 16:40:29 ne view.
3 structured electronic document shown in the world view. 4 Q. Which is so the thing shown on the right is 5 a different structured electronic document than the 16:39:00 6 structured electronic document shown in the world view, 7 right? 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 3 comprised of individual tiles or structured electronic document in the world view. 4 documents on their own. But it is from it or created from an enlargement of the world view electronic document into the zon 37 BY MR. MONACH: 8 Q. So the world view electronic document is not enlarged as an entite translated to center those four boxes, right? 10 MS. MAROULIS: Objection; vague 11 MS. MAROULIS: Objection; vague 12 THE WITNESS: I don't have any results.	electronic t is derived d view 16:40:29 ne view. nent, the
4 Q. Which is so the thing shown on the right is 5 a different structured electronic document than the 16:39:00 6 structured electronic document shown in the world view, 7 right? 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 4 documents on their own. But it is from i 5 or created from an enlargement of the world 6 structured electronic document into the zon 7 BY MR. MONACH: 8 Q. So the world view electronic document is not enlarged as an entite translated to center those four boxes, right? 10 MS. MAROULIS: Objection; vague 11 MS. MAROULIS: Objection; vague 12 THE WITNESS: I don't have any results.	t is derived d view 16:40:29 ne view. nent, the
5 a different structured electronic document than the 16:39:00 5 or created from an enlargement of the world structured electronic document shown in the world view, 7 right? 7 BY MR. MONACH: 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 12 THE WITNESS: I don't have any results.	d view 16:40:29 ne view. nent, the
6 structured electronic document shown in the world view, 7 right? 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 6 structured electronic document into the zon 7 BY MR. MONACH: 8 Q. So the world view electronic document is not enlarged as an entite translated to center those four boxes, right? 10 translated to center those four boxes, right? 11 MS. MAROULIS: Objection; vague translated to center those four boxes, right? 12 THE WITNESS: I don't have any results.	ne view. nent, the
7 right? 8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 1 The selection of of the box shown in 12 okay. In the world view on the left, there is 17 BY MR. MONACH: 8 Q. So the world view electronic docum of translated to center those four boxes, right? 10 translated to center those four boxes, right? 11 MS. MAROULIS: Objection; vague of the world view on the left, there is 12 THE WITNESS: I don't have any results.	nent, the
8 MS. MAROULIS: Objection; vague. 9 THE WITNESS: I thought I said something 10 different, so let me try again. 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 8 Q. So the world view electronic docum of translated to center those four boxes, right? 10 translated to center those four boxes, right? 11 MS. MAROULIS: Objection; vague okay. In the world view on the left, there is	
9 THE WITNESS: I thought I said something 10 different, so let me try again. 16:39:16 11 The selection of of the box shown in 12 okay. In the world view on the left, there is 9 36-tile document is not enlarged as an entit translated to center those four boxes, right? 11 MS. MAROULIS: Objection; vague 12 THE WITNESS: I don't have any recommendation.	
10 different, so let me try again. 16:39:16 10 translated to center those four boxes, right? 11 The selection of of the box shown in 11 MS. MAROULIS: Objection; vague 12 okay. In the world view on the left, there is 12 THE WITNESS: I don't have any re-	y and then
11 The selection of of the box shown in 11 MS. MAROULIS: Objection; vague 12 okay. In the world view on the left, there is 12 THE WITNESS: I don't have any re	16:40:48
12 okay. In the world view on the left, there is	
13 identified in red a first box. Selection of that box by 13 believe that well, let me say it slightly	ason to
14 a first gesture enlarges and centers that box of content 14 differently. I'm not sure, sitting here today.	evactly
15 in the zone view shown on the right. 16:39:38 15 what the the software performed with res	
16 BY MR. MONACH: 16 enlarging and centering. But given what the	
17 Q. But there is no enlarging and translating of 17 are that are intended for LaunchTile, there	
18 the structured electronic document shown on the left; 18 for me, sitting here today, to believe that the	
19 rather, the distinct in your view structured 19 structured electronic document that is that	
20 electronic documents in those four tiles are enlarged 16:39:57 20 world view is not enlarged and the portion	
21 and centered? 21 was selected in that box of content simply 6	
22 MS. MAROULIS: Objection; vague. Assumes 22 translated into the zone view.	omargou una
23 facts. 23 BY MR. MONACH:	
24 BY MR. MONACH: 24 Q. Let's look at the content from these	four
25 Q. Is that right? 16:40:06 25 boxes that are shown in the center of the wo	
Page 208	Page 209
1 then are shown in on the right in the zone view. 16:41:53 1 THE WITNESS: I don't I would	•
2 On one for example, the upper right-hand 2 it is different. Well, I'd say that both the	
3 tile inside the red line you've drawn looks like an 4 e-mail icon. Do you see that? 3 right upper right-hand corner of the zor	
4 e-mail icon. Do you see that? 4 the upper right-hand corner of the first bo 5 A. In the yes. In in the first if 16:42:10 5 from the same document. They're differe	
6 you're referring to the well, go ahead. Which one 7 are we pointing at? 6 manifestations of the same document, but 7 derived from the same structured electron	·
8 Q. Right. So in the box that you've drawn in the 8 which is the rendering of the e-mail syste	
9 world view and labeled the first box, in the upper 9 just based upon the screen real estate, in	
world view and rabeled the first box, in the upper just based upon the screen real estate, in 10 right-hand corner, there is a tile that looks like it 16:42:26 10 different manifestation.	16:43:48
11 has an e-mail icon. Do you see that? 12 BY MR. MONACH:	10.73.70
12 A. I do. 12 Q. It's different content. It's not simp	oly an
13 Q. Right. And that is the that's a tile for 13 enlarging of the images that are shown in	•
14 the e-mail application in LaunchTile, right? 14 the world view; it is a looking at different terms of the many transfer of the ma	
15 A. I believe that yes, I believe that well, 16:42:44 15 displaying different data rather than displ	
16 it is a it is an icon derived from the e-mail 16 same thing in a larger font size or a larger	
17 structured electronic document that underlies it. But 17 right?	·-o- ·
18 yes, it is a 18 MS. MAROULIS: Objection; argu	mentative.
19 Q. And then if you look on the right in the zone 19 Misstates the document.	
20 view, you don't see a blowup or an enlargement of that 16:42:55 20 THE WITNESS: Let me agree that	t it is not a 16:44:14
21 e-mail. What you see is a different level of detail. 21 magnification of what's in the in the up	
22 You see a listing of individual e-mails within the 22 right-hand corner of the first box of the w	
23 e-mail file. There's different content, correct? 23 It is not a magnification the upper right	
24 MS. MAROULIS: Objection; misstates the 24 of the zone view is not a magnification of	
25 document. 16:43:15 25 That's accurate.	16:44:28

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1		1	
1	within the bounds of the of the 2-by-2 box. It is 17:04:34	1	, , , , , , , , , , , , , , , , , , , ,
3	enlarging and centering that in the in the LaunchTile application view. It is an expansion of that box.	2	which has been expanded and centered on page 5, is
4	BY MR. MONACH:	3	labeled the "LaunchTile application view," that it is
5		5	from there, I don't know of a navigation path back to
6	Q. Okay. But and it is not an enlargement and 17:04:48 translation of a structured electronic document	6	the first box other than to go back up to the world view 17:06:51
7		7	and then select the zone again. BY MR. MONACH:
8	consisting of these four squares of content, correct? A. That is what it is doing yes. What it	8	
9	is doing is enlarging and expanding the it happens to	9	Q. If you're working on a computer running Windows and it has Microsoft Word and you double click
10	be enlarging, but it's scrolling into position the upper 17:05:13	10	·
		11	11
11	right-hand quadrant of the original first box, which is	12	launched and replaces whatever has been on the screen
12 13	the 2-by-2 matrix. It's not expanding the entire entirety of the first box. This is	13	previously, covers it up, would you consider that to be
14	-	14	enlarging and translating a structured electronic document?
15	Q. Right. A the second box. 17:05:30	15	MS. MAROULIS: Objection; incomplete 17:07:34
16	Q. And you cannot scroll or pan when you're in	16	hypothetical.
17	the LaunchTile application view to see any of the	17	THE WITNESS: Would I consider it to be
18	adjacent LaunchTile zone view boxes, right?	18	enlarging and translating a structured electronic
19	MS. MAROULIS: Objection; compound.	19	document?
20	THE WITNESS: My best recollection of the way 17:05:54		MR. MONACH: Mm-hmm. 17:07:46
21	that this operates is that is that let me think.	21	THE WITNESS: I would not consider that
22	I don't sitting here right now, I don't remember	22	hadn't considered it before, but I would not, sitting
23	certainly whether or not there is the ability to slide	23	here right now, consider it enlarging and translating a
24		24	structured electronic document. What I think that is is
25	let me sorry. 17:06:32	25	analogous to selecting one of these pieces of mail from 17:08:00
	Page 216		Page 217
1	the LaunchTile application view and opening that up. 17:08:05	1	THE VIDEOGRAPHER: Correct. 17:09:33
2	The LaunchTile application view or the box labeled	2	MR. MONACH: Appendix 8 from your invalidity
3	"LaunchTile application view" is the second box that was	3	report.
4	in the zone view and is derived from the same data and	4	(Whereupon Exhibit 18 marked
5	was in the world view as well. So the expansion of the 17:08:20	5	for identification.) 17:09:38
6	world view of the 4-by-4 matrix to bring up so it	6	BY MR. MONACH:
7	gets expanded and centered on the screen. And the selection that's the first box. The gesture	7	Q. Mr. Gray, is the Robbins '349 patent one of the pieces of prior art you've relied on in opining that
9	_	8	
10	selecting the second box then yields the expansion and essentially centering to create the LaunchTile 17:08:41	10	the at least some of the claims of the '163 patent are invalid? 17:10:20
11	essentially centering to create the LaunchTile 17:08:41 application view.	11	are invalid? 17:10:20 A. Yes. Robbins '349 is one of the pieces of
12	If I were to now select one of those e-mail	12	-
13	one of those e-mails that's on that page and then go	13	prior art that I believe invalidates some of the asserted claims of the '163.
14	into the e-mail reader, that then would be analogous to	14	Q. Could you describe briefly how the Robbins
15	selecting Microsoft Word which then is an application, 17:08:56		invention works. 17:10:46
16	which now you're off on the races.	16	MS. MAROULIS: Objection; vague. Calls for a
17	-	17	narrative.
18	Q. Does tapping on what you call the "second box"	18	THE WITNESS: The Robbins invention takes
19	launch the e-mail application in LaunchTile or not?	19	large creates a allows for the display of a large
20	A. I think that the system, the way it's set up, 17:09:09	20	data set on a relatively small display surface and uses 17:11:01
21	is that the e-mail application was opened at world view,	21	a variety of techniques to segment that large
22		22	information space to allow for access to the to
1 -			
23	LaunchTile application view.	23	details of to filler levels of detail regarding that
23 24	11	24	details or to finer levels of detail regarding that large information space.
			large information space. BY MR. MONACH: 17:11:28

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1	the answer's yes. I think the description in 2B and 2C 17:34:53	1	available as a second gesture, the illustration at 1420 17:36:39
2	in my in Exhibit 18 Deposition Exhibit 18 show a	2	shows an equal overlapping segmentation of adjoining
3	selection of the first segment. And while that first	3	areas prior to the first gesture.
4	box is enlarged, selection of a second segment to I	4	Q. Do you have anyplace where after a first
5	mean, a second box which then will enlarge and center 17:35:24	5	gesture that enlarges the first box, you can still see 17:36:57
6	that or, rather, center I shouldn't say or	6	the second box and then tap on the second box to
7	zoom. Tap to zoom. So the first one is a tap to zoom.	7	substantially center it?
8	The second gesture is a tap to scroll.	8	MS. MAROULIS: Objection; asked and answered.
9	BY MR. MONACH:	9	THE WITNESS: Well, I don't have an
10	Q. Please identify for me in your chart the first 17:35:41	10	illustration I don't have an illustration in the 17:37:12
11	box that's enlarged and substantially centered. Where	11	claim chart that shows a first box with second boxes
12	is that?	12	which would which are available for a second gesture.
13	MS. MAROULIS: Objection; asked and answered.	13	But I believe that the second describes describes the
14	THE WITNESS: In the description for 2B,	14	method by which that second box with a second gesture
15	detecting a first gesture and determining the first box, 17:36:01	15	could be selected or preselected. 17:37:31
16	there's a an illustration there which the	16	BY MR. MONACH:
17	illustration is labeled "340." And the text supports	17	Q. By pressing on a number key?
18	the fact that the segment 6 has been enlarged and it's	18	A. Well, one of the methods that that can be
19	substantially centered.	19	used well, the input component, 230, can be any one
20	BY MR. MONACH: 17:36:18	20	of a touch pad, key pad, pointing device, stylus, 17:37:47
21	Q. Where is the second box if you look at page	21	joystick or D pad.
22	340 or Figure 340?	22	
23		23	MS. MAROULIS: Okay. We're at seven hours, so
	A. So in 2B, there isn't a second box shown.	24	I think we're done with the deposition.
24	When we go to 2C, which is a description of the ability	25	MR. MONACH: Okay. All right. Thank you.
25	to enlarge and then show second boxes which are 17:36:32	45	MS. MAROULIS: I don't have any questions for 17:38:02
	Page 232		Page 233
1	the witness. 17:38:03	1	CERTIFICATE
2	We'll reserve the right to review and sign. I	2	STATE OF CALIFORNIA)
3	believe there was some discussion of code, so we'll put) ss.:
4	it under protective order for now and we'll dedesignate	3	COUNTY OF CONTRA COSTA)
5	it as needed. 17:38:12	4	
6	Thank you, everyone.	5	I, Heidi Belton, a Certified Shorthand
7	THE VIDEOGRAPHER: This marks the end of disk	6	Reporter, a Registered Professional Reporter,
8	4 of 4 and concludes today's deposition of Stephen Gray.	7	a Certified Realtime Reporter, and a
9	The time is 5:38 p.m. And we're off the record.	8	Certified Realtime Professional within and
10	(The proceeding adjourned at 5:38 p.m.)	9 10	for the State of California, do hereby
11		11	certify: That STEPHEN CRAY the witness whose
12		12	That STEPHEN GRAY, the witness whose deposition is herein before set forth, was
13		13	deposition is herein before set forth, was duly sworn by me and that such deposition is
14	NIEPHEN UKAT	14	a true record of the testimony given by such
15		15	witness.
16		16	I further certify that I am not related to
17	Subscribed and sworn to before me	17	any of the parties to this action by blood or
18	this day of 2012	18	marriage and that I am in no way interested
19		19	in the outcome of this matter.
20		20	In witness whereof, I have hereunto set my
21		21	hand this 5th day of May, 20112.
22		22	
23		23	HEIDI BELTON, CSR, RPR, CRR, CCRR
24		24	Certified Shorthand Reporter No. 12885
25		25	_