

Exhibit 54
(Submitted Under Seal)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California
corporation,

Plaintiff,

vs. Case No. 11-CV-01846-LHK

SAMSUNG ELECTRONICS CO., LTD.,
a Korean business entity;

SAMSUNG ELECTRONICS AMERICA,
INC., a New York corporation;

SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC, a Delaware

limited liability company,

Defendants.

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CONFIDENTIAL
ATTORNEYS' EYES ONLY
OUTSIDE COUNSEL
VIDEOTAPED DEPOSITION OF ANDREW PLATZER
Redwood Shores, California
Tuesday, October 18, 2011

Reported by:

LORRIE L. MARCHANT, CSR No. 10523, RPR, CRR, CCRR,
CLR

JOB NO. 42881

1 October 18, 2011
 2 10:10 a.m.
 3
 4 Videotaped Deposition of ANDREW
 5 PLATZER, held at the offices of Quinn
 6 Emanuel Urqhart Oliver & Hedges, LLP,
 7 555 Twin Dolphin Drive, Redwood
 8 Shores, California, before Lorrie L.
 9 Marchant, a Certified Shorthand
 10 Reporter, Registered Professional
 11 Reporter, Certified Realtime Reporter,
 12 California Certified Realtime Reporter
 13 and Certified LiveNote Reporter.
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1 A P P E A R A N C E S:
 2 FOR THE PLAINTIFF APPLE INC.:
 3 MORRISON & FOERSTER
 4 BY: WESLEY OVERSON, ESQ.
 5 425 Market Street
 6 San Francisco, California 94105
 7
 8 FOR THE DEFENDANTS SAMSUNG:
 9 QUINN EMANUEL URQUHART & SULLIVAN
 10 BY: TODD BRIGGS, ESQ.
 11 555 Twin Dolphin Drive
 12 Redwood Shores, California 94065
 13
 14 ALSO PRESENT:
 15 Alan Dias, Videographer
 16 ---oOo---
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1 THE VIDEOGRAPHER: Good morning. This is
 2 the start of Disk No. 1 of the videotaped deposition
 3 of Andrew Platzer in the matter of Apple Inc.,
 4 versus Samsung, in the United States District Court,
 5 Northern District of California, San Jose Division.
 6 Case No. 1 -- 11-CV-01846.
 7 We are located today at 555 Twin Dolphin Drive
 8 in the City of Redwood Shores, California. Today is
 9 October 18, 2011, and the time is 10:10 a.m. My name is
 10 Alan Dias, from TSG Reporting.
 11 Counsel, would you please identify yourself for
 12 the record.
 13 MR. BRIGGS: Todd Briggs from Quinn Emanuel
 14 for Samsung.
 15 MR. OLSON: Erik Olson from Morrison &
 16 Foerster, for Apple and for the witness.
 17 THE VIDEOGRAPHER: Will the court reporter
 18 please swear in the witness.
 19 THE REPORTER: Do you solemnly swear or
 20 affirm under the penalties of perjury that the
 21 testimony you are about to offer will be the truth,
 22 the whole truth and nothing but the truth?
 23 THE WITNESS: I do.
 24 THE VIDEOGRAPHER: You may proceed.
 25 ///

1 EXAMINATION BY MR. BRIGGS
 2 BY MR. BRIGGS:
 3 Q. Can you state your full name for the
 4 record.
 5 A. Andrew Platzer.
 6 Q. How do you spell that?
 7 A. A-N-D-R-E-W, P-L-A-T-Z-E-R.
 8 Q. Where do you live?
 9 A. In Santa Clara, California.
 10 Q. How long have you lived in Santa Clara?
 11 A. Fifteen years.
 12 Q. Where do you work?
 13 A. Apple Computer.
 14 Q. And you work for Apple in Cupertino?
 15 A. Yes.
 16 Q. What's your home address?
 17 A. 3224 El Sobrante Street, Santa Clara.
 18 Q. How long have you worked for Apple?
 19 A. A bit over 15 years.
 20 Q. So you came to Apple in 1996?
 21 A. Yes.
 22 Q. Where were you before that?
 23 A. I worked at a number of smaller companies
 24 in Toronto, Canada.
 25 Q. When did you graduate from college?

1 UIKit? Does that code always interpret a single
 2 input point as a scroll operation?
 3 MR. OLSON: Objection. Vague as to time.
 4 Lack of foundation.
 5 THE WITNESS: Again, I do not understand --
 6 a UIKit is a very large system.
 7 BY MR. BRIGGS:
 8 Q. Can you think of any instances in UIKit
 9 where multiple input points are identified as a
 10 scroll operation?
 11 MR. OLSON: Objection. Vague as to time.
 12 THE WITNESS: Could you be more specific as
 13 to a time?
 14 BY MR. BRIGGS:
 15 Q. Any time.
 16 A. So I'm not a lawyer. You know, I cannot
 17 speak to "interpreted" as far as the patent is
 18 concerned.
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 Q. And does that code ever interpret multiple
 23 inputs as a scroll operation?
 24 A. I do not know without referring to other
 25 materials.

1 Q. What other materials would you refer to?
 2 A. The source code.
 3 Q. Any other materials?
 4 A. Perhaps the documentation.
 5 Q. What -- what documentations?
 6 A. It would be public documentation.
 7 Q. Is there a name for this public
 8 documentation?
 9 A. This would be the API reference.
 10 Q. So there might be something in the API
 11 reference that describes whether multiple input --
 12 input could be interpreted as a scroll operation?
 13 A. I don't know.
 14 Q. Did you write any of the APIs or -- let me
 15 rephrase that.
 16 Did you write any of the API documentation?
 17 A. No.
 18 Q. But sitting here today, you don't recall
 19 whether any of the code or any of the API
 20 documentation describes multiple input points being
 21 interpreted as a scroll operation?
 22 A. I don't understand. Could you break the
 23 question down?
 24 Q. Well, sitting here today, you -- you can't
 25 recall any code that interprets multiple input

1 points as a scroll operation; is that correct?
 2 A. I don't recall.
 3 Q. And sitting here today, you don't recall
 4 any documentation that describes multiple input
 5 points being interpreted as a scroll operation; is
 6 that right?
 7 A. Yes. I don't recall.
 8 Q. Do you know if the UIKit code distinguishes
 9 between a single input point and multiple input
 10 points to determine whether a scroll or gesture
 11 operation is invoked?
 12 MR. OLSON: Objection. Asked and answered.
 13 THE WITNESS: With regards to the patent,
 14 I'm not comfortable in defining "invoked."
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 [REDACTED]
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 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 BY MR. BRIGGS:
 19 Q. Okay. Let's move to the next limitation.
 20 It states, Issuing at least one scroll or
 21 gesture call based on invoking the scroll or gesture
 22 operation.
 23 What is a scroll call?
 24 MR. OLSON: Objection. Calls for a legal
 25 conclusion. Lack of foundation.

1 CERTIFICATE
2 STATE OF CALIFORNIA)
3): ss
4 COUNTY OF SONOMA)
5 I, Lorrie L. Marchant, a Certified Shorthand
6 Reporter, a Registered Professional Reporter, a
7 Certified Realtime Reporter, and a Certified
8 Realtime Professional within and for the State of
9 California, do hereby certify:
10 That ANDREW PLATZER, the witness whose
11 deposition is herein set forth, was duly
12 sworn/affirmed by me and that such deposition is a
13 true record of the testimony given by such witness.
14 I further certify that I am not related to any
15 of the parties to this action by blood or marriage
16 and that I am in no way interested in the outcome of
17 this matter.
18 In witness whereof, I have hereunto set my hand
19 this 18th day of October, 2011.
20
21
22
23 -----
24 LORRIE L. MARCHANT, CSR, RPR, CRR, CLR, CCRR
25 CSR No. 10523

1 I N D E X
2 INDEX OF EXAMINATION
3 PAGE
4 MR. BRIGGS 5
5 ---oOo---
6 INDEX OF EXHIBITS
7 DESCRIPTION PAGE
8 Exhibit 632 Declaration for Utility or 57
9 Design Patent Application
10 (Production Nos. APLPROS0000006260
11 - APLPROS0000006261)
12 ---oOo---
13 QUESTIONS INSTRUCTED NOT TO ANSWER
14 Page Line
15 9 5
16 31 17
17 33 3
18 33 8
19 61 10
20 ---oOo---
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1 NAME OF CASE: Apple v. Samsung
2 DATE OF DEPOSITION: 10/18/2011
3 NAME OF WITNESS: Andrew Platzer
4 Reason Codes:
5 1. To clarify the record.
6 2. To conform to the facts.
7 3. To correct transcription errors.
8 Page _____ Line _____ Reason _____
9 From _____ to _____
10 Page _____ Line _____ Reason _____
11 From _____ to _____
12 Page _____ Line _____ Reason _____
13 From _____ to _____
14 Page _____ Line _____ Reason _____
15 From _____ to _____
16 Page _____ Line _____ Reason _____
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25 ANDREW PLATZER