

Exhibit 67

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY
SUBJECT TO PROTECTIVE ORDER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

APPLE INC.,

V.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC. AND SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

Case No. 11-CV-01846-LHK

**EXPERT REPORT OF JEFFREY JOHNSON, PH.D.
REGARDING NON-INFRINGEMENT OF U.S. PATENT NO. 7,469,381**

7	Galaxy Ace	2.3.4	X	X		
8	Galaxy Prevail	2.3.5				X
9	Galaxy S (i9000)	2.3.4	X	X		
10	Galaxy S II	2.3.5				X
11	Galaxy S 4G	2.3.6				X
12	Galaxy S Showcase (i500)	2.3.5				X
13	Galaxy Tab 7.0	2.2	X			
14	Galaxy Tab 10.1	3.1	X			
15	Gravity Smart	2.2.2	X	X		
16	Indulge	2.2.1	X	X		
17	Infuse 4G	2.2.1	X	X		
18	Mesmerize	2.1-update1	X	X		
19	Nexus S	2.3.1	X	X	X	
20	Nexus S 4G	2.3.4	X	X		
21	Replenish	2.2.2	X	X		
22	Sidekick	2.2.1	X	X		
23	Vibrant	2.1-update1	X	X		

64. **Gallery Feature 1: General snapping behavior.** In horizontal filmstrip mode in Gallery, other than the “edge” or “corner cases” of the left edge of the first image and the right edge of the last image, all of the left and right edges exhibit general snapping behavior, not the more limited ‘381 style snapback. Depending on whether the user translates the image past a threshold beyond the edge of the document, the Gallery application can snap-forward to the next image or snap-back to the current image. This same behavior occurs both in “zoomed-in” and “zoomed-out” modes. Because the Court has interpreted the ‘381 Patent claims to require ‘381 Style Snap-back for all potentially scrollable edges, including ones Apple previously tried to rule out as interior edges, devices with Gallery that include Gallery Feature 1 (general snapping behavior) do not infringe the independent claims of the ‘381 Patent.

65. **Gallery Feature 2: Hold still behavior.** In “zoomed-in” mode of Gallery, a user can translate an image beyond the edge of the document, show an area beyond the edge, and upon lifting her finger, the image will hold still and does not snap back, thus continuing to show area beyond the edge. Because there is no translation of the document in the second direction after the user lifts her finger, devices with Gallery that include Gallery Feature 2 (hold still behavior) do not infringe the independent claims of the '381 Patent.

66. **Gallery Feature 3: Hard stop.** In “zoomed-out” mode of Gallery, when the user attempts to translate the image past the edge of the document, the user encounters a hard stop. No area beyond the edge of the electronic document is displayed, and no translation of the document occurs in the second direction when the finger is lifted off. Because devices with Gallery that include Gallery Feature 3 (hard stop) do not display an area beyond the edge of the electronic document and do not translate the electronic document in a second direction, , they do not infringe the independent claims of the '381 Patent.

67. **Gallery Feature 4: Blue glow.** In devices with blue glow, when the user attempts to translate the image past the edge of the document, the user encounters a hard stop but a blue (or other color) glow is overlaid near the edge of the document to provide a visual indicator that an edge has been reached. No area beyond the edge of the electronic document is displayed, and no translation of the document occurs in the second direction when the finger is lifted off. Because devices with Gallery that include Gallery Feature 4 (blue glow) do not display an area beyond the edge of the electronic document and do not translate the electronic document in a second direction, they do not infringe the independent claims of the '381 Patent.

Contacts

At least 1 Non-infringing Feature in Contacts

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Jeffrey Johnson, Ph.D.

April 16, 2012

Date