Apple Inc. v. Samsung Electronics Co. Ltd. et al

Exhibit 17

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	Page	1
1	Robert Anders, IDSA	
2	UNITED STATES INTERNATIONAL TRADE COMMISSION	
3	Washington, D.C.	
4		
5	In the Matter of)	
6	CERTAIN ELECTRONIC DIGITAL) No. 337-TA-796	
7	MEDIA DEVICES AND COMPONENTS)	
8	THEREOF)	
9		
10		
11		
12		
13	VIDEOTAPE DEPOSITION OF	
14	ROBERT ANDERS, IDSA	
15	Washington, D.C.	
16	Tuesday, April 24, 2012	
17		
18		
19		
20		
21		
22		
23	Reported by:	
24	SUSAN ASHE, RMR/CRR	
25	Job No.: 48828	

	Page 2		Page 3
1	Robert Anders, IDSA	1	Robert Anders, IDSA
2	Tuesday, April 24, 2012	2	APPEARANCE OF COUNSEL:
3	9:10 a.m.	3	FOR COMPLAINANT APPLE INC.:
4	7.10 a.m.	4	MORRISON & FOERSTER LLP
5		5	BY: JENNIFER LEE TAYLOR, ESQ.
6	Videotaped deposition of ROBERT ANDERS,	6	425 Market Street
7	IDSA, taken on behalf of Complainants, at MORRISON &	7	San Francisco, California 94105
8	FOERSTER LLP, 2000 Pennsylvania Avenue, Northwest,	8	Sun Francisco, Camorna 94105
9	Washington, D.C., beginning at 9:10 a.m., on	9	
10	Tuesday, April 24, 2012, before Susan Ashe, RMR/CRR.	10	FOR RESPONDENTS SAMSUNG ELECTRONICS, INC.:
11	ruesday, April 24, 2012, before Susan Ashe, Rivito eRR.	11	QUINN EMANUEL URQUHART & SULLIVAN, LLP
12		12	BY: ALBERT P. BEDECARRE, ESQ.
13		13	50 California Street, 22nd Floor
14^{13}		14	San Francisco, California 94111
15		15	
16		16	
17		17	ALSO PRESENT:
18		18	Reginal Lucas, Esq., US-ITC
19		19	Jordan Mummert, Videographer
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	
	Page 4		Page 5
1	Robert Anders, IDSA	1	Robert Anders, IDSA
2	WASHINGTON, D.C.;	2	Whereupon,
3	TUESDAY, APRIL 24, 2012, 9:10 A.M.	3	ROBERT ANDERS,
4	000	4	the Witness, called for examination by the
5	VIDEOGRAPHER: This is the start of the	5	Complainants, having been first duly sworn according
6	tape labeled No. 1 of the videotaped deposition of	6	to law, was examined and testified as follows:
7	Robert Anders in the matter Certain Electronic 7 EXAMINATION BY COUNSEL FOR COMP		
8	Digital Media Devices, Case No. 337-TA-796.	8	BY MS. TAYLOR:
9	This deposition is taking place at	9	Q Good morning.
10	2000 Pennsylvania Avenue, Washington, D.C., on	10	A Good morning.
11	April 24, 2012 at approximately 9:10 a.m.	11	Q Could you state your name for the record,
12	My name is Jordan Mummert from TSG	12	please.
13	Reporting, Inc. I'm the video specialist.	13	A Robert Anders.
14	The court reporter is Susan Ashe in	14	Q A-n-d-e-r-s?
15	association with TSG Reporting.	15	A Yes.
16	Will the counsel please introduce	16	Q And are you an industrial designer?
17	yourselves.	17 18	A Yes, I am.
18 19	MS. TAYLOR: Jennifer Taylor representing	19	Q Can you tell me some of the types of items that you've designed.
μフ	Apple.	1-2	
		20	Δ I've designed lots of the official United
20	MR. BEDECARRE: Al Bedecarre of Quinn	20 21	A I've designed lots of the official United States exhibitions at trade and cultural affairs in
20 21	MR. BEDECARRE: Al Bedecarre of Quinn Emanuel representing Samsung.	21	States exhibitions at trade and cultural affairs in
20 21 22	MR. BEDECARRE: Al Bedecarre of Quinn Emanuel representing Samsung. MR. LUCAS: Reginald Lucas, United States	21 22	States exhibitions at trade and cultural affairs in different foreign countries.
20 21 22 23	MR. BEDECARRE: Al Bedecarre of Quinn Emanuel representing Samsung. MR. LUCAS: Reginald Lucas, United States International Trade Commission.	21 22 23	States exhibitions at trade and cultural affairs in different foreign countries. I have designed three major pavilions at
20 21 22	MR. BEDECARRE: Al Bedecarre of Quinn Emanuel representing Samsung. MR. LUCAS: Reginald Lucas, United States	21 22	States exhibitions at trade and cultural affairs in different foreign countries.

	Page 286	;	Page 287
1	Robert Anders, IDSA	1	Robert Anders, IDSA
2	Q Is this the clear rectangle side?	2	report, you have a paragraph talking about Figure 1
3	A I believe so.	3	of the patent and a figure of the JP '221 patent.
4	Q So, can you label it	4	Do you see that?
5	A I believe the whole thing is a clear	5	A Yes.
6	rectangle.	6	Q Can you take can you review it if you
7	Q Can you label it: Clear Rectangle Side.	7	need to refresh your recollection.
8	(Witness complies.)	8	A Sure.
9	Q And this is the side of the rectangle	9	(Witness perusing.)
10	the inner rectangle?	10	A Yes.
11	A Yeah.	11	Q It says: In this view, the JP '221 design
12	Q Could you label that side of inner	12	patent has a clear rectangular front surface with
13	rectangle.	13	rounded corners.
14	(Witness complies.)	14	Do you see that?
15	Q Thank you.	15	A Yes.
16	And that was Exhibit C, Roman numeral 2.9,	16	Q Show me on Exhibit C, Roman numeral 3.1,
17	to your expert report?	17	where that clear rectangular front surface with
18	A Yes.	18	rounded corners is.
19	Q Which also happens to be Exhibit 21 to the	19	A Yes.
20	deposition.	20	MR. BEDECARRE: I'm just going to note
21	Could you take a look at Exhibit C, Roman	21	that that's almost going to be impossible to see,
22	numeral 3.1.	22	especially when it's photocopied.
23	A C, 3.1?	23	I don't know if you could go around the
24	Q Yes.	24	outside of the
25	So, if you look at C11 on your expert	25	MS. TAYLOR: I was proposing that we
	Page 288	;	Page 289
1	Robert Anders, IDSA	1	Robert Anders, IDSA
2	describe it and decide if we want to draw further.		
		2	Q Is there anything in the drawing that
3	Maybe do you believe do you believe	3	Q Is there anything in the drawing that indicates to you that it's clear?
3 4	it goes to the edge?		indicates to you that it's clear? A It's just what it looks like. It looks
	it goes to the edge? A Yes.	3 4 5	indicates to you that it's clear?A It's just what it looks like. It lookslike it's clear with an opaque frame, but it looks
4	it goes to the edge? A Yes. Q Okay.	3 4 5 6	indicates to you that it's clear?A It's just what it looks like. It lookslike it's clear with an opaque frame, but it lookslike it's all one continuous surface.
4 5 6 7	it goes to the edge?A Yes.Q Okay.So, perhaps, because this might be easier	3 4 5 6 7	indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is
4 5 6 7 8	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the 	3 4 5 6 7 8	 indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this
4 5 7 8 9	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the corners kind of where you see that it ends in the 	3 4 5 6 7 8 9	indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this surface.
4 5 7 8 9 10	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the corners kind of where you see that it ends in the nonblack part of the page. 	3 4 5 6 7 8 9	 indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this surface. So, that's why it appears to me to be one
4 5 7 8 9 10	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the corners kind of where you see that it ends in the nonblack part of the page. (Witness complies.) 	3 4 5 7 8 9 10	 indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this surface. So, that's why it appears to me to be one continuous surface.
4 5 7 8 9 10 11	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the corners kind of where you see that it ends in the nonblack part of the page. (Witness complies.) Q So, is it your understanding that 	3 4 5 7 8 9 10 11	 indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this surface. So, that's why it appears to me to be one continuous surface. Do we have the Japanese patent with the
4 5 7 8 9 10 11 12 13	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the corners kind of where you see that it ends in the nonblack part of the page. (Witness complies.) Q So, is it your understanding that everything between those four corners that you just 	3 4 5 7 8 9 10 11 12 13	 indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this surface. So, that's why it appears to me to be one continuous surface. Do we have the Japanese patent with the English translation?
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 it goes to the edge? A Yes. Q Okay. So, perhaps, because this might be easier to photocopy, if you could draw at an angle on the corners kind of where you see that it ends in the nonblack part of the page. (Witness complies.) Q So, is it your understanding that everything between those four corners that you just marked is a clear surface? A Yes. Q Could you label the bottom image on Exhibit C, Roman numeral 3.1, as JP '221. (Witness complies.) A And this is MR. BEDECARRE: '678. Q '678. Thank you for labeling that as well. 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	 indicates to you that it's clear? A It's just what it looks like. It looks like it's clear with an opaque frame, but it looks like it's clear with an opaque frame, but it looks like it's all one continuous surface. There's no edge indicating that this is recessed and that it's a clear plane below this surface. So, that's why it appears to me to be one continuous surface. Do we have the Japanese patent with the English translation? Q We do. (Whereupon, Anders Deposition Exhibit No. 23 was marked for identification.) MR. BEDECARRE: Sorry. What number, Exhibit 23? MS. TAYLOR: 23. A Well, it certainly doesn't say anything in words. (Witness perusing.)

	Page 318		Page 319
1	Robert Anders, IDSA	1	Robert Anders, IDSA
2	A 390 is what I bill.	2	MS. TAYLOR: Thank you.
3	Q So, approximately doing the math	3	Thank you.
4	A About 150,000.	4	A Thank you.
5	Q You've incurred about 150,000 in fees?	5	VIDEOGRAPHER: The time is 7:48. We're
6	MR. BEDECARRE: Hold on. I just want to	6	off the record.
7	be clear because it's vague and ambiguous as to this	7	(Ending time: 7:48 p.m.)
8	case because I don't think Mr. Anders has	8	
9	distinguished between two cases.	9	
10	Q I will make that point in a moment.	10	
11	The math is about 150 incurred in fees so	11	
12	far?	12	
13	A For both cases.	13	
14	Q That was going to be my next question.	14	
15	So on both cases you've incurred	15	
16	approximately 150,000 in fees?	16	
17	A Yes. I haven't kept a separate track of	17	
18	my time of the ITC case and the Northern District of	18	
19	California case.	19	
20	It's just I'm working constantly on both	20	
21	and it would be impossible for me to try to divide	21	
22	it.	22	
23	Q I appreciate your time today.	23	
24	Mr. Lucas, did you have any questions?	24	
25	MR. LUCAS: I do not.	25	
	Page 320		Page 321
-			
1	Robert Anders, IDSA	1	Robert Anders, IDSA
⊥ 2	Robert Anders, IDSA DECLARATION	1 2	Robert Anders, IDSA CERTIFICATE
		1	
2	DECLARATION	2	
2 3	DECLARATION I hereby declare under penalty of perjury	2 3	CERTIFICATE I, SUSAN ASHE, a Registered Merit Reporter and Notary Public, hereby certify that the
2 3 4	DECLARATION I hereby declare under penalty of perjury that the foregoing is my deposition under oath; that these are the questions asked of me and my answers thereto; and that I have read my deposition and have	2 3 4	CERTIFICATE I, SUSAN ASHE, a Registered Merit Reporter and Notary Public, hereby certify that the foregoing is a true and accurate transcript of the
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1	Robert Anders, IDSA						
2	NAME OF CASE: Certain Electronic Digital						
3	Media Devices (Case #: 337-TA-796)						
4	DATE OF DEPOSITION: 04/24/2012						
5	NAME OF WITNESS: Robert Anders, I	DSA					
6	REASON CODES:						
7	1. To clarify the record.						
8	2. To confirm the facts.						
9	3. To correct transcription errors.						
10	Page Line Reason						
11	From to						
12	Page Line Reason						
13	From to						
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16 17	Page Line Reason From to						
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