

**DECLARATION OF NATHAN SABRI IN
SUPPORT OF APPLE'S OPPOSITIONS TO
SAMSUNG'S MOTION FOR SANCTIONS AND
MOTION TO ENFORCE**

EXHIBIT 22

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION

4 APPLE INC., a California)
corporation,)

5)
6 Plaintiff,)

7 vs.) No: 11-CV-01846-LHK

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

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

10 SAMSUNG TELECOMMUNICATIONS)
AMERICA, LLC, a Delaware)
limited liability company)

11)
12 Defendants.)
13 _____)

14 **HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**
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16 DEPOSITION OF RICHARD DINH
17 Redwood City, California
18 Thursday, February 16, 2012
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23 Reported By:
24 LINDA VACCAREZZA, RPR, CLR, CRP, CSR. NO. 10201
25 JOB NO. 46594

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February 16, 2012
9:20 a.m.

Videotaped deposition of RICHARD
DINH, held at held at Quinn Emanuel
Urquhart & Sullivan LLP, 555 Twin
Dolphin Drive, Suite 500, Redwood
Shores, California, pursuant to
Subpoena before Linda Vaccarezza, a
Certified Shorthand Reporter of the
State of California.

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A P P E A R A N C E S :

QUINN EMANUEL URQUHART & SULLIVAN

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San Francisco, California 94065

BY: MICHAEL T. ZELLER, ESQ.

SCOTT HALL, ESQ.

MORRISON & FOERSTER

Attorneys for Plaintiff

425 Market Street

San Francisco, California 94105

BY: MARK W. DANIS, ESQ.

VIDEOGRAPHER: Frank Quiarte

1 THE VIDEOGRAPHER: Good morning, ladies
2 and gentlemen. This is the start of disk
3 labeled 1 in the videotaped deposition of
4 Richard Dinh in the matter of Apple, Inc.
5 versus Samsung Electronics, LTD, et al. It's 09:14
6 in the US District Court, Northern District of
7 California, San Jose Division. Case number
8 11-CV-01846-LHK.

9 This deposition is being held at
10 555 Twin Dolphin Drive in Redwood Shores, 09:15
11 California in the offices of Quinn Emanuel on
12 February 16th, 2012 at approximately 9:14 a.m.

13 My name is Frank Quiarte. I'm a
14 legal video specialist from TSG Reporting,
15 Inc. headquartered at 747 Third Avenue, New 09:15
16 York, New York. Our court reporter today is
17 Linda Vaccarezza, in association with TSG
18 Reporting.

19 Will counsel and all present please
20 identify yourself for the record. 09:15

21 MR. ZELLER: Mike Zeller, for Samsung.

22 MR. HALL: Scott Hall for Samsung.

23 MR. DANIS: Mark Danis, Morrison
24 Foerster, for Apple.

25 THE VIDEOGRAPHER: Madam Court 09:15

1 Reporter, will you please swear in the
2 witness.

3

4 R I C H A R D D I N H

5 called as a witness, having been duly sworn by 09:15
6 the Certified Shorthand Reporter, was examined
7 and testified as follows:

8 EXAMINATION BY:

9 BY MR. ZELLER:

10 Q. Good morning. 09:15

11 A. Good morning.

12 Q. If you could please tell us your full
13 name, for the record.

14 A. Richard Hung Minh Dinh.

15 Q. Have you ever gone by any other name? 09:15

16 A. I sometimes go by Rich Dinh, but that's
17 a nickname.

18 Q. And you're currently employed by Apple?

19 A. Correct.

20 Q. And how long have you worked for Apple? 09:16

21 A. Six-and-a-half years .

22 Q. Do you recall what month you started?

23 A. July.

24 Q. And, I'm sorry, my math is not very good
25 this morning. 09:16

1 of any kind with the Acoustics group?

2 A. Yes.

3 Q. Who was the person you had principal
4 contact with within the Acoustics group as it
5 pertained to the iPhone 4? 09:42

6 A. I don't recall.

7 Q. Do you remember the name of anyone who
8 you had contact with?

9 A. During the iPhone 4?

10 Q. Yes. 09:42

11 A. The names don't come to mind right now.
12 I'm sorry.

13 Q. Who did you deal with in the Acoustics
14 group with respect to the iPhone 4S?

15 MR. DANIS: Objection. Foundation. 09:42

16 THE WITNESS: His name is Andrew
17 Bright.

18 Q. Is he still with Apple?

19 A. Yes.

20 Q. With respect to the acoustics testing 09:42
21 that you saw or had awareness was being done in
22 connection with the first iPhone, were all those tests
23 conducted by Apple internal personnel or were they
24 done by consultants or outside vendors or both?

25 MR. DANIS: Objection. Speculation. 09:43

C E R T I F I C A T E

STATE OF CALIFORNIA)

)

COUNTY OF SAN FRANCISCO)

I, LINDA VACCAREZZA, a Certified
Shorthand Reporter for the State of
California, do hereby certify:

That RICHARD DINH, the witness whose
deposition is hereinbefore set forth, was duly
sworn by me and that such deposition is a true
record of the testimony given by such
witness.

I further certify that I am not related
to any of the parties to this action by blood
or marriage; and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 16th day of February, 2012.

LINDA VACCAREZZA, CSR. NO. 10201