

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

**EXHIBIT 23**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION  
4

5 APPLE, INC., )  
6 Plaintiff, )  
7 vs. ) NO. 11-CV-01846-LHK  
8 SAMSUNG ELECTRONICS, LTD., )  
9 et al., )  
10 Defendants. )

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14 ATTORNEYS' EYES ONLY  
15 PURSUANT TO THE PROTECTIVE ORDER

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19 VIDEOTAPED DEPOSITION OF WEI CHEN, Ph.D.  
20 PALO ALTO, CALIFORNIA  
21 THURSDAY, MARCH 1, 2012  
22

23 Reported By:  
24 Yvonne Fennelly, CCRR, CSR No. 5495  
25 JOB NO. 46969

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MARCH 1, 2012

9:06 A.M.

Videotaped deposition of WEI CHEN, Ph.D.,  
held at the offices of Quinn Emanuel, 555 Twin  
Dolphin Drive, Redwood Shores, California,  
pursuant to Notice, before Yvonne Fennelly,  
CCRR, CSR 5495.

1           A P P E A R A N C E S

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19  
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21  
22           VIDEOGRAPHER:

23                     Aric Kerhoulas

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1 Redwood Shores, California

2 Thursday, March 1, 2012

3 - - -

4 THE VIDEOGRAPHER: Good morning.

5 This marks the beginning of Disk 1 of the 09:06AM

6 videotaped deposition of Wei Chen in the matter

7 Apple, Incorporated versus Samsung Electronics,

8 et al., in the United States District Court for

9 the Northern District of California, San Jose

10 Division, case No. 11-CV-01846 LHK. 09:06AM

11 This deposition is being held at the

12 office of Quinn Emanuel at 555 Twin Dolphin

13 Drive in Redwood Shores, California.

14 The date today is March 1, 2012. The

15 time is approximately 9:06 a.m. My name is Aric 09:06AM

16 Kerhoulas of TSG Reporting, Incorporated. Our

17 court reporter today is Yvonne Fennelly in

18 association with TSG.

19 Will counsel please introduce

20 yourselves starting with the questioning 09:07AM

21 attorney.

22 MS. NEILL: Anna Neill of Quinn

23 Emmanuel Urquhart & Sullivan on behalf of

24 Samsung.

25 MR. MONACH: Andrew Monach from 09:07AM

1 Morrison & Foerster representing Apple and the  
2 witness.

3 THE VIDEOGRAPHER: If the court  
4 reporter will please swear in the witness we can  
5 proceed.

09:07AM

6 WEI CHEN, Ph.D.,  
7 having been first duly sworn was  
8 examined and testified as follows:

9 - - -

10 THE VIDEOGRAPHER: You may proceed.

09:07AM

11 EXAMINATION

12 BY MS. NEILL:

13 Q. Good morning, Mr. Chen.

14 A. Good morning.

15 Q. Would you please state your full name  
16 for the record?

09:07AM

17 A. Wei Chen.

18 Q. And can you please spell that?

19 A. W-E-I, C-H-E-N.

20 Q. Okay. And would you please state  
21 your home address and your business address?

09:07AM

22 A. Home address is 2898 Ramona Street,  
23 Palo Alto, California 94306. Business address  
24 is 1 Infinite Loop, Cupertino, California.

25 95014, I think.

09:07AM

1 (Recess taken.)

2 (Document marked Exhibit 1950  
3 for identification.)

4 THE VIDEOGRAPHER: We're on the  
5 record, the time is 10:19 a.m. 10:19AM

6 BY MS. NEILL:

7 Q. Dr. Chen, do you recognize this  
8 e-mail?

9 A. I see my name is on it, but I  
10 actually don't recall seeing this e-mail. 10:19AM

11 Q. On the second page of this chain of  
12 e-mails, page ending 489.

13 A. Sorry?

14 Q. The page ending 489.

15 A. Okay. 10:20AM

16 Q. There appears to be an e-mail from  
17 Tang Yew Tan?

18 A. Correct.

19 Q. Do you know Tang Tan?

20 A. Yes. 10:20AM

21 Q. And who is Tang Tan?

22 A. He -- Tang is the manager of product  
23 design team for iPhone.

24 Q. And at the bottom of this page, there  
25 is a list of action items that starts with 10:20AM

1 No. 1, Provide a cost comparison of the  
2 following Grapes, followed by the name Priya.

3 Do you know who Priya is?

4 A. Priya is the manager of the display  
5 and touch panel procurement team, what we call 10:21AM  
6 global supply manager.

7 Q. And do you know what the term  
8 "Grapes" refers to in this sentence?

9 A. Grape is loosely referring to touch  
10 panels, internally. 10:21AM

11 Q. Under No. 1, the letter A, it says,  
12 M68 full lam?

13 What is M68?

14 A. M68 is the code name for the original  
15 iPhone. 10:22AM

16 Q. And what does full lam, L-A-M, refer  
17 to?

18 A. Full lam refers to the optical  
19 bonding between the touch glass and the displays  
20 or between cover glass and the touch displays. 10:22AM  
21 Bonding.

22 MR. MONACH: Bonding, B-O-N-D-I-N-G.  
23 Sorry.

24 THE WITNESS: Thank you.

25 BY MS. NEILL: 10:22AM



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C E R T I F I C A T E

STATE OF CALIFORNIA )  
 ) ss:  
COUNTY OF CONTRA COSTA )

I, YVONNE FENNELLY, CCRR, CSR 5495,  
within and for the State of California, do  
hereby certify:

That WEI CHEN, Ph.D, 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 1st day of March, 2012.

\_\_\_\_\_  
YVONNE FENNELLY, CCRR, CSR NO. 5495