

# Exhibit 13

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2 UNITED STATES DISTRICT COURT  
3 NORTHERN DISTRICT OF CALIFORNIA  
4 SAN JOSE DIVISION  
5

6 APPLE INC., a California )  
corporation, )  
7 )  
Plaintiff, )  
8 )

vs. ) No. 11-CV091846-LHK

9 )  
SAMSUNG ELECTRONICS CO., )  
10 LTD., a Korean business )  
entity; et al., )  
11 )  
Defendants. )

12 \_\_\_\_\_ )

13 VIDEOTAPED DEPOSITION OF CHRISTOPHER MOUNT  
14 555 West Fifth Street  
15 Los Angeles, California  
16 Wednesday, April 25, 2012  
17  
18  
19  
20  
21  
22

23 Reported By:  
24 PATRICIA L. HUBBARD, CSR #3400  
25 JOB NO. 49018

1                   CHRISTOPHER MOUNT,  
2                   called as a witness, having been  
3                   sworn, was examined and testified as  
4                   follows:

5

6                   EXAMINATION

7 BY MR. ZHANG:

8           Q.    Good afternoon, Mr. Mount.

9           A.    Hi.

10          Q.    You understand that you're testifying           01:40PM  
11 under oath here today and under penalty of perjury?

12          A.    Yes.

13          Q.    And I'm going to be asking you a number  
14 of questions today, and from time to time your  
15 attorney will object.   01:40PM

16                    But you understand that you should  
17 answer the question fully and truthfully unless  
18 your attorney instructs you not to answer?

19          A.    Yes.

20          Q.    You're obviously welcome to take a           01:40PM  
21 break at any time. I'd just ask that if there is a  
22 pending question, that you answer the question  
23 fully before we take a break.

24          A.    Yes.

25          Q.    Is there any reason why you can't give       01:40PM

1 A. No.

2 Q. Do you believe that the iPad design is  
3 purely functional?

4 A. Let me explain what is purely  
5 functional. What is purely functional are -- tend 04:08PM  
6 to be space industry things, medical tools, pieces  
7 in the military, engineering gears, those kinds of  
8 things. They tend to be purely functional.

9 Everything else does -- that is design  
10 that we use that is not a life and death -- one 04:08PM  
11 could even argue that a formula one race car which  
12 is -- many people think of as fairly functional is  
13 ornamented with a Ferrari on it and stickers on it.

14 So, yes. Of course it has -- it has  
15 some -- there is some human design that goes into 04:08PM  
16 this.

17 Q. So it's your opinion that the iPad is  
18 not a purely functional design?

19 MS. CARUSO: Objection. Vague.

20 THE WITNESS: It's a very very 04:09PM  
21 functional design, but it's not a purely functional  
22 design.

23 BY MR. ZHANG:

24 Q. So it seems to me that when you call  
25 something an anonymous and basic box, you don't 04:09PM

1 REPORTER'S CERTIFICATE

2  
3 I, PATRICIA L. HUBBARD, do hereby certify:

4  
5 That I am a duly qualified Certified  
6 Shorthand Reporter in and for the State of California,  
7 holder of Certificate Number 3400, which is in full  
8 force and effect, and that I am authorized to  
9 administer oaths and affirmations;

10  
11 That the foregoing deposition testimony of  
12 the herein named witness, to wit, CHRISTOPHER MOUNT,  
13 was taken before me at the time and place herein set  
14 forth;

15  
16 That prior to being examined, CHRISTOPHER  
17 MOUNT was duly sworn or affirmed by me to testify the  
18 truth, the whole truth, and nothing but the truth;

19  
20 That the testimony of the witness and all  
21 objections made at the time of examination were  
22 recorded stenographically by me and were thereafter  
23 transcribed by me or under my direction and  
24 supervision;

1                   That the foregoing pages contain a full,  
2 true and accurate record of the proceedings and  
3 testimony to the best of my skill and ability;  
4

5                   I further certify that I am not a relative  
6 or employee or attorney or counsel of any of the  
7 parties, nor am I a relative or employee of such  
8 attorney or counsel, nor am I financially interested  
9 in the outcome of this action.  
10

11                   IN WITNESS WHEREOF, I have subscribed my  
12 name this 26th day of April, 2012.  
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\_\_\_\_\_  
16                   PATRICIA L. HUBBARD, CSR #3400  
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