

# Exhibit C

**EXHIBIT 10**  
**UNDER SEAL**

1 UNITED STATES INTERNATIONAL TRADE COMMISSION  
2 WASHINGTON, D.C.

3  
4 In the Matter of:

Investigation No.

5 CERTAIN ELECTRONIC DIGITAL  
6 MEDIA DEVICES AND COMPONENTS 337-TA-796  
7 THEREOF  
8  
9

10 CONFIDENTIAL ATTORNEYS' EYES ONLY  
11 PURSUANT TO THE PROTECTIVE ORDER  
12

13  
14 VIDEOTAPED DEPOSITION OF DANIELE DE IULIIS  
15 San Francisco, California  
16 Wednesday, February 22, 2012  
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22  
23 REPORTED BY:

24 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR

25 JOB NO. 45581

1 APPEARANCES:

2  
3 FOR COMPLAINANT APPLE INC.:

4 MORRISON & FOERSTER

5 BY: HAROLD J. McELHINNY, ESQ.

425 Market Street

6 San Francisco, California 94105

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9  
10 FOR RESPONDENTS SAMSUNG ELECTRONICS COMPANY,  
LTD., SAMSUNG ELECTRONICS AMERICA, INC., and  
11 SAMSUNG TELECOMMUNICATIONS AMERICA, LLC:

12 QUINN EMANUEL URQUHART & SULLIVAN

13 BY: SCOTT B. KIDMAN, ESQ.

865 South Figueroa Street

14 Los Angeles, California 90017

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16  
17 ALSO PRESENT:

18 Danielle Coleman, Esq., Apple Inc.

19 Lisa Olle, Esq., Apple Inc.

20 Pete Sais, Videographer

1 just maybe circle that line that we're talking  
2 about?

3 A. Circle?

4 Q. Or indicate it with an arrow, yes, and  
5 label that A.

6 A. (Witness complies.)

7 Q. So the dashed line that we've labeled  
8 as A -- first of all, does that look like a  
9 dashed line to you?

10 A. Yes.

11 Q. And do you know what that particular  
12 line depicts --

13 MR. McELHINNY: Objection.

14 BY MR. KIDMAN:

15 Q. -- in the '678 patent?

16 A. I don't.

17 Q. And above the dashed line that we've  
18 labeled A is a -- is a second dashed line.

19 Do you see that?

20 A. I do.

21 Q. And do you know what that second dashed  
22 line depicts in the '678 patent?

23 MR. McELHINNY: Objection.

24 THE WITNESS: I don't.

25 //

1 BY MR. KIDMAN:

2 Q. And looking at Figure 1, if you look at  
3 the front face of the device, do you see a series  
4 of diagonal lines?

5 A. I do.

6 Q. And do you know what those diagonal  
7 lines depict in the '678 patent?

8 MR. McELHINNY: Objection.

9 THE WITNESS: I don't.

10 BY MR. KIDMAN:

11 Q. And looking at the chin of the device,  
12 there is a circle in dashed lines.

13 Do you see that?

14 A. I do.

15 Q. And do you know what that circle and  
16 dashed lines depict in the '678 patent?

17 MR. McELHINNY: Objection.

18 THE WITNESS: I don't.

19 BY MR. KIDMAN:

20 Q. If you turn the page to Figure 3, and  
21 Figure 3 is described in the patent as a front  
22 view of the device. And do you see in Figure 3 a  
23 solid rectangular line that is above the dashed  
24 circular line in the chin and below the  
25 lozenge-shaped opening that's in the forehead?

1 A. I see the rectangle.

2 Q. And do you know what that rectangle  
3 depicts in the '678 patent?

4 MR. McELHINNY: Objection.

5 THE WITNESS: I don't know what that  
6 depicts.

7 BY MR. KIDMAN:

8 Q. And then do you see a second solid line  
9 that -- well, let me focus you.

10 Do you see a dashed line that runs  
11 around the perimeter of the front of the device  
12 shown in Figure 3?

13 A. This line here (indicating)?

14 Q. The outermost --

15 A. Yes --

16 Q. -- dashed line.

17 A. -- I see it.

18 Q. Okay. And then inside of that  
19 outermost dashed line is a second dashed line  
20 that runs contiguous with the outermost dashed  
21 line.

22 Do you see that?

23 MR. McELHINNY: Objection.

24 THE WITNESS: I don't know if I would  
25 use "contiguous." It's -- yeah, it's not

1 contiguous. I see this dashed line.

2 BY MR. KIDMAN:

3 Q. You see the outermost dashed line and  
4 then to the interior you see a second dashed  
5 line --

6 A. I do.

7 Q. -- also follows the same outline as  
8 that first same dashed line; correct?

9 A. Yes.

10 Q. And then do you also see a solid line  
11 that follows the same path as that second dashed  
12 line?

13 A. I see that line.

14 Q. And do you know what that -- what that  
15 solid line represents or depicts in the '678  
16 patent?

17 MR. MCELHINNY: Objection.

18 THE WITNESS: I don't know what that  
19 depicts.

20 BY MR. KIDMAN:

21 Q. How is it that you recognize the design  
22 that's shown in the '678 patent as being the  
23 original iPhone?

24 A. I can see that it is a representation  
25 of the iPhone when I look at all the images, but



1 as to what each specific line represents, as I  
2 said earlier, I'm not a patent lawyer or patent  
3 draftsman, and I don't know what those lines  
4 may or may not represent.

5 Q. Do you know what invention is claimed  
6 by the '678 patent?

7 MR. McELHINNY: Objection.

8 THE WITNESS: I don't recall.

9 BY MR. KIDMAN:

10 Q. If you take a look at Figure 1, does  
11 Figure 1 show a continuous glass surface on the  
12 front of the device?

13 MR. McELHINNY: Objection.

14 THE WITNESS: I don't know.

15 BY MR. KIDMAN:

16 Q. Does Figure 1 show a continuous flat  
17 surface on the top of the device?

18 MR. McELHINNY: Objection.

19 THE WITNESS: I don't know.

20 BY MR. KIDMAN:

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]



1                   :SS

2       COUNTY OF SAN MATEO )

3                   I, CYNTHIA MANNING, a Certified Shorthand  
4       Reporter of the State of California, do hereby  
5       certify:

6                   That the foregoing proceedings were taken  
7       before me at the time and place herein set forth;  
8       that any witnesses in the foregoing proceedings,  
9       prior to testifying, were placed under oath; that  
10      a verbatim record of the proceedings was made by  
11      me using machine shorthand which was thereafter  
12      transcribed under my direction; further, that the  
13      foregoing is an accurate transcription thereof.

14                  I further certify that I am neither  
15      financially interested in the action, nor a  
16      relative or employee of any attorney of any of  
17      the parties.

18  
19                  IN WITNESS WHEREOF, I have subscribed  
20      my name this 22nd day of February 2012.

21  
22                   \_\_\_\_\_  
23                  CYNTHIA MANNING, CSR No. 7645, CCRR, CLR

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25                   I N D E X