

# **KANG DECLARATION EXHIBIT 15**

**Exhibit 44**  
**(Submitted Under Seal)**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE, INC., a California  
corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS, CO., LTD.,  
a Korean business entity;  
SAMSUNG ELECTRONICS AMERICA,  
INC., a New York corporation;  
SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC, a Delaware limited  
liability company,

Defendants.

---

SAMSUNG ELECTRONICS, CO., LTD.,  
a Korean business entity;  
SAMSUNG ELECTRONICS AMERICA,  
INC., a New York corporation;  
SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC, a Delaware limited  
liability company,

Counterclaim-Plaintiffs,

v.  
APPLE, INC., a California  
corporation,

Counterclaim-Defendant.

\*\*\* HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*\*

VIDEOTAPED PERSONAL DEPOSITION OF:  
HANGIL SONG

February 8, 2012  
Kim & Chang  
Seoul, South Korea  
9:02 A.M. - 2:20 P.M.

1 BY MR. STERN:

2 Q. Based on your work designing the Prevail,  
3 Mr. Song, you don't have any recollection of the nature of  
4 the front surface of the Prevail?

5 MS. CARUSO: Objection, mischaracterizes the  
6 prior testimony, vague.

7 A. When it comes to the design of the front  
8 surface, actually the boundaries are quite vague. This is  
9 because the corner portions are curved, so it's hard to  
10 tell whether it belongs to the front surface or bottom  
11 surface or side surface. So because of that ambiguity of  
12 the borders, it's hard to answer your question.

13 BY MR. STERN:

14 Q. So you're not able to tell me whether the front  
15 face of the Prevail is -- consists of a piece of glass  
16 extending from the edge to edge of the device; is that  
17 correct?

18 MS. CARUSO: Objection, mischaracterizes the  
19 testimony, vague.

20 A. No.

21 BY MR. STERN:

22 Q. Do you recall, Mr. Song, any alternative  
23 designs that you considered when you were working on the  
24 design of the Prevail?

25 MS. CARUSO: Objection, vague.

1           A.       There are a lot of alternative designs in order  
2 to complete a single design. For example, when you  
3 determine your hairstyle, there are a lot of options that  
4 you can consider.

5 BY MR. STERN:

6           Q.       Do you recall any of those options that you  
7 considered with respect to the Prevail?

8           A.       If we look at the top view of this drawing,  
9 this is the main concept that we used. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18           Q.       When you refer to the "line," are you referring  
19 to the thin shiny and metallic-looking edge that runs  
20 around the face of the phone?

21           MS. CARUSO: Objection, vague, mischaracterizes  
22 the record, lacks foundation. The witness does not have  
23 the phone in front of him.

24           A.       What you are referring to as "metallic-looking"  
25 is actually plastic, and what I was referring to was that

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

SEOUL )  
 )  
KOREA )

I, Michael E. Miller, Registered Diplomat Reporter, Certified Realtime Reporter, do hereby certify that the aforementioned witness was first duly sworn by me pursuant to stipulation of counsel to testify to the truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of any party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand this February 9, 2012.

MICHAEL E. MILLER  
Certified Realtime Reporter  
Registered Diplomat Reporter  
Realtime Systems Administrator