

# EXHIBIT 3

*Apple v. Samsung*, No. 11-01846  
**EXHIBIT 3a**  
 Apple's Witness List

<b>Witnesses Apple Expects to Present at Trial</b>		
<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Balakrishnan, Ravin	Previously provided	Dr. Balakrishnan is a Professor of Computer Science at the University of Toronto. His fields of expertise include computer science, human-computer interaction, and computer user interfaces. Dr. Balakrishnan may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the '381 patent, Samsung's infringement of that patent, the validity of that patent, and the functionality and operation of Samsung's Accused Products.
Blevins, Tony	Previously provided	Mr. Blevins is currently the Vice President of Procurement at Apple. Mr. Blevins may testify regarding Apple's history, products, components, supply chain and procurement, supplier relationships, and technology, and the sales and marketing of Apple's products.
Bressler, Peter	Previously provided	Mr. Bressler, FIDSA, is an industrial designer and an adjunct professor at the University of Pennsylvania. Mr. Bressler may testify regarding the contents of and subjects disclosed in his expert reports, including the industrial design, background, and state of the art of the D'889, D'677, and D'087 patents, Samsung's infringement and Apple's practice of those patents, the validity and non-functionality of those patents, and the non-functionality of Apple's asserted trade dress.
Chapman, Greg	Previously provided	Mr. Chapman is currently an engineer at Apple and may testify regarding the design, development, research, operation, function, performance, features, and/or structure of the accused Apple products.

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Donaldson, Richard	Previously provided	Mr. Donaldson was formerly a licensing executive at Texas Instruments and has expertise in licensing and intellectual property valuation, including with respect to declared-essential patents. He may testify regarding the subjects disclosed in his expert reports, including without limitation FRAND licensing; whether Samsung's licensing offers were consistent with FRAND; the appropriate FRAND rate for Samsung's declared-essential UMTS patents; including the patents-in-suit, and the Samsung-Intel license.
Dourish, Paul	Previously provided	Dr. Dourish is a Professor of Informatics in the Donald Bren School of Information and Computer Sciences at the University of California, Irvine. His fields of expertise include computer science, mobile computing systems, human-computer interaction, embedded systems, and user interface design and operation. Dr. Dourish may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the asserted claims of the '893 patent, the interpretation of the asserted claims of the '893 patent, the invalidity of the '893 patent, the design and operation of Apple's Accused Products as they relate to the asserted claims of the '893 patent, and Apple's non-infringement of the asserted claims of the '893 patent.
Forstall, Scott	Previously provided	Mr. Forstall is the Senior Vice President of iOS software at Apple and a named inventor of the '163 patent. Mr. Forstall may testify regarding the graphical user interfaces in Apple products such as the iPhone and iPad, the design and development process for these interfaces, and the inventions of the '381, 915, and '163 utility patents and their significance.

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<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Gitlin, Richard	Previously provided	Dr. Gitlin is a Distinguished Professor of Electrical Engineering at the University of South Florida. Dr. Gitlin's fields of expertise include, among other things, wireless networking and telecommunications. Dr. Gitlin may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the '604 and '792 patents, the invalidity of the '604 patent, the design and operation of Apple's Accused Products as they relate to the asserted claims of the '604 patent, and Apple's non-infringement of the asserted claims of the '604 patent. Dr. Gitlin may also testify as to alternative technologies to the '604 and '792 patents.
Givargis, Tony	Previously provided	Dr. Givargis is a Professor of Computer Science at the University of California, Irvine. His fields of expertise include computer science, computer architecture, and software design. Dr. Givargis may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the asserted claims of the '711 patent, the invalidity of the '711 patent, the design and operation of Apple's Accused Products as they relate to the asserted claims of the '711 patent, and Apple's non-infringement of the asserted claims of the '711 patent.

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Hamkins, Jon	Previously provided	Dr. Hamkins is a technical supervisor at NASA's Jet Propulsion Laboratory. Dr. Hamkins' fields of expertise include, among other things, channel coding, information theory, modulation, synchronization, and communications technology. Dr. Hamkins may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the '410 patent, and alternative technologies to the '410 patent.
Hauser, John	Previously provided	Dr. Hauser is the Kirin Professor of Marketing at the MIT Sloan School of Management. His field of expertise includes marketing research, customer satisfaction, and consumer decision-making. Dr. Hauser may testify regarding the contents of and subjects disclosed in his expert report, including the conjoint studies that he conducted to determine the price premium Samsung consumers are willing to pay for the features associated with the patents-in-suit.
Hedge, Alan	Previously provided	Dr. Hedge is a Professor in the Department of Design and Environmental Analysis at Cornell University and a Research Professor in the Department of Mechanical and Aerospace Engineering at Syracuse University. Dr. Hedge may testify regarding the contents of and subjects disclosed in his expert report, including the field of ergonomics and human factors, the non-functionality of the D'889, D'677, D'087, and D'305 patents, and the non-functionality of Apple's asserted trade dress.

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<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Kare, Susan	Previously provided	Ms. Kare is an icon designer and user interface graphic designer. Ms. Kare may testify regarding the contents of and subjects disclosed in her expert reports, including icon and user interface graphics design, the background of and state of the art relevant to the D'305 patent, Samsung's infringement and Apple's practice of that patent, the validity and non-functionality of that patent, and the non-functionality of Apple's asserted trade dress.
Kim, Emilie	Previously provided	Ms. Kim is currently a software engineer at Apple on the Photos and Camera apps team. Ms. Kim may testify regarding Apple prior art and the design, development, research, operation, function, performance, and features of the accused Apple products.
Kim, Hyong	Previously provided	Dr. Kim is a Professor of Electrical and Computer Engineering at Carnegie Mellon University. Dr. Kim's fields of expertise include wireless communication networks and the areas of network management and control systems. Dr. Kim may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the asserted claims of the '516, the claims of the '516 patent, the invalidity of the asserted claims of the '516 patent, the design and operation of Apple's Accused Products as they relate to the asserted claims of the '516 patent, and Apple's non-infringement of the asserted claims of the '516 patent. Dr. Kim may also testify as to alternative technologies to the '516 patent.

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<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Knighly, Edward	Previously provided	Dr. Knighly is a Professor of Electrical and Computer Engineering at Rice University. His fields of expertise include mobile and wireless communication networks and high-performance protocol design, analysis, and implementation, as well as deployment of testbeds. Dr. Knighly may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the asserted claims of the '941 patent, the asserted claims of the '941 patent, the invalidity of the '941 patent, the design and operation of Apple's Accused Products as they relate to the asserted claims of the '941 patent, and Apple's non-infringement of the asserted claims of the '941 patent. Dr. Knighly may also testify as to alternative technologies to the '941 patent.
Musika, Terry	Previously provided	Mr. Musika is a CPA with over 37 years of experience and is a managing director and co-founder of Invotex Group. His fields of expertise include accounting, finance, valuation, business planning, and economic damages analysis. Mr. Musika may testify regarding the contents of and subjects disclosed in his expert reports, including the damages that Apple has suffered due to Samsung's violation of Apple's intellectual property and a rebuttal of certain damages Samsung may seek in connection with Samsung's counterclaims. Mr. Musika may also testify in rebuttal to Dr. O'Brien regarding the contents of and subjects disclosed in his expert report concerning defects in the methodology, assumptions, and data used by Dr. O'Brien in calculating a reasonable royalty for the three Samsung feature patents.

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Ordoover, Janusz	Previously provided	Dr. Ordoover is a Professor of Economics at New York University. His fields of expertise include industrial organization, antitrust and regulation economics. He may testify regarding the contents of and subjects disclosed in his expert reports, including without limitation relevant industry background; standardization of IPR; FRAND licensing; the definition of the relevant input technologies markets; the effect of Samsung's conduct on those markets; Samsung's market power; and the effects of Samsung's conduct on downstream competition.
Poret, Hal	Previously provided	Mr. Poret is an expert in the design and execution of consumer surveys. Mr. Poret may testify regarding the contents of and subjects disclosed in his expert report, including the methodology and results of his surveys to test consumer recognition of the iPhone and iPad trade dresses.
Rossi, Peter	Previously provided	His fields of expertise include marketing, statistics, economics, and survey research. Dr. Rossi may testify regarding the contents of and subjects disclosed in his expert report, including defects in the methodology, assumptions, and data of Dr. Sukumar, and the reasons why Dr. Sukumar's opinions concerning alleged use of the patented features and the value of the feature patents are invalid and unreliable and an improper basis for calculating damages, in rebuttal to Dr. Sukumar and Dr. O'Brien.

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<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Schiller, Phil	Previously provided	Mr. Schiller is the Senior Vice President of Worldwide Product Marketing at Apple. Mr. Schiller may testify regarding Apple's marketing for Apple mobile devices such as the iPhone and iPad, including information on advertising strategy and expenditures, sales figures, other publicity for these products, internal market research, and the marketing, advertising, and retail channels for both Apple's and competitors' products. Mr. Schiller also may testify regarding drivers of demand for devices such as Apple's iPhone and iPad products and the competitive market for mobile devices, such as smartphones and tablets.
Singh, Karan	Previously provided	Dr. Singh's fields of expertise include computer science, human-computer interaction, and computer user interfaces. Dr. Singh may testify regarding the contents of and subjects disclosed in his expert reports and declarations, including the technical background and state of the art relevant to the asserted claims of the '163 and '915 patents, Samsung's infringement of those patents, the validity of those patents, and the functionality and operation of Samsung's Accused Products as they relate to those patents.
Sood, Sanjay	Previously provided	Dr. Sood is an Associate Professor at the Anderson Graduate School of Management of the University of California, Los Angeles. Dr. Sood may testify regarding the contents of and subjects disclosed in his expert report, including the importance of design in consumer choice, Apple's brand equity, and the impact of Samsung's accused products on Apple's product designs and overall brand.

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Srivastava, Mani	Previously provided	Dr. Srivastava's fields of expertise include mobile computing systems, embedded systems, low-power systems, wireless sensing, and wireless networks. Dr. Srivastava may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the asserted claim of the '460 patent, the invalidity of the '460 patent, the design and operation of Apple's Accused Products as they relate to the asserted claim of the '460 patent, and Apple's non-infringement of the asserted claim of the '460 patent.
Stark, Wayne	Previously provided	Dr. Stark is a Professor of Electrical Engineering and Computer Science at the University of Michigan, Ann Arbor. Dr. Stark's fields of expertise include, among other things, wireless communication systems. Dr. Stark may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the '867 and alternative technologies to that patent.
Stringer, Chris	Previously provided	Mr. Stringer is currently a Senior Director of Industrial Design at Apple and is a co-inventor on the D'889, D'677, and D'087 patents. Mr. Stringer may testify regarding the industrial design process at Apple, the background, conception, and reduction to practice of those patents, other designs considered by Apple, and the background, design, and success of Apple's products.

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Teksler, Boris	Previously provided	Mr. Teksler is the Director of Patent Licensing and Strategy at Apple. Mr. Teksler may testify regarding Apple's practices and policies with respect to licensing of its intellectual property and Apple's efforts to stop Samsung from violating Apple's intellectual property and proprietary technology. Mr. Teksler may also testify concerning Apple's licensing negotiations with Samsung, the costs incurred by Apple in defense of Samsung's assertion of declared-essential patents, FRAND licensing, and Apple's licenses relating to UMTS declared-essential patents.
Van Liere, Kent	Previously provided	Dr. Van Liere is an expert in statistics and survey research methods. He may testify regarding the contents of and subjects disclosed in his expert report, including the methodology and results of his surveys, whether consumers associate Samsung phones with Apple, and whether consumers confuse the source of the Samsung Galaxy Tab 10.1 with Apple.
Veeravalli, Venugopal	Previously provided	Dr. Veeravalli is a Professor of Electrical and Computer Engineering at the University of Illinois at Urbana-Champaign. Dr. Veeravalli may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and state of the art relevant to the '001 patent, and alternative technologies to the '001 patent.

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<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Walker, Martin	Previously provided	Dr. Walker is a consultant at Glew Engineering and the Chief Executive Officer of Brass Rat Group, Inc. Dr. Walker's fields of expertise include, among other things, software and integrated circuit design. Dr. Walker may testify regarding the contents of and subjects disclosed in his expert reports, including the technical background and code relevant to the '604 patent and the design and operation of Apple's Accused Products as they relate to the '604 patent.
Walker, Michael	Previously provided	Dr. Walker is the former Chair of the European Telecommunications Standards Institute ("ETSI") Board and has expertise with respect to ETSI's IPR policy as well as disclosure and licensing of declared standards-essential patents. He may testify regarding the contents of and subjects disclosed in his expert report, including without limitation the ETSI IPR policy, Samsung's failure timely to disclose the '516, '941, '001, '410, '604, '792 and '867 patents, Samsung's irrevocable commitments to ETSI under the ETSI IPR policy to license those patents, and its breach of such commitments by seeking injunctive relief in this case.
Watrous, Bruce "BJ"	Previously provided	Mr. Watrous is the Vice President & Chief IP Counsel at Apple and may testify concerning Apple's licensing negotiations with Samsung, the costs incurred by Apple in defense of Samsung's assertion of declared-essential patents, FRAND licensing, and Apple's licenses relating to UMTS declared-essential patents.

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<b>Name</b>	<b>Address</b>	<b>Substance of Testimony to Be Given</b>
Winer, Russell	Previously provided	Dr. Winer is the William Joyce Professor of Marketing and the Chair of the Marketing Department at the Stern School of Business, New York University. Dr. Winer may testify regarding the content of and subjects disclosed in his expert reports, including the strength of Apple's brand, the relationship between Apple's product design and the strength of Apple's brand, the strength and fame of Apple's asserted trade dress, Samsung's infringement and dilution of Apple's asserted trade dress, and the impact that Samsung's accused products have on Apple's product designs and the overall Apple brand.

<b>Witnesses Apple MAY CALL at Trial if the Need Arises</b>		
<b>Name</b>	<b>Address</b>	<b>Proposed Purpose of Testimony</b>
Anzures, Freddy	Previously provided	Mr. Anzures is currently a Designer at Apple and is a co-inventor on the D'305 patent. Mr. Anzures may testify regarding the D'305 patent, including its background, conception, and reduction to practice, the design process at Apple, other designs considered by Apple, and the background, design, and success of Apple's products. Mr. Anzures also may testify regarding the design and development of the iPhone user interface unveiled at MacWorld 2007.
Beyer, Tom	Morrison & Foerster LLP 425 Market St. San Francisco, CA 94105	Mr. Beyer is a legal assistant in the San Francisco office of Morrison & Foerster, counsel for Apple. Mr. Beyer may testify regarding the parties' productions in this case, including the authenticity of documents and devices produced by Apple.

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<b>Name</b>	<b>Address</b>	<b>Proposed Purpose of Testimony</b>
Buckley, Mark	Previously provided	Mr. Buckley is a financial analyst at Apple, Inc. Mr. Buckley may testify regarding information from Apple's internal systems relating to Apple's financial results, Apple's manufacturing capacity, and the profitability of Apple's products and services.
Christie, Greg	Previously provided	Mr. Christie is the Vice President of Human Interface at Apple and a named inventor of the '163 patent. Mr. Christie may testify regarding the graphical user interfaces in Apple products such as the iPhone and iPad, the design and development process for these interfaces, and the inventions of the '381, 915, and '163 utility patents and their significance.
Denison, Justin	Address known to Samsung	Mr. Denison is STA's Chief Strategy Officer. He may be called to testify regarding the development, design, sales and marketing of the accused Samsung products, Samsung's awareness of and consideration of Apple, its products, and its intellectual property, competition between Apple and Samsung in the smartphone and tablet markets, and the pricing and hardware and software design of Samsung's accused products.
Hill, Arthur Lee IV	Sony Mobile Communications USA, 3333 Piedmont Rd., Suite 600 Atlanta, GA 30305	Mr. Hill is the General Counsel for Sony Mobile Communications (USA) Inc. He may be called to testify to the authenticity of sales records produced by Sony Mobile Communications (USA) Inc. and other Sony business records.

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<b>Name</b>	<b>Address</b>	<b>Proposed Purpose of Testimony</b>
Joswiak, Greg	Previously provided	Mr. Joswiak is the Vice President for iPod, iPhone, and iOS Product Marketing at Apple. Mr. Joswiak may testify regarding Apple's marketing for Apple's iOS devices such as the iPhone, including Apple's advertising strategy and expenditures, sales figures, other publicity for these products, and internal market research, and the marketing, advertising, and retail channels for both Apple's and competitors' products. Mr. Joswiak also may testify regarding the competitive market for mobile devices, such as smartphones.
Keeper of the Records	Sony Ericsson Mobile Communications 100 Redwood Shores Parkway, Redwood City, CA	The Keeper of the Records may be called to testify to the authenticity of sales records produced by Sony Mobile Communications (USA) Inc. and other Sony business records.
Lutton, Richard J.	Previously provided	Mr. Lutton is the former Chief Patent Counsel at Apple. Mr. Lutton may testify regarding Apple's practices and policies with respect to licensing of its intellectual property, Apple's efforts to stop Samsung from violating Apple's intellectual property and using Apple's proprietary technology, and communications between Apple and Samsung including licensing negotiations.
Ording, Bas	Previously provided	Mr. Ording is the named inventor of the '381 patent and may testify regarding its invention.
Platzer, Andrew	Previously provided	Mr. Platzer is a named inventor of the '915 patent and may testify regarding its invention.

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<b>Name</b>	<b>Address</b>	<b>Proposed Purpose of Testimony</b>
Rosenbrock, Karl Heinz	Previously provided	Mr. Rosenbrock is the former Director-General of ETSI and was retained by Samsung as an expert witness in this and prior litigation. Mr. Rosenstock may be called to testify concerning the subjects of his deposition, including without limitation the IPR policies of ETSI.
Samsung Custodian of Records	Address known to Samsung	Samsung's Custodian of Records may be called to testify regarding the authenticity of documents and devices produced by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.
Schroepfer, Peter	Morrison & Foerster LLP 425 Market St. San Francisco, CA 94105	Mr. Schroepfer is a Korean Language Translator and may testify regarding the parties' Korean language interpretations.
Sittler, Ed	Morrison & Foerster LLP 425 Market St. San Francisco, CA 94105	Mr. Sittler is a legal assistant in the San Francisco office of Morrison & Foerster, counsel for Apple. Mr. Sittler may testify regarding the parties' productions in this case, including the authenticity of documents and devices produced by Apple.
Sohn, Dale	Address known to Samsung	Mr. Sohn is the CEO of STA and an officer at SEC. Mr. Sohn may be called to testify regarding the accused Samsung products, including their sale, marketing, and development, the relationship between SEC and STA, Samsung's analysis and consideration of Apple's products, designs, and technology, and the direction and implementation of campaigns relating to Apple.

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Tchao, Michael	Previously provided	Mr. Tchao is the Vice President of iPad Product Marketing at Apple. Mr. Tchao may testify regarding Apple's marketing for Apple's iPad devices, including the advertising strategy and expenditures, sales figures, other publicity for these products, and internal market research for these devices, and the marketing, advertising, and retail channels for both Apple's and competitors' products. Mr. Tchao may testify regarding the competitive market for tablets.

Deposition Designations

Witnesses	Substance of Testimony To Be Given
Ahn, Seung-Ho <sup>1</sup>	Mr. Ahn is the head of the IP Center at Samsung. Apple may present testimony from Mr. Ahn concerning the subjects of his depositions, including without limitation Samsung's licenses and licensing practices.
Benner, Timothy	Mr. Benner is STA's Senior Manager of Consumer Insights and Analytics. Apple may present testimony from Mr. Benner concerning the subjects of his deposition, including without limitation consumer surveys in Samsung's possession relating to the smartphone and tablet markets.
Blasius, Brian	Mr. Blasius is a licensing executive at Motorola Mobility and previously at Motorola, Inc. Apple may present testimony from Mr. Blasius concerning the subjects of his deposition, including without limitation Motorola's licensing negotiations with Samsung.
Brunner, Robert	Mr. Brunner is the former head of Apple's Industrial Design group. Apple may present testimony from Mr. Brunner concerning the subjects of his deposition, including without limitation alleged prior art designs.
Chang, Dong Hoon <sup>1</sup>	Mr. Chang is a Senior Vice President at Samsung and head of SEC's Mobile Design Group. Apple may present testimony from Mr. Chang concerning the subjects of his depositions, including without limitation the accused Samsung products, Samsung's design and development process and strategy, the availability of alternative designs, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and customer confusion relating to tablet designs.
Chen, Stephanie	Ms. Chen is an employee at TBWA/Media Arts Lab. Apple may present testimony from Ms. Chen concerning the subjects of her deposition, including without limitation Apple's advertisements for the iPhone and iPad products and Apple's advertising strategy, content, media placement, and expenditures.
Cheong, Joseph	Mr. Cheong is STA's Chief Financial Officer. Apple may present testimony from Mr. Cheong concerning the subjects of his deposition, including without limitation Samsung's financial results, the profitability of the accused Samsung products, competition between Apple and Samsung, and Samsung's awareness of Apple's proprietary technology, intellectual property, and claims for patent infringement and trade dress violation.

Witnesses	Substance of Testimony To Be Given
Cheung, Benjamin	Dr. Cheung is currently a lead system engineer at Alcatel Lucent. Apple may present testimony from Dr. Cheung concerning the subjects of his deposition, including without limitation the interpretation of technical standards, the design, development, research, operation, function, performance, features, structure, and/or standards compliance of the radio network controller and base station hardware used with the accused Apple products, and communications with network operators concerning implementation of particular features.
Cho, Joon-Young	Mr. Cho is listed as a co-inventor on the '516 patent and currently works as a principal engineer at Samsung. Apple may present testimony from Mr. Cho concerning the subjects of his deposition, including without limitation the technical background and state of the art relevant to the asserted claims of the '516 patent, the '516 patent and the asserted claims of the '516 patent, the delayed disclosure of the '516 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.
Cho, Nara	Mr. Cho is a member of Samsung's Smartphone Planning Group. Apple may present testimony from Mr. Cho concerning the subjects of his deposition, including without limitation the Galaxy Tab 10.1, Samsung's design and development of the Galaxy Tab 10.1, the reasons for customer returns of the Galaxy Tab 10.1, and Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property.
Cho, Seungwhan	Mr. Cho is an executive at Samsung. Apple may present testimony from Mr. Cho concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, Samsung's competitive intelligence practices, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authentication of certain documents.
Choi, Sung Ho <sup>1</sup>	Mr. Choi is a standards engineer at Samsung. Apple may present testimony from Mr. Choi concerning the subjects of his depositions, including without limitation Samsung's standards-setting policies and procedures, Samsung's policies and procedures about the decisions to seek patents on standardized technology, and the facts relating to Samsung's participation in 3GPPP.

Witnesses	Substance of Testimony To Be Given
Choi, Gee-sung	Mr. Choi is the head of Samsung Group's corporate strategy and recently served as CEO and Vice Chairman of Samsung Electronics. Apple may present testimony from Mr. Choi regarding the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, Samsung's corporate strategy and structure, and Samsung's practices and actions concerning the retention and preservation of documents.
Choi, Gin-kyu	Mr. Choi is a former Samsung employee and an inventor listed on the '792 patent. Apple may present testimony from Mr. Choi concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '792 patent.
Choi, Joon III <sup>1</sup>	Mr. Choi is a senior manager in the Mobile Communications Division of SEC. Apple may present testimony from Mr. Choi concerning the subjects of his depositions, including without limitation the accused Samsung products, Samsung's product planning and market strategy, its design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property.
Choi, Soon-Jae	Mr. Choi is a former Samsung employee and an inventor listed on the '410 patent. Apple may present testimony from Mr. Choi concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '410 patent
Chung, Minhyung <sup>1</sup>	Mr. Chung is a member of the IP Center at Samsung. Apple may present testimony from Mr. Chung concerning the subjects of his depositions, including without limitation Samsung licenses and licensing practices.
Conley, Cira	Ms. Conley is a corporate representative for Gravity Tank. Apple may present testimony from Ms. Conley concerning the subjects of her deposition, including without limitation Gravity Tank's relationship with and work for Samsung.

Witnesses	Substance of Testimony To Be Given
Denison, Justin <sup>1</sup>	Mr. Denison is STA's Chief Strategy Officer. Apple may present testimony from Mr. Denison concerning the subjects of his depositions or trial testimony, including without limitation the accused Samsung products, Samsung's sales and marketing of the accused products, Samsung's design and development process and strategy, competition between Apple and Samsung, the overall U.S. smartphone and tablet markets, and Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and intellectual property.
Eun, Sung-Ho	Mr. Sung-ho Eun is an engineer at Samsung. Apple may present testimony from Mr. Eun concerning the subjects of his deposition, including without limitation the design, development, conception, reduction to practice, and/or prosecution of the '893 patent.
Hong, Wong Pyo	Mr. Hong is an Executive Vice President and the head of SEC's global product strategy. Apple may present testimony from Mr. Hong concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, the availability of alternative designs, Samsung's consideration, analysis and emulation of Apple's designs, technology, products, and/or intellectual property, Samsung's corporate strategy and structure, and the availability of alternative designs.
Jeong, Moon-Sang	Mr. Jeong is a Senior Engineer at Samsung. Apple may present testimony from Mr. Jeong concerning the subjects of his deposition, including without limitation the design, development, conception, reduction to practice, and/or prosecution of the '711 patent, the scope and content of the prior art, and Samsung products that purportedly practice the '711 patent.
Kang, Hee-Won <sup>1</sup>	Mr. Kang is a Samsung employee and an inventor listed on the face of the '867 patent. Apple may present testimony from Mr. Kang concerning the subjects of his depositions, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '867 patent.
Karo, Monica	Ms. Karo is President, Integrated Accounts at OMD. Apple may present testimony from Ms. Karo concerning the subjects of her deposition, including without limitation Apple's advertisements for the iPhone and iPad products and Apple's advertising strategy, content, media placement, and expenditures.

Witnesses	Substance of Testimony To Be Given
Kerstetter, Corey	Mr. Kerstetter is STA's Vice-President of Business Planning and Operations. Apple may present testimony from Mr. Kerstetter concerning the subjects of his deposition, including without limitation competition between Apple and Samsung and the similarities in appearance between Apple's and Samsung's products.
Kho, Wookyun	Mr. Kho is an engineer in SEC's Advanced Development Software Group 1. Apple may present testimony from Mr. Kho concerning the subjects of his deposition, including without limitation Samsung's implementation of the bounce feature in its products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authenticity of certain documents.
Kim, Ahyoung <sup>1</sup>	Ms. Kim is a senior designer at SEC. Apple may present testimony from Ms. Kim concerning the subjects of her depositions, including without limitation Samsung's interaction with carriers relating to design, its design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the availability of alternative designs.
Kim, Bora <sup>1</sup>	Mr. Kim is a designer at SEC. Apple may present testimony from Mr. Kim concerning the subjects of his depositions, including without limitation Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, the availability of alternative designs, and alleged functional constraints surrounding smartphone designs.
Kim, Byungwook	Mr. Kim is an engineer in the application framework group at Samsung. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation Samsung's knowledge of Apple's patents and the authenticity of certain documents.
Kim, Hun Kee	Mr. Kim is a Samsung employee and an inventor listed on the '792 patent. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '792 patent.

Witnesses	Substance of Testimony To Be Given
Kim, Jae Yoel	Mr. Kim is a Samsung employee and an inventor listed on the '867 patent. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '867 patent.
Kim, Jinsoo <sup>1</sup>	Mr. Kim is an industrial designer at Samsung. Apple may present testimony from Mr. Kim concerning the subjects of his depositions, including without limitation the design and development of Samsung's smartphone and tablet computer devices including the Galaxy Tab 10.1, the availability of alternative designs, alleged functional constraints surrounding tablet design, and Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property.
Kim, Min-Goo <sup>1</sup>	Mr. Kim is a Samsung employee and an inventor listed on the '410 and '001 patents. Apple may present testimony from Mr. Kim concerning the subjects of his depositions, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '410 and '001 patents.
Kim, Minkyung	Ms. Kim is a user interface designer at Samsung. Apple may present testimony from Ms. Kim concerning the subjects of her deposition, including without limitation the accused Samsung products, the design and development of Samsung's graphical user interfaces, alleged functional constraints for Samsung's user interfaces, the availability of alternative designs, Samsung's ability to alter its user interfaces, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the visual appearance of Samsung's user interfaces in relation to Apple's user interfaces.
Kim, Noh-Sun	Mr. Kim is a Samsung employee and an inventor listed on the '792 patent. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '792 patent.
Kim, Se-Hyoung	Mr. Kim is a Samsung employee and an inventor listed on the '410 and '001 patents. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '410 and '001 patents.

Witnesses	Substance of Testimony To Be Given
Kim, Sehyun	Mr. Kim is an engineer at third party ThinkFree. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation the source code and operation of the ThinkFree Office application on Samsung's accused products.
Kim, Seong Guen <sup>1</sup>	Mr. Kim is a vice president at SEC responsible for mobile design at the Mobile Communication Business Division. Apple may present testimony from Mr. Kim concerning the subjects of his depositions, including without limitation the accused Samsung devices, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the availability of alternative designs.
Kim, Seongwoo <sup>1</sup>	Mr. Kim is the director of IP licensing at Samsung. Apple may present testimony from Mr. Kim concerning the subjects of his depositions and the topics for which he was designated as a corporate representative, including without limitation Samsung's licenses and licensing practices.
Kim, Soeng-Hun	Mr. Kim is listed as a co-inventor on the '941 patent and a senior engineer at Samsung. Apple may present testimony from Mr. Kim concerning the subjects of his deposition, including without limitation the technical background and state of the art relevant to the asserted claims of the '941 patent, the '941 patent and the asserted claims of the '941 patent, the delayed disclosure of the '941 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.
Kim, Young-Bum <sup>1</sup>	Mr. Kim is listed as a co-inventor on the '516 patent and is a senior engineer at Samsung. Apple may present testimony from Mr. Kim concerning the subjects of his depositions, including without limitation the technical background and state of the art relevant to the asserted claims of the '516 patent, the '516 patent and the asserted claims of the '516 patent, the delayed disclosure of the '516 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.

Witnesses	Substance of Testimony To Be Given
Kwak, Yong-Jun <sup>1</sup>	Mr. Kwak is listed as a co-inventor on the '516 patent and currently works at Samsung. Apple may present testimony from Mr. Kwak concerning the subjects of his depositions, including without limitation the technical background and state of the art relevant to the asserted claims of the '516 patent, the '516 patent and the asserted claims of the '516 patent, the delayed disclosure of the '516 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.
Lam, Ioi <sup>1</sup>	Mr. Lam is an engineer at Samsung. Apple may present testimony from Mr. Lam concerning the subjects of his depositions, including without limitation the accused Samsung products, the user interface and functionality of the accused Samsung products, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authenticity of certain documents.
Lee, DonJoo <sup>1</sup>	Mr. Lee is the Head of Sales and Marketing for the Mobile Business Unit at Samsung. Apple may present testimony from Mr. Lee concerning the subjects of his depositions, including without limitation the accused Samsung products, Samsung's design and development process and strategy, Samsung's business and marketing strategy, and the availability of alternative designs.
Lee, GiYoung <sup>1</sup>	Ms. Lee is an industrial designer at Samsung. Apple may present testimony from Ms. Lee regarding the subjects of her depositions, including without limitation the accused Samsung products, the design and development of Samsung's smartphone devices, the availability of alternative designs, alleged functional constraints surrounding smartphone design, and Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property.
Lee, HyeJung	Ms. Lee is an assistant designer at SEC. Apple may present testimony from Ms. Lee concerning the subjects of her deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its competitive intelligence practices, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authenticity of certain documents.

Witnesses	Substance of Testimony To Be Given
Lee, Hyeon Woo	Dr. Lee was a principal engineer at Samsung. Apple may present testimony from Dr. Lee concerning the subjects of his deposition, including without limitation the design, development, conception, reduction to practice, and/or prosecution of the '604 patent, the scope and content of the prior art, and Samsung products that purportedly practice the '604 patent and/or components therein. Dr. Lee may also testify regarding Samsung's standards-setting activities, standards-setting policies and procedures, and IPR disclosure practices and procedures, including technical proposals and other submissions to ETSI and 3GPP.
Lee, JuHo <sup>1</sup>	Mr. Lee is listed as a co-inventor on the '516 patent and is a principal engineer at Samsung. Apple may present testimony from Mr. Lee concerning the subjects of his depositions, including without limitation the technical background and state of the art relevant to the asserted claims of the '516 patent, the '516 patent and the asserted claims of the '516 patent, the delayed disclosure of the '516 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.
Lee, Jun-Sung	Mr. Lee is a Samsung employee and an inventor listed on the '792 patent. Apple may present testimony from Mr. Lee concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '792 patent.
Lee, JunWon <sup>1</sup>	Mr. Lee is SEC's Director of Licensing. Apple may present testimony from Mr. Lee concerning the subjects of his deposition or for which he was designated as a corporate representative, including without limitation Samsung's awareness of Apple's patents, Samsung's notice of Apple's claims of patent infringement and trade dress violations, and the lack of any Samsung licenses comparable to the intellectual property at issue. Apple may also present testimony from Mr. Lee concerning Samsung's licenses and licensing practices and Samsung's policies and practices for participating at ETSI and 3GPP.
Lee, Kiwon <sup>1</sup>	Mr. Lee is a lead engineer at SEC. Apple may present testimony from Mr. Lee concerning the subjects of his depositions or trial testimony, including without limitation the accused Samsung devices, Samsung's devices' interpretation of touch inputs, scrolling and gestures, the source code for the Samsung devices, Samsung's competitive intelligence practices, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, products, and/or technology, and the authenticity of certain exhibits.

Witnesses	Substance of Testimony To Be Given
Lee, MinHyouk <sup>1</sup>	Mr. Lee is vice president of the Mobile Communications Division Design Team at SEC. Apple may present testimony from Mr. Lee concerning the subjects of his depositions or trial testimony, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the availability of alternative designs.
Lee, Sanguen	Mr. Lee is a Manager at Samsung. Apple may present testimony from Mr. Lee concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's business and marketing strategy, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, Samsung's sales to and communications with Best Buy, and Samsung's customer surveys.
Lee, Seung Yun	Ms. Lee is an engineer at Samsung. Apple may present testimony from Ms. Lee concerning the subjects of her deposition, including but not limited to Samsung's implementation of the bounce feature in Samsung's accused products, its awareness, consideration, analysis, and emulation of Apple designs, technology, products, and/or intellectual property, and the authenticity of certain documents.
Lee, Sungsik	Mr. Lee is a Vice President in the UX Design part of SEC. Apple may present testimony from Mr. Lee concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authenticity of certain documents.
Lee, YunJung <sup>1</sup>	Ms. Lee is a principal designer at SEC. Apple may present testimony from Ms. Lee concerning the subjects of her depositions, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, the availability of alternative designs, and the authenticity of certain documents.

Witnesses	Substance of Testimony To Be Given
Ling, Qi	Mr. Ling is an engineer at Samsung. Apple may present testimony from Mr. Ling concerning the subjects of his deposition, including without limitation the accused Samsung products, the user interface and functionality of Samsung's accused products, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authenticity of certain documents.
Mauney, Daniel	Mr. Mauney is a former employee of HumanCentric Technologies. Apple may present testimony from Mr. Mauney concerning the subjects of his deposition, including HumanCentric's work for Samsung.
Merrill, Travis <sup>2</sup>	Mr. Merrill is a Director of Product Marketing at SEA. Apple may present testimony from Mr. Merrill concerning the subjects of his depositions or for which he was designated as a corporate representative, including without limitation the accused Samsung products, Samsung's manufacturing and sales activities, and the production, supply chain, and sales channels for the accused Samsung products.
Moon, Yong-Suk	Mr. Moon is a Samsung employee and an inventor listed on the '792 patent. Apple may present testimony from Mr. Moon concerning the subjects of his deposition, including without limitation Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '792 patent.
Nam, Ki Hyung <sup>1</sup>	Mr. Nam is a senior engineer at SEC. Apple may present testimony from Mr. Nam concerning the subjects of his depositions or trial testimony, including the authenticity of certain documents.
Oh, Jeong Seok	Mr. Oh is a senior engineer at Samsung. Apple may present testimony from Mr. Oh concerning the subjects of his deposition, including without limitation the design, development, conception, reduction to practice, and/or prosecution of the '460 patent, the scope and content of the prior art, and Samsung products that purportedly practice the '460 patent.
Paltian, Markus	Mr. Paltian is a senior specialist, firmware development at Intel Mobile Communications. Apple may present testimony from Mr. Paltian concerning the subjects of his deposition, including without limitation the interpretation of technical standards and the design, development, research, operation, function, performance, features, structure, and/or standards compliance of the baseband processor used in the accused Apple products.

Witnesses	Substance of Testimony To Be Given
Park, Chang Soo	Mr. Park is a principal engineer at Samsung. Apple may present testimony from Mr. Park concerning the subjects of his deposition, including without limitation the design, development, conception, reduction to practice, and/or prosecution of the '604 patent, the scope and content of the prior art, and Samsung products that purportedly practice the '604 patent and/or components therein. Apple also may present testimony from Mr. Park regarding Samsung's standards-setting activities, standards-setting policies and procedures, and IPR disclosure practices and procedures, including technical proposals and other submissions to ETSI and 3GPP.
Park, Hyoung Shin <sup>1</sup>	Ms. Park is a Senior Designer at Samsung. Apple may present testimony from Mr. Lee concerning the subjects of her depositions or trial testimony, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the availability of alternative designs.
Park, Junho	Mr. Park is a director of product planning at Samsung. Apple may present testimony from Mr. Park concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, Samsung's competitive intelligence practices, and the authenticity of certain documents.
Park, Sang-Ryul	Mr. Park is a principal engineer at Samsung. Apple may present testimony from Mr. Park concerning the subjects of his deposition, including without limitation the design, development, conception, reduction to practice, and/or prosecution of the '460 patent, the scope and content of the prior art, and Samsung products that purportedly practice the '460 patent.
Park, Seunggun	Mr. Park is Senior Vice President of the IP Center at Samsung. Apple may present testimony from Mr. Park concerning the subjects of his deposition, including Samsung's compliance with and understanding of the ETSI IPR policy regarding FRAND licensing, its patent disclosures and FRAND commitments, and its licenses and licensing negotiations.

Witnesses	Substance of Testimony To Be Given
Pendleton, Todd <sup>1</sup>	Mr. Pendleton is STA's Chief Marketing Officer. Apple may present testimony from Mr. Pendleton concerning the subjects of his depositions, including without limitation the accused Samsung products, Samsung's and Apple's product designs, competition between Apple and Samsung, Samsung's marketing and advertising with respect to the feature patents, Samsung's business, and the overall U.S. smartphone and tablet markets.
Roarty, Sean	Mr. Roarty was the corporate designee of Bloomberg LP. Apple may present testimony from Mr. Roarty concerning the subjects of his deposition, including without limitation the design and development of Bloomberg terminals, alleged functional constraints, and the availability of alternative designs.
Rosenberg, Brian	Mr. Rosenberg is STA's Senior Vice President of Mobile Phone and Tablet Sales. Apple may present testimony from Mr. Rosenberg concerning the subjects of his deposition, including without limitation information concerning sales, pricing, retail channels, and carriers of Samsung's accused products, competition between Apple and Samsung, Samsung's business, Samsung's business strategies, and the overall U.S. smartphone and tablet markets.
Rosenbrock, Karl Heinz <sup>1</sup>	Mr. Rosenbrock is an expert witness retained by Samsung in this and prior litigation. He is the former Director-General of ETSI. Apple may present testimony from Mr. Rosenbrock concerning the subjects of his depositions, including without limitation the IPR policies of ETSI.
Rowden, Tim <sup>2</sup>	Mr. Rowden is STA's Vice President and General Manager for the Verizon account. Apple may present testimony from Mr. Rowden concerning the subjects of his deposition and for which he was offered as a corporate representative, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its competitive intelligence practices, and its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property.
Ryu, DongSeok	Mr. Ryu is responsible for UX negotiations with carriers at SEC. Apple may present testimony from Mr. Ryu concerning the subjects of his deposition, including without limitation Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, Samsung's ability to alter user interfaces, Samsung's business strategies, and the visual appearance of Samsung's user interfaces in relation to Apple's user interfaces.

Deposition Designations

Witnesses	Substance of Testimony To Be Given
Schin, MinCheol	Mr. Schin is an executive for SEC's Android Development Group 1. Apple may present testimony from Mr. Schin concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, the user interface and functionality of Samsung's accused products, and the authenticity of certain documents.
Sheppard, Tim <sup>1</sup>	Mr. Sheppard is STA's Vice President of Finance and Operations. Apple may present testimony from Mr. Sheppard concerning the subjects of his depositions, including without limitation the financial results and profitability of Samsung's accused products, Samsung's productions of financial information to Apple, Samsung's tax relationship with the United States and transfer/allocation of profits between the three named defendants, the pricing and sales of Samsung's accused products, and Samsung's relationships with wireless network carriers.
Shin, Jaegwan <sup>1</sup>	Mr. Shin is an engineer at Samsung. Apple may present testimony from Mr. Shin concerning the subjects of his depositions, including without limitation the accused Samsung products, the user interface and functionality of the accused Samsung products, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the authenticity of certain documents.
Sim, Jaehwang	Mr. Sim is a Vice President within the management support team at SEC. Apple may present testimony from Mr. Sim concerning the subjects of his deposition, including without limitation the financial results and profitability of Samsung's accused products and Samsung's production of financial information to Apple.
Sohn, Dale	Mr. Sohn is STA's President and Chief Executive Officer. Apple may present testimony from Mr. Sohn concerning the subjects of his deposition, including without limitation the accused Samsung products, competition between Apple and Samsung, similarity of Apple's and Samsung's products, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and its awareness of Apple's claims for patent infringement and trade dress violations.

Witnesses	Substance of Testimony To Be Given
Song, Hangil <sup>1</sup>	Mr. Song is a senior designer at SEC. Apple may present testimony from Mr. Song concerning the subjects of his depositions, including without limitation the accused Samsung products, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, the design and development of Samsung's tablet computer devices and smartphone devices, the availability of alternative designs, and alleged functional constraints surrounding tablet design.
Van Der Velde, Himke	Mr. Van Der Velde is listed as a co-inventor on the '941 patent and currently works as a standards engineer at Samsung. Apple may present testimony from Mr. Van Der Velde concerning the subjects of his deposition, including without limitation the technical background and state of the art relevant to the asserted claims of the '941 patent, the '941 patent and the asserted claims of the '941 patent, the delayed disclosure of the '941 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.
Van Lieshout, Gert-Jan	Mr. Van Lieshout is listed as a co-inventor on the '941 patent, currently works as a standards engineer at Samsung, and is a past Chairman of the 3GPP RAN 2 working group. Apple may present testimony from Mr. Van Lieshout concerning the subjects of his deposition, including without limitation the technical background and state of the art relevant to the asserted claims of the '941 patent, the '941 patent and the asserted claims of the '941 patent, the delayed disclosure of the '941 patent to ETSI, the general patenting and IPR disclosure process at Samsung, and Samsung's incentives to patent and/or contribute to technical standards.
Wang, Jeeyeun	Jeeyeun Wang is a senior designer at SEC. Apple may present testimony from Mr. Wang concerning the subjects of his deposition, including without limitation Samsung's interaction with carriers relating to design, its design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, and the availability of alternative designs.
Wesel, Richard	Dr. Wesel is a professor of electrical engineering at UCLA and was retained by Samsung in this litigation. Dr. Wesel purports to be an expert in, among other things, error control coding and communication systems. Apple may present testimony from Dr. Wesel concerning the subjects of his deposition, including without limitation alternative technologies to Samsung's declared-essential patents.

Deposition Designations

Witnesses	Substance of Testimony To Be Given
Woo, Hyun Goo	Mr. Woo is a senior engineer at SEC's mobile communications division. Apple may present testimony from Mr. Woo concerning the subjects of his deposition, including without limitation the accused Samsung products, Samsung's design and development process and strategy, its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, the user interface and functionality of the browser application on the accused Samsung products, and the authenticity of certain documents.
Yeo, JungMin	Ms. Yeo is an industrial designer at Samsung. Apple may present testimony from Ms. Yeo concerning the subjects of her deposition, including without limitation the accused Samsung products, the design and development of Samsung's tablet computer devices and smartphone devices, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property, the availability of alternative designs, and alleged functional constraints surrounding tablet design.
Yi, Sun Young	Ms. Yi is a user interface designer at Samsung. Apple may present testimony from Ms. Yi concerning the subjects of her deposition, including without limitation the accused Samsung products, the design and development of Samsung's graphical user interfaces, alleged functional constraints for user interfaces, the availability of alternative designs, Samsung's ability to alter the user interfaces, Samsung's awareness, consideration, analysis, and emulation of Apple's designs, technology, and products, and the visual appearance of Samsung's user interfaces in relation to Apple's user interfaces.
Yoo, Seung Hun	Mr. Yoo is a senior designer at SEC. Apple may present testimony from Mr. Yoo concerning the subjects of his deposition, including without limitation the accused Samsung devices, Samsung's design and development process and strategy, and its awareness, consideration, analysis, and emulation of Apple's designs, technology, products, and/or intellectual property.
Yoon, Jae-Seung	Mr. Yoon is a Samsung employee and an inventor listed on the '792 patent. Apple may present testimony from Mr. Yoon concerning the subjects of his deposition, including Samsung's participation in 3GPP and ETSI and the existence of alternative technologies to the '792 patent.

EXHIBIT 3b

Deposition Designations

Witnesses	Substance of Testimony To Be Given
Zorn, Andre	Mr. Zorn is currently a senior staff engineer at Intel Mobile Communications. Apple may present testimony from Mr. Zorn concerning the subjects of his deposition, including without limitation the interpretation of technical standards, and the design, development, research, operation, function, performance, features, structure, and/or standards compliance of the processor used in the accused Apple products.

Name : N.D. Cal. Case No. 11-cv-1846 only

Name<sup>1</sup>: N.D. Cal. Case No. 11-cv-1846; also ITC No. 337-TA-794, -796<sup>†</sup>

Name<sup>2</sup>: ITC No. 337-TA-794, -796 only

<sup>†</sup>Apple conditionally identifies for designation testimony from International Trade Commission Investigation Nos. 337-TA-794 & 796, based on its expectation that Samsung intends to do so.