EXHIBIT D

Exhibit D

Objections to Deposition Designations

Samsung generally objects to Apple's planned designation of deposition testimony from the 794 Investigation (with the exception of specific transcripts as to which the parties have agreed to cross-use).

Witness from Whom Apple Intends to Designate Testimony	Objections
Seung-Ho Ahn (NDCAL and ITC testimony)	
Timothy Benner	
Brian Blasius	
Robert Brunner	Samsung objects to the designation of testimony from Mr. Brunner on the grounds that Apple has not demonstrated that he is unavailable pursuant to Federal Rule of Civil Procedure 32(a)(4).
Dong Hoon Chang	
Stephanie Chen	
Joseph Cheong	Samsung objects to any testimony of Mr. Cheong beyond the scope of Apple's representations to the Court in its motion to compel as to the subjects on which it intended to depose him.
Benjamin Cheung	
Joon-Young Cho	
Nara Cho	
Seungwhan Cho	
Sung Ho Choi (NDCAL and ITC testimony)	
Gee-sung Choi	
Gin-kyu Choi	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Joon Ill Choi (NDCAL and ITC testimony)	
Soon-Jae Choi	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Minhyung Chung (NDCAL and ITC testimony)	

Witness from Whom Apple Intends to Designate Testimony	Objections
Cira Conley	
Justin Denison (NDCAL and ITC testimony)	
Sung-Ho Eun	
Wong Pyo Hong	
Moon-Sang Jeong	
Hee-Won Kang (NDCAL and ITC testimony)	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Monica Karo	
Corey Kerstetter	
Wookyun Kho	
Ahyoung Kim (NDCAL and ITC testimony)	
Bora Kim (NDCAL and ITC testimony)	
Byungwook Kim	
Hun Kee Kim	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Jae Yoel Kim	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Jinsoo Kim (NDCAL and ITC testimony)	
Min-Goo Kim (NDCAL and ITC testimony)	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Minkyung Kim	
Noh-Sun Kim	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Se-Hyoung Kim	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Sehyun Kim	
Seong Guen Kim (NDCAL and ITC testimony)	
Seongwoo Kim (NDCAL and ITC testimony)	
Soeng-Hun Kim	
Young-Bum Kim (NDCAL and ITC	

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Witness from Whom Apple Intends to Designate Testimony	Objections
testimony)	
Yong-Jun Kwak (NDCAL and ITC testimony)	
Ioi Lam (NDCAL and ITC testimony)	Samsung objects to the designation of testimony from Mr. Lam on the grounds that Apple has not demonstrated that he is unavailable pursuant to Federal Rule of Civil Procedure 32(a)(4).
DonJoo Lee (NDCAL and ITC testimony)	
GiYoung Lee (NDCAL and ITC testimony)	
HyeJung Lee	
Hyeon Woo Lee	
JuHo Lee (NDCAL and ITC testimony)	
Jun-Sung Lee	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
JunWon Lee (NDCAL and ITC testimony)	
Kiwon Lee (NDCAL and ITC testimony)	
MinHyouk Lee (NDCAL and ITC testimony)	
Sanguen Lee	
Seung Yun Lee	
Sungsik Lee	
YunJung Lee (NDCAL and ITC testimony)	
Qi Ling	Samsung objects to the designation of testimony from Mr. Ling on the grounds that Apple has not demonstrated that he is unavailable pursuant to Federal Rule of Civil Procedure 32(a)(4).
Daniel Mauney	
Travis Merrill (ITC testimony)	
Young-Suk Moon	Samsung objects to designations from this witness on the ground the witness is an inventor of patent(s) that are no longer being asserted and hence irrelevant.
Ki Hyung Nam (NDCAL and ITC testimony)	
Jeong Seok Oh	
Markus Paltian	
Chang Soo Park	
Hyoung Shin Park (NDCAL and ITC testimony)	
Junho Park	
Sang-Ryul Park	
Seunggun Park	

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Witness from Whom Apple Intends to Designate Testimony	Objections
Todd Pendleton (NDCAL and ITC testimony)	
Sean Roarty	
Brian Rosenberg	
Karl Heinz Rosenbrock (NDCAL and ITC	
testimony)	
Tim Rowden (ITC testimony)	
DongSeok Ryu	
MinCheol Shin	
Tim Sheppard (NDCAL and ITC testimony)	
Jaegwan Shin (NDCAL and ITC testimony)	Samsung objects to the designation of testimony from Mr. Shin on the grounds that Apple has not demonstrated that he is unavailable pursuant to Federal Rule of Civil Procedure 32(a)(4).
Jaehwang Sim	
Dale Sohn	
Hangil Song (NDCAL and ITC testimony)	
Himke Van Der Velde	
Gert-Jan Van Lieshout	
Jeeyeun Wang	
Richard Wesel	Samsung objects to designations from this witness on the ground the witness is an expert regarding patent(s) that are no longer being asserted and hence irrelevant.
Hyun Goo Woo	
JungMin Yeo	
Sun Young Yi	
Seung Hun Yoo	
Jae-Seung Yoon	Samsung objects to designations from this
	witness on the ground the witness is an
	inventor of patent(s) that are no longer being
	asserted and hence irrelevant.
Andre Zorn	

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