

# EXHIBIT 1

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY  
SUBJECT TO PROTECTIVE ORDER

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

APPLE INC.,

V.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC. AND SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC

Case No. 11-CV-01846-LHK

**EXPERT REPORT OF JEFFREY JOHNSON, PH.D.  
REGARDING NON-INFRINGEMENT OF U.S. PATENT NO. 7,469,381**

68. **Contacts Feature 1: Blue glow.** In devices with blue glow, when the user attempts to translate the list past the edge of the document, the user encounters a hard stop but a blue glow is overlaid near the edge of the document. No area beyond the edge of the electronic document is displayed, and no translation of the document occurs in the second direction. Because devices with Contacts that include Contacts Feature 1 (blue glow) do not display an area beyond the edge of the electronic document and do not translate the electronic document in a second direction, they do not infringe the independent claims of the '381 Patent.

**Browser**

**At least 3 Non-infringing Features in Browser**

	Product	Android Version	Feature		
			1	2	3
1	Exhibit 4G	2.3.3			
2	Galaxy Ace	2.3.4			
3	Galaxy S II	2.3.5			X
4	Galaxy Tab 7.0	2.2	X	X	
5	Galaxy Tab 10.1	3.1		X	
6	Gravity Smart	2.2.2			

69. **Browser Feature 1: Hard Stop.** When the user attempts to translate the webpage past the edge of the document, the user encounters a hard stop. No area beyond the edge of the electronic document is displayed, and no translation of the document occurs in the second direction when the finger is lifted off. Because devices with Browser that include Browser Feature 1 (hard stop) do not display an area beyond the edge of the electronic document and do not translate the electronic document in a second direction, they do not infringe the independent claims of the '381 Patent.

70. **Browser Feature 2: “Escapable” Scroll lock.** In devices with Browser Feature 2 (“escapable” scroll lock), when the user initially begins movement of her finger in a near vertical or horizontal direction, Browser locks the translation of the webpage into constrained vertical or horizontal translation. However, if the user’s finger movement deviates sufficiently from vertical or horizontal respectively, then the initial scroll lock is broken and the webpage then tracks the user’s finger, unconstrained in two dimensions. As described below, applications running in two-dimensional mode without a constraint on translation of the document do not meet both “first direction” limitations of the claims of the ’381 Patent, and consequently do not infringe the ’381 Patent.

71. **Browser Feature 3: Blue Glow.** In devices with blue glow, when the user attempts to translate the webpage past the edge of the document, the user encounters a hard stop but a blue glow is overlaid near the edge of the document. No area beyond the edge of the electronic document is displayed, and no translation of the document occurs in the second direction. Because devices with Browser that include Browser Feature 3 (blue glow) do not display an area beyond the edge of the electronic document and do not translate the electronic document in a second direction, they do not infringe the independent claims of the ’381 Patent.

**ThinkFree Office**

At least 2 Non-infringing Features in ThinkFree Office Application

	Product	TFO Version	Feature	
			1	2
1	Continuum	2.0.0810.01		X
2	Droid Charge	2.0.110222		X
3	Epic 4G	2.0.110222		X
4	Exhibit 4G	2.0.110222		X
5	Fascinate	2.0.0604.01	X	

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6	Galaxy Ace		NO TFO	
7	Galaxy Prevail	2.0.110919		X
8	Galaxy S (i9000)	2.0.110222		X
9	Galaxy S 4G	2.0.111005	X	
10	Galaxy S Showcase (i500)	2.0.110222		X
11	Galaxy Tab 7.0	2.0.0604.01		X
12	Indulge	2.0.1115.01		X
13	Intercept	2.0.1115.01		X
14	Mesmerize	2.0.0810.01		
15	Replenish	2.0.110222		X
16	Sidekick	2.0.110222		X

72. **ThinkFree Office Feature 1:** Vertical layout of pages. When ThinkFree Office display pages of a PDF document in a vertical layout, there is no snapping behavior observed on any of the edges. Rather, the user encounters a hard stop on all of the external edges. No area beyond the edge of the electronic document is displayed, and no translation of the document occurs in the second direction. Because devices with ThinkFree Office that include ThinkFree Office Feature 1 (Vertical layout of pages) do not display an area beyond the edge of the electronic document and do not translate the electronic document in a second direction, they do not infringe the independent claims of the '381 Patent.

73. **ThinkFree Office Feature 2:** Horizontal layout of pages. When ThinkFree Office displays pages of a PDF document in a horizontal layout, the behavior of ThinkFree Office is similar to Gallery Feature 1. General snapping behavior is observed on all right and left edges of pages except the left edge of the first page and right edge of the last page. Because the Court has interpreted the '381 Patent claims to require '381 Style Snap-back on all potentially scrollable edges, devices with ThinkFree Office that include ThinkFree Office Feature 2 (Horizontal layout of pages) do not infringe the '381 Patent.

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74. In the table below, I indicate which non-infringing features I observed in the accused applications in the accused devices:

	Product	Gallery				Contacts	Browser			ThinkFree Office	
		1	2	3	4		1	2	3	1	2
1	Captivate	X	X								
2	Continuum	X	X								X
3	Droid Charge	X	X								X
4	Epic 4G				X	X					X
5	Exhibit 4G	X	X								X
6	Fascinate	X	X							X	
7	Galaxy Ace	X	X							NO TFO	
8	Galaxy Prevail				X						X
9	Galaxy S (i9000)	X	X								X
10	Galaxy S II				X	X			X		
11	Galaxy S 4G				X	X				X	
12	Galaxy S Showcase (i500)				X						X
13	Galaxy Tab 7.0	X					X	X			X
14	Galaxy Tab 10.1	X						X			
15	Gravity Smart	X	X								
16	Gem										
17	Indulge	X	X								X
18	Infuse 4G	X	X								
19	Intercept										X
20	Mesmerize	X	X								
21	Nexus S	X	X	X							
22	Nexus S 4G	X	X								
23	Replenish	X	X								X
24	Sidekick	X	X								X
25	Vibrant	X	X								

- ❖ 4 non-infringement features in the Gallery Application:
  - Feature 1: general snapping behavior (See Exhibit 3)
  - Feature 2: hold still (See Exhibit 4)
  - Feature 3: hard stop (See Exhibit 5)