

EXHIBIT 2

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

3
4 APPLE, INC., a California Corporation

5 vs. CN:11-CV-01846-LHK

6 SAMSUNG ELECTRONICS COMPANY,

7 LTD, a Korean business entity; SAMSUNG

8 ELECTRONICS AMERICA, INC., a New

9 York Corporation; SAMSUNG

10 TELECOMMUNICATIONS AMERICA, LLC,

11 a Delaware Limited Liability Company.

12 _____/

13
14
15 The videorecorded deposition of RAVIN

16 BALAKRISHNAN, PH.D., was held on Friday, April 20,

17 2012, commencing at 9:07 A.M., at the Law Offices of

18 Quinn Emanuel, 1299 Pennsylvania Avenue, N.W., Suite

19 825, Washington, D.C., before Ronda J. Thomas, a

20 Notary Public.

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22
23 REPORTED BY:

24 Ronda J. Thomas, RPR, CLR

25 JOB NO. 48807

1 A That's not quite what I said before. 11:05

2 What I said before is I'm accusing the 11:05

3 particular products that are listed in paragraph 37, 11:05

4 running those particular applications that I examined 11:05

5 in counsel's office and every other product out there 11:05

6 that is of the same model and version of software and 11:05

7 hardware, and also, I've looked at the code for each of 11:05

8 these that are in the family of code and any device of 11:05

9 the same type that's running that same chunk of code 11:05

10 would also infringe. 11:05

11 (Balakrishnan Exhibit 5 was marked for 11:05

12 purposes of identification.) 11:05

13 Q I'm going to mark, as Exhibit 5, a Galaxy 11:06

14 Tab 7.0. 11:06

15 MR. BUSEY: This is Exhibit 5? 11:06

16 MR. JOHNSON: Right. 11:06

17 MR. BUSEY: Could I see that just a moment? 11:06

18 Thank you. 11:06

19 Q You've accused the Browser feature of this 11:07

20 particular device of infringing, right? 11:07

21 A And you're representing this is the Galaxy 11:07

22 Tab 7.0? 11:07

23 Q You tell me what it is. 11:07

24 A It says Galaxy Tab. It looks like the 7.0, 11:07

25 but you can't tell whether, can't 100 percent tell 11:07

1 without the box. 11:07

2 Q Yeah, it's the 7.0. 11:07

3 A Okay. 11:07

4 Q So you've accused the Browser feature of 11:07

5 infringing in this particular device, right? 11:08

6 A I've accused it in the device I saw at 11:08

7 counsel's office -- sorry, Apple's counsel's office -- 11:08

8 and to the extent it's the same device on the same 11:08

9 software, it would infringe. 11:08

10 Q Okay. Well, take a look at the Browser 11:08

11 function on, on this particular device, and this is the 11:08

12 way it came out of the box. 11:08

13 And I want to ask you whether this 11:08

14 particular Browser function infringes the '381 patent? 11:08

15 (Witness reading.) 11:11

16 A So this particular version of the Browser 11:13

17 that I'm looking at on this Galaxy Tab appears to do a 11:13

18 hard stop instead of the functionality of the '381 11:13

19 patent. 11:13

20 Q And you don't know what version of Browser 11:13

21 you looked at on the Galaxy Tab that's referenced in 11:13

22 your report? 11:13

23 A As I said, it was the default Browser that 11:13

24 came on the device. 11:13

25 Q You don't know what that is, though? 11:13