

EXHIBIT 7
FILED UNDER SEAL

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION

4 --oOo--

5 APPLE, INC., A CALIFORNIA)
6 CORPORATION,)
7 PLAINTIFF,) No. 11-CV-01846-LHK
8 vs.)
9 SAMSUNG ELECTRONICS CO.,)
10 LTD., A KOREAN BUSINESS)
11 ENTITY; SAMSUNG ELECTRONICS)
12 AMERICA, INC., A NEW YORK)
13 CORPORATION; SAMSUNG)
14 TELECOMMUNICATIONS AMERICA,)
15 LLC, A DELAWARE LIMITED)
16 LIABILITY COMPANY,)
17 DEFENDANTS.)
18 _____)

19
20 VIDEOTAPED DEPOSITION OF IOI KIM LAM
21 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
22 San Francisco, California
23 Thursday, March 8, 2012

24 Reported By:
KATHLEEN WILKINS, CSR #10068, RPR, CRR, CCRR, CLR
25 JOB NO. 47476

1 & Foerster representing Apple. 10:02

2 MR. BRIGGS: Todd Briggs from Quinn 10:02

3 Emanuel representing Samsung and the witness 10:02

4 Mr. Lam, and also with me is Michelle Yang from 10:02

5 Samsung. 10:02

6 THE VIDEOGRAPHER: Would the court 10:02

7 reporter please swear in the witness. 10:02

8 IOI KIM LAM, 10:02

9 having been duly sworn, 10:02

10 was examined and testified as follows: 10:02

11 --oOo-- 10:02

12 THE VIDEOGRAPHER: Please begin. 10:02

13 EXAMINATION BY MR. MONACH 10:02

14 BY MR. MONACH: 10:02

15 Q. Good morning, Mr. Lam. 10:02

16 A. Good morning. 10:02

17 Q. Have you ever had your deposition taken 10:02

18 before? 10:03

19 A. No. 10:03

20 Q. My name is Andrew Monach. I represent 10:03

21 Apple in a lawsuit against Samsung. And I'm here 10:03

22 to ask you some questions that will be 10:03

23 transcribed. 10:03

24 Do you understand that? 10:03

25 A. Yes. 10:03

1 A. That's what the log says. 01:54

2 Q. Okay. And these logs are supposed to be 01:54
3 accurate so that you have a record of what changes 01:55
4 have been made to the source code, right? 01:55

5 A. As I mentioned to you before, we have 01:55
6 very -- we are not very organized in terms of 01:55
7 maintaining the logs. I write a better log. So 01:55
8 you see the prettiest e-mail, I had more detailed 01:55
9 log. That's a few paragraphs. This is a single 01:55
10 liner, so that was done by an engineer that's not 01:55
11 following the -- the common practices of recording 01:55
12 more detailed information. 01:55

13 Q. Okay. But you understand what changing 01:55
14 the bounce speed and browser to match iPad means, 01:55
15 right? 01:55

16 A. Speed has many meanings. Speed could 01:55
17 mean performance, and I usually mean it could mean 01:55
18 the number of frames that are taken that could be 01:55
19 rendered per second. So this, although it has 01:55
20 speed, it could mean smoothness. 01:55

21 Q. So whether it means speed or smoothness, 01:56
22 you'd agree this is indicating a change on the 01:56
23 bounce feature in the browser to match what the 01:56
24 iPad does, right? 01:56

25 A. It seems to indicate that he's -- he 01:56

1 might have measured the frames per second in how 01:56
2 many times the -- the browser could render to the 01:56
3 screen. At that point, he's rendering speed, 01:56
4 seems to be close or around what the iPad could 01:56
5 render. 01:56

6 Q. Okay. Do you recall any instances of 01:56
7 engineers in the Samsung lab changing the bounce 01:56
8 speed in the Samsung browser to make it more 01:56
9 similar to the iPad? 01:56

10 A. I don't remember seeing that. As I 01:57
11 mention to you, our group is focused on 01:57
12 performance, so we are more focused on frames per 01:57
13 second, how many frames the application can render 01:57
14 to the screen and not how fast things moves on the 01:57
15 screen as appear to the user. 01:57

16 Q. In the Android code that you were using 01:57
17 when you got frustrated by the -- let me rephrase 01:57
18 that. 01:57

19 You testified earlier today about 01:57
20 Android code that did not have what you described 01:58
21 as the elastic bounce effect. 01:58

22 Do you recall that? 01:58

23 A. Yes. 01:58

24 Q. When you pulled a web page to its -- to 01:58
25 its end using that Android code by itself, did the 01:58

1 device glow at the edge or have any indication 01:58
2 that you had reached the end of the web page other 01:58
3 than freezing? 01:58
4 A. Which version of Android? 01:58
5 Q. Whatever version you were talking about 01:58
6 when you testified earlier today. 01:58
7 A. There were different versions. I think 01:58
8 the first version that I looked at, the indication 01:58
9 was that the page stops moving. 01:58
10 Q. And was there a later version of -- with 01:58
11 no glow of any kind; is that what you're saying? 01:58
12 A. What do you mean by glow? 01:59
13 Q. Do you understand the word "glow"? 01:59
14 A. Glow. So -- 01:59
15 Q. Any -- 01:59
16 A. Glow -- 01:59
17 Q. Any emission of light that wasn't there 01:59
18 before you reached the end of the web page? 01:59
19 A. So on earlier versions of Android, there 01:59
20 is a shadow at the top of the page. And when you 01:59
21 scroll to the top of the page, you will see a 01:59
22 shadow and that could be interpreted by someone as 01:59
23 a glow. 01:59
24 Q. Have you ever seen in a version of 01:59
25 Android a different kind of indication of reaching 01:59

1 the end of a web page where there was actually a 01:59
2 glow of some kind of color, whether it be orange 01:59
3 or blue? 01:59
4 A. Yes. 01:59
5 Q. And what versions of Android had that 01:59
6 glow feature? 01:59
7 A. I don't remember the version. It could 02:00
8 be 2.2 or 2.3. 02:00
9 Q. Do you know whether any Samsung 02:00
10 commercial products use that glow feature instead 02:00
11 of the elastic bounce that you described? 02:00
12 A. Commercial products? As I mentioned to 02:00
13 you, I am not familiar with the commercial 02:00
14 business. I've been designated as a witness for 02:00
15 the lab which is producing internally-used source 02:00
16 code, so I do not know one way or the other. 02:00
17 MR. MONACH: Okay. Let's mark as next 02:00
18 in order an e-mail dated June 9th, 2011, Bates 02:00
19 number SAMNDCA525379. 02:00
20 (Whereupon, Deposition Exhibit 2404 02:01
21 was marked for identification.) 02:01
22 MR. MONACH: Which number are we on now? 02:01
23 THE REPORTER: 2404. 02:01
24 BY MR. MONACH: 02:01
25 Q. Mr. Lam, do you have what's been marked 02:01

1 as Exhibit 2404 in front of you? 02:01

2 A. Yes. 02:01

3 Q. Is this a copy of an e-mail that you 02:01

4 sent to Jaegwan Shin and Qi Ling on or around 02:01

5 June 9th, 2011? 02:01

6 A. Yeah, that seems to be the case. 02:01

7 Q. All right. It responds -- you're 02:01

8 responding to an e-mail from Mr. Shin dated that 02:01

9 same day, June 9th, 2011 right? 02:01

10 A. Yes. 02:02

11 Q. And there's a reference to scrolling and 02:02

12 the iPad not doing horizontal scroll once vertical 02:02

13 scroll is starting while P4 is doing 02:02

14 horizontal/vertical scroll at the same time. 02:02

15 Do you see that? 02:02

16 A. One vertical scroll ... yes, I see that 02:02

17 sentence. 02:02

18 Q. And Mr. Shin is writing to you saying 02:02

19 this can cause unintentional horizontal scrolling 02:02

20 during vertical scrolling, right? 02:02

21 A. Yes. 02:02

22 Q. And you respond, "Hi Mr. Shin, Now I 02:02

23 understand. Will try to fix this one." 02:02

24 Do you see that? 02:02

25 A. Yes. 02:02