

EXHIBIT 8
FILED UNDER SEAL

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

4 APPLE INC., a California)
corporation,)

5)
6 Plaintiff,)

7 vs.) No: 11-CV-01846-LHK

8 SAMSUNG ELECTRONICS CO., LTD,)
a Korean business entity;)

9 SAMSUNG ELECTRONICS AMERICA,)

INC., a New York corporation;)

10 SAMSUNG TELECOMMUNICATIONS)

AMERICA, LLC, a Delaware)

limited liability company)

11)
12 Defendants.)

13 _____)

14 **HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

15
16 DEPOSITION OF JAEGWAN SHIN
17 San Francisco, California
18 Friday, January 27, 2012
19
20
21

22
23 Reported By:

24 LINDA VACCAREZZA, RPR, CLR, CRP, CSR. NO. 10201

25 JOB NO. 44993

1 MS. KIM: Samantha Kim, Morrison
2 Foerster for Apple.

3 MS. YANG: Michelle Yang from
4 Samsung.

5 MR. TUNG: Mark Tung from Quinn 09:32
6 Emanuel for Samsung.

7 THE VIDEOGRAPHER: Will the court
8 reporter please swear in the witness.

9 (Korean Interpreters sworn.)

10 JAEGWAN SHIN, 09:32

11 Having been duly sworn, by the
12 Certified Shorthand Reporter, was
13 examined and testified as follows:

14 EXAMINATION

15 BY MR. KREEGER: 09:32

16 Q. Good morning.

17 A. Good morning.

18 Q. We met off the record, but my name

19 is Matthew Kreeger, and I'm an attorney at

20 Morrison Foerster. We are here to take your 09:32

21 deposition. Could you begin by giving us your
22 full name, please?

23 A. Yes. My name is Jaegwan Shin.

24 Q. Mr. Shin, do you understand that

25 I'm going to ask you a series of questions and 09:33

1 SAMNDCA00201780, marked for
2 identification.)

3 BY MR. KREEGER:

4 Q. Have you seen the document that's
5 been marked as Exhibit 1338 before? 04:03

6 A. I don't recall.

7 Q. Have you seen documents in this
8 format before?

9 MR. TUNG: Objection. Vague.

10 THE WITNESS: This is a very 04:04
11 common spreadsheet format documents.

12 Q. Mr. Shin, it appears that this
13 spreadsheet lists a series of issues or perhaps
14 bugs with the Galaxy Tab. Have you ever seen a
15 document like this that lists bugs or issues with 04:05
16 Samsung products?

17 A. Yes, I have seen many documents
18 such as this.

19 Q. Who generates documents of this
20 type? 04:05

21 MR. TUNG: Objection. Lacks
22 foundation.

23 THE WITNESS: There is no
24 particular person designated. It could
25 be done by the QA team or it could be 04:05

1 done by the R&D team.

2 Q. Have you personally reported bugs
3 or issues with Samsung products?

4 A. No, I have not.

5 (Exhibit 1339, "Smartphone Feature 04:07
6 Report," Bates stamped SAMNDCA00201683
7 through SAMNDCA00201692, marked for
8 identification.)

9 BY MR. KREEGER:

10 Q. Have you seen this document 04:07
11 before, Mr. Shin?

12 A. I don't recall.

13 Q. Do you know whether Samsung has
14 replaced in certain products the bounce effect
15 with a blue glow? 04:08

16 MR. TUNG: Caution the witness not
17 to reveal the substance of any attorney-client
18 communications in his answer.

19 THE WITNESS: What do you mean by
20 "blue glow"? 04:08

21 Q. Well, has Samsung disabled the
22 bounce effect on any of its products?

23 MR. TUNG: Same caution.

24 THE WITNESS: Some models use the
25 bounce effects, some models don't. So 04:09

1 I'm not quite sure as to that. Did you
2 ask me about disabling something?

3 Q. Has anyone in the San Jose lab
4 worked on replacing the bounce effect with some
5 other effect? 04:09

6 A. If you disable the bounce effect,
7 then you would see the effects which was
8 originally set at Google. So I think that there
9 might be someone who have worked on this.

10 Q. You think there might be someone 04:11
11 at San Jose who worked on disabling the bounce
12 effect so that you would see the effect
13 originally set at Google?

14 A. Yes.

15 Q. And who do you think might have 04:11
16 worked on that?

17 A. If it is related to the browser, I
18 think it might be Qi Ling.

19 (Exhibit 1340 was marked for
20 identification but withdrawn.) 04:12

21 BY MR. KREEGER:

22 Q. Have you seen Exhibit 1340?

23 MR. TUNG: Counsel, this is a
24 privileged document. We need to claw
25 this back. 04:12

1 MR. KREEGER: All right.

2 MR. TUNG: Did you just mark
3 Exhibit 1340? I recognize this as a
4 privileged document.

5 MR. KREEGER: You don't need to 04:13
6 look at that.

7 MR. TUNG: So I need to collect
8 the copies of it.

9 MR. KREEGER: I have some marking
10 on this. I'm going to have to destroy 04:13
11 it, but you can have the others.

12 MR. TUNG: I'm not going to take
13 the ones with markings on it.

14 MR. KREEGER: We'll have to
15 destroy this. 04:13

16 (Exhibit 1341, Email from Sangeon
17 Kim dated April 27, 2011, Bates stamped
18 SAMNDCA00202089 through SAMNDCA00202113,
19 marked for identification.)

20 BY MR. KREEGER: 04:14

21 Q. Have you seen Exhibit 1341 before?

22 A. I don't recall.

23 Q. If you turn to the page bearing

24 Bates number that ends in 107, you'll see a

25 table. 04:15