

EXHIBIT 10
FILED UNDER SEAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California
corporation,

Plaintiff,

vs. Case No. 11-CV-01846-LHK

SAMSUNG ELECTRONICS CO., LTD.,
a Korean business entity;
SAMSUNG ELECTRONICS AMERICA,
INC., a New York corporation;
SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC, a Delaware
limited liability company,

Defendants.

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CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF DANIELE De IULIIS
Redwood Shores, California
Friday, October 21, 2011

Reported by:
LORRIE L. MARCHANT, CSR No. 10523, RPR, CRR, CCRR, CLR
JOB NO. 43000

1 MR. MONACH: Objection. Vague.

2 THE WITNESS: I don't understand if I
3 understand your definition.

4 BY MS. CARUSO:

5 Q. Did the gap -- why was there a gap? I'll
6 ask that question.

7 A. I really don't remember.

8 Q. If you'd look at this --

9 A. Thank you.

10 Q. -- and if you could just hold that up again
11 for the camera.

12 THE VIDEOGRAPHER: I didn't get a shot of
13 the front. You have to hold it longer for me.

14 Thank you. Great.

15 BY MS. CARUSO:

16 Q. Does that prototype also have a gap?

17 A. It does.

18 Q. And is there anything sort of in the
19 interior of that gap that you can see?

20 MR. MONACH: Objection. Vague.

21 THE WITNESS: I see a detail within what
22 you're calling the gap.

23 BY MS. CARUSO:

24 Q. Is that detail found in the first prototype
25 you were looking at, as well?

1 A. They appear to be similar.

2 Q. Do you recall any discussions about that
3 detail?

4 A. Having seen it now for the first time in
5 many years, I remember working as a team on this
6 detail.

7 Q. Do you remember any discussion about the
8 detail?

9 A. I don't.

10 Q. Do you remember any reason why it added
11 esthetically to the product?

12 MR. MONACH: Objection. Vague.

13 THE WITNESS: Probably had a very good
14 reason at the time.

15 BY MS. CARUSO:

16 Q. But you can't recall right now what that
17 was?

18 A. I can't recall.

19 Q. And I asked you about any esthetic reason
20 for putting it there. Do you remember any other
21 reason for having that detail?

22 A. I don't recall.

23 Q. Is it your understanding that Figure 1
24 reflects that detail?

25 MR. MONACH: Object to the form of the

1 question to the extent it calls for a legal
2 conclusion.

3 But you can review that figure and give
4 your understanding.

5 THE WITNESS: I believe that line reflects
6 the gap that's shown here.

7 BY MS. CARUSO:

8 Q. I take it that as with the other design
9 patents we discussed, you can't call out any
10 particular contribution made by any member of the
11 design team with respect to the design of the D889
12 patent; is that correct?

13 A. That's correct.

14 Q. Would you describe the surface of this
15 prototype as contiguous from end to end?

16 MR. MONACH: Object to the form of the
17 question as vague.

18 THE WITNESS: I would describe the piece of
19 glass here as being contiguous.

20 BY MS. CARUSO:

21 Q. Would you describe the glass surface as
22 extending to the outside of the product?

23 MR. MONACH: Objection. Vague.

24 THE WITNESS: I don't know if I'd say -- if
25 I would categorize it that way.

1 BY MS. CARUSO:

2 Q. Why not?

3 A. Well, you said to the outside of the
4 product.

5 Q. M-hm.

6 A. And the glass stops. It doesn't go to the
7 outside of the product.

8 Q. Would you describe the surface of the
9 iPhone as extending to the outside of the product?

10 MR. MONACH: Objection. Vague.

11 BY MS. CARUSO:

12 Q. I'll reask the question.

13 Would you describe the glass surface of the
14 iPhone as extending to the outside of the product?

15 A. I would describe the glass surface
16 extending to the bezel.

17 MS. CARUSO: We need to take a short break
18 to change the tape.

19 THE VIDEOGRAPHER: This marks the end of
20 Tape No. 3 in today's deposition of Daniele de
21 Iuliis. The time is 5:29 p.m. We are off the
22 record.

23 (Recess taken, from 5:29 to 5:38.)

24 THE VIDEOGRAPHER: This marks the beginning
25 of Tape No. 4 in today's deposition of Daniele de