

Exhibit 10
(Submitted Under Seal)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE, INC., a California
corporation,

Plaintiff,

CASE NO.
11cv01846-LHK

v.

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.

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,

Counterclaim-Plaintiffs,

v.

APPLE, INC., a California
corporation,

Counterclaim-Defendant.

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

VIDEOTAPED PERSONAL DEPOSITION OF:
JUNGMIN YEO

February 2, 2012
Kim & Chang
Seoul, South Korea
9:51 a.m. - 3:29 p.m.

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JUNGMIN YEO,

having been first duly sworn, testified as follows:

EXAMINATION

BY MR. ZHANG:

Q. Good morning, Ms. Yeo. Do you understand that there's a litigation between Apple and Samsung that is venued in California in a U.S. court?

A. Yes.

Q. Do you understand that we're here today to take your testimony for purposes of that case?

A. Yes.

Q. And your attorney is going to make objections to my questions from time to time, but unless your attorney instructs you not to answer, you should answer my questions fully and truthfully. Do you understand that?

A. Yes.

Q. And of course you're welcome to take a break at any time. I just ask that if I have asked you a question, that you answer the question fully before you request a break.

A. Yes.

Q. Okay. Is there any reason you can't give your best testimony here today?

A. No.

Q. Have you been deposed previously in a U.S.

1 BY MR. ZHANG:

2 Q. Which one of these groups would tell you if there
3 was a difficulty with manufacturing a design that you have
4 suggested?

5 MR. WALL: Objection to form.

6 A. What do you mean by a difficulty with
7 manufacturing? I think your question is too broad.

8 BY MR. ZHANG:

9 Q. If there was an issue with -- have you ever come
10 across an instance where there was a difficulty in
11 manufacturing a design that you have submitted?

12 A. No.

13 Q. And have you ever -- has there ever been an
14 instance where you've received a report that a design that
15 you've submitted was too costly?

16 MR. WALL: Objection to form.

17 A. So what design are you talking about that I made?

18 BY MR. ZHANG:

19 Q. How about -- let me just ask a different
20 question.

21 For the Tab 10.1 design, what were the
22 constraints that you considered in the design process?

23 MR. WALL: Objection to form.

24 A. There was no design constraint.

25 BY MR. ZHANG:

1 BY MR. ZHANG:

2 Q. No, I asked you a question --

3 CHECK INTERPRETER: Interjection --

4 BY MR. ZHANG:

5 Q. -- which is: Are there multiple different
6 designs possible for a tablet computer that is lightweight?

7 MR. WALL: Objection to form, calls for
8 speculation.

9 BY MR. ZHANG:

10 Q. And you can answer the question however you
11 honestly feel about it. And if the answer is that you don't
12 know or that you're not aware unless you sit here and design
13 one, then I'll take that answer.

14 MR. WALL: Objection to form.

15 A. The question was difficult for me because it
16 seems to me that you're asking me whether that would be
17 possible, would not be possible. So I just thought they
18 might have to think about a way to do that, sitting here
19 right now all of a sudden.

20 BY MR. ZHANG:

21 Q. So let me ask it this way: As an industrial
22 designer at Samsung, is it your testimony that there is only
23 one possible tablet design for a thin tablet computer?

24 MR. WALL: Objection to form,
25 mischaracterizes testimony.

1 A. No.

2 BY MR. ZHANG:

3 Q. And is it your testimony as an industrial
4 designer at Samsung that there is only one possible design
5 for a lightweight tablet computer?

6 A.

7 MR. WALL: Objection to form,
8 mischaracterizes testimony.

9 A. No.

10 BY MR. ZHANG:

11 Q. And is it your testimony as an industrial
12 designer at Samsung that there's only one possible design
13 for a tablet computer that is easy to use by the consumer?

14 MR. WALL: Objection to form, lacks
15 foundation.

16 A. No, I haven't said that.

17 BY MR. ZHANG:

18 Q. And is it your testimony as an industrial
19 designer at Samsung that there's only one possible design
20 for a tablet computer that is easy to manufacture?

21 MR. WALL: Objection to form, lacks
22 foundation.

23 A. No, I haven't said so.

24 BY MR. ZHANG:

25 Q. And is it your testimony as an industrial

1 designer at Samsung that there's only one possible design
2 for a tablet computer that is acceptable to consumers?

3 MR. WALL: Objection to form, lacks
4 foundation.

5 A. No.

6 BY MR. ZHANG:

7 Q. So isn't it true that you had great freedom in
8 terms of the design that you chose for the Galaxy Tab 10.1?

9 MR. WALL: Objection to form, lacks
10 foundation.

11 A. I'm not sure about the meaning of "fairly great."

12 LEAD INTERPRETER: Well, main interpreter
13 interjecting, "fairly" was added by me.

14 A. I think you talk about the freedom, the level of
15 freedom, but I'm not really sure what you meant by that.

16 BY MR. ZHANG:

17 Q. I mean that you had the freedom to design the
18 Galaxy Tab 10.1 in a number of different ways; is that
19 correct?

20 MR. WALL: Objection to form.

21 A. Yes.

22 BY MR. ZHANG:

23 Q. Then can you explain why the Galaxy Tab 10.1
24 design looks so similar to the iPad 2 design?

25 MR. WALL: Objection to form, lacks

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C E R T I F I C A T E

SEOUL)
)
KOREA)

I, Michael E. Miller, Registered Diplomat Reporter, Certified Realtime Reporter, do hereby certify that the aforementioned witness was first duly sworn by me pursuant to stipulation of counsel to testify to the truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of any party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand this February 3, 2012.



MICHAEL E. MILLER
Certified Realtime Reporter
Registered Diplomat Reporter
Realtime Systems Administrator