

Exhibit 11
(Submitted Under Seal)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE, INC., a California
Corporation,
Plaintiff,

vs.

Civil Action. No.
11-CV-01846-LHK

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

Defendants.

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

Counterclaim-Plaintiffs,

vs.

APPLE, INC., a California
corporation,
Counterclaim-Defendant.

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

VIDEOTAPED PERSONAL DEPOSITION OF:
GI-YOUNG LEE

February 16, 2012
Kim & Chang
Daewoo, South Korea
9:17 a.m. - 1:24 p.m.

1 validity of the deposition based on the oaths.

2 MS. NEILL: We agree.

3 VIDEOGRAPHER: Our court reporter, Melanie
4 Giamarco of American Realtime Court Reporters/Asia will
5 now swear in our interpreters and the witness, and then
6 we can proceed.

7 (Interpreters sworn.)

8 GI-YOUNG LEE,
9 after having been duly sworn by the reporter, pursuant
10 to stipulation of counsel, was examined and testified
11 through the interpreter as follows:

12 MR. ZHANG: Before we get started, I just
13 wanted to state for the record that we requested
14 counsel for Samsung to allow Miss Lee to sit for her
15 ITC deposition first today on the notice date of that
16 deposition, and it was expressed to us that Miss Lee
17 was not being offered for her ITC deposition first, and
18 that her NDCAL deposition would need to take place
19 first.

20 MS. NEILL: And to be clear, Samsung offered
21 Ms. Lee's deposition on -- today for the Northern
22 District of California action and for tomorrow in the
23 ITC action, and so Samsung requested that the Northern
24 District of California deposition proceed first.

25

1 A. Yes.

2 Q. Do you recall giving an interview about your
3 work on the Galaxy Nexus phone?

4 A. Yes.

5 Q. And does this article correctly capture the
6 statements that you made about the Galaxy Nexus design?

7 MS. NEILL: Objection, vague. Are there any
8 particular statements or all of them related to the
9 article?

10 Q. (By MR. ZHANG) I'm just asking if the
11 article is accurate as to the statements that you made?

12 MS. NEILL: Objection, vague, compound.

13 A. It reflects some and not others accurately.

14 Q. (By MR. ZHANG) What was the design
15 inspiration for your work on the Galaxy Nexuses?

16 MS. NEILL: Objection, vague, lacks
17 foundation.

18 A. Since I did not start participating from the
19 very initial design in that regard, I don't think I'm
20 in a position to talk about the inspiration.

21 Q. (By MR. ZHANG) Is it true that the Galaxy
22 Nexus phone has a front surface that is curved?

23 MS. NEILL: Objection, vague.

24 A. It is true that it is of a curved design.

25 Q. (By MR. ZHANG) What are the benefits of

1 having a curved front surface on a phone?

2 MS. NEILL: Objection, lacks foundation,
3 vague, compound.

4 A. In my view, because a human face has a
5 curved feature, I would think, because of that, the
6 contact between the phone against the surface of the
7 human face will be smoother, easier.

8 Q. (By MR. ZHANG) Are there any other
9 benefits?

10 MS. NEILL: Objection, lacks foundation,
11 vague.

12 A. I would think there would certainly be other
13 benefits than that, but I can't come up with any others
14 at the moment.

15 Q. (By MR. ZHANG) Do you believe that the
16 curved front surface design is more beautiful than a
17 flat front surface design?

18 MS. NEILL: Objection, vague.

19 A. I think that would vary depending on the
20 design.

21 Q. (By MR. ZHANG) Are there any downsides to
22 having a curved front surface to a phone?

23 MS. NEILL: Objection, vague.

24 A. I haven't given that a thought,
25 particularly.

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C E R T I F I C A T E

DAEWOO)
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SOUTH KOREA)

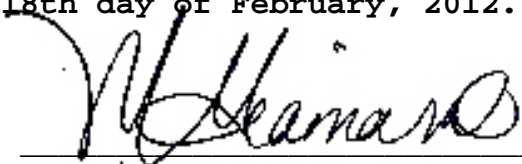
I, Melanie L. Giamarco, Registered Professional Reporter and Certified Realtime Reporter, do hereby certify that the aforementioned witness was first duly sworn by me pursuant to stipulation of counsel to testify to the truth; that I was authorized to and did report said deposition in stenotype; and 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 18th day of February, 2012.



Melanie L. Giamarco
Certified Realtime Reporter
Registered Professional Reporter
Certified Shorthand Reporter