

Exhibit 4

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

4 APPLE, INC., a California
5 corporation,

6 Plaintiff,

CASE NO.
11cv01846-LHK

7 v.

8 SAMSUNG ELECTRONICS, CO., LTD., a
9 Korean business entity; SAMSUNG
10 ELECTRONICS AMERICA, INC., a New
11 York corporation; SAMSUNG
12 TELECOMMUNICATIONS AMERICA, LLC,
13 a Delaware limited liability
14 company,

15 Defendants.

16
17
18 SAMSUNG ELECTRONICS, CO., LTD., a
19 Korean business entity; SAMSUNG
20 ELECTRONICS AMERICA, INC., a New
21 York corporation; SAMSUNG
22 TELECOMMUNICATIONS AMERICA, LLC,
23 a Delaware limited liability
24 company,

25 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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1 APPEARANCES:

2 For the Plaintiff/Counterclaim-Defendant, Apple, Inc.

3 MORRISON FOERSTER

4 By: Patrick Zhang, Esq.

5 425 Market Street

6 San Francisco, California 94105-2482

7 (415) 268-7000

8 -and-

9 MORRISON FOERSTER

10 By: Sun Park, Esq.

11 555 West 5th Street

12 Suite 3500

13 Los Angeles, California 90013-1024

14 (213) 892-5200

15 For the Defendants/Counterclaim-Plaintiffs, the Samsung

16 entities:

17 QUINN, EMANUEL, URQUHART & SULLIVAN, LLP

18 By: Eric E. Wall, Esq.

19 50 California Street

20 22nd Floor

21 San Francisco, California 94111

22 (415) 875-6600

23 Also present:

24 Rosa W. Kim, Samsung

25 Jamie Wright, Lead Interpreter

Hyesun Sunny Lee, Check Interpreter

RJ Buckler, Videographer

Michael E. Miller, Court Reporter

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1 PROCEEDINGS

2 (February 2, 2012 at 9:51 a.m.)

3 THE VIDEOGRAPHER: My name is RJ Buckler, a

4 Certified Legal Video Specialist with American Realtime

5 Court Reporters in Asia. The date today is

6 February 2nd, 2012, and the time is approximately 9:51.

7 This deposition is being held in the office

8 of Kim & Chang, located at the Daewoo office on the

9 second floor in Seoul, South Korea. The caption of this

10 case is Apple, Incorporated vs. Samsung

11 Electronics Co. Ltd., et al., held in the United States

12 District Court, Northern District of California, the

13 San Jose Division, with a case number of 11cv10846-LHK.

14 The name of the witness is JungMin Yeo,

15 testifying in her personal capacity.

16 The court reporter today is Mike Miller, also

17 with American Realtime Court Reporters in Asia.

18 At this time I would ask all counsel and

19 interpreters to please state their appearances and whom

20 they represent for the record.

21 MR. ZHANG: Patrick Zhang from Morrison &

22 Foerster on behalf of Apple, and with me is Sun Park.

23 MR. WALL: Eric Wall of Quinn Emanuel for the

24 Defendants. With me, but not present in the room

25 currently, is Rosa Kim of Samsung Electronics.

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1 WITNESS: I N D E X PAGE

2 JUNGMIN YEO PAGE

3 Examination by BY MR. ZHANG 6

4 E X H I B I T S

5 NUMBER DESCRIPTION PAGE

6 Exhibit 1343 "Stylist" Document 12

7 (SAMNDCA10473738 - SAMNDCA10473741)

8 Exhibit 1344 * Apple iPad 18

9 Exhibit 1345 * Samsung Galaxy Tab 10.1 35

10 Exhibit 1346 ** Samsung Tablet Model 1 50

11 Exhibit 1347 ** Samsung Tablet Model 14 54

12 Exhibit 1348 ** Samsung Tablet Model 17 54

13 Exhibit 1349 Color Photographs of Galaxy Tab 10.1b 58

14 Exhibit 1350 Blog Post from Samsung Website 60

15 Exhibit 1351 E-mail 69

16 (SAMNDCA10472951 - SAMNDCA10472953)

17 Exhibit 1352 E-mails 71

18 (SAMNDCA10247373 - SAMNDCA10247378)

19 Exhibit 1353 Best Buy Task Force Document 78

20 (SAMNDCA10154003 - SAMNDCA10154053)

21 * (Physical exhibit retained by counsel for Apple)

22 ** (Physical exhibit retained by counsel for Samsung)

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1 LEAD INTERPRETER: Jamie Wright, lead

2 interpreter.

3 CHECK INTERPRETER: Hyesun Lee, checker

4 interpreter, certified court interpreter.

5 THE VIDEOGRAPHER: Would counsel please state

6 any stipulations for the record.

7 MR. ZHANG: We understand that the court

8 reporter is not authorized to administer oaths in this

9 venue. Nevertheless, we request that he administer the

10 oath, and we stipulate that we waive any objection to

11 the validity of the deposition based on the oaths.

12 MR. WALL: Defendants agree.

13 THE WITNESS: I have a question: Should I

14 look at the camera, or should I look at the counsels

15 specifically?

16 MR. WALL: Please look at the camera.

17 THE WITNESS: Yes.

18 THE VIDEOGRAPHER: Thank you. At this time,

19 our court reporter will swear in the witness and

20 interpreters and then we can proceed.

21 (Interpreters sworn.)

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1 BY MR. ZHANG:
 2 Q. And in the design process for the Galaxy
 3 Tab 10.1, did you ever consider an alternate design that
 4 didn't have rounded corners?
 5 A. No.
 6 Q. Are you aware of any disadvantages related to
 7 having a tablet design with rounded corners?
 8 A. Can you repeat once more?
 9 LEAD INTERPRETER: Do you want me to repeat
 10 your question?
 11 MR. ZHANG: Yes, please.
 12 A. So disadvantages of the tablet with the rounded
 13 corners?
 14 BY MR. ZHANG:
 15 Q. Yes.
 16 A. No.
 17 Q. Do rounded corners take away interior space for
 18 components?
 19 MR. WALL: Objection to form.
 20 A. Yes.
 21 BY MR. ZHANG:
 22 Q. Are rounded corners a more complex shape that's
 23 more difficult to manufacture commercially?
 24 MR. WALL: Objection to form, assumes facts
 25 not in evidence.

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1 BY MR. ZHANG:
 2 Q. So I'm talking about the clear window that covers
 3 the front of the Galaxy Tab 10.1 as opposed to a design
 4 that's more like, you know, the computer that's in front of
 5 you, like this kind of raised frame over a screen.
 6 MR. WALL: Objection to form.
 7 A. Okay.
 8 BY MR. ZHANG:
 9 Q. Are you aware of any advantages of the Galaxy Tab
 10 design over the more traditional frame design that I just
 11 described?
 12 MR. WALL: Objection to form, assumes facts
 13 not in evidence.
 14 A. Can you repeat it?
 15 LEAD INTERPRETER: Do you want me to repeat
 16 it?
 17 MR. ZHANG: Yes, please.
 18 MR. WALL: Please repeat my objection.
 19 A. Are you talking about strength of the frame
 20 design?
 21 MR. WALL: Hold on, can we just -- I wanted
 22 to talk about an issue of -- can we just go off the
 23 record for a minute? I just want to talk about
 24 translation issue.
 25 MR. ZHANG: Okay.

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1 A. The question is too broad, and it's case by case.
 2 BY MR. ZHANG:
 3 Q. What about the transparent surface that covers
 4 the front of the Galaxy Tab 10.1? Are you aware of any
 5 advantages of that particular feature?
 6 MR. WALL: Objection to form.
 7 A. What do you mean by "transparent surface"?
 8 BY MR. ZHANG:
 9 Q. I mean the translucent covering that's on top of
 10 the screen and the black area.
 11 MR. WALL: Objection to form.
 12 A. Are you talking about the window?
 13 BY MR. ZHANG:
 14 Q. Okay. We can call it the window.
 15 A. So what part of window are you talking about?
 16 I'm not really understanding the terms that you're using
 17 here.
 18 Q. Sure. So is there an advantage to using a clear
 19 window over the entire front surface of a device rather than
 20 a more traditional frame over a screen?
 21 MR. WALL: Objection to form, lacks
 22 foundation, assumes facts not in evidence.
 23 A. I'm sorry, but I'm not really understanding your
 24 question. So are you talking about this one, this portion
 25 that is consisting of one part?

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1 THE VIDEOGRAPHER: We're going off the
 2 record. The time is 11:37.
 3 (Discussion off the record.)
 4 THE VIDEOGRAPHER: The time is 11:38. We are
 5 back on the record.
 6 THE WITNESS: So should I answer?
 7 MR. WALL: Well, do you want to just repeat
 8 the question?
 9 MR. ZHANG: Let me repeat the question.
 10 BY MR. ZHANG:
 11 Q. Are you aware of any advantages of the clear
 12 window design for the Galaxy Tab 10.1 over the more
 13 traditional frame design that we just discussed?
 14 MR. WALL: Objection to form, assumes facts
 15 not in evidence.
 16 A. Yes.
 17 BY MR. ZHANG:
 18 Q. What are they?
 19 A. The traditional method or design is too broad
 20 term for me, so I can't really compare this design with the
 21 traditional method because I don't know what exactly a
 22 traditional method or design is.
 23 But if I can just talk about this itself, this is
 24 just one part, it's aesthetically beautiful and it also cuts
 25 the cost.

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1 (Counsel representing this witness should arrange for
 2 reading and signing and thereafter distribute copies of the
 3 signed Errata sheet to opposing counsel without involvement
 4 of the court reporter.)

4 STYLE OF CASE: Apple v. Samsung (ND CAL)

5 DEPOSITION OF: JUNGMIN YEO

6 TAKEN: February 2, 2012

7 E R R A T A S H E E T

8 Page	Line	Change	Reason
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22 I hereby certify that I have read my deposition and that it
 23 is true and correct subject to any changes in form or
 24 substance entered here.

25 Date _____ JUNGMIN YEO _____

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C E R T I F I C A T E

1

2 SEOUL)

3 KOREA)


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

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

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

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

25 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