

Exhibit 8  
(Submitted Under Seal)

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UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.

In the Matter of:  
CERTAIN ELECTRONIC DIGITAL  
MEDIA DEVICES AND COMPONENTS      Inv. No.    337-TA-796  
THEREOF

\_\_\_\_\_ /

CONFIDENTIAL BUSINESS INFORMATION  
PURSUANT TO THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF TANG YEW TAN  
REDWOOD SHORES, CALIFORNIA  
MONDAY, MARCH 5, 2012

BY:    ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR  
CSR LICENSE NO. 9830  
JOB NO. 46148

1 MONDAY, MARCH 5,  
 2 10:08 A.M.  
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 4  
 5  
 6 VIDEOTAPED DEPOSITION OF TANG YEW TAN,  
 7 taken at QUINN, EMANUEL, URQUHART &  
 8 SULLIVAN, 555 Twin Dolphin Drive, Suite 500,  
 9 Redwood Shores, California, pursuant to  
 10 Notice, before me, ANDREA M. IGNACIO HOWARD,  
 11 CLR, CCRR, RPR, CSR License No. 9830.  
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1 A P P E A R A N C E S:  
 2  
 3 FOR APPLE INC.:  
 4 MORRISON & FOERSTER LLP  
 5 By: ANDREW MONACH, Esq.  
 6 425 Market Street  
 7 San Francisco, California 94105  
 8 Phone: (415) 268-7588 Fax: (415) 268-7522  
 9 amonach@mofo.com  
 10  
 11  
 12 FOR SAMSUNG ELECTRONICS CO. LTD:  
 13 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 14 By: MARY MCNEILL, Esq.  
 15 50 California Street, 22nd Floor  
 16 San Francisco, California 94111  
 17 Phone: (415) 875-6600 Fax: (415) 875-6700  
 18 marymcneill@quinnemanuel.com  
 19  
 20  
 21 ALSO PRESENT: Aric Kerhoulas, Videographer  
 22  
 23  
 24  
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1 REDWOOD SHORES, CALIFORNIA  
 2 MONDAY, MARCH 5, 2012  
 3 10:08 A.M.  
 4  
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 6  
 7 THE VIDEOGRAPHER: Good morning.  
 8 This marks the beginning of Disc 1 of the  
 9 videotaped deposition of Tang Yew Tan. In the matter  
 10 of Certain Electronic Digital Media Devices and  
 11 Components Thereof.  
 12 In the United States International Trade  
 13 Commission, Washington D.C. Investigation  
 14 No. 337-TA-796.  
 15 This deposition is being held at the office  
 16 of Quinn Emanuel at 555 Twin Dolphin Drive in  
 17 Redwood Shores, California.  
 18 The date today is March 5, 2012, and the time  
 19 is approximately 10:08 a.m.  
 20 My name is Aric Kerhoulas from TSG Reporting,  
 21 Incorporated. Our court reporter today is Andrea  
 22 Ignacio, in association with TSG Reporting.  
 23 Will counsel please introduce yourselves,  
 24 starting with the questioning attorney.  
 25 MS. MCNEILL: Mary McNeill of Quinn Emanuel

1 for Samsung.  
 2 MR. MONACH: Andrew Monach, Morrison &  
 3 Foerster, representing Apple and the witness.  
 4 THE VIDEOGRAPHER: If the court reporter will  
 5 please swear in the witness, we can proceed.  
 6  
 7 TANG YEW TAN,  
 8 having been sworn as a witness  
 9 by the Certified Shorthand Reporter,  
 10 testified as follows:  
 11  
 12 EXAMINATION BY MS. MCNEILL  
 13 MS. MCNEILL: Q. Good morning, Mr. Tan.  
 14 A Good morning.  
 15 Q Would you please state your name for the  
 16 record.  
 17 A Tang Yew Tan.  
 18 Q Mr. Tan, what is your home address?  
 19 A 617 Wellsbury Way, Palo Alto, California  
 20 94306.  
 21 Q And what is your business address?  
 22 A 1 Infinite Loop, Mailstop 305-1PH, Cupertino,  
 23 California 95014.  
 24 Q Now, Mr. Tan, I'm going to go over some of  
 25 the ground rules of the deposition today just to make

1 working on related to the development of the  
 2 iPhone 3G?  
 3 A In addition to the volume button, the -- the  
 4 switch also -- the switch to the high stainless steel  
 5 also included a hole button and a ringer button. So I  
 6 was also involved in that transition, working with BJ  
 7 and Eric.  
 8 Again, working with the industrial design  
 9 group on achieving the flat glass on the front with  
 10 all the ID details and geometric, and working on the  
 11 high-shine bezel or -- bezel is what we call the  
 12 metal -- high-hardness stainless steel ring around the  
 13 front of the phone.  
 14 Q And anything else you can think of, sitting  
 15 here today?  
 16 A Any particular -- I mean, apart from the ones  
 17 that I mentioned, I can't remember anything else at  
 18 this moment.  
 19 Q And what was your participation working with  
 20 the industrial design team on the manufacture of the  
 21 enclosure for the iPhone 3G?  
 22 A Very similar to some of the things I  
 23 testified earlier. Industrial design team will come  
 24 up with the design goal of what they want the product  
 25 to look like, and I'll work closely with the

1 THE WITNESS: As I sit here right now, trying  
 2 to recollect events from many years ago, that's what I  
 3 remember.  
 4 MS. MCNEILL: Q. And I have your best and  
 5 complete recollection on that?  
 6 MR. MONACH: Asked and answered.  
 7 THE WITNESS: As far as I recollect, yes.  
 8 MS. MCNEILL: And you mentioned that you  
 9 worked with the industrial design team in creating a  
 10 flat glass and front of the iPhone 3G.  
 11 Q What was your participation in creating a  
 12 flat glass and front of the iPhone 3G with the  
 13 industrial design team?  
 14 A As we were given the goal, again, from the  
 15 industrial design group, we worked closely with the  
 16 operations group and the manufacturers to achieve the  
 17 high-flatness, high-polished glass top surface.  
 18 Q And were there any manufacturing challenges  
 19 presented with respect to achieving the flat glass  
 20 front of the iPhone 3G as requested by the industrial  
 21 design team?  
 22 A There were -- there are manufacturing  
 23 challenges to achieve the look which require using  
 24 regular processes. But we created additional steps  
 25 and processes to make sure that we can achieve

1 operations team and also the vendors to find  
 2 manufacturing processes to achieve the industrial  
 3 design goal.  
 4 Q And were there any instances where you  
 5 couldn't find manufacturing processes to achieve the  
 6 exact design goal that was given to you with respect  
 7 to the manufacture of the enclosure for the iPhone 3G?  
 8 A None that I can think of right now. None  
 9 that I can recollect.  
 10 Q Were there any instances where you couldn't  
 11 find manufacturing processes to achieve the exact  
 12 design goal that was given to you from the industrial  
 13 design team with respect to anything related to the  
 14 iPhone 3G?  
 15 A Again, like I mentioned earlier, as I sit  
 16 here right now, there's nothing that I can -- that I  
 17 can remember that we did not achieve on the given ID  
 18 goals.  
 19 Q So just to be sure I'm clear, the industrial  
 20 design team presented you with design goals related to  
 21 the iPhone 3G. And in the process of seeking out  
 22 manufacturing processes to achieve those design goals,  
 23 you were able to effectively achieve those -- every  
 24 single one of those goals without any changes?  
 25 MR. MONACH: Objection; asked and answered.

1 whatever that was requested by ID.  
 2 Q And what were the decision steps or processes  
 3 you created?  
 4 MR. MONACH: Objection; lack of foundation.  
 5 You can describe any that you're aware of and  
 6 remember.  
 7 THE WITNESS: There is a -- the opening in  
 8 the -- in the front of the glass, what we call a  
 9 receiver opening, and ID wanted very, very sharp  
 10 details, very nice details around the opening of the  
 11 glass, right centered in the top area of the product.  
 12 Any time you work with glass, it's a -- it's  
 13 a very hard material. It's -- it's difficult to  
 14 process with glass. And to achieve that level of  
 15 refinement and precision that is required, it  
 16 required -- necessitated a bunch of new manufacturing  
 17 processes and steps.  
 18 MS. MCNEILL: Q. And what were those new  
 19 manufacturing processes and steps, generally?  
 20 MR. MONACH: Objection; lack of foundation.  
 21 THE WITNESS: Some of them would involve --  
 22 for example, ID wanted a high-polished chamfer. That  
 23 would require a tool that will go in to polish out the  
 24 glass.  
 25 ID wanted a nice chamfer feature which was --

1 which had a controlled dimension per the ID file, and  
2 that required creating grinding tools that had  
3 geometry that matched that.

4 So some examples of manufacturing processes  
5 that were developed to satisfy the industrial design  
6 requirement.

7 MS. MCNEILL: Q. And did the industrial  
8 design team ever approach you or your team about  
9 creating a device where the display ran from one edge  
10 of the device to the other?

11 MR. MONACH: Objection; vague.

12 THE WITNESS: I wouldn't -- I would -- I  
13 don't know whether you can define "approach."

14 But, I mean, the industrial design team came  
15 up with what they wanted the design to look like, and  
16 we basically went off to explore the means of  
17 achieving that goal.

18 MS. MCNEILL: Q. And did one of the designs  
19 that the industrial design team came up with that they  
20 wanted the device to have, was one of those designs a  
21 display that ran from one edge of the device to the  
22 other?

23 MR. MONACH: Objection; vague; lack of  
24 foundation.

25 THE WITNESS: Can you define clearly what you

1 mean by a display that ran from one edge to the edge  
2 of the product? What do you mean by "display"  
3 specifically?

4 MS. MCNEILL: The display being the part of  
5 the phone that you -- that you view.

6 Q Well, I'll ask you, since you're the expert:  
7 What's the display on the iPhone?

8 MR. MONACH: Objection to the form of the  
9 question; vague and ambiguous; lacking foundation.

10 THE WITNESS: I would interpret display as  
11 the liquid crystal display that has a viewable area.

12 MS. MCNEILL: Q. And did the design team  
13 ever present to you a desired design for the iPhone  
14 where the display began at one edge of the device and  
15 ran continuously to the other edge of the device?

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

18 THE WITNESS: Not that I can recollect. But  
19 then again, my group is responsible for product  
20 design. There is a display group that handles the  
21 selection of displays within Apple. So as far as I  
22 know, I don't -- I don't know.

23 MS. MCNEILL: Q. And do you recall ever  
24 hearing about the possibility of a design for the  
25 iPhone wherein the display screen took up one edge of

1 the phone to the other edge of the phone?

2 MR. MONACH: Object to form.

3 THE WITNESS: Not that I can recollect on the  
4 development of the first phone.

5 MS. MCNEILL: Q. And any that you can  
6 recollect in the development of any of the iPhones?

7 MR. MONACH: Same objection.

8 THE WITNESS: None that -- none that I can  
9 recollect for any of the phones that have shipped, no.

10 MS. MCNEILL: Q. And can you recollect that  
11 for any phones that weren't shipped?

12 MR. MONACH: Objection; vague.

13 And let me just caution you, in case your  
14 last answer referred to something under development,  
15 I'll instruct you not to reveal anything under --  
16 under development. If it's designs leading up to that  
17 were abandoned for anything from the first iPhone  
18 through the iPhone 4S, you can describe that.

19 THE WITNESS: Yeah, nothing -- nothing in the  
20 development of the iPhone 1 to iPhone -- the first  
21 iPhone to the iPhone 4S, as far as I know, had the  
22 request for a display from edge to edge.

23 MS. MCNEILL: Q. And are you aware of any  
24 request for a display from edge to edge for any Apple  
25 products --

1 MR. MONACH: Objection; lack --

2 MS. MCNEILL: Q. -- whether --

3 MR. MONACH: Sorry.

4 MS. MCNEILL: Sorry.

5 Not asking to unreleased future products.

6 Q But specifically in regards to products that  
7 Apple has either tested or made prototypes for or  
8 investigated or released in the past, have any  
9 considerations been made, to your knowledge, for a  
10 display that ran from edge to edge?

11 MR. MONACH: Objection; lack of foundation.

12 THE WITNESS: Not that I know of. Again, I'm  
13 not part of the industrial design team, so I don't  
14 know what models they have created or what designs  
15 they have come up with. I have no idea.

16 MS. MCNEILL: Q. And are you aware of  
17 manufacturing constraints or challenges with respect  
18 to display screens that run from the edge -- one edge  
19 of the device to the other?

20 MR. MONACH: Objection; lack of foundation;  
21 assumes facts not in evidence; vague; incomplete  
22 hypothetical.

23 THE WITNESS: The liquid crystal display is  
24 not part of the product design group, so I don't know  
25 the details of the manufacturing processes.

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1 CERTIFICATE OF REPORTER  
2  
3  
4 I, ANDREA M. IGNACIO HOWARD, hereby certify  
5 that the witness in the foregoing deposition was by me  
6 duly sworn to tell the truth, the whole truth, and  
7 nothing but the truth in the within-entitled cause;  
8  
9 That said deposition was taken in shorthand  
10 by me, a Certified Shorthand Reporter of the State of  
11 California, and was thereafter transcribed into  
12 typewriting, and that the foregoing transcript  
13 constitutes a full, true and correct report of said  
14 deposition and of the proceedings which took place;  
15  
16 That I am a disinterested person to the said  
17 action.  
18  
19 IN WITNESS WHEREOF, I have hereunto set my  
20 hand this 6th day of March, 2012.  
21  
22 \_\_\_\_\_  
23 ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830  
24  
25

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1 E X H I B I T S (Continued.)  
2  
3 EXHIBIT PAGE  
4 Exhibit 6 1-7-08 E-mail String, Subject: 130  
5 Re: Ringer, Bates Nos.  
6 APL-ITC796-0000033455 - '56;  
7 2 pgs.  
8 Exhibit 7 9-12-07 E-mail String, Subject: 137  
9 You are one brave dude..., Bates  
10 Nos. APL-ITC796-0000022555 - '58;  
11 4 pgs.  
12 Exhibit 8 U.S. Patent 7,863,533, Bates Nos. 149  
13 APL-ITC796-0000000365 - '77; 13 pgs.  
14 Exhibit 9 U.S. Patent No. 7,688,574 B2; 156  
15 13 pgs.  
16 Exhibit 10 12-27-07 E-mail String, Subject: 217  
17 Re: Metal btn DFM, Bates Nos.  
18 APL-ITC796-0000151780 - '81; 2 pgs.  
19 Exhibit 11 1-17-08 E-mail String, Subject: 222  
20 Re: Latest Slides for Buttons,  
21 Bates Nos. APL-ITC796-0000032828;  
22 '32863 - '68; 7 pgs.  
23 Exhibit 12 1-12-07 E-mail String, Subject: 229  
24 Re: 3G Samsung, Bates Nos.  
25 APL7940012243697 - '98; 2 pgs.

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1 I N D E X  
2 DEPOSITION OF TANG YEW TAN  
3  
4 EXAMINATION  
5 PAGE  
6 BY MS. MCNEILL 5  
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8 E X H I B I T S  
9  
10 EXHIBIT PAGE  
11 Exhibit 1 7-19-04 E-mail String, Subject: 43  
12 Group addresses for Q79 Program,  
13 Bates Nos. APL-ITC796-0000355464 -  
14 '65; 2 pgs.  
15 Exhibit 2 1-17-08 E-mail String, Subject: 49  
16 Re: Latest Slides for Buttons,  
17 Bates No. APL-ITC796-0000013419;  
18 1 pg.  
19 Exhibit 3 4-15-08 E-mail String, Subject: 77  
20 Re: DVTa volume buttons feel  
21 squishy, Bates Nos.  
22 APL-ITC7960000033707 - '08; 2 pgs.  
23 Exhibit 5 Respondent's First Notice of 115  
24 Deposition to Complainant Apple  
25 Inc.; 13 pgs.

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1 E X H I B I T S (Continued.)  
2  
3 EXHIBIT PAGE  
4 Exhibit 13 5-18-07 E-mail String, Subject: 283  
5 Re: N82 Thermal Review 5/16,  
6 Bates Nos. APL7940001977602 -  
7 '05; 4 pgs.  
8 Exhibit 14 5-22-07 E-mail String, Subject: 285  
9 Re: N82 Thermal Meeting Minutes,  
10 Bates Nos. APL7940001977606 -  
11 '07; 2 pgs.  
12 ---oOo---  
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14 \*\*NOTE: Exhibit 4 Redacted from the record.  
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