

Exhibit 4

In The Matter Of:

Apple Inc. v.

SamSung Electronics Co., Ltd., et al.

Saku Hieta

July 13, 2012

Behmke Reporting and Video Services, Inc.

160 Spear Street, Suite 300

San Francisco, California 94105

(415) 597-5600

Original File 20242Hieta.txt

Min-U-Script® with Word Index

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4
5 - - - - -
6 APPLE INC., a California corporation,)
7 Plaintiffs,) CASE NO.
8 vs.) 11-CV-01846-LHK
9 SAMSUNG ELECTRONICS CO., LTD., et al.)
10 - - - - -
11
12 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY
13 VIDEOTAPED DEPOSITION OF
14 SAKU HIETA
15 FRIDAY, JULY 13, 2012
16
17
18
19
20
21 BEHMKE REPORTING AND VIDEO SERVICES, INC.
22 BY: CHRISTINE A. TRISKA, CSR NO. 12826, RPR
23 160 SPEAR STREET, SUITE 300
24 SAN FRANCISCO, CALIFORNIA 94105
25 (415) 597-5600

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8 Videotaped Deposition of SAKU HIETA, taken on behalf
9 of DEFENDANTS, at the Law Offices of Quinn Emanuel, 555
10 Twin Dolphin Drive, Redwood Shores, California, commencing
11 at 7:25 A.M., FRIDAY, JULY 13, 2012, before Christine A.
12 Triska, Certified Shorthand Reporter No. 12826, pursuant
13 to Notice.
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1 APPEARANCES OF COUNSEL:
2 FOR PLAINTIFF:
3 WILMER, CUTLER, PICKERING, HALE
4 AND DORR LLP
5 BY: MARK D. SELWYN, ATTORNEY AT LAW
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7 Palo ALto, CA 94304
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12 FOR THE DEFENDANTS:
13 QUINN, EMANUEL, URQUHART, OLIVER
14 AND HEDGES, LLP
15 BY: ERIC E. WALL, ATTORNEY AT LAW
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17 San Francisco, CA 94111
18 Telephone: (415)875-6375
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21
22 ALSO PRESENT:
23 CYNDI WHEELER, IN-HOUSE COUNSEL, APPLE
24 BRIAN MONROE, CLVS
25

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1 I N D E X
2 FRIDAY, JULY 13, 2012
3 SAKU HIETA PAGE
4 Examination by MR. WALL 7, 27
5 Examination by MR. SELWYN 27
6 -000-
7
8 QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:
9 PAGE LINE
10 NONE
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1	EXHIBITS	
2	SAKU HIETA	
3	Number Description	Page
4	Exhibit 1 Declaration of Saku Hieta	
5	Submitted Under Seal	
6	- 11 pages	6
7		
8	Exhibit 2 Step-In License Agreement by	
9	Apple, Infineon Technologies	
10	Delta GmbH and Infineon North	
11	America	
12	- 5 pages	21
13		
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1 behalf of Apple and the witness. With me today is Cyndi
2 Wheeler of Apple.
3 **THE VIDEOGRAPHER:** And the court reporter
4 today is Christine Triska, Certified Shorthand Reporter,
5 contracted by Behmke Reporting and Video Services, Inc.
6 Would the court reporter now please swear in
7 the witness?
8
9 SAKU HIETA,
10 after having been first duly
11 sworn, testified as follows:
12
13 **THE WITNESS:** I do.
14 **VIDEOTAPE OPERATOR:** You may begin.
15
16 **EXAMINATION**
17 **BY MR. WALL:**
18 **Q** Good morning.
19 **A** Good morning.
20 **Q** Can you please state your full name for the
21 record?
22 **A** My full name is Saku Pietari Hieta.
23 **Q** What is your home address?
24 **A** It's 12433 Brooklyn Drive in Saratoga,
25 California.

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1 FRIDAY, JULY 13, 2012; 7:25 A.M.
2 ...
3 (Deposition Exhibit 1
4 was marked for identification.)
5
6 **THE VIDEOGRAPHER:** Here marks the beginning
7 of DVD Number One in the deposition of Saku Hieta in the
8 matter of Apple, Incorporated versus Samsung Electronics
9 Company Limited in the United States District Court for
10 the Northern District of California, San Jose Division.
11 Case number is 11-CV-01846-LHK. Today's date
12 is July 13, 2012, and the time on the video monitor is
13 7:25 a.m.
14 The video operator today is Bryan Monroe
15 employed by Behmke Reporting and VIDEO SERVICES, INC. at
16 160 Spear Street, Suite 300 in San Francisco,
17 California.
18 This video deposition is taking place at 555
19 Twin Dolphin Drive in Redwood Shores, California and was
20 noticed of Eric Wall, Esquire, of Quinn Emanuel LLP.
21 Counsel, would you please voice identify
22 yourselves for the record?
23 **MR. WALL:** Eric Wall of Quinn Emanuel for
24 Samsung.
25 **MR. SELWYN:** Mark Selwyn from Wilmer Hale on

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1 **Q** What is your business address?
2 **A** Business address would be One Infinite Loop in
3 Cupertino, California.
4 **Q** Do you understand that you are testifying
5 under oath today subject to the penalty of perjury, same
6 as in a court?
7 **A** I do.
8 **Q** Is there any reason you can't give your best
9 testimony today?
10 **A** No.
11 **Q** I'd like to show you what's been marked as
12 Exhibit One.
13 **A** Okay.
14 **Q** Can you please Identify Exhibit One?
15 **MR. SELWYN:** Do you have one more copy?
16 **MR. WALL:** Sorry.
17 (Whereupon, counsel hands
18 the document to Mr. Selwyn.)
19 **MR. SELWYN:** Thanks.
20 **THE WITNESS:** Okay.
21 **BY MR. WALL:**
22 **Q** What is Exhibit Number One?
23 **A** This is the declaration I gave in January
24 regarding this matter.
25 **Q** And is that your signature on the third page

1 **SOW pertaining to the PMB 9801 chip set?**

2 A No. That was also preexisting.

3 **Q I take it you have no information regarding**
4 **the negotiation of that agreement; correct?**

5 A Correct.

6 **MR. WALL:** No further questions.

7 **MR. SELWYN:** I have no further questions.

8 Apple designates the entirety of the transcript "Highly
9 Confidential - Outside Attorneys' Eyes Only" pursuant to
10 the protective order. I thank the witness. Your
11 deposition is concluded.

12 **THE VIDEOGRAPHER:** Okay. This concludes the
13 deposition of Saku Hieta. The total number of DVDs we
14 used today was one, and the original will be retained by
15 Behmke Reporting and VIDEO SERVICES, INC. at 160 Spear
16 Street, Suite 300, in San Francisco, California
17 California.

18 We are going off the record. The time on the
19 video monitor is 8:07 a.m.

20 (At 8:07 A.M., the deposition
21 proceedings concluded.)

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25

SAKU HIETA

1 STATE OF CALIFORNIA)
2) ss.
3 COUNTY OF SANTA CLARA)
4

5 I hereby certify that the witness in the
6 foregoing deposition, SAKU HIETA, was by me duly sworn to
7 testify to the truth, the whole truth, and nothing but the
8 truth, in the within-entitled cause; that said deposition
9 was taken at the time and place herein named; that the
10 deposition is a true record of the witness's testimony as
11 reported by me, a duly certified shorthand reporter and a
12 disinterested person, and was thereafter transcribed into
13 typewriting by computer.

14 I further certify that I am not interested in
15 the outcome of the said action, nor connected with, nor
16 related to any of the parties in said action, nor to
17 their respective counsel.

18 IN WITNESS WHEREOF, I have hereunto set my
19 hand this 13th day of July, 2012

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CHRISTINE A. TRISKA, CSR NO. 12826
STATE OF CALIFORNIA