

EXHIBIT 11
FILED UNDER SEAL

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 APPLE INC., a California
6 corporation,

7 Plaintiff,

8 vs.

CASE NO. 11-cv-01846-LHK

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

18 _____/
19
20 H I G H L Y C O N F I D E N T I A L
21 A T T O R N E Y S E Y E S O N L Y
22

23 VIDEOTAPED DEPOSITION OF ANDRE BOULE
24 REDWOOD SHORES, CALIFORNIA
25 WEDNESDAY, OCTOBER 26, 2011

26 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR.
27 CSR LICENSE NO. 9830
28 JOB NO. 42861

1 structured electronic document on the touch screen
2 display, wherein the structured electronic document
3 comprises a plurality of boxes of content."

4 Do you recall any discussions regarding a
5 structured electronic document?

6 MR. BARTLETT: Objection; calls for a legal
7 conclusion; vague; and asked and answered.

8 THE WITNESS: Yes.

9 MS. DUCCA: Okay.

10 Q Which -- what conversations do you recall
11 regarding structured electronic documents?

12 A We've had many discussions about displaying
13 web pages, which is an example of, you know, an
14 electronic document comprising a plurality --
15 plural -- sorry -- plurality of boxes, so -- yeah, I'm
16 not sure which conversations you -- you're referring
17 to.

18 Q And -- well, what is a structured electronic
19 document?

20 MR. BARTLETT: Objection; calls for a legal
21 conclusion.

22 THE WITNESS: Yeah, I'm not sure how to
23 describe it more than, you know, the -- the name kind
24 of describes what it is. It's an electronic document,
25 and it's structured.

1 MS. DUCCA: Okay.

2 Q Can it include a web page?

3 MR. BARTLETT: Objection; calls for a legal
4 conclusion.

5 THE WITNESS: I think a web page is an
6 example of a structured electronic document, yes.

7 MS. DUCCA: Q. How about a Word document
8 with images embedded?

9 MR. BARTLETT: Same objections; calls for a
10 legal conclusion.

11 THE WITNESS: I'm not familiar with the Word
12 document format, but I would presume that, yes, it's a
13 structured electronic document.

14 MS. DUCCA: Q. How about a Word document
15 with no images embedded? Is that a structured
16 electronic document?

17 MR. BARTLETT: Objection; calls for a legal
18 conclusion.

19 THE WITNESS: I wouldn't make a distinction
20 between with or without images.

21 MS. DUCCA: Q. What about an electronic book
22 or an eBook? Is that a structured electronic
23 document?

24 MR. BARTLETT: Objection; calls for a legal
25 conclusion.

1 THE WITNESS: As far as my understanding,
2 yes.

3 MS. DUCCA: Q. How about a JPEG, an image?

4 MR. BARTLETT: Objection; calls for a legal
5 conclusion.

6 THE WITNESS: Well, that -- that might be a
7 little bit more difficult to -- to answer. But again,
8 it depends on -- it depends on what you mean by
9 "structured electronic document." There -- there
10 could be different possible interpretations, and that
11 could be one.

12 MS. DUCCA: Q. Now, you didn't invent a
13 structured electronic document; did you?

14 MR. BARTLETT: Objection; vague; calls for a
15 legal conclusion.

16 THE WITNESS: Which specific structured
17 electronic document are you referring to?

18 MS. DUCCA: Just a structured electronic
19 document.

20 Q Did you ever -- did you invent a structured
21 electronic document?

22 MR. BARTLETT: Objection; vague; calls for a
23 legal conclusion.

24 THE WITNESS: I probably have over the course
25 of my career.

1 CERTIFICATE OF REPORTER

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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 26th day of October, 2011.
21

22 _____
23 ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830
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