

EXHIBIT 12
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 H I G H L Y C O N F I D E N T I A L
20 A T T O R N E Y S ' E Y E S O N L Y

21 VIDEOTAPED DEPOSITION OF RICHARD WILLIAMSON
22 REDWOOD SHORES, CALIFORNIA
23 FRIDAY, OCTOBER 28, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
25 CSR LICENSE NO. 9830
JOB NO. 42876

1 Q Do you have an engineering -- do you have any
2 independent knowledge of what a structured electronic
3 document is?

4 A Yes.

5 MR. BARQUIST: Objection; vague and
6 ambiguous; calls for a legal conclusion.

7 THE WITNESS: I will not interpret the legal
8 language. I can tell you about the engineering work.

9 MR. MACK: Okay. I'm not asking for the
10 legal interpretation.

11 Q Just do you have -- have you heard the term
12 structured electronic document used at Apple before?

13 A I can tell you about the way we talk about
14 structured documents from an engineering perspective
15 and what a structured document is.

16 Q Okay. My question was, though, have you
17 heard the term structured electronic document at Apple
18 before?

19 MR. BARQUIST: Objection.

20 Other than in connection with meetings with
21 counsel, you may answer it.

22 MR. MACK: Q. I mean, in your work as an
23 engineer, have you ever heard of the term structured
24 electronic document?

25 A I use the term structured document a lot,

1 especially as it relates to the double tap technology
2 that we have.

3 Q Okay. And what is a structured document?

4 A A structured document is something that has a
5 visual structure with structurally interesting
6 components. And there are many examples of a
7 structured document, whether it be a .pdf document
8 with an imposed structure or whether it be a web page
9 with a structure or an .rtf document. So a structured
10 document is something that, you know, a normal human
11 can look at and identify areas of interest.

12 Q Okay. So would it be safe to say a
13 structured document has some sort of layout associated
14 with it; is that fair?

15 MR. BARQUIST: Objection; vague and
16 ambiguous.

17 THE WITNESS: I'm not sure. I mean, that's
18 different than the definition I just gave you. So,
19 you know, I think of a structured document more in
20 terms of its visual appearance and having visually
21 interesting elements that you can zoom in to.

22 MR. MACK: Okay.

23 Q So would a -- would a plain text document be
24 a structured document?

25 MR. BARQUIST: Objection; incomplete

1 hypothetical; calls for a legal conclusion.

2 THE WITNESS: To the extent that that's a --
3 you know, trying to impose a legal question to me, I'm
4 not sure I'm qualified to answer that.

5 MR. MACK: Yeah, but I'm not asking for the
6 legal definition.

7 Q Like, would you consider a text document a
8 structured document from the definition you just gave?

9 MR. BARQUIST: Objection; vague and
10 ambiguous; incomplete hypothetical.

11 THE WITNESS: What kind of text document? I
12 mean, you need to be more specific.

13 MR. MACK: Just a -- you know, not a rich
14 format; just a regular form -- regular text document,
15 a .txt file that you're displaying on a screen.

16 Q Would that -- would you consider that a
17 structured document?

18 MR. BARQUIST: Objection; lacks foundation;
19 vague and ambiguous.

20 THE WITNESS: I mean, it all depends on the
21 context.

22 MR. MACK: Okay.

23 Q But you gave examples of a web -- you gave
24 examples of some structured documents; correct?

25 And you said a web page is a structured

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CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO HOWARD, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings which took place;

That I am a disinterested person to the said action.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of October 2011.

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