

Exhibit 2
(Submitted Under Seal)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE, INC., a California
corporation,
Plaintiff,

vs.

Civil Action. No.
11-CV-01846-LHK

SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity, SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation, and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC,
a Delaware limited liability
company, a California corporation.

Defendants.

SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity, SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation, and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC,
a Delaware limited liability
company, a California corporation.

Counterclaim-Plaintiffs,

vs.

APPLE, INC., a California
corporation,

Counterclaim-Defendant.

*** HIGHLY CONFIDENTIAL ***
*** ATTORNEYS' EYES ONLY ***

VIDEOTAPED INDIVIDUAL DEPOSITION OF:
JUNHO PARK
(VOLUME 2)

March 30, 2012
Kim & Chang
Seoul, South Korea
1:14 p.m. - 7:12 p.m.

1 APPEARANCES:

2 For the Plaintiff and Counterclaim-Defendant, Apple,
3 Inc.

MORRISON FOERSTER

4 By: Matthew Ahn, Esq.
5 755 Page Mill Road
6 Palo Alto, California 94304-1018

7 For the Defendants and Counterclaim-Plaintiffs, the
8 Samsung entities:

QUINN, EMANUEL, URQUHART & SULLIVAN, LLP

9 By: Carl Anderson, Esq.
10 865 South Figueroa Street
11 Los Angeles, California 90017

12 Also present:

13 Jeesoo Jung, Lead Interpreter
14 Eunice Hyo-Rim Lee, Check Interpreter
15 Samantha Kim, Morrison Foerster
16 Hankil Kang, Samsung
17 Inga Kornev, Videographer
18 Jason Meadors, Court Reporter

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15:18:23 1 Q. I'll repeat it for you.

15:18:25 2 You have information related to my question
15:18:28 3 about how information on Apple's patents is kept at
15:18:33 4 Samsung, but you can't tell me anything because of the
15:18:37 5 instruction not to answer. Is that correct?

15:19:02 6 MR. ANDERSON: For the record, I cautioned the
15:19:04 7 witness not to reveal privileged information, and I gave
15:19:07 8 no instruction not to answer.

15:19:28 9 CHECK INTERPRETER: (Speaking Korean.)

15:19:48 10 A. Yes.

15:19:53 11 Q. (By MR. AHN) Will you tell me what that
15:19:55 12 information is?

15:19:56 13 MR. ANDERSON: I instruct the witness not to
15:19:57 14 answer. That's a totally inappropriate question. That's
15:20:01 15 really outrageous. You know, it's an ethical violation
15:20:06 16 to try to deceive a witness into breaking attorney-client
15:20:11 17 privilege.

15:20:11 18 MR. AHN: Counsel, your comments are totally
15:20:14 19 inappropriate. You did not instruct the witness not to
15:20:18 20 answer the question. So I needed to ask to see if you're
15:20:21 21 going to instruct him. It appears that you've just
15:20:23 22 instructed him, so let's find out if the witness will
15:20:26 23 answer my question or not.

15:20:27 24 MR. ANDERSON: Again, I instruct the witness
15:20:28 25 not to answer this question.

15:21:00 1 A. I cannot answer.

15:21:02 2 Q. (By MR. AHN) You're following your counsel's
15:21:04 3 instruction, correct?

15:21:14 4 A. When it comes to what I was consulted with
15:21:20 5 counsel, I'm not able to answer.

15:21:23 6 Q. My question is just, are you following your
15:21:25 7 counsel's instruction?

15:21:33 8 CHECK INTERPRETER: (Speaking Korean.)

15:21:34 9 A. Yes.

15:21:38 10 Q. (By MR. AHN) I'm going to hand you what has
15:21:40 11 been marked as Exhibit 2548. Exhibit 2548 bears the
15:21:56 12 Bates numbers SAMNDCA11280015 through 0054.

15:22:10 13 Do you recognize Exhibit 2548?

15:22:17 14 A. No, I don't.

15:22:19 15 Q. Ever seen a document like Exhibit 2548?

15:22:24 16 MR. ANDERSON: Objection. Vague.

15:22:28 17 A. No, I have not.

15:22:35 18 Q. (By MR. AHN) On the first page, there is a
15:22:37 19 bullet point in the center that states, "Patent
15:22:40 20 application. Apple looking into radial menus concept."
15:22:47 21 Do you see that?

15:22:56 22 A. Yes, I do.

15:22:57 23 Q. You mentioned previously that your team looks
15:23:01 24 into future functions that Apple might have based on
15:23:06 25 patent applications. Is that right?

19:11:34 1 Q. (By MR. AHN) You have no opinion on that,
19:11:35 2 correct?

19:11:39 3 A. Correct.

19:11:41 4 Q. When did you collect documents for production
19:11:43 5 in this case?

19:12:07 6 A. I delivered my PC to our legal team towards the
19:12:11 7 end of December 2011.

19:12:16 8 Q. Did you provide email messages to the legal
19:12:19 9 team?

19:12:28 10 A. I provided my entire PC.

19:12:31 11 Q. So your emails would have been on your PC at
19:12:35 12 that time; is that right?

19:12:37 13 A. Yes.

19:12:48 14 MR. AHN: That's all the questions I have
19:12:50 15 today.

19:12:51 16 MR. ANDERSON: No questions from Samsung.

19:12:55 17 VIDEOGRAPHER: This marks the end of Disk
19:12:57 18 Number 4 in the deposition of Junho Park. Going off the
19:13:00 19 record. The time is 7:12.

20 (Time noted: 7:12 p.m.)

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

5 STYLE OF CASE: Apple v. Samsung (NDCAL)
 6 DEPOSITION OF: JUNHO PARK

7 DATE TAKEN: March 30, 2012

8 E R R A T A S H E E T

9 Page Line Change Reason

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

25 _____ JUNHO PARK

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C E R T I F I C A T E

SEOUL)
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SOUTH KOREA)

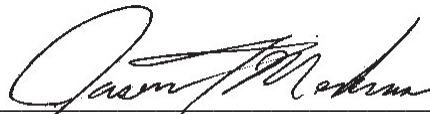
I, Jason T. Meadors, Registered Professional Reporter and Certified Realtime Reporter, do hereby certify that the aforementioned witness was first duly sworn by me pursuant to stipulation of counsel to testify to the truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

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

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

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

IN WITNESS WHEREOF, I have hereunto set my hand this 31st day of March, 2012.



Jason T. Meadors
Certified Realtime Reporter
Registered Professional Reporter