

Exhibit 41
(Submitted Under Seal)

In The Matter Of:

APPLE, INC.,

v.

SAMSUNG ELECTRONICS CO., LTD.,

JUN WON LEE - Vol. 1

March 5, 2012

***HIGHLY CONFIDENTIAL
BUSINESS INFORMATION***

MERRILL CORPORATION

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

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APPLE, INC., a California
corporation,

Plaintiff,

vs.

Case No.
4:11-cv-01846-LHK

SAMSUNG ELECTRONICS CO., LTD.,
et al.,

Defendants.

_____ /

DEPOSITION OF
JUN WON LEE

Monday, March 05, 2012

HIGHLY CONFIDENTIAL BUSINESS INFORMATION

REPORTED BY: RACHEL FERRIER, CSR 6948

(3-441636)

1 THE INTERPRETER: So --

2 MR. HEYISON: -- to resolve this so I can move
3 on here.

4 THE INTERPRETER: Okay. Boo sa jang is EVP and
10:11:41 5 jeon moo is SVP.

6 MR. HEYISON: Great. Okay.

7 THE INTERPRETER: So this person is SVP in this
8 context, I believe.

9 MR. HEYISON: Okay. Excellent.

10:11:55 10 Q Now, at the first meeting, who attended from
11 Apple?

12 A Jim Luton, patent counsel, and the general
13 counsel came too. I don't remember the name, though.

14 Q If I suggest to you Bruce Sewell, is that the
10:12:27 15 general counsel from Apple that attended the meeting?

16 A Apple's own general counsel, Bruce Sewell.

17 Q Where was the meeting?

18 MR. WEINSTEIN: Objection; outside the scope.

19 THE WITNESS: Seoul.

10:12:54 20 BY MR. HEYISON:

21 Q Can you give me a month and a year?

22 A I don't remember the date. I'm not really good
23 at remembering the dates. I have to look at the record.

24 Q Okay. So did anybody make any written
10:13:16 25 presentations?

1 MR. WEINSTEIN: Objection; beyond the scope.

2 THE WITNESS: Probably Samsung did some kind of
3 presentation -- oh, Apple did --

4 THE INTERPRETER: Interpreter's correction:
10:14:17 5 Apple -- probably Apple did some kind of presentation,
6 but Samsung did not make any presentation.

7 BY MR. HEYISON:

8 Q Okay. Please tell me in as much detail as you
9 can -- strike that.

10:14:36 10 Okay. How long did the meeting last?

11 MR. WEINSTEIN: Objection; outside the scope.

12 THE WITNESS: I don't remember those dates at
13 the time. I don't have all those things in my head.

14 BY MR. HEYISON:

10:15:02 15 Q Please tell me in as much detail as you can
16 what Apple said and what Samsung said.

17 MR. WEINSTEIN: Objection; outside the scope.

18 THE WITNESS: Samsung mostly was listening to
19 what Apple said in the first meeting. Apple was talking
10:15:52 20 about Samsung's smartphone infringed Apple phone's
21 patents and design, so they were complaining about our
22 infringement about Apple's patent and design in their
23 phone.

24 BY MR. HEYISON:

10:16:20 25 Q Anything else that you recall Apple saying?

1 MR. WEINSTEIN: Objection; outside the scope.

2 THE WITNESS: I don't remember any specific
3 contents in detail.

4 BY MR. HEYISON:

10:16:47 5 Q And so what did Apple say in response?

6 MR. WEINSTEIN: Objection; outside the scope.

7 MR. HEYISON: Samsung. Thank you.

8 Q What did Samsung say in response?

9 MR. WEINSTEIN: Same objection.

10:17:06 10 THE WITNESS: Samsung contended that there was
11 no such infringement and also requested the evidences
12 for the contention of the infringement.

13 BY MR. HEYISON:

14 Q Okay. At that first meeting you attended,
10:17:49 15 Mr. Lee, did Samsung assert that Apple was infringing
16 any of Samsung's patents?

17 MR. WEINSTEIN: Objection; outside the scope.

18 THE WITNESS: Samsung did not assert that any
19 specific Samsung's patent was infringed.

10:18:32 20 BY MR. HEYISON:

21 Q At that meeting, that first meeting, did
22 Samsung tell Apple that Samsung believed Apple was
23 infringing any Samsung patents?

24 MR. WEINSTEIN: Objection; outside the scope.

10:19:10 25 THE WITNESS: It is possible that Samsung might

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1 MR. OLSON: But we can save some of that with
2 me, actually, tomorrow morning saying closing that
3 notice -- or closing that transcript or not.

4 MR. HEYISON: Okay.

19:32:25

5 MR. WEINSTEIN: And the one request I would
6 make is that for the specific documents where you made
7 requests for production, if you could put that in
8 writing.

9 MR. HEYISON: We will do so.

19:32:34

10 MR. WEINSTEIN: Very good.

11 MR. HEYISON: Thank you.

12 THE VIDEOGRAPHER: This marks the end of Tape
13 No. 5 in the deposition of Jun Won Lee.

14 Going off the record, the time is 7:32.

19:32:48

15 (Whereupon, the deposition was adjourned at
16 7:32 p.m.)

17 ---o0o---

18 I declare under penalty of perjury that the
19 foregoing is true and correct. Subscribed at

20 SF, California, this 24 day of

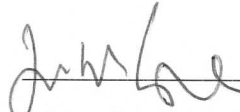
21 May, 2012.

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Signature of the witness

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CERTIFICATE OF REPORTER

I, RACHEL FERRIER, a Certified Shorthand Reporter, 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 down in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony was thereafter reduced to typewriting by computer under my direction and supervision and is a true record of the testimony given by the witness;

That before completion of the deposition, review of the transcript [X] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

DATED:

RACHEL FERRIER, CSR No. 6948

ERRATA SHEET

NAME OF CASE: Apple v. Samsung, No. 11-cv-1846-LHK (ND Cal)

DATE OF DEPOSITION: March 5, 2012 (Vol. 1)

NAME OF WITNESS: Jun Won Lee

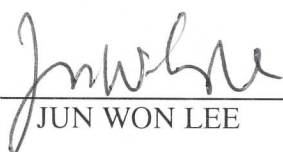
Reason Codes:

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page	Line	Now Reads	Should Read	Reason
16	5	entering a	entering into a	1
16	18	mobile phone	mobile phones	1
22	22	sineo	for a	3
22	23	ago so	so	1
22	25	touch wheel issue, touch wheel	a touch wheel issue; a touch wheel	1
28	6	I met	we met	1
32	19	Samsung's	Samsung	3
33	10	Samsung's	Samsung	3
42	14	I think I did.	I think I do.	1
42	16	make	made	1
42	17	such meeting, I don't need them anymore, so I discard	the meeting, I didn't need them anymore, so I discarded	1
53	17	none about	no mention of	1
57	16	a different terms and condition	different terms and conditions	1
58	16	the Apple's	Apple's	1
58	22	includes	include	1
62	25	Nothing.	No.	1
63	15	The next meeting after this.	Yes, the next meeting after that one.	1
69	5	Samsung have	Samsung has	1
74	20	royalty	royalties	1
74	23	royalty	royalties	1
79	19	base that	based that	1
80	24	Apple.	Apple's agreement.	1
81	10	license	licensed	1
89	11	the Microsoft	Microsoft	1
90	3	the Microsoft	Microsoft	1
93	6	May not be exact	It may not be exact	1
97	8	I rather like you	I rather pose	1

98	1	experiences in licensing agreement	experience in licensing agreements	1
98	15	cannot	do not	1
98	17	cannot	do not	1
101	16	standard's	standards	3
101	17	standard's	standards	3
110	4	the companies	companies	1
113	11	reviewed about the companies	reviewed the portfolios of companies	1
114	5	values valuation	valuation	1
114	10	there is no such thing	no	1
118	21	made or not	were made or not	1
119	10	I have not involved	I have not been involved	1
122	23	-- Apple nor	-- neither Apple nor	1
133	15	assertion where	assertion	1
133	16	the Ericsson conducted – Ericsson had an improper	that Ericsson conducted – Ericsson engaged in improper	1
139	22	it's	is	1
140	13	on a	on the	1
140	23	we have	rely	1
143	15	that	those	1
145	9	we had	did we	1
145	10	sought	seek a	1
145	17	demanded royalty	demanded royalties	1
149	10	Some Samsung	Samsung	1
152	18	applying patents	applying for patents	1
154	4	Apples	Apple	3
157	10	entered	entered into	1

Signed:



 JUN WON LEE

Date:

