

EXHIBIT 18
FILED UNDER SEAL

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

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5 APPLE INC., A CALIFORNIA)
6 CORPORATION,)
7 PLAINTIFF,) No. 11-CV-01846-LHK
8 vs.)
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 VIDEOTAPED DEPOSITION OF ROBERT BRUNNER
21 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

22 San Francisco, California

23 Monday, March 5, 2012

24 Reported By:

KATHLEEN WILKINS, CSR #10068, RPR, CRR, CCRR, CLR

25 JOB NO. 47111

1 referring to as the bezel. 11:44

2 A. Let's see. This -- this plastic 11:44
3 material (indicating) which surrounds the display 11:44
4 is commonly referred to as a bezel. 11:44

5 Q. Thank you. 11:44

6 And on page 134 of Exhibit 1, the black 11:44
7 plastic that surrounds and sits above the display, 11:44
8 that's also something you referred to as a 11:44
9 "bezel"? 11:44

10 A. Yes, that is correct. 11:44

11 Q. On this Jaguar concept on page 134, is 11:44
12 the flat panel display something that can be 11:44
13 detached and used separate and apart from the rest 11:44
14 of the device? 11:44

15 A. It's designed to be detached but not 11:44
16 separately. It was intended as -- the portion 11:44
17 behind the display is intended as a desktop 11:45
18 computer which could be connected to virtually any 11:45
19 monitor. And then the flat panel section was 11:45
20 intended as a module to attach should you want to 11:45
21 make it portable. 11:45

22 Q. And if you wanted to input information 11:45
23 into this computer, can you do it through the 11:45
24 display? 11:45

25 A. No. No. It was entirely based on 11:45

1 keyboard and mouse interaction. 11:45

2 Q. So the display, even if detached, would 11:45
3 never be used in a manner where a person would 11:45
4 hold it with one hand and touch the display with 11:45
5 the other -- with fingers of the other hand? 11:45

6 A. No, it would not. 11:45

7 Q. Let's look at page 144, the brain box. 11:45
8 This is Exhibit 1, so it's the brain box -- 11:45

9 A. Yes. 11:45

10 Q. -- picture we were talking about 11:45
11 earlier? 11:45

12 You testified that the brain box was a 11:46
13 concept that was developed before you arrived at 11:46
14 Apple. 11:46

15 Do you have, as you sit here today, 11:46
16 knowledge about what that concept looked like 11:46
17 separate and apart from what you see in the 11:46
18 picture? 11:46

19 MR. WEBSTER: Object. That misstates 11:46
20 his testimony. 11:46

21 THE WITNESS: I do not recall ever 11:46
22 seeing the concept in person. I have seen 11:46
23 photographs of it. I have never actually seen the 11:46
24 concept model, that I recall seeing it. 11:46

25 BY MS. TUCHER: 11:46

1 Q. Have you seen photographs of it other 11:46
2 than the photograph that is on page 144 of 11:46
3 Exhibit 1? 11:46

4 A. I'm not positive. I -- I think so, but 11:46
5 I'm not entirely positive. 11:46

6 Q. Do you know what the back of the display 11:46
7 screen looks like? 11:47

8 MR. WEBSTER: Object. It calls for 11:47
9 speculation. 11:47

10 THE WITNESS: It's -- it would be 11:47
11 guesswork at this point. Again, without seeing 11:47
12 photographs, I think I know what it looks like, 11:47
13 but I can't say with absolute certainty. 11:47

14 BY MS. TUCHER: 11:47

15 Q. I'm not asking you to guess. So if you 11:47
16 can't give us any information about what the back 11:47
17 of the product looks like, we will have to leave 11:47
18 it there. 11:47

19 A. Mh-hmm. 11:47

20 Q. Let's look at page 174 of Exhibit 1, the 11:47
21 PenMac device that you were asked about earlier. 11:47

22 Does this device also have a raised 11:47
23 plastic bezel surrounding the display screen? 11:47

24 A. Yes, it does. 11:48

25 Q. And is this device actually rectangular, 11:48