

**EXHIBIT 8**  
**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 O U T S I D E C O U N S E L O N L Y

21 VIDEOTAPED DEPOSITION OF JONATHAN IVE  
22 SAN FRANCISCO, CALIFORNIA  
23 THURSDAY, DECEMBER 1, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR  
25 CSR LICENSE NO. 9830  
JOB NO. 43920

1 same question about your interpretation and  
2 understanding of those diagonal lines for Figure 3,  
3 you'd give me the same answer as you did for Figure 1?

4 A Yes. My interpretation from those diagonal  
5 lines on Figure 3 would be that it -- it communicates  
6 that that surface is flat. And because four of the  
7 five of those diagonal lines cross another feature,  
8 that it would indicate to me -- or I would interpret  
9 that as meaning that that material was perhaps clear.

10 Q And when you say they're another feature,  
11 what are you referring to?

12 A The -- the way that they cross the dotted  
13 line, this suggests the display opening.

14 Q Do you have any understanding or explanation  
15 as to why the front surface as shown in Figure 1 and  
16 Figure 3 has the diagonal lines in both of those, but  
17 then looking at the back surface figures shown in  
18 Figure 2 and Figure 4, those diagonal lines only  
19 appear in Figure 2 and not Figure 4?

20 A No, I -- I don't have an explanation, but I  
21 do have a clear interpretation of what these drawings  
22 and all of these figures in conjunction with each  
23 other are communicating.

24 Q With respect to Figure 1 and Figure 3, you've  
25 used the phrase "dotted line."

1 A Yes.

2 Q What -- what does the dotted line signify, in  
3 your understanding?

4 A Well --

5 Q In those two figures, of course.

6 A So the dotted line in Figure 1 and in  
7 Figure 3, my interpretation of that dotted line is  
8 that denotes the ending of an opaque border and the  
9 beginning of the display that occurs; both of those,  
10 that transition occurring underneath the clear  
11 material.

12 Q And when you say "the beginning of the  
13 display," are you referring to the active area of the  
14 display, or are you referring to something else?

15 A When -- when -- yes. When I'm referring to  
16 the display, I'm referring to that being the beginning  
17 of -- there's always a slight -- a slight margin, and  
18 then the active area of the display.

19 And that would, of course, also correspond  
20 with the -- the DITO panel which carries the  
21 multi-touch ITO.

22 Q And so we have a clear record of it, then,  
23 the -- the area shown in Figure 1 and Figure 3, that's  
24 inside the interior dotted rectangular line,  
25 represents the active area of the -- the display?

1           A    My interpretation would be that that dotted  
2   line marks the junction between essentially the active  
3   area of the display and the end of the opaque mask  
4   that's behind the clear material. That's my  
5   interpretation.

6           Q    As we talked about, the -- that line showing  
7   the demarcation between the active area of the display  
8   and the margin is in a dotted line form; right?

9           A    Yes.

10          Q    Do you have any understanding as to whether  
11   or not the dotted line has any significance for  
12   purposes of whether or not that demarcation line is --  
13   is part of the claim design here?

14          A    In -- in my interpretation of these images,  
15   I've been interpreting just these graphic images. So  
16   that's -- all of my comments are based on, these are  
17   graphic images, what do I interpret, and assume what  
18   they mean in conjunction with each other.

19                So my assumption was this dotted line  
20   suggests that it is a -- a junction and feature that  
21   is below. But that's just looking at these graphic  
22   images, and I'm not making any reference to reading  
23   the -- the -- the -- the descriptions at the  
24   beginning.

25          Q    And perhaps let's do that, then. If you can

1 please take a look at the description field.

2 A Yes.

3 Q You'll see that it says in -- in depicting or  
4 describing Figure 9, it says:

5 "Figure 9 is an exemplary diagram of the use  
6 of the electronic device thereof, the broken lines  
7 being shown for illustrative purposes only, and form  
8 no part of the claim design."

9 Do you see that language?

10 A So that's on Figure --

11 Q 9.

12 A Oh, Figure 9.

13 So what does it say on Figure 3?

14 So the dotted line that -- they're talking  
15 about the person here?

16 Q Right. And I -- what I'd like to do is just  
17 take this one step at a time. So let's talk about  
18 Figure 9 for a moment.

19 A Okay.

20 Q So just to go back for a second, you see the  
21 language under the description field where it says:

22 "Figure 9 is an exemplary diagram of the use  
23 of the electronic device thereof, the broken lines  
24 being shown for illustrative purposes only in form no  
25 part of the claim design."