

# Exhibit E

## (Submitted Under Seal)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JONES DIVISION

APPLE, INC., A CALIFORNIA )  
CORPORATION, )  
Plaintiff, )  
VS. ) CASE  
NO. )  
11-CV-01846-LHK(PSG)  
SAMSUNG ELECTRONICS CO., )  
LTD., A KOREAN BUSINESS )  
ENTITY; SAMSUNG )  
ELECTRONICS AMERICA, )  
INC., A NEW YORK )  
CORPORATION; SAMSUNG )  
TELECOMMUNICATIONS )  
AMERICA, LLC, A DELAWARE )  
LIMITED LIABILITY )  
COMPANY, )  
Defendant. )

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ORAL AND VIDEOTAPED DEPOSITION OF  
DAE IL "DALE" SOHN  
Friday, April 20, 2012

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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ORAL AND VIDEOTAPED DEPOSITION OF DAE IL "DALE" SOHN,  
produced as a witness at the instance of the Plaintiff(s),  
and duly sworn, was taken in the above-styled and numbered  
cause on Friday, April 20, 2012, from 9:33 a.m. to  
5:27 p.m., before Tamara K. Chapman, CSR in and for the  
State of Texas, reported by machine shorthand, at Regus,  
4515 Cole Avenue, Dallas, Texas, pursuant to the Federal Rules of  
Civil Procedure and the provisions stated on the record or  
attached hereto.  
JOB NO: 48590

THE VIDEOGRAPHER: This is the start of tape  
labeled No. 1 of the videotaped deposition of Dale Sohn in  
the matter of Apple, Inc., versus Samsung Electronics  
Company, Ltd., for the Northern District of California,  
San Jose Division, No. 11-CV-01846-LHK (PSG). This  
deposition is being held in Dallas, Texas, on April 20th,  
2012, at approximately 9:33 a.m. The court reporter is  
Tamara Chapman.

Will counsel please introduce yourselves, 09:33  
after which the court reporter will swear in the witness. 09:33

MR. OLSON: Erik Olson from Morrison & 09:33  
Foerster on behalf of Apple, and with me is Emily 09:33  
Sheffield from my office. 09:33

MS. MAROULIS: Victoria Maroulis with Quinn 09:33  
Emanuel, counsel for Samsung and the witness, Mr. Dale 09:33  
Sohn. With my is Cindi Moreland, general counsel of STA. 09:33

DAE IL "DALE" SOHN, 09:33  
having been first duly sworn, testified as follows: 09:33

EXAMINATION 09:33  
BY MR. OLSON: 09:33

Q. Mr. Sohn, state your full name for the record. 09:34

A. My Korean name is Dae Il Sohn. 09:34

THE INTERPRETER: D-A-E I-L S-O-H-N. 09:34

Q. (BY MR. OLSON) Do you go by a different name in 09:34  
the United States? 09:34

1	A. The name that I use for the sake of the business	09:34
2	affairs in the United States is Dale Sohn.	09:34
3	Q. What's your residential address?	09:34
4	A. 5320 Catamaran Drive, Plano, Texas.	09:34
5	Q. And you are the president and CEO of Samsung	09:35
6	Telecommunications America's, LLC, correct?	09:35
7	A. Yes.	09:35
8	Q. And Samsung Telecommunications America, if I	09:35
9	refer to that as STA, would that make sense to you?	09:35
10	A. Yes.	09:35
11	Q. And isn't it the case that that's one of the ways	09:35
12	that people within Samsung refer to your subsidiary?	09:35
13	A. Correct.	09:35
14	Q. And Samsung Telecommunications America or STA	09:35
15	sells over 9 billion in products a year in the United	09:36
16	States, correct?	09:36
17	MS. MAROULIS: Objection. Calls for	09:36
18	speculation.	09:36
19	A. Our revenue is more or less than \$9 billion, but	09:36
20	when it comes to the accurate number, I don't have a clear	09:36
21	recollection.	09:36
22		09:36
23	Q. (BY MR. OLSON) You've been the president and CEO	09:36
24	of STA since May of 2006, correct?	09:36
25	A. Correct.	09:37

1 MS. MAROULIS: Objection; vague, calls for 10:52  
2 speculation. 10:52

3 A. Correct. 10:52

4 Q. (BY MR. OLSON) In the postpaid market for 10:53  
5 smartphones, isn't it correct that Apple is a primary 10:53  
6 competitor of Samsung with respect to smartphones, and 10:53  
7 I'll say for 2011 and 2012? 10:53

8 MS. MAROULIS: Objection; compound, vague. 10:53

9 A. That is correct. 10:53

10 Q. (BY MR. OLSON) And with respect to the Galaxy S 10:53  
11 phones, Apple is a primary competitor for the customers 10:53  
12 who would purchase those phones or, alternatively, 10:53  
13 purchase an iPhone? 10:54

14 MS. MAROULIS: Objection; vague, calls for 10:54  
15 speculation, assumes facts not in evidence. 10:54

16 A. The competition situation may differ depending on 10:55  
17 carriers. When it comes to Verizon, there is a brand 10:55  
18 named DROID. So actually competition with the DROID could 10:55  
19 be fiercer. And when it comes to T-Mobile, it doesn't 10:55  
20 handle iPhones at all. 10:56

21 So even in the postpaid market, we have fierce 10:56  
22 composition with other vendors such as HTC and Motorola. 10:56  
23 So it would be somewhat difficult to pinpoint iPhones as 10:56  
24 our -- as the primary competitive product with regard to 10:56  
25 the Galaxy S II product. 10:56

1 Q. (BY MR. OLSON) But Apple would be a competitor 10:56  
2 of Samsung with respect to the Galaxy S and the Galaxy 10:56  
3 S II product? 10:56

4 A. Yes. 10:56

5 Q. Has Samsung Korea or Samsung Telecommunications 10:56  
6 America placed any particular focus on an effort to beat 10:57  
7 Apple in 2010 or 2011 or 2012? 10:57

8 MS. MAROULIS: Objection; compound. 10:57

9 A. Yes. 10:57

10 Q. (BY MR. OLSON) And it's correct in fact that in 10:57  
11 each of those three years it has been a particular goal of 10:57  
12 STA to beat Apple in the United States? 10:57

13 MS. MAROULIS: Objection; compound, assumes 10:58  
14 facts. 10:58

15 A. It is not true. 10:58

16 Q. (BY MR. OLSON) Is it true in 2012 that one of 10:58  
17 your goals for the STA organization is to beat Apple? 10:58

18 MS. MAROULIS: Objection; vague. 10:58

19 A. That is correct. 10:58

20 Q. (BY MR. OLSON) And -- and it's the case that you 10:58  
21 have been directed by superiors at SEC Korea to come up 10:58  
22 with a strategy in 2012 to beat Apple? 10:59

23 MS. MAROULIS: Objection; vague. 10:59

24 A. No, that is not true. 10:59

25 Q. (BY MR. OLSON) Have you received any 10:59

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LIMITED LIABILITY  
COMPANY,

Defendant.

REPORTER'S CERTIFICATION  
DEPOSITION OF DAE IL "DALE" SOHN  
APRIL 20, 2012

I, Tamara K. Chapman, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:

That the witness, DAE IL "DALE" SOHN, was duly sworn  
by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by the  
witness;

That the deposition transcript was submitted on

1 April 20th, 2012 to the witness or to the attorney for  
2 the witness for examination, signature and return to me by  
3 May 20th, 2012;

4 That the amount of time used by each party at the  
5 deposition is as follows:

6 Mr. Erik J. Olson - 6:01

7 Ms. Victoria F. Maroulis - 00:00

8 That pursuant to information given to the deposition  
9 officer at the time said testimony was taken, the  
10 following includes counsel for all parties of record:

11 Mr. Erik J. Olson - THE PLAINTIFF

12 Ms. Victoria F. Maroulis - THE DEFENDANT

13 That \$\_\_\_\_\_ is the deposition officer's charges  
14 to the Plaintiff(s) for preparing the original deposition  
15 transcript and any copies of exhibits;

16 I further certify that I am neither counsel for,  
17 related to, nor employed by any of the parties or  
18 attorneys in the action in which this proceeding was  
19 taken, and further that I am not financially or otherwise  
20 interested in the outcome of the action.



1                   Certified to by me this 20th day of April 2012.

2  
3                   \_\_\_\_\_  
                  Tamara K. Chapman, Texas CSR 7248

4                   Expiration Date: 12/31/10

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