

EXHIBIT 2

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., LTD.,
10 A Korean business entity;
11 SAMSUNG ELECTRONICS AMERICA,
12 INC., a New York corporation;
13 SAMSUNG TELECOMMUNICATIONS
14 AMERICA, LLC, a Delaware
15 limited liability company,

16 Defendants.
17 _____/

18 C O N F I D E N T I A L
19 A T T O R N E Y S ' E Y E S O N L Y
20 O U T S I D E C O U N S E L
21

22 VIDEOTAPED DEPOSITION OF RAVIN BALAKRISHNAN, Ph.D.
23 SAN FRANCISCO, CALIFORNIA
24 TUESDAY, AUGUST 16, 2011
25

26 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
27 CSR LICENSE NO. 9830
28 JOB NO. 41176

1 did zoom in. But whether or not it has to be zoomed
2 in, I need to spend a bit more time making sure
3 whether it has to or not. I have not done that right
4 now on this device.

5 MR. JOHNSON: Okay.

6 THE WITNESS: So, on this device, I went
7 through the -- the preamble. It's clearly a
8 computer-implemented method. It has a device with a
9 touchscreen display. It is displaying right now a
10 first portion of an electronic document. The
11 electronic document here happens to be a photograph or
12 an image, some kind of a picture of something.

13 MR. JOHNSON: Q. Is the electronic doc --
14 what -- what does an "electronic document" mean in the
15 context of this patent?

16 MR. MONACH: Object to form to the extent
17 it's calling for a legal conclusion, but you can give
18 your views on that.

19 THE WITNESS: In the context of this patent,
20 my understanding, having read the patent and the
21 claims, is the electronic document is some visual
22 representation on the screen that has a defined length
23 and a width, as an example, or defined set of
24 boundaries, because they may not have to be a
25 rectangular set of boundaries.

1 MR. JOHNSON: Q. So can it -- it can be
2 anything with a defined length and width?

3 A It could be any visually represented thing
4 with a defined boundary. I'd rather use the word
5 "boundaries," because length and width may connote a
6 rectangular thing. It may not be a rectangle,
7 necessarily.

8 Q Okay. So an electronic document is anything
9 that can be visually represented with a defined
10 boundary?

11 MR. MONACH: Object to the form of the
12 question; object as calling for a legal conclusion.

13 THE WITNESS: In the context of this patent
14 and the claims, reading the patent and the claims, I
15 would say that would be a -- my definition of an
16 electronic document would be something visually
17 representable on the screen that -- that has a defined
18 set of boundaries.

19 MR. JOHNSON: Okay.

20 Q How about the next limitation?

21 A Okay. So, as I said earlier, it's got a
22 first portion of an electronic document. We already
23 went through that.

24 Q And -- and -- I'm sorry.

25 A I'm sorry.