

EXHIBIT 10
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 SCOTT FORSTALL
22 REDWOOD SHORES, CALIFORNIA
23 THURSDAY, OCTOBER 27, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
25 CSR LICENSE NO. 9830
JOB NO. 43002

1 language in here are you sort of pointing to that
2 reflects this notion of -- of pointing to a logical or
3 semantical region?

4 A It talks about a plurality of boxes of
5 content. And so in this case, boxes of content would
6 refer to these sort of semantic or logical regions as
7 one area I see in this that implies that.

8 Q Okay. Anything else?

9 A Let's see.

10 Well, I mean, a structured electronic
11 document, so this implies some level of structure.
12 Structure itself would imply there are semantic
13 regions, logical regions, within it, and that's what
14 the structure entails. So the structured electronic
15 document itself helps describe this idea.

16 So those are -- I mean, there might be
17 something else I'm missing in there, but those are the
18 two that I --

19 Q Okay. What does "structured electronic
20 document" mean?

21 MR. JACOBS: Objection; calls for a legal
22 conclusion.

23 MR. JOHNSON: Q. You can go ahead and answer
24 unless he tells you not to answer something. He's
25 just preserving the rights for the record.

1 A Okay. Could you ask the question again.

2 Q What does elect -- sorry -- what does
3 "structured electronic document" mean?

4 MR. JACOBS: Same objection.

5 THE WITNESS: I don't know the legal
6 definition, if there is a legal definition of
7 structured electronic document.

8 I can answer sort of my understanding of how
9 I would interpret structured electronic document to
10 mean, and I would take it to mean a -- a document
11 which has some form of structure in it, and that
12 structure could come in many different forms.

13 HTML is a great example of sort of a
14 structured electronic document where it is a document
15 that the actual organization of HTML implies different
16 regions. There's, like, divs and there's a document
17 object model, and all of this sort of builds and
18 creates structure; and so there's sort of a render
19 tree you have for this that's non-UI, and then you
20 apply different styles and other things to then
21 display it on the screen. And so there is -- there is
22 a structure sort of as a piece of that.

23 MR. JOHNSON: Q. If you -- if you turn to
24 Figure 5A, I think, each one of the blocks that are
25 labeled there, are those -- are those structured

1 electronic documents like you were just referring to?

2 A Well, you can infer -- or you could -- there
3 can be multiple different ways of looking at this.

4 One way is to look at the entire web page as
5 a structured electronic document, and then these are
6 sort of the semantic regions I was talking about
7 earlier.

8 You could imagine that you could embed a
9 whole other document within a document as well. So
10 you could have maybe, you know, an Excel spreadsheet
11 in a piece of this or a whole other web page inside of
12 a frame, and then that itself could be considered a
13 structured electronic document inside of another one.

14 You know, from this you can't determine
15 precisely which those blocks are, but it can be
16 interpreted in multiple ways.

17 Q Okay. So you could have, for example,
18 block -- Block 1 could be its own structured
19 electronic document, and then there could be something
20 embedded within there, like the Excel spreadsheet or
21 something else, which would then be another box of
22 content; is that what you're saying?

23 A I'm not sure what you mean by "box of
24 content" there.

25 Q Right.

1 A You could have --

2 Q I was -- yeah. I mean, if you turn back to
3 Claim 2, it talks about a structured electronic
4 document "wherein the structured electronic document
5 comprises a plurality of boxes of content."

6 A Uh-huh.

7 Q So -- and I'm not trying to put words in your
8 mouth. I'm trying to understand.

9 What I understand structured electronic
10 document to mean is that it can be very broad in a lot
11 of senses, and it can be the whole web page, per se,
12 and it can also be something smaller, like Block 1, if
13 there is something that's embedded within it, like an
14 Excel spreadsheet; is that accurate?

15 MR. JACOBS: Objection; form.

16 THE WITNESS: So there's a potential
17 recursive nature of structure and -- I mean, you see
18 its nature. You see it's in fractals. A fractal is
19 something which is recursive and it is a structure to
20 fractals, but when you zoom into them, there's a
21 structure embedded within them. So a structured
22 electronic document itself could embed other
23 structured electronic documents within it.

24 MR. JOHNSON: Okay.

25 Q What is --