

**EXHIBIT 11**  
**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 A T T O R N E Y S ' E Y E S O N L Y

21 VIDEOTAPED DEPOSITION OF RICHARD WILLIAMSON  
22 REDWOOD SHORES, CALIFORNIA  
23 FRIDAY, OCTOBER 28, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR  
25 CSR LICENSE NO. 9830  
JOB NO. 42876

1 Q Do you have an engineering -- do you have any  
2 independent knowledge of what a structured electronic  
3 document is?

4 A Yes.

5 MR. BARQUIST: Objection; vague and  
6 ambiguous; calls for a legal conclusion.

7 THE WITNESS: I will not interpret the legal  
8 language. I can tell you about the engineering work.

9 MR. MACK: Okay. I'm not asking for the  
10 legal interpretation.

11 Q Just do you have -- have you heard the term  
12 structured electronic document used at Apple before?

13 A I can tell you about the way we talk about  
14 structured documents from an engineering perspective  
15 and what a structured document is.

16 Q Okay. My question was, though, have you  
17 heard the term structured electronic document at Apple  
18 before?

19 MR. BARQUIST: Objection.

20 Other than in connection with meetings with  
21 counsel, you may answer it.

22 MR. MACK: Q. I mean, in your work as an  
23 engineer, have you ever heard of the term structured  
24 electronic document?

25 A I use the term structured document a lot,

1 especially as it relates to the double tap technology  
2 that we have.

3 Q Okay. And what is a structured document?

4 A A structured document is something that has a  
5 visual structure with structurally interesting  
6 components. And there are many examples of a  
7 structured document, whether it be a .pdf document  
8 with an imposed structure or whether it be a web page  
9 with a structure or an .rtf document. So a structured  
10 document is something that, you know, a normal human  
11 can look at and identify areas of interest.

12 Q Okay. So would it be safe to say a  
13 structured document has some sort of layout associated  
14 with it; is that fair?

15 MR. BARQUIST: Objection; vague and  
16 ambiguous.

17 THE WITNESS: I'm not sure. I mean, that's  
18 different than the definition I just gave you. So,  
19 you know, I think of a structured document more in  
20 terms of its visual appearance and having visually  
21 interesting elements that you can zoom in to.

22 MR. MACK: Okay.

23 Q So would a -- would a plain text document be  
24 a structured document?

25 MR. BARQUIST: Objection; incomplete

1 hypothetical; calls for a legal conclusion.

2 THE WITNESS: To the extent that that's a --  
3 you know, trying to impose a legal question to me, I'm  
4 not sure I'm qualified to answer that.

5 MR. MACK: Yeah, but I'm not asking for the  
6 legal definition.

7 Q Like, would you consider a text document a  
8 structured document from the definition you just gave?

9 MR. BARQUIST: Objection; vague and  
10 ambiguous; incomplete hypothetical.

11 THE WITNESS: What kind of text document? I  
12 mean, you need to be more specific.

13 MR. MACK: Just a -- you know, not a rich  
14 format; just a regular form -- regular text document,  
15 a .txt file that you're displaying on a screen.

16 Q Would that -- would you consider that a  
17 structured document?

18 MR. BARQUIST: Objection; lacks foundation;  
19 vague and ambiguous.

20 THE WITNESS: I mean, it all depends on the  
21 context.

22 MR. MACK: Okay.

23 Q But you gave examples of a web -- you gave  
24 examples of some structured documents; correct?

25 And you said a web page is a structured