

EXHIBIT 57

1 UNITED STATES INTERNATIONAL TRADE COMMISSION
2 WASHINGTON, D.C.
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4 In the Matter of:

Investigation No.

5 CERTAIN ELECTRONIC DIGITAL
6 MEDIA DEVICES AND COMPONENTS 337-TA-796
7 THEREOF
8
9

10 CONFIDENTIAL OUTSIDE COUNSEL ONLY
11 PURSUANT TO PROTECTIVE ORDER
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14 VIDEOTAPED DEPOSITION OF JONATHAN IVE
15 San Francisco, California
16 Tuesday, February 7, 2012
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23 REPORTED BY:

24 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR

25 JOB NO. 46227

1 Then on Exhibit 5, I would say that's
2 not the case. That exhibit -- the design
3 described in Exhibit 5 is -- is -- I think moves
4 further away from -- from that initial design
5 that we were pursuing.

6 Exhibit 6, I feel, moves even further
7 away from that first design that we were
8 pursuing.

9 And then Exhibit 7 appears to be --
10 those seem to be CAD files for -- for a different
11 product.

12 Q. And then just in terms of the one that
13 seems the most similar to the project that you
14 were talking about, and again without repeating
15 everything that you said about it, but the one
16 that basically some people said was ugly, is
17 the -- is the set of drawings as part of
18 Exhibit 1, in your view, the closest one or were
19 there others that were closer to your memory on
20 that?

21 A. I'm afraid my memory really isn't --
22 yeah. It could have been -- it could have been
23 any one of those -- those...

24 Q. 1 through 4?

25 A. 1 through 4.

1 There were elements that -- in each of
2 them that's -- that seem reminiscent of the
3 design that we had been working on.

4 Q. And what was it -- whether these
5 drawings are exact or not of the design that you
6 were referring to, what was it about the design
7 that people thought -- meant it wasn't -- it
8 wasn't beautiful enough or it was ugly or
9 whatever those other words were that people used
10 to describe it?

11 A. Well, I can't -- I can't recall what it
12 was that caused other people to -- to describe it
13 as ugly. I don't recall what -- I don't recall
14 specifics.

15 I recall generally that it was --
16 somehow the design was not special enough.

17 I recall long conversations about how
18 dramatically new this technology and this product
19 was going to be, and that the design that we had
20 been exploring and developing didn't correlate to
21 the newness of the product.

22 I recall a conversation that was much
23 more about what -- what the design should aspire
24 to be, rather than what was wrong with the
25 current design.

1 And I would say that that's fairly
2 typical of -- of our design process, whether
3 that's conversations with people outside the
4 design group or amongst designers.

5 Q. And you were referring to how
6 dramatically new this technology would be.

7 What are you referring to there when
8 you say "this technology"?

9 A. So I'm using the word "technology"
10 really very broadly. I'm talking about the
11 processing capability of the silicon.

12 I'm talking about the combination of
13 different wireless connectivity, so from the
14 cellular radios through to Bluetooth and to WiFi.

15 Talking about the -- the single display
16 without a numeric keypad. And so by not having a
17 numeric keypad, this display could be large and,
18 as a percentage, occupy a significant part of the
19 product's front elevation.

20 And affording technology that allowed
21 us to get rid of the keypad and any sort of
22 alphanumeric buttons, the affording technology
23 was multi-touch.

24 And what we were particularly excited
25 about was that the -- the buttons would be

1 completely specific to the functional mode that
2 you were in.

3 So for example, if you were on a call
4 there were certain controls that were relevant to
5 being on a call. And so rather than being
6 distracted by a whole, in some cases alphanumeric
7 keyboard, you were basically presented with six
8 -- six buttons, I think. I can't remember the
9 precise number, and the most significant button
10 being the, you know, make the call/break the
11 call.

12 And I think that that was -- that was
13 cause for us to be very excited about the
14 potential of the product, and we felt very
15 strongly that that could transform the industry,
16 transform the ways that we could use this
17 particular product.

18 And the industrial design at that point
19 in time, I think other people made the
20 observation, and I think we felt the same way
21 internally as a design group, that the industrial
22 design wasn't good enough.

23 Q. And did you yourself have a -- just a
24 step back.

25 When I talked about the -- and I used

1 the word "ugly" again. You had said that wasn't
2 your word.

3 Did you ever express a similar
4 sentiment about that -- that prior design
5 yourself?

6 A. I don't recall.

7 Q. Do you recall what your impression was
8 of it in that sense?

9 A. My recollection was that it was a very
10 competent piece of design that wasn't good
11 enough.

12 Q. And do you have a -- do you have a
13 memory of what it was that made you think that it
14 wasn't good enough?

15 A. No. My recollection -- I -- I don't
16 recall any specifics. But my recollection is
17 that it's the combination of multiple design
18 elements, form.

19 It's the combination of multiple
20 elements that just meant that it wasn't beautiful
21 enough, that it wasn't as distinct, didn't
22 feel -- it felt -- I think the predominant
23 feeling that I had was, on one hand we were very
24 excited about the -- the multi-touch. We had
25 made the -- the first very crude multi-touch