

EXHIBIT 60

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 PHIL HOBSON
22 REDWOOD SHORES, CALIFORNIA
23 TUESDAY, FEBRUARY 28, 2012

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
25 CSR LICENSE NO. 9830
JOB NO. 46054

1 that your understanding? 15:34

2 A That's my understanding, yes. 15:34

3 Q Mr. Hamblin in his e-mail says: 15:34

4 "We have made some additional modifications 15:34
5 to the Grape mechanical drop samples." 15:34

6 Do you see that? 15:34

7 A Yes. 15:34

8 Q Do you know what he refers -- what he's 15:34
9 referring to when he says "Grape mechanical drop 15:34
10 samples"? 15:34

11 MR. GALLEGOS: Objection; lacks foundation. 15:34

12 THE WITNESS: I don't know specifically what 15:34
13 he's referring to. 15:34

14 MR. KIDMAN: Q. Were you involved in any 15:34
15 drop testing that related to the touch panel? 15:34

16 A Specifically just the touch panel? I mean, 15:35
17 we did drop testing for -- for the general 15:35
18 architecture. 15:35

19 Q And did the drop -- any of the drop testing 15:35
20 that you participated in include samples of phones 15:35
21 where the touch panel was in operation? 15:35

22 MR. GALLEGOS: Objection; vague. 15:35

23 THE WITNESS: Yes. I mean, we did drop 15:35
24 testing all the way up to production ramp. 15:35

25 MR. KIDMAN: Q. Were there any drop tests, 15:35

1 the purpose of which was to determine the -- the -- 15:35

2 the impact on the touch panel? 15:35

3 A The touch panel was one of many components 15:36
4 we'd look at after getting drop test results. 15:36

5 Q In this e-mail, Mr. Hamblin writes "the 15:36
6 changes are," and in the paragraph No. 1, he says: 15:36

7 "We've added a black mask around the 15:36
8 perimeter of the bottom side of the cover sheet." 15:36

9 Do you know what he's referring to there? 15:36

10 MR. GALLEGOS: Objection; lacks foundation. 15:36

11 THE WITNESS: I can only make an assumption. 15:36
12 I don't know specifically what he's referring to. 15:36

13 MR. KIDMAN: Q. Are you familiar with 15:37
14 something on the original iPhone that's referred to as 15:37
15 the "black mask"? 15:37

16 A That typically is the ink layer on the 15:37
17 underside of the cover glass to hide the mechanical 15:37
18 bits inside the product. 15:37

19 Q And can you see the black mask from the 15:37
20 exterior of the phone if you're -- if you're holding 15:37
21 it and looking at the front of the phone? 15:37

22 A Yes. 15:37

23 Q And what -- what is the -- what is the 15:37
24 black -- black mask? Is that the black border that 15:37
25 surrounds the active area of the screen? 15:37

1 MR. GALLEGOS: Objection; vague. 15:37

2 THE WITNESS: The black mask is -- again, 15:37

3 it's an ink layer applied to the underside of the 15:37

4 cover glass that hides all the mechanical parts inside 15:37

5 the product. 15:37

6 MR. KIDMAN: Q. And from the -- viewing the 15:37

7 phone from the exterior, does the black mask appear as 15:38

8 a border that runs around the active area of the 15:38

9 display? 15:38

10 MR. GALLEGOS: Objection; vague. 15:38

11 THE WITNESS: It depends on how you define a 15:38

12 border. 15:38

13 MR. KIDMAN: Q. Well, if you're just looking 15:38

14 at the -- holding the original iPhone and looking at 15:38

15 the screen, is the black mask that you're referring to 15:38

16 visible? 15:38

17 A From the front of the product, yes. 15:38

18 Q And that's the area that is between the 15:38

19 active area of the display and the -- the bezel; is 15:38

20 that -- is that correct? 15:38

21 MR. GALLEGOS: Objection; form; vague. 15:38

22 THE WITNESS: The black mask extends from the 15:38

23 outer edge of the glass to the visible active area of 15:39

24 the LCD. 15:39

25 MR. KIDMAN: Q. And what components of the 15:39

1 device does the black mask hide? 15:39

2 MR. GALLEGOS: Objection; form. 15:39

3 THE WITNESS: I mean, most all the components 15:39
4 on the inside, mechanical components. 15:39

5 MR. KIDMAN: Q. In his e-mail, Mr. Hamblin 15:40
6 goes on to say: 15:40

7 "The critical dimension for the black mask 15:40
8 location is to ensure a 0.2mm gap between the LCD 15:40
9 active area and the edge of the black mask." 15:40

10 Do you see that? 15:40

11 A Yes. 15:40

12 Q Do you have any understanding as to what he's 15:40
13 referring to there? 15:40

14 MR. GALLEGOS: Objection; lacks foundation. 15:40

15 THE WITNESS: I can only make an assumption 15:40
16 as to what he's talking about. 15:40

17 MR. KIDMAN: Q. Well, what would your 15:40
18 understanding be based on? 15:40

19 A Based on what I read, my understanding would 15:40
20 be he's talking about the gap between the active area 15:40
21 of the LCD at 0.2, and then the edge of the black mask 15:40
22 starts. 15:40

23 Q And the "0.2mm" refers to 0.2 millimeters; is 15:41
24 that correct? 15:41

25 A Yes. 15:41

1 Q And is that 0.2-millimeter gap between the 15:41
2 active area of the screen and the edge of the black 15:41
3 mask, is that sometimes called the dead pixel area? 15:41

4 MR. GALLEGOS: Objection; form. 15:41

5 THE WITNESS: I never heard it referred to as 15:41
6 that. 15:41

7 MR. KIDMAN: Q. Do you have any 15:41
8 understanding as to why the active area of the screen 15:41
9 on the original iPhone does not extend all the way to 15:41
10 the edge of the bezel? 15:41

11 MR. GALLEGOS: Objection; form. 15:41

12 THE WITNESS: There are things located around 15:41
13 the border of the LCD that necessarily need to be 15:42
14 there, things like seals between the different glass 15:42
15 layers, traces for the electrical signals. So you 15:42
16 need space for those things to reside. 15:42

17 MR. KIDMAN: Q. Any other reasons? 15:42

18 MR. GALLEGOS: Objection; form. 15:42

19 THE WITNESS: No, that's the -- the main 15:42
20 reasons. 15:42

21 MR. KIDMAN: Q. Any other -- I understand 15:42
22 that may be the main reason, but are there any other 15:42
23 reasons, whether you'd call them main reasons or not? 15:42

24 MR. GALLEGOS: Objection; form; vague; lacks 15:43
25 foundation. 15:43