

EXHIBIT 63

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION

4 APPLE INC., a California)
corporation,)

5)
6 Plaintiff,)

7 vs.)

No: 11-CV-01846-LHK

8 SAMSUNG ELECTRONICS CO., LTD,)
a Korean business entity;)

9 SAMSUNG ELECTRONICS AMERICA,)

INC., a New York corporation;)

10 SAMSUNG TELECOMMUNICATIONS)

AMERICA, LLC, a Delaware)

limited liability company)

11)
12 Defendants.)

13 _____)

14 **HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

15
16 DEPOSITION OF STEPHEN ZADESKY
17 Redwood Shores, California
18 Monday, March 5, 2012
19
20
21

22
23 Reported By:

24 LINDA VACCAREZZA, RPR, CLR, CRP, CSR. NO. 10201

25 JOB NO. 46058

1 Q. And do you remember any specific
2 issues regarding air gaps --

3 A. Yes.

4 Q. -- on the original iPhone?

5 A. Yes. 11:17

6 Q. Where was the air gap issue, like
7 on the body of the phone, where was it located?

8 A. Wherever two different materials
9 came together there was typically a gap.

10 Q. And do you recall any specific 11:17
11 meeting of two materials that was an issue that
12 you addressed?

13 A. Yes.

14 Q. Where was it located?

15 A. The gap between the cover glass 11:18
16 and the stainless steel bezel.

17 Q. And the stainless steel what?

18 A. Bezel.

19 Q. Okay. So the -- was this on a
20 model that was close to what was released as the 11:18
21 original iPhone, meaning the issue of the air gap
22 that you're talking about?

23 A. Yes.

24 Q. And what specifically was the
25 issue that you were addressing? 11:18

1 bezel do in that -- in terms of being the primary
2 structural member of the phone?

3 A. It provides structural support and
4 attachment points for the other internal
5 components of the device.

11:20

6 Q. Did it have a role in attaching
7 the display and cover glass?

8 A. Yes. The cover glass and display
9 were some of the items attached.

10 Q. And what else?

11:20

11 A. It would be a really long list. A
12 lot of things.

13 Q. And the bezel also attached those
14 units to the back housing; is that right?

15 A. I'm sorry, what's those units?

11:20

16 Q. The things that you said it
17 supported.

18 A. Right.

19 Q. Or the attachment points that it
20 created were to attach certain items to the back
21 housing; is that right, so that it would be one
22 solid unit?

11:20

23 A. Yes. Some of the components were
24 attached to the bezel. Some of the components
25 were attached to the bottom housing. And then as

11:21

1 part of the assembly process they would meet
2 together. So either directly or indirectly, yes.

3 Q. Did the bezel also have a role in
4 protecting the cover glass?

5 A. Yes. 11:21

6 Q. What was that role?

7 A. In a drop event, if the unit were
8 to land on the stainless steel bezel rather than
9 on the glass, it would protect the glass.

10 Q. Have there been designs that 11:21
11 involved glass going all the way to the edge of
12 the device?

13 A. On?

14 Q. On the iPhone?

15 A. On the M68? 11:21

16 Q. Yes.

17 A. I don't think so, no. Or I'm not
18 sure.

19 Q. Do you remember any designs where
20 the glass was proud of the bezel, meaning higher 11:22
21 than the top of the bezel?

22 A. During the development of M68?

23 Q. Yes.

24 A. We go through so many different
25 iterations at the beginning that I would be 11:22