

EXHIBIT 64

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. Case 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
11 limited liability company,

12 Defendants.

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15
16 CONFIDENTIAL
17 ATTORNEYS' EYES ONLY
18 OUTSIDE COUNSEL
19 VIDEOTAPED DEPOSITION OF IMRAN CHAUDHRI
Redwood Shores, California
20 Friday, October 14, 2011
21
22

23 Reported by:

LORRIE L. MARCHANT, CSR No. 10523, RPR, CRR, CCRR, CLR

24 JOB NO. 42879
25

1 this very broadly, then, I take it you don't have
2 any knowledge or information about the specific
3 mockup that's in front of you right now?

4 A. That's correct.

5 MR. ZELLER: So I think that --

6 MR. KREEGER: Can we take a quick break,
7 please?

8 MR. ZELLER: Sure.

9 THE VIDEOGRAPHER: This is the end of Disk
10 No. 3, Volume I. We are off the record at 2:45 p.m.

11 (Recess taken, from 2:45 to 2:56.)

12 THE VIDEOGRAPHER: This is the beginning of
13 Disk No. 4, Volume I. We are back on the record at
14 2:56 p.m. You may proceed.

15 BY MR. ZELLER: Let's please mark as
16 Exhibit 576 a multipage document, which is a copy of
17 the United States Design Patent 627,790.

18 (Marked for identification purposes,
19 Exhibit 576.)

20 BY MR. ZELLER:

21 Q. Please let me know when you've had a chance
22 to review Exhibit 576.

23 A. Okay.

24 Q. Do you recognize this as the '790 design
25 patent that you're named as the inventor on?

1 A. I do.

2 Q. And I take it you've seen this before
3 today?

4 A. I have.

5 Q. Can you please tell me, upon reviewing
6 the -- the figure which is on the last page of
7 Exhibit 790 [sic], what is it that you invented
8 that's reflected here?

9 MR. KREEGER: Objection.

10 You can answer.

11 THE WITNESS: It looks like it's the home
12 screen for the iPhone.

13 BY MR. ZELLER:

14 Q. And in terms of what's depicted here of the
15 home screen of the iPhone that's shown in this
16 figure, what is it that you -- you came up with
17 yourself?

18 A. I came up with the shape of the icons and
19 the way they're laid out. And the two sections.

20 Q. And when you say "the two sections," the
21 fact that there's two rows on top and then this
22 missing or blank area and then a bottom row?

23 A. Yeah. The -- mainly that the bottom row is
24 different from the rest of the icons.

25 Q. And what do you mean by that? How are they

1 different from the rest of the icons?

2 A. They -- they give the customer a quicker
3 access to them.

4 Q. Oh, I see.

5 The bottom row, because it remains static,
6 as opposed to moving when -- when pages are scrolled
7 through on the device, gives the user quicker access
8 to those -- those bottom -- that bottom row of
9 icons?

10 A. For example, yeah.

11 Q. What else does it do? What other ways does
12 it give -- does this layout give the customer
13 quicker access?

14 A. It also gives them a closer proximity to
15 where their finger was previously.

16 Q. And perhaps if you could explain that for
17 me. I'm not -- I'm not entirely following that
18 part.

19 A. So the customer would press the home
20 button, which would bring them to this home screen.
21 And generally their -- their finger would be towards
22 the bottom of the screen anyway. And it means that
23 their -- that their finger wouldn't have to travel
24 as far.

25 Q. And by that, it means that having that --