

EXHIBIT 77

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 FREDDY ANZURES
17 Redwood Shores, California
18 Tuesday, October 18, 2011
19
20
21

22
23 Reported By:
24 LINDA VACCAREZZA, RPR, CLR, CRP, CSR. NO. 10201
25 JOB NO. 42857

1 Q. And what's the silhouette intended
2 to depict?

3 A. It's intended to depict a
4 general -- a person.

5 Q. And why did you choose that image
6 or graphic as part of that icon along with the
7 physical real world address book for the icon?

8 MR. MONACH: Object to the form.

9 THE WITNESS: It's one of a number
10 of symbols that people associate with
11 people, a silhouette.

12 Q. So one reason was you thought it
13 was already familiar to people?

14 A. Yes.

15 Q. And why use the silhouette of a
16 top of the person's head as opposed to, like, a
17 whole person on an icon?

18 A. Scale. It's easier to see.
19 Typically when you look at IDs of any sort, it's
20 usually the top portion of a person.

21 Q. Directing your attention to Figure
22 1 of the '305 design patent, which is Exhibit
23 577, you'll see that there's an empty space there
24 between the third rows and then the dock?

25 A. Yes.

1 Q. Do you know if there's a reason
2 for that empty space?

3 A. Yes.

4 Q. What's the reason for the empty
5 space?

6 A. The reason was to provide a space
7 between the main icons and the dock icons?

8 Q. And why was that?

9 A. By design. So that there's a
10 visual distinction between the four icons at the
11 bottom, which we call your favorites, and the
12 other icons on the screen.

13 Q. And from your perspective as a
14 designer, what was the reason for having that
15 space between the top three rows of icons and
16 then the dock?

17 A. It separates the top icons from
18 the bottom.

19 Q. And does that help users in some
20 way, is what I'm driving at?

21 MR. MONACH: Objection to the form
22 of the question.

23 THE WITNESS: It helps users
24 distinguish their favorite icons from the
25 other icons on the springboard.

1 Q. Does that make the screen layout,
2 that's shown here in the '305 design patent, more
3 efficient for users to operate in some way or to
4 use?

5 MR. MONACH: Objection. Lack of
6 foundation, vague, calling for
7 speculation.

8 THE WITNESS: I don't know.

9 Q. Does it help a user in some way to
10 be able to distinguish between the -- the
11 favorites, as you were calling them, that are
12 part of the dock and then the other icons?

13 MR. MONACH: Same objection.

14 THE WITNESS: The space enables
15 users to visually see a grouping of their
16 favorites at the bottom and a grouping of
17 the other icons at the top.

18 Q. Does the missing space make it
19 easier for the user to find the favorites that
20 are there in the dock as opposed to the other
21 icons?

22 MR. MONACH: Objection. Lack of
23 foundation, calls for speculation.

24 Q. From your perspective as a
25 designer?