

# EXHIBIT 52

1                   IN THE UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF CALIFORNIA  
3                   SAN JOSE DIVISION  
4

APPLE, INC., a California  
5 corporation,  
6

7                                   Plaintiff,  
8

9                   -vs-

No. 11-CV-01846-LHK

10 SAMSUNG ELECTRONICS CO., LTD.,  
11 a Korean business entity; et al.,  
12                                   Defendants.

13                   VIDEOTAPED DEPOSITION OF MICHAEL TCHAO  
14                   CONFIDENTIAL - ATTORNEYS' EYES ONLY  
15                   REDWOOD SHORES, CALIFORNIA  
16                   TUESDAY, FEBRUARY 21, 2012  
17  
18  
19  
20

21 Reported by: LOUISE MARIE SOUSOURES, CSR NO. 3575  
22                                   Certified LiveNote Reporter  
23 Job # 46145  
24  
25

1 Q. Any other negative feedback from the consumer 11:19  
2 research reports regarding the original iPad? 11:19

3 A. Other than the ones we've already discussed, 11:19  
4 no, not that I can recall. 11:19

5 Q. I asked you about consumer feedback from the 11:20  
6 consumer research -- from the consumer research 11:20  
7 reports regarding iPad 2 and you've listed a number of 11:20  
8 things that sounded like they were -- it was negative 11:20  
9 feedback. 11:20

10 I want to ask you specifically about iPad 2, 11:20  
11 what do you recall from the consumer research reports 11:20  
12 regarding positive feedback regarding iPad 2? 11:20

13 A. Again, with iPad 2, some of the same things 11:20  
14 that consumers -- iPad 1 users were positive about 11:20  
15 were similarly positive for iPad 2. 11:21

16 Big beautiful screen, thin, light, portable, 11:21  
17 easy and fun to use. Recent survey discussed that 11:21  
18 iPad -- iPad 2 users saw their iPads as their 11:21  
19 preferred device for doing many tasks including 11:21  
20 checking e-mail and web browsing and using apps. 11:21

21 Q. Any other positive feedback from the consumer 11:21  
22 research reports that you recall regarding iPad 2? 11:21

23 A. I think the variety and quality of apps was 11:22  
24 mentioned by a number of consumers as positive. 11:22

25 Q. Anything else? 11:22

1 A. That's what I can recall. 11:22

2 Q. With respect to iPad 2, do you recall any 11:22

3 consumer feedback concerning the size of the product? 11:23

4 A. Again, size, weight, thinness were all 11:23

5 discussed as positive attributes of the product. 11:23

6 Q. Do you recall any feedback about iPad 2 being 11:23

7 comfortable to hold? 11:23

8 A. Yes. 11:23

9 Q. What do you recall -- 11:23

10 A. I believe in some of the verbatims, customers 11:23

11 discussed about iPad 2 being comfortable to hold. 11:23

12 Q. What do you recall about that? 11:23

13 A. Just that. 11:23

14 Q. Did they attribute the comfort to hold to 11:23

15 anything in particular? 11:23

16 A. Other than that the iPad 2 was comfortable to 11:23

17 hold and that was a positive attribute of the product. 11:24

18 Q. Do you think the iPad 2 is comfortable to 11:24

19 hold? 11:24

20 A. Yes, I believe the iPad 2 is comfortable to 11:24

21 hold. 11:24

22 Q. What do you attribute that to? 11:24

23 A. I believe both the physical design of the 11:24

24 product, the weight of the product. 11:24

25 Q. Anything else? 11:24

1           A. I think that would be -- those would           11:24  
2 encompass it.           11:24

3           Q. What about the physical design of the product   11:24  
4 makes it comfortable to hold?           11:24

5           A. The shape of the back housing, the area of       11:24  
6 the -- around the screen, the bezel around the screen,   11:24  
7 the weight of the product and the distribution of that   11:24  
8 weight, the balance of the product.           11:24

9           Q. Anything else?           11:24

10          A. The materials that the product is made of.   11:25

11          Q. Would your answer be the same if I asked you   11:25  
12 the same question about the original iPad?           11:25

13          A. Yes.           11:25

14          Q. What is it about the bezel -- first of all,   11:25  
15 when you say "bezel," what are you referring to?       11:25

16          A. In this particular respect, the bezel I'm       11:25  
17 referring to the black area or the -- around the       11:25  
18 screen, that is the -- the area around the screen, I   11:25  
19 guess is probably the best way to describe it.       11:25

20          Q. The black border that surrounds the active   11:25  
21 area of the screen?           11:25

22          A. That's correct.           11:25

23          Q. What is it about that black border around the   11:25  
24 active area of the screen that in your view adds to   11:25  
25 the comfort to holding the iPad?           11:25

1           A. It provides an area for your hand to rest           11:25  
2     without activating the screen while you're holding the     11:25  
3     device.   11:26

4           Q. What is it about the what you refer to as the     11:26  
5     housing -- first of all, when you say the housing of     11:26  
6     the device, what are you referring to?                     11:26

7           A. I'm referring specifically to what also might     11:26  
8     be called the back case of the product, the -- in the     11:26  
9     case of iPad and iPad 2, the aluminum enclosure that     11:26  
10    makes up the back of the product.                           11:26

11          Q. What is it about the shape of the housing         11:26  
12    that makes the iPad easy to hold, in your view?           11:26

13          A. The curve of the housing, so no sharp areas     11:26  
14    contact your hand, the smooth contour of it, and           11:26  
15    texture of the material that makes it easy to hold on     11:27  
16    to.   11:27

17          Q. Does the rectangular shape of the iPad           11:27  
18    contribute to the ease with which it can be held?         11:27

19           MS. TAYLOR: Objection, it's vague.                 11:27

20           THE WITNESS: Does the -- could you repeat         11:27  
21    the question again? I'm sorry.                             11:27

22    BY MR. KIDMAN:   11:27

23          Q. Sure. Would you agree that the general shape     11:27  
24    of the iPad is rectangular?                                 11:27

25          A. The iPad and iPad 2 are rectangular in shape,     11:27

1 yes. 11:27

2 Q. Do you think that rectangular shape 11:27

3 contributes to the ease with which it can be held? 11:27

4 MS. TAYLOR: Objection, it's vague. 11:27

5 THE WITNESS: I believe the shape of the iPad 11:27

6 does contribute to its being easy to hold. 11:27

7 BY MR. KIDMAN: 11:27

8 Q. How about -- would you agree that both the 11:27

9 iPad and the iPad 2 have rounded corners? 11:27

10 A. By corners, what are you referring to? 11:27

11 Q. If you look at the iPad sort of from the top 11:27

12 view, the corners appear rounded. 11:28

13 Would you agree with that? 11:28

14 A. Yes, both iPad and iPad 2 feature rounded 11:28

15 corners if you look at it from the top down. 11:28

16 Q. As opposed to pointed corners? 11:28

17 A. Yes, as opposed to pointed corners. 11:28

18 Q. Do you think the rounded corners of the iPad 11:28

19 and the iPad 2 contribute to the ease with which it 11:28

20 can be held? 11:28

21 MS. TAYLOR: Objection, it's vague. 11:28

22 THE WITNESS: I'm not sure the rounded 11:28

23 corners contribute to it being easy to hold. 11:28

24 BY MR. KIDMAN: 11:28

25 Q. In your view, is there any advantage from a 11:28

1 user's point of view to having the rounded corners as 11:28

2 opposed to, say, pointed corners? 11:28

3 A. I can certainly imagine that rounded corners 11:28

4 would be preferable to certain other shapes of corners 11:28

5 in a product like an iPad. 11:29

6 Q. Why is that? 11:29

7 A. Well, again, I have to compare it to 11:29

8 something specific in order to answer that question, 11:29

9 but as an example, if a corner of a product were made 11:29

10 to be sharp, it could be painful to hold. 11:29

11 Q. Anything else that comes to mind? 11:29

12 A. That's just a specific example. 11:29

13 Q. Any other examples that come to mind? 11:29

14 A. Not readily. 11:29

15 MR. KIDMAN: Okay. We need to take a break 11:29

16 to change the tape. 11:29

17 THE WITNESS: Okay. 11:29

18 THE VIDEOGRAPHER: This marks the end of disk 11:29

19 number 1 to the videotaped deposition of Michael 11:29

20 Tchao. 11:29

21 The time is 11:29 a.m., we are off the 11:29

22 record. 11:29

23 (Recess taken.) 11:29

24 THE VIDEOGRAPHER: This marks the beginning 11:40

25 of disk number 2 to the videotaped deposition of 11:40



1 Michael Tchao, the time is 11:40 a.m., we are back on 11:40  
2 the record. 11:40

3 BY MR. KIDMAN: 11:40

4 Q. In the consumer research reports that you've 11:40  
5 seen, have you seen any consumer feedback, positive or 11:40  
6 negative, on the rectangular shape of the iPad or the 11:40  
7 iPad 2? 11:40

8 A. Not specifically the rectangular shape. 11:40

9 Q. When you say "not specifically the 11:40  
10 rectangular shape," what do you mean? 11:40

11 A. As I mentioned, the research does discuss 11:40  
12 people having positive comments about the design, the 11:40  
13 size of the product. 11:40

14 I don't believe the term rectangular shape is 11:40  
15 in the research. 11:40

16 Q. In the consumer research reports you've seen, 11:41  
17 have you seen any consumer feedback on the rounded 11:41  
18 corner of the iPad or iPad 2? 11:41

19 A. Not specifically. 11:41

20 Q. When you say "not specifically" -- 11:41

21 A. I can recall no specific mentions of rounded 11:41  
22 corners in any of the consumer feedback that I've 11:41  
23 read. 11:41

24 Q. In the consumer research that you've seen, 11:41  
25 have you seen any consumer feedback on the black 11:41

1 consumers? 14:22

2 A. Yes, we believe that it was for both iPad 1 14:22

3 and for iPad 2. 14:22

4 Q. And why do you believe that to be an 14:22

5 important feature for consumers? 14:22

6 A. Because it speaks to its portability and 14:22

7 because of its small size, it's able to be taken from 14:22

8 place to place more easily. 14:23

9 Q. A thinner tablet's easier to transport or 14:23

10 carry around, is that your understanding? Do 14:23

11 consumers view it that way? 14:23

12 A. Our belief is -- well, prior to the iPad, 14:23

13 tablet PCs were thick and heavy and so we wanted to 14:23

14 contrast iPad to those tablets, PCs that came before. 14:23

15 Q. And what benefits are there to consumers from 14:23

16 the iPad being thinner than what came before it? 14:23

17 MS. TAYLOR: Calls for speculation. 14:23

18 THE WITNESS: Our belief was -- the reason 14:23

19 why we wanted to distinguish ourselves from those 14:23

20 tablet PCs was because we felt the thinner, lighter 14:23

21 iPad would be more portable and therefore be used in 14:23

22 more situations and -- more readily than previous 14:23

23 tablet PCs which had not seen much success. 14:24

24 BY MR. KIDMAN: 14:24

25 Q. Do you believe that the flat screen that 14:24

1 covers the front face of the iPad is an important 14:24  
2 feature to consumers? 14:24

3 MS. TAYLOR: Objection, it's vague. 14:24

4 THE WITNESS: I'm not sure I understand the 14:24  
5 question. 14:24

6 BY MR. KIDMAN: 14:24

7 Q. Would you describe the iPad as having a flat 14:24  
8 front surface? 14:24

9 A. Yes. 14:24

10 Q. And would you describe that flat front 14:24  
11 surface as covering the front of the iPad? 14:24

12 MS. TAYLOR: Objection, it's vague. 14:24

13 THE WITNESS: Again, you're referring to what 14:24  
14 aspect of the front? The entire front or the screen 14:25  
15 specifically? I'm not sure I understand what you're 14:25  
16 referring to. 14:25

17 BY MR. KIDMAN: 14:25

18 Q. How would you describe the front surface of 14:25  
19 the iPad? 14:25

20 A. So the front surface of the iPad is a -- is a 14:25  
21 piece -- a flat piece of glass. 14:25

22 Q. And would you describe that flat piece of 14:25  
23 glass that makes up the front surface of the iPad as 14:25  
24 an important feature to consumers? 14:25

25 MS. TAYLOR: Objection, it's vague. 14:25

1 THE WITNESS: I'm not sure I know whether 14:25

2 it's an important feature to consumers. 14:25

3 BY MR. KIDMAN: 14:25

4 Q. Would you agree that the design of the iPad 14:25  
5 defers to the screen? 14:26

6 MS. TAYLOR: Objection, vague. 14:26

7 THE WITNESS: I would say -- we have said and 14:26  
8 I would say that the iPad is primarily screen. 14:26

9 BY MR. KIDMAN: 14:26

10 Q. And why is that? 14:26

11 A. Because in our design, we have stripped away 14:26  
12 those other attributes -- those aspects of design and 14:26  
13 function from the front of the device so that you just 14:26  
14 can focus on the screen. 14:26

15 Q. And why do you want users to focus on the 14:26  
16 screen? 14:26

17 A. Because on the iPad, they interact with their 14:26  
18 information through the screen. 14:27

19 Q. Through the multi-touch features? 14:27

20 A. That's correct. 14:27

21 Q. So for that reason is it important to have a 14:27  
22 large screen area? 14:27

23 MS. TAYLOR: Objection, it's vague. 14:27

24 THE WITNESS: There are multi-touch 14:27

25 devices -- in fact, we ship multi-touch devices that 14:27

1 have smaller screens. 14:27

2 BY MR. KIDMAN: 14:27

3 Q. What would be an example of that? 14:27

4 A. The iPhone has a three and a half inch 14:27

5 screen, it's multi-touch. It was our first 14:27

6 multi-touch device. 14:27

7 Q. Does Apple do any research of competitive 14:27

8 product? 14:28

9 MS. TAYLOR: Objection, it's vague. 14:28

10 THE WITNESS: We do study competitive 14:28

11 products from time to time. 14:28

12 BY MR. KIDMAN: 14:28

13 Q. For what purpose? 14:28

14 A. There are a range of purposes that we look at 14:28

15 competitor products. 14:28

16 Q. And what would those reasons be? 14:28

17 A. One reason might be to answer questions that 14:28

18 the press might ask about our product relative to the 14:28

19 competition. 14:29

20 Q. Any others? 14:29

21 A. Another reason might be to determine what 14:29

22 features should be in future products or to benchmark 14:29

23 our product against other products. 14:29

24 Q. Any others? 14:29

25 A. Another reason might be to determine if a 14:29