EXHIBIT 55

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, D.C.

In the Matter of:

	Investigation No.
CERTAIN ELECTRONIC DIGITAL MEDIA DEVICES AND COMPONENTS THEREOF	337-TA-796

CONFIDENTIAL -- ATTORNEYS' EYES ONLY

PURSUANT TO THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF FLETCHER R. ROTHKOPF

Redwood Shores, California

Thursday, April 19, 2012

REPORTED BY:

CYNTHIA MANNING, CSR No. 7645, CLR, CCRR

JOB NO. 48527

Q. Okay. Do you recall any discussions discussing product design risks with using a cover glass configuration where the top surface of the cover glass is curved?

A. Are we talking just about the edges being curved?

Q. Top surface being curved in any manner.

A. Product design. What is a product design consideration?

Q. Well, my question was -- I'm talking about product design risks, so let me just reframe the question.

A. Okay.

Q. Do you recall any discussions about the product design risks associated with using a cover glass configuration where the top surface is curved in either of the ways that you've described?

MR. OVERSON: Objection; vague.

MR. KIDMAN: Let me just clear it up.

BY MR. KIDMAN:

Q. You've talked about cover glass configurations where the entire top surface is curved and then cover glass configurations where the top -- where the edges of the top surface are

curved; correct?

A. Well, I mostly talked about not seeing configurations where the entire cover glass was curved on an iPhone or iPod Touch, so not really correct.

Q. Okay. Let me just -- let me just back up then.

Do you recall any discussions about product design risks with using cover glass where the top surface is curved in connection with -- with any product at Apple?

A. Would a reliability risk be considered a product design risk?

Q. Well, you've -- you're familiar with the term "product design risk" or "PD risk"; correct?

A. Yes.

Q. It's a term that you've used in updates that you give concerning devices like the iPod Touch; correct?

A. Yes.

Q. And when you use that term "product design risk," you -- you include reliability result risk; correct?

A. Yes.

Q. Okay. So using that definition of "PD risk" or "product design risk" that you've used in update documents at Apple, using that definition of "product design risk," do you recall any discussions about any product design risks associated with cover glass configuration where the top surface is curved?

A. If I -- if I include reliability and manufacturing and yield risk and those kinds of things and PD risks, which in those updates I write I do, then yes.

Q. Okay. And what do you recall being discussed about product design risks as you've used that term in connection with using cover glass where the top surface is curved?

A. I recall yield risks, difficulty in manufacturing some of those curved glasses.

Q. Anything else?

A. Not specifically related to the glass being curved. I can't remember anything else.

Q. When you say not specifically relating to the glass being curved, do you recall any discussions about PD risks with using a curved configuration where the curved configuration contributed in some way to the -- to the PD risk?

A. In those considerations where the glass was curved and proud of the rest of the unit or above the rest of the unit, yes.

Q. And -- and so you're saying that you recall the discussion of PD risks with curved cover glass and then -- and then in addition, a discussion of PD risks where the curve -- where the cover glass sat above -- noticeably above the edge of the device; is that correct?

A. In some cases we consider the glass being above the edge of the device to be a risk in itself.

Q. And what was the -- what was the risk with the glass sitting above the edge of the device itself?

A. The risk is that the edges of the glass are more likely to contact the ground or anything else in the normal use of the device or abusive cases also.

Q. And does that have an impact on failure -- failure rates?

A. In some cases it has in the reliability test failure rates.

Q. And do you recall any discussions -- well, strike that.

yield risks that you've told me about?

A. They're pretty much one and the same, yep.

Q. Is there any --

A. Difficult manufacturing processes lead to sometimes low-yield until you have them figured out, so those remain as risks.

MR. KIDMAN: Let's mark the next document as Exhibit 2.

(Deposition Exhibit 2 was marked for identification)

MR. KIDMAN: And for the record, Exhibit 2 is a multipage documents Bates-labeled APLNDC0002455740 through 2455745.

THE WITNESS: (Witness reviewing document.)

BY MR. KIDMAN:

Q. And, Mr. Rothkopf, take a moment to review this. My first question is going to be: Have you seen any part of this -- this document before?

A. Give me one minute.

Q. Sure.

A. I don't think I've seen any part of this before. I don't remember seeing it now.

Q. Okay. And particularly, if you look at the third page of the document --

A. Mm-hmm, yes.

Q. -- there is a chart there. It's got some columns at the top. One says "Layout Diagram." The next column says "Z Stack." The next column says "Time to Market (Ranked)." And then the next column is "Grape Risks." And the next column is "PD Risks."

Do you see that?

A. Yes, I do.

Q. You don't recall having seen this -- this chart before?

A. No.

Q. Do you recall there being any discussion about increased cost using cover glass configurations where the top surface or any part of the top surface is curved as opposed to the glass being flat?

A. Yes.

Q. What do you recall about that?

A. I recall that due to the yield risks associated with the curved surfaces, you see an increased cost as a result of those. So every piece of glass you throw away, you basically have

to pay for even though you don't get to ship them to a customer.

In addition, the processing time for some of the curved glass configurations was longer than a flat glass configuration.

Q. And so the longer processing time adds to the cost?

A. Correct.

Q. Do you recall any discussion in connection with any curved cover glass configurations, meaning that the top surface of the cover glass is curved or some portion of the top surface of the cover glass is curved, any discussions concerning any difficulties with the operation of the -- the touch sensor?

A. Not specifically relating to the glass being curved, but I can see some of those risks highlighted in the document that you put in front of me here.

Q. And where is that?

A. Under the column labeled "Grape Risks" on the third page of the document.

Q. And when you say those risks are not specifically -- specifically relating to the cover glass being curved, is the discussion of

grape risks related to the cover glass, cover glass being curved so?

A. So I hadn't previously heard of risks -- these type of -- these so-called grape risks here related to the cover glass being curved, but now, you know, I've read this entire column, so now I have -- I know what's on this document for the most part.

Q. Independent --

A. When I say -- sorry. When I say I know what's on this document, I mean only because now I have seen it in front of me and I have it in front of me.

Q. Independent of this document, have you heard any discussion concerning any of the things that have been identified in this document as grape risks in connection with using curved cover glass configurations?

A. So some of these risks are -- look to be somewhat general and could also apply to cover glass configurations that weren't curved, and so I've seen some of them before in that context, but not in the context of specifically this is a risk because the cover glass is curved.

Q. Now, at least one version of the iPod

glass manufacturing, but they are very difficult to see with the naked eye that could be curved to be curved, so --

Q. Okay. So when we're talking about the fourth and fifth generation, iPod Nano and we're talking about cover glass that's curved on the top surface, we're talking about cover glass that's visibly curved on -- on the top surface and that was the design intent; is that correct?

A. Correct, yes.

Q. And you were involved from that product development perspective with both the fourth and fifth generation iPod Nano; correct?

A. Really just the fourth.

Q. And what was your involvement with the fourth generation iPod Nano?

A. I designed some of the parts inside of it and I designed some of the overall architecture of the device as far as the mechanical parts of the architecture and components go.

Q. And how is the cover glass on the sixth generation iPod Nano different from the cover glass configuration on the fourth and fifth generations?

A. The sixth generation iPod Nano is flat on both sides, so there is no intentional design element that makes it curved.

Q. And was there an additional cost associated with using the curved cover glass on the fourth and fifth generation iPod Nanos?

A. I don't know.

Q. Do you recall seeing any -- any documents that discussed an additional cost related to the use of the curved cover glass?

A. I don't specifically recall seeing documents related to that.

Q. Do you recall generally there being any discussion about there being an additional cost associated with using the curved cover glass on either the fourth or fifth generation iPod Nano?

A. Generally, yes, I can -- I can remember some people talking about that it might be more expensive, but I can't -- only generally. I can't remember exactly what documents were generated or anything like that.

Q. And was that additional expense related to the higher -- I'm sorry, the yield risks and the manufacturing difficulty that you described earlier?

A. I don't know if it was related to the yield risks or the higher processing time or the larger amount of bulk material required. Any three of those could contribute.

Q. And when you say "larger amount of bulk material required," what -- what are you referring to?

A. The overall volume of the piece of glass that you start with before you make it into a curved piece of glass, in the center of the glass, sort of at the apex of the curve, if you will, those products are pretty thick, so it takes a lot of -- a thick sheet of glass going in and in some cases I know we pay for glass per square or cubic meter, kind of per weight, so it could have been more expensive because of that, just requiring more raw material input to the process.

Q. And why is -- on that curved configuration, why is the glass thicker in the center?

A. That curved configuration -- why is it thicker in the center? So as opposed to being a shell kind of shape where the thickness is even and the glass is bent, if you will, you start

with a piece of glass that's as thick as the apex and you remove material on the curved sections. So what you end up is towards the edges of the glass, it's thin and towards the center it's thick. Kind of like if you took a sphere and cut a piece off of it.

Q. And why is that the process that's used to create the curvature as opposed to, as you said, it just being a shell with a -- kind of a constant thickness?

A. It may be possible to do it either way, so I don't know exactly -- I don't know exactly why. It's possible. We probably could have done it the other way if we had a motivation for doing it the other way.

Q. And do you have any understanding as to why it was done the way it was done where the -- you start with a thicker piece of material and -- and remove material from -- from the edges as opposed to creating that shell with the constant thickness?

A. Yes.

Q. And what's your understanding in that regard?

A. Creating a shell with a constant