

EXHIBIT 4

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

5 APPLE INC., a California
6 corporation,

7 Plaintiff,

8 vs. CASE NO. 11-cv-01846-LHK

9 SAMSUNG ELECTRONICS CO.,
10 LTD., a Korean business
11 entity; SAMSUNG ELECTRONICS
12 AMERICA, INC., a New York
13 corporation; SAMSUNG
14 TELECOMMUNICATIONS AMERICA,
15 LLC, a Delaware limited
16 liability company,
17 Defendants.

18 _____/

19 H I G H L Y C O N F I D E N T I A L
20 O U T S I D E C O U N S E L O N L Y

21 VIDEOTAPED DEPOSITION OF CHRISTOPHER STRINGER
22 REDWOOD SHORES, CALIFORNIA
23 FRIDAY, NOVEMBER 4, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
25 CSR LICENSE NO. 9830
TSG JOB NO. 43706

1 themselves for the record.

2 MR. ZELLER: Mike Zeller for Samsung.

3 MR. JACOBS: Michael Jacobs from Morrison &
4 Foerster for Apple. With me is Cyndi Wheeler from
5 Apple Legal.

6 THE VIDEOGRAPHER: Thank you.

7 Will the reporter please swear the witness.

8

9 CHRISTOPHER STRINGER,

10 having been sworn as a witness,

11 by the Certified Shorthand Reporter,

12 testified as follows:

13

14 THE VIDEOGRAPHER: Thank you.

15 Please proceed.

16

17 EXAMINATION BY MR. ZELLER

18 MR. ZELLER: Let's please mark as

19 Exhibit 1161 the Reply Declaration of Christopher

20 Stringer in Support of Apple's Motion for Preliminary

21 Injunction.

22 (Document marked Exhibit 1161

23 for identification.)

24 MR. ZELLER: Q. Please let me know when

25 you've reviewed 1161.

1 collection of field CAD drawings.

2 (Document marked Exhibit 1172
3 for identification.)

4 THE WITNESS: Okay.

5 MR. ZELLER: Q. Do you recognize anything
6 that's depicted here in Exhibit 1172?

7 A Yes.

8 Q What do you recognize these as?

9 A I recognize an exercise that Shin Nishibori
10 worked on. I do not recall when, but the dates would
11 indicate it was in '06, March of '06.

12 Q And even though you don't recall, as you've
13 said, is there any reason for you to think it was not
14 in the 2006 time period?

15 A No.

16 Q Did you work on this project yourself?

17 A This is an exercise. I see that as distinct
18 from a project. It could be considered as to be some
19 abstract portion of a project, that being the iPhone.

20 Q I'm happy to call it either. So just so we
21 have -- we understand we're talking about the same
22 thing. So whether it's exercise or project, focusing
23 on this design work that was done that pertained in
24 particular to these designs that are shown here in
25 Exhibit 1172 with the name Sony on it, can you please

1 tell me generally what that -- what the purpose of
2 that was.

3 A It was a -- just a fun exercise where Shin
4 made an object resembling an iPhone that would --
5 almost in a role-playing kind of way, what would Sony
6 do if they were us?

7 Q Do you have an understanding -- and that's
8 the reason why Sony is -- is on this?

9 A Yeah. It was fun.

10 Q Do you know who came up with the idea for
11 this exercise?

12 A I do not recall.

13 Q Did you yourself prepare any designs or
14 drawings that was part of this exercise?

15 A No.

16 Q Do you know if anyone other than
17 Mr. Nishibori did?

18 A No.

19 Q Generally speaking, I take it you recognize
20 the images here in Exhibit 1172 as filled in CAD
21 drawings?

22 A Rendered, shaded, yes.

23 Q And do you know were any three-dimensional
24 models created as part of the exercise that we're
25 talking about?

1 A I believe so, but I am not absolutely
2 certain.

3 Q Generally speaking, do you have a memory
4 of -- of seeing some kind of model or model number?

5 A Not sufficiently clear. I can't recall.

6 Q You're just not sure?

7 A Uh-huh.

8 Q I'm sorry. You need to give an audible --

9 A Yes.

10 Q Yeah. Okay.

11 Is there anything else that you remember
12 generally about this exercise?

13 A No.

14 Q Let me show you what was previously marked as
15 Exhibit 751, which is a copy of United States design
16 patent 622,270.

17 A Yes.

18 Q Do you recognize the '270 design patent as a
19 design patent that you're a named inventor on?

20 A Yes.

21 Q And, generally speaking, do you recognize
22 what -- what product or object is depicted here?

23 A The iPod Touch.

24 Q Was this the first iPod Touch?

25 A I think so. Yes, I believe that is the case.

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J U R A T

I, CHRISTOPHER STRINGER, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on November 4, 2011; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

DATED this ____ day of _____, 2011,
at _____, California.

SIGNATURE OF WITNESS

1 CERTIFICATE OF REPORTER

2
3
4 I, ANDREA M. IGNACIO HOWARD, hereby certify
5 that the witness in the foregoing deposition was by me
6 duly sworn to tell the truth, the whole truth, and
7 nothing but the truth in the within-entitled cause;
8

9 That said deposition was taken in shorthand
10 by me, a Certified Shorthand Reporter of the State of
11 California, and was thereafter transcribed into
12 typewriting, and that the foregoing transcript
13 constitutes a full, true and correct report of said
14 deposition and of the proceedings which took place;
15

16 That I am a disinterested person to the said
17 action.
18

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 4th day of November 2011.
21

22 _____
23 ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830
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