

# Exhibit C

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE INC., a California  
corporation,

Plaintiff,

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

SAMSUNG ELECTRONICS CO.,  
LTD., a Korean business  
entity; SAMSUNG ELECTRONICS  
AMERICA, INC., a New York  
corporation; SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited  
liability company,  
Defendants.

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

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

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

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1 other. And I think I now understand, what you're  
 2 saying is that the space in between, that depicts the  
 3 housing.  
 4 A Yes.  
 5 Q And now I'm trying to figure out: Do the two  
 6 lines -- where they diverge there, do those -- do  
 7 those signify some edge of the housing?  
 8 MR. JACOBS: Objection; form.  
 9 THE WITNESS: I see a surface in between  
 10 those lines that is adjacent to the cover glass that  
 11 is on the same plane as the cover glass, butting up  
 12 against the edge of the cover glass.  
 13 MR. ZELLER: Q. And one reason you reached  
 14 that conclusion is because of the drawings in the  
 15 other figures?  
 16 A That's how -- yes.  
 17 Q What other figures were you referring to,  
 18 just so we have a clear record on that, that were  
 19 helping you in your understanding?  
 20 A Figure 1, Figure 3, and Figure 5 -- well, 5,  
 21 6, 7, and 8 equally, along with Figure 9, I create an  
 22 image of a product.  
 23 Q Would you please mark as Exhibit 1172 a  
 24 multipage document bearing Bates  
 25 Nos. APLNDC-NCC0000247 through '281, and it's a

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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?

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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

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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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1 No. 3 of 3 and concludes today's deposition of Chris  
 2 Stringer.  
 3 The time is 3:23 p.m., and we are off record.  
 4 (WHEREUPON, the deposition ended at  
 5 3:23 p.m.)  
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1 CERTIFICATE OF REPORTER  
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 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  
 24  
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1 J U R A T  
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 4 I, CHRISTOPHER STRINGER, do hereby certify  
 5 under penalty of perjury that I have read the  
 6 foregoing transcript of my deposition taken  
 7 on November 4, 2011; that I have made such  
 8 corrections as appear noted herein in ink,  
 9 initialed by me; that my testimony as  
 10 contained herein, as corrected, is true and  
 11 correct.  
 12  
 13  
 14 DATED this \_\_\_\_ day of \_\_\_\_\_, 2011,  
 15 at \_\_\_\_\_, California.  
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 20 SIGNATURE OF WITNESS  
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1 I N D E X  
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 3 DEPOSITION OF CHRISTOPHER STRINGER  
 4  
 5 EXAMINATION  
 6 PAGE  
 7 BY MR. ZELLER 5  
 8 BY MR. JACOBS 119  
 9  
 10 E X H I B I T S  
 11 EXHIBIT PAGE  
 12 Exhibit 1161 Reply Declaration of Christopher 5  
 13 Stringer in support of Apple's  
 14 Motion for a Preliminary  
 15 injunction; 50 pgs.  
 16 Exhibit 1162 Colored Photograph Ad of iPad 26  
 17 Thinner and Lighter; 1 pg.  
 18 Exhibit 1163 U.S. Patent No. D627,777 S; 41  
 19 7 pgs.  
 20 Exhibit 1164 U.S. Patent No. D637,596 S; 41  
 21 7 pgs.  
 22 Exhibit 1165 U.S. Patent No. D621,825 S; 41  
 23 14 pgs.  
 24 Exhibit 1166 Sketchbooks, Bates Nos. 41  
 25 APLNDC0000037650 - '95; 46 pgs.