

# Exhibit 1

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

4 APPLE INC., a California §  
Corporation, §  
5 §  
Plaintiff, §  
6 §

7 Vs. § Case No.  
§ 11-CV-01846-LHK  
§

8 SAMSUNG ELECTRONICS CO., §  
LTD., a Korean business §  
9 entity; SAMSUNG ELECTRONICS §  
AMERICA, INC., a New York §  
10 corporation; SAMSUNG §  
TELECOMMUNICATIONS AMERICA, §  
11 LLC, a Delaware limited §  
liability company, §  
12 §  
Defendants. §

13  
14 HIGHLY CONFIDENTIAL  
UNDER THE PROTECTIVE ORDER

15  
16  
17 DEPOSITION OF JUSTIN DENISON  
Dallas, Texas  
18 Wednesday, September 21st, 2011  
19  
20  
21  
22

23 Reported by:

24 Daniel J. Skur, Notary Public and CSR

25 JOB NO. 41964

1 P R O C E E D I N G S

2 VIDEOGRAPHER: This is tape 1 in the  
3 video deposition of Justin Denison. Today  
4 is Wednesday, September 21st, 2011. We're  
5 now on record at approximately 9:36 a.m.  
6 Will the attorneys please introduce  
7 themselves for the record.

8 MR. HUNG: Richard Hung of Morrison  
9 & Foerster on behalf of Apple, Inc. With  
10 me today is Diana Kruze, also of Morrison &  
11 Foerster and also for Apple.

12 MS. MAROULIS: Victoria Maroulis  
13 with Quinn Emanuel, counsel for Samsung,  
14 and with me is Mark Tung of Quinn Emanuel,  
15 Cindy Moreland of STA, and we have an  
16 interpreter, Ann Park.

17 JUSTIN DENISON,  
18 having been duly sworn, testified as follows:

19 EXAMINATION

20 BY MR. HUNG:

21 Q. Morning, Mr. Denison.

22 A. Morning.

23 MR. HUNG: Before we get started, I  
24 did have a discussion with Ms. Maroulis,  
25 and I just wanted to note a couple of

1           A.       Outside of the name that I've  
2           already offered, I don't believe that there  
3           are -- is anyone else other than Cindy Moreland  
4           who is the general counsel of STA and is  
5           present today. I've not referred to her  
6           directly, but the Quinn Emanuel attorney  
7           Margaret --

8                    MS. MAROULIS: Caruso.

9           A.       -- Caruso, thank you, and Quinn  
10          Emanuel attorney Mark Tung, who is seated here  
11          today as well.

12         BY MR. HUNG:

13          Q.       Did you have a separate meeting with  
14          the individuals to whom you just referred apart  
15          from the conversations with the individuals  
16          listed on Exhibit 225?

17          A.       Yes.

18          Q.       When did that meeting occur?

19          A.       I have had several meetings with the  
20          Quinn Emanuel attorneys to prepare for this  
21          deposition, the first of which occurred last  
22          week, and the most recent of which occurred  
23          yesterday, not counting this morning.

24          Q.       Again, I don't want to know what you  
25          discussed. I just want to know how long those

1 meetings were. How long were those meetings in  
2 aggregate?

3 A. In aggregate, I would estimate that  
4 I spent two to three full days in discussions  
5 with the Quinn Emanuel attorneys.

6 Q. Is this separate and apart from the  
7 10 to 12 hours that you testified you spent  
8 speaking with the individuals listed on Exhibit  
9 225?

10 MS. MAROULIS: Objection, vague.

11 A. As I understand the question,  
12 outside of the teleconference time I spent with  
13 the individuals that are on this sheet of  
14 paper, yes, the time frame I gave you is  
15 approximate.

16 BY MR. HUNG:

17 Q. Okay. Did those meetings occur in  
18 Dallas?

19 A. Yes.

20 Q. The Dallas area?

21 A. The meetings -- the meetings with  
22 the Quinn Emanuel attorneys occurred in the  
23 Dallas area.

24 MS. MAROULIS: I think he's talking  
25 about Richardson.

1           hypothetical, beyond the scope.

2       BY MR. HUNG:

3           Q.       What steps does Samsung take, if  
4       any, to ensure that its employees do not copy  
5       Apple's designs in developing its Android smart  
6       phones?

7                   MS. MAROULIS:  Objection, beyond the  
8       scope to the extent it goes beyond products  
9       at issue.

10          A.       When conferring with the designers  
11       for the products at issue, in all cases I  
12       specifically asked them if they had considered  
13       or studied or drawn direct comparisons or what  
14       have you versus the relevant Apple products,  
15       whether it be tablet or smart phone in either  
16       case, and in each case the designers said that  
17       they had not.

18          Q.       Did you ask them whether they had  
19       used -- let's focus first on the Infuse 4G.  
20       Did you ask the designers on the Infuse 4G  
21       whether they had used any Apple product as  
22       inspiration for the design of the Infuse 4G?

23                   MS. MAROULIS:  Objection, vague,  
24       asked and answered.

25          A.       I specifically asked the engineers

1 C E R T I F I C A T E  
2 STATE OF TEXAS )  
 )  
3 COUNTY OF DALLAS )  
4

5 I, Daniel J. Skur, a Notary Public  
6 within and for the State of Texas, do  
7 hereby certify:

8 That JUSTIN DENISON, the witness  
9 whose deposition is hereinbefore set forth,  
10 was duly sworn by me and that such  
11 deposition is a true record of the  
12 testimony given by such witness.

13 I further certify that I am not  
14 related to any of the parties to this  
15 action by blood or marriage; and that I am  
16 in no way interested in the outcome of this  
17 matter.

18 IN WITNESS WHEREOF, I have hereunto  
19 set my hand this 21st day of September,  
20 2011.

21  
22 \_\_\_\_\_  
Daniel J. Skur  
23 Notary Public, State of Texas.  
My Commission Expires 7/10/2014  
24  
25