

Exhibit 2

CONFIDENTIAL BUSINESS INFORMATION SUBJECT TO PROTECTIVE ORDER
SEUNG-HO AHN - 3/15/2012

Page 1

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of

CERTAIN ELECTRONIC DEVICES) Investigation
INCLUDING WIRELESS,) No. 337-TA-794
ET AL.,)
_____)

"CONFIDENTIAL BUSINESS INFORMATION
SUBJECT TO PROTECTIVE ORDER"

VIDEOTAPED DEPOSITION OF SEUNG-HO AHN

Thursday, March 15, 2012

AT: 9:00 a.m.

Taken at:

Renaissance Seoul Hotel
Seoul, S. Korea

Court Reporter:

Jeanne Bullis
RPR, CSR

CONFIDENTIAL BUSINESS INFORMATION SUBJECT TO PROTECTIVE ORDER
SEUNG-HO AHN - 3/15/2012

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

4 APPLE INC., a California)
5 corporation,)
6 Plaintiff,)
7 vs.) Case No.
8) 11-cv-01846-LHK
9 SAMSUNG ELECTRONICS CO.,)
10 LTD., a Korean business)
11 entity; SAMSUNG)
12 ELECTRONICS AMERICA,)
13 INC., a New York)
14 corporation, SAMSUNG)
15 TELECOMMUNICATIONS)
16 AMERICA, LLC, a Delaware)
17 limited liability company,)
18 Defendants.)

19 "CONFIDENTIAL - ATTORNEYS' EYES ONLY"

20 VIDEOTAPED DEPOSITION OF SEUNG-HO AHN

21 Thursday, March 15, 2012

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23 Taken at:

24 Renaissance Seoul Hotel

25 Seoul, South Korea

Court Reporter:

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RPR, CSR

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1 A P P E A R A N C E S

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18 Ted Kim - Main Interpreter
19 Ann Park - Check Interpreter

20 ALSO PRESENT:
21 Brian Kim - Samsung

22 VIDEOGRAPHER:
23 Joe Cheung

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1 I N D E X

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6 E X H I B I T S

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ORIGINAL EXHIBITS RETAINED BY PLAINTIFF'S COUNSEL

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2 (Pages 2 to 5)

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<p>09:19:15 1 PROCEEDINGS 09:19:15 2 VIDEOGRAPHER: This is the video operator 09:19:17 3 speaking, Joe Cheung, of Merrill Corporation, Boston. 09:19:22 4 Today is March 15, 2012. The time is 9:19. We are at 09:19:27 5 the Azalea Room, Renaissance Seoul Hotel, Seoul, South 09:19:43 6 Korea, to take the videotaped deposition of Dr. Ahn in 09:19:46 7 the matter of Certain Electric Devices Including 09:19:56 8 Wireless, et al. Investigation number is 337-TA-794. 09:19:58 9 Will counsel please introduce themselves for the 09:20:02 10 record, please. 09:20:03 11 MR. MUELLER: Joe Mueller, Wilmer, Cutler, 09:20:06 12 Pickering, Hale and Dorr, for Apple. And also let me 09:20:08 13 note for the record, I believe this deposition is also 09:20:11 14 for the Northern District of California case as well, 09:20:13 15 and I'll read the civil action number, which is Case 09:20:15 16 No. 11-cv-01846-LHK. And that case is captioned 09:20:25 17 Apple, Incorporated vs. Samsung Electronics, Co., 09:20:30 18 Limited. 09:20:30 19 MR. PEASE: Tom Pease, Quinn, Emanuel, for 09:20:33 20 Samsung, and with me is Brian Kim from Samsung. 09:20:38 21 VIDEOGRAPHER: And will the court reporter, 09:20:43 22 Jeanne Bullis of Merrill Corporation, Boston, please 09:20:47 23 swear the witness and the interpreter. 09:21:14 24 (Whereupon, the aforementioned Witness and 09:21:25 25 Interpreters were sworn in.)</p>	<p>09:22:57 1 correct? 09:23:02 2 A. Yes, that's correct. 09:23:03 3 Q. And that was in metallurgy? 09:23:11 4 A. Yes. 09:23:11 5 Q. And you also attended Santa Clara for your 09:23:15 6 law degree; correct? 09:23:25 7 A. Yes. 09:23:25 8 Q. And at one time you were an admitted member 09:23:28 9 of the California State Bar; correct? 09:23:37 10 A. Yes. 09:23:37 11 Q. Are you fluent in English? 09:23:57 12 A. Well, my answer would be different, depending 09:23:59 13 on your definition of fluent. I don't think my 09:24:04 14 abilities are all that fluent. 09:24:11 15 Q. Do you feel comfortable speaking in English? 09:24:14 16 A. That depends on the situation. 09:24:17 17 Q. If you were to testify at trial in litigation 09:24:22 18 against Apple, would you testify in English or Korean? 09:24:42 19 A. It would be better for me to testify in 09:24:49 20 Korean. 09:24:49 21 Q. You would testify in Korean? 09:24:50 22 A. Correct. 09:24:51 23 Q. Have you been deposed before? 09:24:58 24 A. Yes. 09:25:00 25 Q. How many times?</p>
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<p>1 WHEREUPON, 2 SEUNG-HO AHN 3 having been first duly sworn as noted above, was 4 examined and testified through the interpreter as 09:21:18 5 follows: 09:21:18 6 EXAMINATION 09:21:20 7 BY MR. MUELLER: 09:21:21 8 Q. Good morning. 09:21:22 9 A. Good morning. 09:21:22 10 Q. Could you please state and spell your full 09:21:26 11 name for the record? 09:21:30 12 A. Yes, my name is Seung-Ho Ahn. A-H-N 09:21:43 13 S-E-U-N-G-H-O. 09:21:45 14 Q. Mr. Ahn, do you speak English? 09:21:51 15 A. Yes, a little bit. 09:21:54 16 Q. And did you study at schools in the United 09:22:04 17 States? 09:22:04 18 A. Yes. 09:22:04 19 Q. Which ones? 09:22:29 20 A. I had gone through the doctorate program at 09:22:35 21 University of Illinois, Urbana-Champaign, and then 09:22:41 22 thereafter, I completed the JD program at the 09:22:48 23 Santa Clara, California, University of Santa Clara, 09:22:53 24 law school. 09:22:53 25 Q. And at Illinois, you received a Ph.D.;</p>	<p>09:25:08 1 A. My recollection would be that about twice. 09:25:11 2 Q. And do you recall in which cases? 09:25:24 3 A. On the occasion of litigation between Samsung 09:25:34 4 and Sharp. Also Samsung vs. SEL. 09:25:40 5 Q. Were those the only two cases in which you 09:25:42 6 were deposed? 09:25:49 7 A. That is my recollection. 09:25:53 8 Q. Did you testify at a hearing or a trial in 09:25:56 9 those cases? 09:26:06 10 A. I did testify in the case against Sharp. 09:26:15 11 Q. In which court? 09:26:18 12 A. ITC. 09:26:21 13 Q. When was this? 09:26:34 14 A. Four or five years ago. Well, I would say 09:26:39 15 three, four years ago. 09:26:41 16 Q. Do you recall the general subject matter of 09:26:43 17 your testimony? 09:26:53 18 A. I do not recall. 09:26:55 19 Q. Is that a patent case? 09:26:58 20 A. The case itself was a patent-related case. 09:27:15 21 Q. Was that case instigated by sharp or Samsung? 09:27:19 22 A. Both parties. 09:27:26 23 Q. Both parties brought claims against each 09:27:28 24 other? 09:27:32 25 A. Yes, that's correct.</p>

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<p>10:02:21 1 A. A year, year and a half. 10:02:25 2 Q. And you began work there about, when was it, 10:02:28 3 2009, 2010? 10:02:38 4 A. I think that should be about right. 10:02:42 5 Q. Do you recall when you completed your work 10:02:44 6 there, which year? 10:02:50 7 A. That would have been either July or August of 10:02:59 8 2010, but I do not know exactly. 10:03:01 9 Q. What did you do next? 10:03:07 10 A. Thereafter I became the head of the IP 10:03:19 11 center, which I still do. 10:03:20 12 Q. What is the IP center? 10:03:24 13 A. This is the place where it handles, or it 10:03:41 14 oversees the general patent-related work for Samsung 10:03:48 15 Electronics Company. 10:03:54 16 Q. All divisions? 10:04:21 17 A. Well, previously IP teams used to belong to 10:04:26 18 each of the business divisions, but right now you can 10:04:33 19 say that through the IP center, you are able to 10:04:44 20 oversee all the aspects. 10:04:48 21 Q. When was the IP center created? 10:04:54 22 A. Once again, that would have been July or 10:05:04 23 August of 2010, which I'm not quite certain. 10:05:07 24 Q. Were you the first head of the IP center? 10:05:18 25 A. Well, I'm the first head of the IP center in</p>	<p>10:08:28 1 licensing executive at Samsung? 10:08:43 2 A. Yes. 10:08:44 3 Q. To whom do you report? 10:08:50 4 A. That is the CEO. 10:08:58 5 Q. And who directly reports to you? 10:09:08 6 A. There are four team leaders at the IP center. 10:09:18 7 Q. And just so the record is clear, I'm going to 10:09:22 8 ask you to give each person's name, and let's start 10:09:24 9 with the CEO. 10:09:46 10 A. Surname is Choi, and first name Jiseong. A 10:10:00 11 common spelling, but that's probably not the correct 10:10:04 12 spelling. I myself -- I know that that is not it, but 10:10:07 13 I don't know how it is spelled. 10:10:09 14 Q. No problem. And could you name for me, 10:10:12 15 please, sir, the four team leaders that report to you? 10:10:26 16 A. Seung-Geon Park. Minhyung Chung. Jaewan Ji. 10:11:09 17 Gijoong Kang. 10:11:17 18 Q. And I should have asked this earlier, but do 10:11:21 19 you prefer Dr. Ahn or Mr. Ahn? 10:11:29 20 A. (In English) Anything's okay. I forgot the 10:11:32 21 fact that I was a doctor before, so -- all right. 10:11:36 22 Call me Mr. Ahn. That's all right. 10:11:40 23 Q. Thank you. Mr. Ahn, what are your day-to-day 10:11:50 24 responsibilities today at the IP center? 10:12:18 25 A. I think it would be difficult to pinpoint</p>
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<p>10:05:35 1 its current iteration, but ten or some odd years ago, 10:05:41 2 there was an IP center then, and back then it was 10:05:48 3 somebody else. 10:05:49 4 Q. But for the current iteration, you were the 10:05:51 5 first and remain the only head of the IP center; 10:05:54 6 correct? 10:06:08 7 A. Yes, so far. 10:06:10 8 Q. Does the IP center have lead responsibility 10:06:15 9 at Samsung Electronics for patent prosecution? 10:06:37 10 MR. PEASE: Objection, vague. 10:06:58 11 A. Earlier I was alluding to the fact that all 10:07:02 12 the IP-related work were combined to be the work for 10:07:15 13 IP center, but what had been left out in this 10:07:20 14 combining process was the patent prosecution, which 10:07:23 15 still remained with each of the business divisions. 10:07:30 16 BY MR. MUELLER: 10:07:30 17 Q. Does the IP center have lead responsibility 10:07:34 18 at Samsung for licensing? 10:07:48 19 MR. PEASE: Objection, vague. 10:08:03 20 A. Well, I do not exactly understand what you 10:08:06 21 mean by "lead" here, but at the time of 10:08:13 22 licensing-related work, there is cooperation with the 10:08:20 23 related business division. 10:08:25 24 BY MR. MUELLER: 10:08:25 25 Q. Mr. Ahn, are you the highest ranking</p>	<p>10:12:22 1 specifically it is this or it is that, but I could say 10:12:27 2 that I'm handling the overall general patent-related 10:12:35 3 work for Samsung. 10:12:38 4 Q. And your duties include licensing; correct? 10:12:46 5 A. Yes. 10:12:47 6 Q. Do your duties also include acquisitions of 10:12:52 7 intellectual property, including patents? 10:13:05 8 A. Yes. 10:13:06 9 Q. Do you have any involvement at all in patent 10:13:08 10 prosecution these days? 10:13:14 11 A. I do not. 10:13:23 12 Q. Are there other areas beyond licensing and 10:13:26 13 acquisitions that you currently work in? 10:13:45 14 A. Well, there is the patent analysis work and 10:14:00 15 there are some people who handle litigation, and some 10:14:06 16 other people who handle strategy, and many different 10:14:13 17 things. 10:14:13 18 Q. And when you say "patent analysis," what are 10:14:17 19 you referring to? 10:14:33 20 A. Well, at the time of the purchase of patents, 10:14:43 21 there can be some patent analysis work prior to such 10:14:47 22 acquisition, and if there are some claims made or 10:14:54 23 litigation occurs, then the related patents could be 10:14:59 24 analyzed. 10:15:00 25 Q. Do you supervise patent-related litigation?</p>

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1 CERTIFICATE OF REPORTER

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I, JEANNE BULLIS, RPR, CSR, hereby certify that the testimony of the witness, SEUNG-HO AHN, in the foregoing transcript taken on the 15th day of March, 2012, was recorded by me in machine shorthand and was thereafter transcribed by me; and that the foregoing transcript is a true and accurate verbatim record of the said testimony.

I further certify that I am not a relative, employee, counsel or financially involved with any of the parties to the within cause, nor am I an employee or relative of any counsel for the parties, nor am I in any way interested in the outcome of the within cause.

Signed:
Name: Jeanne Bullis
Date:

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1 ERRATA SHEET

2 Case Name: APPLE VS. SAMSUNG
3
4 Witness Name: SEUNG-HO AHN
5 Date: March 15, 2012

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18
19 Subscribed and sworn to before
me this day of 2012.

20 _____
21 SEUNG-HO AHN
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35 (Pages 134 to 135)