

EXHIBIT 2

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 C O N F I D E N T I A L
20 A T T O R N E Y S E Y E S O N L Y

21 VIDEOTAPED DEPOSITION OF QI LING
22 SAN FRANCISCO, CALIFORNIA
23 WEDNESDAY, FEBRUARY 1, 2012

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
25 CSR LICENSE NO. 9830
JOB NO. 45295

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WEDNESDAY, FEBRUARY 1, 2012

9:31 a.m.

VIDEOTAPED DEPOSITION OF QI LING,
taken at MORRISON & FOERSTER, LLP,
425 Market Street, San Francisco,
California, pursuant to Notice, before me,
ANDREA M. IGNACIO HOWARD, CLR, CCRR, RPR,
CSR License No. 9830.

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

2

3 FOR APPLE INC.:

4 MORRISON & FOERSTER

5 By: MATTHEW I. KREEGER, Esq.

6 425 Market Street

7 San Francisco, California 94105

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12 FOR SAMSUNG ELECTRONICS CO. LTD:

13 QUINN EMANUEL URQUHART & SULLIVAN

14 By: MARK TUNG, Ph.D., Esq.

15 555 Twin Dolphin Drive

16 Redwood Shores, California 94065

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19

20 ALSO PRESENT: Pete Sais, Videographer

21 Michelle Yang, Samsung

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1 SAN FRANCISCO, CALIFORNIA 09:29

2 WEDNESDAY, FEBRUARY 1, 2012 09:29

3 9:30 A.M. 09:30

4 09:30

5 09:30

6 09:30

7 THE VIDEOGRAPHER: Good morning. This is the 09:30

8 start of Disc labeled No. 1 in the videotaped 09:30

9 deposition of Qi Ling, in the matter of Apple, Inc., 09:30

10 versus Samsung Electronics Company, Limited, et al. 09:30

11 In the United States District Court, Northern 09:30

12 District of California, San Jose Division, case 09:30

13 No. 11-cv-01846 LHK. 09:30

14 This deposition is being held at 425 Market 09:30

15 Street in San Francisco, California, on February 1st, 09:31

16 2012, at approximately 9:31 a.m. 09:31

17 My name is Pete Sais, and I'm the legal video 09:31

18 specialist from TSG Reporting, Inc., headquartered at 09:31

19 747 Third Avenue, New York, New York. 09:31

20 The court reporter is Andrea Ignacio, in 09:31

21 association with TSG Reporting. 09:31

22 Will counsel please introduce yourselves, and 09:31

23 the court reporter can swear in the witness. 09:31

24 MR. KREEGER: Matthew Kreeger, Morrison & 09:31

25 Foerster, for Apple. 09:31

1 MR. TUNG: Mark Tung from Quinn Emanuel for 09:31

2 Samsung. 09:31

3 MS. YANG: Michelle Yang for Samsung. 09:31

4 09:31

5 QI LING, 09:31

6 having been sworn as a witness 09:31

7 by the Certified Shorthand Reporter, 09:31

8 testified as follows: 09:40

9 09:40

10 EXAMINATION BY MR. KREEGER 09:31

11 MR. KREEGER: Good morning, Mr. Ling. My 09:31

12 name is Matthew Kreeger, and I'm an attorney for 09:31

13 Apple, and I'm here to take your deposition today. 09:32

14 Q Have you ever been deposed before? 09:32

15 A No. 09:32

16 Q Why don't we start by -- if you could give us 09:32

17 your full name. 09:32

18 A Sure. 09:32

19 My last name is L-I-N-G, Ling. First name is 09:32

20 Q-I, Qi. 09:32

21 Q And where do you live, Mr. Ling, your home 09:32

22 address? 09:32

23 A Home address is 1235 Wildwood Avenue, 09:32

24 Apartment 190, Sunnyvale. ZIP code is 4 -- I'm 09:32

25 sorry -- 94089. 09:32

1 Q And where do you work? 09:32

2 A I work at San Jose Mobile Communications Lab, 09:32

3 Samsung Telecommunications of America. 09:32

4 Q Okay. And what's the address there? 09:32

5 A I believe it's 2820 Orchard Parkway, 09:32

6 San Jose. 09:32

7 Q If at any point today you don't understand 09:32

8 one of my questions -- 09:33

9 A Sure. 09:33

10 Q -- please let me know, and I'll do my best to 09:33

11 rephrase the question. Otherwise, I'm going to assume 09:33

12 you understand. 09:33

13 A Sure. 09:33

14 Q Is there any reason why you can't give full 09:33

15 and accurate testimony today? 09:33

16 A No. 09:33

17 Q You're not taking any medication or otherwise 09:33

18 impaired? 09:33

19 A No. 09:33

20 Q Okay. What is your title -- your work title? 09:33

21 A My title is senior engineer. 09:33

22 Q And could you briefly describe your 09:33

23 educational background after high school. 09:33

24 A After high school? 09:33

25 Q Uh-huh. 09:33

1 A I got my bachelor's degree at the University 09:33
2 of Science and Technology of China, in China. And 09:33
3 then I went to U.S. for the Ph.D. degree, and I got my 09:33
4 Ph.D. from Michigan State University. And after that 09:33
5 I joined Samsung. 09:34

6 Q Is your Ph.D. in computer science? 09:34

7 A No. It's in electrical and computer 09:34
8 engineering. 09:34

9 Q Okay. You mentioned you work at the San Jose 09:34
10 Mobile Communications Lab. 09:34

11 A Yes. 09:34

12 Q Is there a particular group that you're a 09:34
13 part of within that lab? 09:34

14 A There's been a couple of reorganizations, so 09:34
15 I was in different groups. 09:34

16 Q All right. 09:34

17 Maybe we should go through the history of it. 09:34

18 Where -- when you started at Samsung, did you 09:34
19 start at the San Jose Mobile Communications Lab? 09:34

20 A Yes, as a contractor. 09:34

21 Q And when was that? 09:34

22 A It's January 2008. 09:34

23 Q And which group were you a part of at that 09:34
24 point? 09:34

25 A I don't really remember the name of the 09:34