

# Exhibit D

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

13 Defendants.  
14 \_\_\_\_\_/

15 C O N F I D E N T I A L  
16 A T T O R N E Y S ' E Y E S O N L Y  
17 O U T S I D E C O U N S E L  
18

19 VIDEOTAPED DEPOSITION OF RICHARD J. LUTTON, JR.  
20 REDWOOD SHORES, CALIFORNIA  
21 TUESDAY, JULY 26, 2011  
22

23 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR  
24 CSR LICENSE NO. 9830  
25 JOB NO. 40668

1 REDWOOD SHORES, CALIFORNIA

2 TUESDAY, JULY 26, 2011

3 9:11 a.m.

4  
5  
6  
7 THE VIDEOGRAPHER: Good morning.

8 This is the start of tape labeled No. 1, in  
9 the videotaped deposition of Richard Lutton, in the  
10 matter of Apple, Inc., versus Samsung Electronics  
11 Company Limited, et al., in the United States District  
12 Court for the Northern -- Northern District of  
13 California, San Jose Division.

14 Case No. 11-CV-01846-LHK.

15 This deposition is being held at  
16 555 Twin Dolphin Drive, in Redwood Shores, California,  
17 on July 26th, 2011, at approximately 9:11 a.m.

18 My name is Pete Sais, from TSG Reporting,  
19 Inc., and I'm the legal video specialist. The court  
20 reporter is Andrea Ignacio in association with TSG  
21 Reporting.

22 Will counsel please introduce yourself, and  
23 the court reporter can swear in the witness.

24 MR. JOHNSON: I'm Kevin Johnson, from Quinn  
25 Emanuel, on behalf of Samsung.

1 Q -- is that right?

2 A -- practicing as a lawyer since 1993. I've  
3 been --

4 Q You were a clerk for a little bit; right?

5 A I was a clerk for a little while, but I was  
6 a -- the patent lawyer part, I was just gonna say I  
7 was admitted to the PTS some time after that.  
8 Maybe '96.

9 MR. JOHNSON: Okay. All right. Thank you.

10 No ques- -- no further questions, and I just  
11 want to put on the record, from our standpoint, the  
12 deposition remains open.

13 There are, obviously, several documents that  
14 we thought should have been produced before today, and  
15 so we reserve our rights with respect to continuing  
16 the deposition.

17 MR. MONACH: Okay. You reserve your rights,  
18 and our position is you're done.

19 THE VIDEOGRAPHER: This marks the end of  
20 Volume I, Disk 5, in the deposition of Richard Lutton.

21 The time is 8:05 p.m., and we are off the  
22 record.

23 (WHEREUPON, the deposition ended at  
24 8:05 p.m.)

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