

# EXHIBIT H

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 --o0o--

4 APPLE INC., a California  
5 corporation,

6 Plaintiff,

7 Vs.

Case No. 11-CV-01846-LHK

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

15 Defendants.

16 \_\_\_\_\_/

17 VIDEOTAPED DEPOSITION OF COOPER WOODRING

18 Redwood Shores, California

19 Friday, August 5, 2011

20 (HIGHLY CONFIDENTIAL ATTORNEYS' EYES  
21 ONLY PORTIONS BOUND SEPARATELY)

22 Reported By: CAROL S. NYGARD, CSR No. 4018  
23 Registered Merit Reporter  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

August 5, 2011

9:46 a.m.

Videotaped Deposition of COOPER  
WOODRING, held at the offices of  
Quinn Emanuel Urquhart & Sullivan,  
LLP, 555 Twin Dolphin Drive, Redwood Shores,  
California, before Carol S. Nygard,  
A Certified Shorthand Reporter,  
Registered Merit Reporter.

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

2 FOR THE PLAINTIFF APPLE, INC.:

3 MORRISON & FOERSTER

BY: ANDREW E. MONACH, ESQ.

4 PATRICK J. ZHANG, ESQ.

425 Market Street

5 San Francisco, California 94105

6  
7  
8 CYNDI WHEELER, Patent Counsel

Apple

1 Infinite Loop, MS 40-PAT

9 Cupertino, California 95014

10  
11 FOR THE DEFENDANTS SAMSUNG:

12 QUINN EMANUEL URQUHART & SULLIVAN

13 BY: MICHAEL T. ZELLER, ESQ.

TAMAR BUCHAKJIAN ESQ,

14 856 South Figueroa Street

10th Floor

15 Los Angeles, CA 90017

16  
17  
18 QUINN EMANUEL URQUHART & SULLIVAN

BY: MARGARET CARUSO, ESQ.

19 JOELLE PERRY, ESQ.

555 Twin Dolphin Drive

20 5th Floor

Redwood Shores, California 94065

21  
22  
23 Also Present:

24 JAKE KROHN, Videographer

25 NATE SUN

1 MR. ZELLER: We need to change tapes.

2 VIDEOGRAPHER: This is the end of tape one for  
3 the deposition of Cooper Woodring.

4 We are off the record at 11:53.

5 (Discussion off the record)

6 VIDEOGRAPHER: This is the beginning of tape  
7 two for the deposition of Cooper Woodring.

8 We are back on the record at 11:56.

9 BY MR. ZELLER:

10 Q. Finishing up there then with Exhibit 63, the  
11 phone that you have in front of you, in terms of the  
12 overall impression of the surface of that phone that you  
13 have in front of you, do you believe that it is  
14 substantially the same as the design depicted in the 677  
15 design patent?

16 MR. MONACH: Object to the form of the  
17 question as asking this witness to form an opinion on  
18 the fly here, but you can answer if you'd like.

19 THE WITNESS: With regard to its color, yes.

20 BY MR. ZELLER:

21 Q. I'm asking about it overall now.

22 MR. MONACH: Same objections.

23 MR. ZELLER: The overall surface.

24 THE WITNESS: That's just not a -- an analysis  
25 that I've previously made and would be reluctant to --

1 try to do that within 30 seconds when, you know,  
2 substantially the same analysis is a fairly complex  
3 analysis to make.

4 BY MR. ZELLER:

5 Q. So you can't offer an opinion on that?

6 A. I'd be reluctant to.

7 Q. I'm not asking if you're reluctant to.

8 Can you offer an opinion on that?

9 MR. MONACH: Objection. Asked and answered.  
10 Object to form.

11 THE WITNESS: I don't think I'm willing to.

12 BY MR. ZELLER:

13 Q. Are you refusing to answer my question or are  
14 you saying you cannot answer it?

15 MR. MONACH: Object to the form of the  
16 question.

17 THE WITNESS: I cannot answer it.

18 BY MR. ZELLER:

19 Q. So you have no opinion; correct?

20 MR. MONACH: Object to form.

21 THE WITNESS: I'm -- I'm unwilling to -- to  
22 try to answer your question in, you know, 30 seconds or  
23 not when I've spent hours and hours trying to arrive at  
24 a -- a correct solution in other comparisons.

25 BY MR. ZELLER:

1 Q. Anything else?

2 A. No, that's about it.

3 MR. ZELLER: All right.

4 MR. MONACH: All right.

5 Thank you.

6 VIDEOGRAPHER: This is the end of the  
7 deposition of Cooper Woodring after four tapes.

8 And we're off the record at 7:33.

9 (Thereupon the deposition was adjourned at.  
10 7:33 p.m.)

11 --o0o--

12 Signed under penalty of perjury:

13 \_\_\_\_\_  
14 COOPER C. WOODRING

15 \_\_\_\_\_  
16 DATE

17

18

19

20

21

22

23

24

25

1 I, CAROL S. NYGARD, a Certified Shorthand  
2 Reporter of the State of California, duly authorized to  
3 administer oaths, do hereby certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth; that  
6 any witnesses in the foregoing proceedings, prior to  
7 testifying, were duly sworn; that a record of the  
8 proceedings was made by me using machine shorthand which  
9 was thereafter transcribed under my direction; that the  
10 foregoing transcript is a true record of the testimony  
11 given.

12 Further, that if the foregoing pertains to the  
13 original transcript of a deposition in a Federal Case,  
14 before completion of the proceedings review of the  
15 transcript was not requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee of  
18 any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name:

21 Dated: August 6th, 2011

22  
23 \_\_\_\_\_  
24 CAROL S. NYGARD, CSR #4018  
25