

Exhibit V

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,

Defendants.
13 _____/

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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 RAVIN BALAKRISHNAN, Ph.D.
20 SAN FRANCISCO, CALIFORNIA
21 TUESDAY, AUGUST 16, 2011
22

23 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
24 CSR LICENSE NO. 9830
25 JOB NO. 41176

1 TUESDAY, AUGUST 16, 2011

2 9:10 a.m.

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6 VIDEOTAPED DEPOSITION OF RAVIN BALAKRISHNAN,
7 Ph.D., taken at QUINN EMANUEL URQUHART &
8 SULLIVAN, 50 California Street, 22nd Floor,
9 San Francisco, California, pursuant to
10 Notice, before me, ANDREA M. IGNACIO HOWARD,
11 CLR, CCRR, RPR, CSR License No. 9830.

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

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3 FOR APPLE INC.:

4 MORRISON & FOERSTER

5 By: ANDREW E. MONACH, Esq.

6 DEOK KEUN AHN, Esq.

7 425 Market Street

8 San Francisco, California 94105

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12 FOR SAMSUNG ELECTRONICS CO. LTD:

13 QUINN EMANUEL URQUHART & SULLIVAN

14 By: KEVIN JOHNSON, Esq.

15 HENRY LIEN, Esq.

16 TODD BRIGGS, Esq.

17 MARK TUNG, Ph.D., Esq.

18 555 Twin Dolphin Drive

19 Redwood Shores, California 94065

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23 ALSO PRESENT: Alan Dias, Videographer

24

25

1 So let's see if I can show this. I've got my
2 finger on the screen, my object on the screen. The
3 first portion is this part of the document that, let's
4 say, starts with Chris Thomas at the top, and at the
5 bottom it has the word "QWERTY," that I just entered.
6 I'm gonna -- I'm gonna move my -- move my finger, and
7 so in response to my -- my finger, it's gonna
8 translate the electronic document to display --
9 translate in a first direction, in one direction here,
10 to display a second portion, which is different from
11 the first portion.

12 So, now, the second portion now, as you see,
13 on the top, has Billy Smith, and the bottom has
14 Michael Myers on the -- on the list of the information
15 on the document. So it's clearly different from that
16 first portion that we saw earlier that had different
17 names on the top and bottom.

18 Now -- now, I'm gonna keep going here to the
19 next element. It says "In response to an edge of the
20 electronic document being reached while translating
21 the electronic document in the first direction, while
22 the object is still detected on or near the
23 touchscreen display, displaying an area beyond the
24 edge of a document and displaying a third portion of
25 the electronic document, wherein the third portion is

1 product, but you can answer.

2 MR. JOHNSON: You can have a running
3 objection on that, just to try and cut though this.

4 THE WITNESS: So I haven't examined this in
5 any great detail, but just looking at this right now,
6 it's -- certainly is an application that's running on
7 a computer-implemented -- or a computer -- so it is a
8 computer-implemented method.

9 MR. JOHNSON: Okay.

10 Q And does LaunchTiles running on iPAQ, does
11 that meet the limitation of a device with a
12 touchscreen display?

13 MR. MONACH: Same objection.

14 THE WITNESS: It's not clear, to me, this is
15 a touchscreen display. I tried touching it a minute
16 ago, like when I was playing with it, and it didn't
17 react to me, but the -- the pen seems to do the job.

18 Okay, so now it does react, so maybe I was
19 mistaken. Given what he just did, it appears to react
20 to touches, so, sure, it would be a device with a
21 touchscreen display.

22 MR. JOHNSON: Okay.

23 Q So in the -- in the 2x2 grid that we see
24 there running on the iPAQ, does that meet the
25 limitation of displaying a first portion of an

1 electronic document?

2 MR. MONACH: Same objection; lack of
3 foundation; incomplete hypothetical.

4 THE WITNESS: So I would have to study this
5 in detail before answering that question, because I
6 need to understand the context of the content being
7 shown on the -- on the display as to what constitutes
8 an electronic document there, whether it's all four
9 tiles is one document or a single tile is a document.
10 I cannot make that determination, just looking at this
11 on the fly.

12 MR. JOHNSON: Q. So if the -- in this
13 example, assume the 2x2 is an electronic document.

14 A So you're representing to me that you want me
15 to consider --

16 Q I want you to consider the 2x2 is an
17 electronic document?

18 A So just to clarify it, does that mean the --
19 the whole thing is one document. Is that what you're
20 saying to me?

21 Q Right. Right, the 2x2.

22 And so, then, when --

23 A So that's your representation. I'm not
24 necessarily agreeing with that.

25 Q I'm just -- yeah, right.

1 So as I stated earlier, I haven't studied
2 this in detail enough in matching it up with the
3 claims, so your representation is you wanted me to
4 consider all four tiles as one doc -- in a -- in its
5 combination, as an entirety, as one document.

6 That might be an electronic document
7 vis-à-vis the claims. It might not be. I would have
8 to study that in detail --

9 MR. JOHNSON: Well --

10 THE WITNESS: -- relative to the context of
11 the application. I have not done that detailed
12 analysis yet. So it may be that only each -- each
13 tile is an electronic document in this application. I
14 don't know.

15 MR. JOHNSON: Q. Well, it's visually
16 represented on screen with a defined set of
17 boundaries, right, those 2x2 tiles?

18 MR. MONACH: Object to the form of the
19 question; assumes facts not in evidence; lack of
20 foundation.

21 THE WITNESS: As I said, you -- you're
22 representing to me that you wanted me to consider
23 that. So if you considered those four tiles as one
24 entirety with the defined boundaries, that could be
25 an --

1 MR. JOHNSON: Tilt it, Henry. Yep.

2 Q See that?

3 A Keep going.

4 Q Doesn't that meet claim limitation seven?

5 MR. MONACH: Same -- same objection.

6 THE WITNESS: I think I would have to study
7 that in detail. It's not clear to me that I -- it
8 definitely meets the edge -- reaches the edge. When I
9 know that I reached the edge because I've gone -- I've
10 already explored that list further, but just looking
11 at that and maybe there's something beyond that, I
12 don't know. It's only when it goes much further that
13 it clearly tells me that I've reached the edge. So,
14 again, I would caveat this by saying I have to study
15 this in detail --

16 MR. MONACH: Sorry.

17 THE WITNESS: -- before making that
18 determination.

19 MR. MONACH: Sorry.

20 Mr. Videographer, are we at seven hours? Two
21 minutes? Okay.

22 MR. JOHNSON: Okay.

23 Q Can you tell me if this meets the limitations
24 of Claims 19 and 20?

25 MR. MONACH: Same objection.

1 perspective, no surprise, I suspect, the deposition is
2 over.

3 THE VIDEOGRAPHER: This is the end of today's
4 deposition.

5 We are off the record at 6:37 p.m.

6 The master disk will be held by TSG.

7 (WHEREUPON, the deposition ended at
8 6:37 p.m.)

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J U R A T

I, RAVIN BALAKRISHNAN, Ph.D., do hereby certify under penalty of perjury that, I have read the foregoing transcript of my deposition taken on August 16, 2011; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

DATED this ____ day of _____, 2011,
at _____.

SIGNATURE OF WITNESS

CERTIFICATE OF REPORTER

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4
5 I, ANDREA M. IGNACIO HOWARD, hereby certify
6 that the witness in the foregoing deposition was by me
7 duly sworn to tell the truth, the whole truth, and
8 nothing but the truth in the within-entitled cause;
9

10 That said deposition was taken in shorthand
11 by me, a Certified Shorthand Reporter of the State of
12 California, and was thereafter transcribed into
13 typewriting, and that the foregoing transcript
14 constitutes a full, true and correct report of said
15 deposition and of the proceedings which took place;
16

17 That I am a disinterested person to the said
18 action.
19

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand this 17th day of August, 2011.
22

23 _____
24 ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830
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