

EXHIBIT H

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

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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
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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

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7
8 CYNDI WHEELER, Patent Counsel

Apple

1 Infinite Loop, MS 40-PAT

9 Cupertino, California 95014

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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

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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.)

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12 Signed under penalty of perjury:

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14 COOPER C. WOODRING

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16 DATE

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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
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