

EXHIBIT O

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California
corporation,

Plaintiff,

vs.

No: 11-cv-01846

LHK

SAMSUNG ELECTRONICS CO., LTD.,

a Korean business entity;

SAMSUNG ELECTRONICS AMERICA,

INC., a New York corporation,

SAMSUNG TELECOMMUNICATIONS

AMERICA, LLC, a Delaware

limited liability company,

Defendants.

DEPOSITION OF CHRISTOPHER STRINGER
Redwood Shores, California
Wednesday August 3, 2011

Reported By:

LINDA VACCAREZZA, RPR, CLR, CRP, CSR. NO. 10201

JOB NO. 40906

1 MS. CARUSO: Margret Caruso, Quinn
2 Emanuel, for Samsung.

3 MR. JACOBS: Michael Jacobs,
4 Morrison Foerster, for Apple.

5 MR. ZHANG: Patrick Zhang,
6 Morrison Foerster, for Apple.

7 MS. TIERNEY: Erica Tierney for
8 Apple.

9 THE VIDEOGRAPHER: Thank you.
10 Will the court reporter please administer
11 the oath, and we can proceed.
12

13 C H R I S T O P H E R S T R I N G E R:
14 called as a witness, having been duly
15 sworn by the Certified Shorthand
16 Reporter, was examined and testified as
17 follows:

18 EXAMINATION BY:

19 MR. ZELLER:

20 Q Good morning.

21 A Hi.

22 Q Have you ever had your deposition
23 taken before?

24 A Yes.

25 Q On how many times?

1 MR. JACOBS: Objection, form as
2 previously stated.

3 THE WITNESS: I don't feel I am
4 equipped to answer that question beyond
5 what I've already said.

6 Q. You're not certain; is that true?

7 A. As -- I'm not certain that I fully
8 understand exactly the implications of your
9 question, so I cannot answer it without further
10 study.

11 Q. I'm not asking about implications,
12 nor is it relevant whether you understand
13 implications. My question is a simple one. You
14 understand that patents claim something or it
15 doesn't, right?

16 A. Yes.

17 Q. My question is: Part of the
18 design that is claimed here in U.S. design patent
19 504889, does it claim this line that's here
20 depicting a border or the margin, yes or no?

21 MR. JACOBS: Objection form.

22 THE WITNESS: I believe the dotted
23 line represents the area outside of the
24 active area of the LCD. That what I'm
25 not clear on is whether the patent claims

1 -- I cannot answer yes or no. I'm not --

2 Q. You're not certain whether the
3 patent claims that -- what you're calling that
4 line representing the border between the active
5 area of the LCD and the area outside of it,
6 right?

7 A. As I understand it, broken lines
8 are not part of the claim design.

9 Q. I know and you've said that. My
10 question is about this particular patent. Does
11 this particular patent, the 889 design patent,
12 claim that dotted line as part of its patent
13 claim?

14 A. I would have to research this and
15 look into the nature of how this is dotted. It
16 is not dotted in the fashion that I see in the
17 other patent drawings, so I cannot attest to
18 whether or not there is a printing issue or if
19 it's truly a dotted line.

20 Q. In other words, you can't tell
21 from the face of Exhibit 8 as you have it; is
22 that true?

23 A. Based on comparison with other
24 patent drawings, which aren't very clear on what
25 a dotted line looks like, I have to say there is

1 in my mind a small amount of ambiguity, and I'm
2 not prepared to go beyond this.

3 Q. Whether it's a small amount or
4 not, it's ambiguous to you, correct?

5 A. Yes.

6 Q. That's right?

7 Directing your attention to Figure
8 9.

9 MR. JACOBS: Figure 9 of what?

10 MR. ZELLER: Of the same patent,
11 the 889 design patent which is Exhibit 8.

12 THE WITNESS: Okay.

13 Q. Directing your attention to Figure
14 9 of the 889 design patent, Exhibit 8, do you see
15 the tablet sides?

16 A. Yes.

17 Q. You'll see that it looks thicker
18 in the side profile on the side that's closer and
19 then narrows into what's essentially a wedge
20 shape? Do you see that?

21 A. I can -- it can be interpreted as
22 what you described. I can see other
23 interpretations also.

24 Q. Well, what interpretation, in
25 fact, is being claimed here in the 889 design

1 designs on it so that the witness could
2 be asked about CAD designs, and I'm
3 holding it for the video camera now.
4 Other than that, I think we are done.

5 MR. ZELLER: And we obviously
6 reserve our rights and I think you intend
7 to leave, if I understand things
8 correctly.

9 MR. JACOBS: Off the record.

10 THE VIDEOGRAPHER: This marks the
11 end of Tape Number 5 of five and
12 concludes today's deposition of
13 Christopher Stringer. The time is
14 7:04 p.m. and we are off the record.

15 (Time noted: 7:04 p.m.)

16

17

18

19

CHRISTOPHER STRINGER

20

21 Subscribed and sworn to before me

22 This /s/ day of SEPTEMBER, 2011.

23

24

25

Apple v. Samsung
Case No. 11-CV-01846-LHK

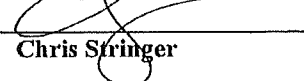
ERRATA SHEET

Deponent: Chris Stringer, on behalf of Apple Inc.
Date: August 3, 2011

Page	Line(s)	Original Text	Change to Text	Reason for Change
7	25	I'm the director	I'm a director	Transcription error
14	3	Is Director	It's Director	Transcription error
22	13	Because there were	Because they were	Transcription error
24	17	Sidney	Sydney	Transcription error
25	15	Seymore Powel	Seymour Powell	Transcription error
30	12-13	For the purpose that have exhibition there	For the purpose of having exhibitions. There was....	Transcription error
46	12	Every product that we make it	Every product that we make is	Transcription error
75	6	In a course way	In a coarse way	Transcription error
77	22	The rear house to go a single piece	The rear housing to get a single piece	Transcription error
80	14	Essentially chasse	Essentially a chassis	Transcription error
101	21	Monotone plain	Monotone plane	Transcription error
129	12-13	There was a long, thin rectangle as my best recollection	There was a long, thin rectangle is my best recollection	Transcription error
172	21	It that is multiple meanings	It has multiple meanings	Transcription error
176	2	It is disadvantage	It is a disadvantage	Transcription error

Page	Line(s)	Original Text	Change to Text	Reason for Change
192	6	Traces in a grade	Traces in a grid	Transcription error
192	11	That the grids	That the grid is	Transcription error
197	8	The designers are a	The designs are a	Transcription error
200	5	Our CAD sculptures	Our CAD sculptors	Transcription error
208	9	It would be more commercial viable	It would be more commercially viable	Transcription error
231	14	There is a whole slue	There is a whole slew	Transcription error
260	20	Thick, raised bevel	Thick, raised bezel	Transcription error
261	21	Raised thick bevel	Raised thick bezel	Transcription error
275	24	Which aren't very clear	Which are very clear	Transcription error
278	25	Dotted men	Dotted man	Transcription error
286	9	When this patent drawing	What this patent drawing	Transcription error
297	20	Johnny	Jony	Transcription error
297	22	That results	The results	Transcription error
299	20	Cal Cid	Cal Seid	Transcription error
310	8	As I think you've asking me	As I think you're asking me	Transcription error

Dated: 9-1-11

By: 
Chris Stringer

[NOTARY BLOCK]