

EXHIBIT Q

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

25 TSG JOB NO. 40907

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.

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1 MS. WHEELER: Cindy Wheeler, Apple.

2 VIDEOGRAPHER: Will the Court Reporter please
3 swear in the witness.

4 (Thereupon the oath was administered to the
5 Witness by the Court Reporter.)

6 EXAMINATION

7 BY MR. ZELLER:

8 Q. Good morning.

9 Please tell us your full name.

10 A. Cooper Coolidge Woodring.

11 Q. And what is your current business address?

12 A. 131 Highland Avenue, Wakefield, Rhode Island
13 02789.

14 Q. And where do you currently reside?

15 A. At that same address.

16 Q. Currently do you -- do you have a company or a
17 firm that you work with?

18 A. No.

19 Q. You're out on your own as a consultant?

20 A. Yes.

21 Q. When is it that you were first contacted by
22 anyone about potentially being engaged in connection
23 with a dispute with Samsung?

24 A. I think it was early May of this year.

25 Q. Who did you hear from?

1 in B?

2 A. Yes.

3 Q. So, again, just --

4 I wanted to make sure that I heard you
5 correctly and understood everything you said.

6 So all the elements, the major design elements
7 listed here in paragraph 16, are present in the design
8 we marked as Exhibit 67 except for the parts where it
9 says flat, clear, black colored, and inset, and as to
10 those you don't know?

11 MR. MONACH: Object to the form of the
12 question.

13 To the extent -- if you're asking him to
14 testify, it's asked and answered.

15 If you're changing it each time you repeat it
16 over and over again, then it's mischaracterizing the
17 prior testimony.

18 Same standing objection to this line of
19 questions.

20 Go ahead.

21 THE WITNESS: You're -- I think you're asking
22 me for an infringement analysis by -- by asking me
23 whether or not it is substantially the same in the eyes
24 of the ordinary observer.

25 That's a -- as I testified earlier this

1 morning, that's a lengthy, detailed, analytical
2 conclusion based on review of prosecution history and
3 file wrappers and prior art, and I'm not prepared to
4 give you a definitive answer to that here today.

5 I will say that it looks suspiciously similar.

6 BY MR. ZELLER:

7 Q. I'm not asking for so-called infringement
8 analysis. I'm asking something factual right now.

9 In paragraph 16 of your declaration you lay
10 out what you consider to be the major design elements of
11 the 677 design patent; right?

12 A. Yes.

13 Q. And I'm simply asking you whether you see in
14 this design that we marked as Exhibit 67 elements that
15 you've listed here in that design, and, if I understand
16 you correctly, you do see in Exhibit 67 all the major
17 design elements of the 677 design patent that you lay
18 out here except for the following: Flat, clear,
19 black-colored and inset; right?

20 MR. MONACH: Object to the form of the
21 question for the reasons previously stated.

22 Objection, asked and answered.

23 Object to the extent it misstates his prior
24 testimony.

25 THE WITNESS: I believe that's correct.