

Exhibit I

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION

4
5
6 APPLE INC., A CALIFORNIA :
7 CORPORATION, :
8 PLAINTIFF, :

9 VS.

:
: CASE NO.
: 11-CV-01846-LHK

10 SAMSUNG ELECTRONICS, CO., :
11 LTD., A KOREAN BUSINESS :
12 ENTITY; SAMSUNG ELECTRONICS :
13 AMERICA, INC., A NEW YORK :
14 CORPORATION; SAMSUNG :
15 TELECOMMUNICATIONS AMERICA, :
16 LLC, A DELAWARE LIMITED :
17 LIABILITY COMPANY, :

18
19
20 DEFENDANTS

21 DEPOSITION OF ANDRIES VAN DAM, an Expert
22 Witness in the above-entitled cause, taken on
23 behalf of the Plaintiff, before Barbara
24 Warner, RPR, Notary Public in and for the
25 State of Rhode Island, at the offices of
Allied Court Reporters, 115 Phenix Avenue,
Cranston, RI, on September 14, 2011
at 9:30 A.M.

Job Number: 41901

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APPEARANCES :

FOR THE PLAINTIFF APPLE INC. :
MORRISON & FOERSTER
BY: RICHARD S.J. HUNG, ESQ.
BY: DEOK KEUN MATTHEW AHN, ESQ.
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SAN FRANCISCO, CALIFORNIA 94105

FOR THE DEFENDANTS SAMSUNG :
QUINN EMANUEL URQUHART OLIVER & HEDGES
BY: TODD M. BRIGGS, ESQ.
BY: AARON KAUFMAN, ESQ.
555 TWIN DOLPHIN DRIVE
REDWOOD SHORES, CALIFORNIA 94065

ALSO PRESENT :
MIKE HENRIQUES, VIDEOGRAPHER

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ATTORNEYS.

1 (DEPOSITION COMMENCED AT 9:54 A.M.)

2 ANDRES VAN DAM

3 THE VIDEOGRAPHER: This is the
4 start of the tape labeled number 1 of the
5 videotaped deposition of Andries van Dam in
6 the matter of Apple Inc., versus Samsung
7 Electronics Company, Limited, in the United
8 States District Court, Northern District of
9 California, San Jose Division. The
10 deposition is being held at Allied Court
11 Reporters, 115 Phenix Avenue, Cranston, Rhode
12 Island on September 14, 2011 at approximately
13 9:54 a.m.

14 My name is Mike Henriques. I am
15 the legal video specialist from TSG
16 Reporting, Inc., headquartered at 747 Third
17 Avenue, New York, New York. The court
18 reporter is Barbara Warner in association
19 with TSG Reporting. And if counsel could
20 please introduce themselves.

21 MR. HUNG: Richard Hung of
22 Morrison & Foerster for Apple Inc. With me
23 today is Matthew Ahn, also of Morrison &
24 Foerster.

25 MR. BRIGGS: Todd Briggs from

1 Q. Or doesn't infringe, as represented in those
2 claim charts?

3 A. Correct.

4 Q. Do you have any patents of your own?

5 A. No.

6 Q. I take it you are not an inventor on any
7 patent, whether a utility patent or design
8 patent?

9 A. I am not.

10 Q. Or form patent?

11 A. I am not.

12 Q. Now, I would like to get into some of the
13 substance of your declaration.

14 A. Please.

15 Q. Turn to paragraph 21 of your declaration.

16 A. Starting with --

17 Q. I apologize. Paragraph 21 on page 5. I will
18 use paragraphs today to make it easier.

19 A. That's fine.

20 MR. HUNG: Todd, if I can help him
21 just find the paragraph.

22 MR. BRIGGS: Sure.

23 A. I have read it.

24 Q. I will be referring today to this snap-back
25 feature referenced in paragraph 21, and I

1 want to make sure we are on the same page
2 with respect to how we understand that
3 feature. Describe to me what you meant by
4 the snap-back feature?

5 A. Yes. If you are moving an electronic
6 document in a certain direction, and you
7 scroll it past its edge, where there is no
8 new information to come into view, you are
9 going to be displaying beyond the edge. If
10 your excursion beyond the edge is small and
11 you lift your finger or your stylist,
12 whatever your pointing device is, then the
13 view will snap back so that there is no
14 unrelated information to be seen. That
15 material beyond the edge disappears. So it
16 should be seen as a mechanism for overpanning
17 or overscrolling and realigning the final
18 view.

19 Q. There are two more words I want to ask you
20 about two, three more words, because at least
21 two of them appeared in your declaration.

22 What do you mean by overpanning?

23 A. Going beyond the edge. An attempt to pull
24 the electronic document further than it
25 should go and this particular form of visual

1 feedback lets you know that by as soon as you
2 lift up, snapping the document to another
3 view in which there is no material beyond the
4 edge visible.

5 Q. I take it that overscrolling is different
6 than overpanning?

7 A. No, I mean them exactly the same way.
8 Scrolling to some people means moving in a
9 linear direction, similar direction. Panning
10 may mean that or it could mean in an
11 arbitrary direction in a way that a film
12 camera can pan.

13 Q. You refer to the feature as snap-back. Is
14 that the same as moving back? Is there a
15 distinction between moving back and snapping
16 back?

17 A. Yes, there is.

18 Q. What is the distinction?

19 A. The term snap-back or bounce-back is used
20 to indicate that there is an attempt to
21 simulate a kind of physics which you would
22 get from, say, attaching a rubber band to the
23 edge and having the rubber band pull the edge
24 back. So the animation which you can see on
25 my iPhone does that. It gives you the

1 C E R T I F I C A T E

2 I, Barbara Warner, a Notary Public in
3 and for the State of Rhode Island, duly
4 commissioned and qualified to administer
5 oaths, do hereby certify that the foregoing
6 Deposition of Andries van Dam, a Witness in
7 the above-entitled cause, was taken before me
8 on behalf of the Plaintiff, at the offices of
9 Allied Court Reporters, 115 Phenix Avenue,
10 Cranston, Rhode Island on September 14, 2011
11 at 9:30 A.M.; that previous to examination of
12 said witness, who was of lawful age, he was
13 first sworn by me and duly cautioned to
14 testify to the truth, the whole truth, and
15 nothing but the truth, and that he thereupon
16 testified in the foregoing manner as set out
17 in the aforesaid transcript.

18 I further testify that the foregoing
19 Deposition was taken down by me in machine
20 shorthand and was later transcribed by
21 computer, and that the foregoing Deposition
22 is a true and accurate record of the
23 testimony of said witness.

24 Pursuant to Rules 5(b) and 30(f) of the
25 Federal Rules of Civil Procedure, original
transcripts shall not be filed in Court;
therefore, the original is delivered to and
retained by Plaintiff's attorney, Richard
S.J. Hung, Esquire.

Correction and signature pages were sent
to Plaintiff's Counsel, Todd M. Briggs.

IN WITNESS WHEREOF, I have hereunto set
my hand and seal this 15th day of September,
2011.

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BARBARA WARNER, NOTARY PUBLIC/CERTIFIED
COURT REPORTER

1 NAME OF CASE: Apple, Inc. v. Samsung Elecs. Co., Ltd.
2 DATE OF DEPOSITION: September 14, 2011
3 NAME OF WITNESS: Andries Van Dam
4
5

6 ACKNOWLEDGMENT OF DEPONENT
7

8 I, ANDRIES VAN DAM, do hereby acknowledge that I have
9 read and examined the foregoing testimony, and the same
10 is a true, correct and complete transcription of the
11 testimony given by me, with the exception of the noted
12 corrections, if any, appearing on the attached errata
13 sheet signed by me, to the best of my knowledge and
14 belief.
15

16 19 Oct 2011 Andries Van Dam
17 (Date) (Signature)

18
19 Subscribed and sworn to before me this 19th
20 day of October, 2011.
21 My commission expires _____
22 Notary Public Amanda Morrissette
23
24
25

AMANDA MORRISSETTE
NOTARY PUBLIC
STATE OF RHODE ISLAND
MY COMMISSION EXPIRES NOV. 21, 2012

