

Exhibit Q

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

4 APPLE INC., a California
corporation,

5
6 Plaintiff,

7 vs. Case No. 11-CV-01846-LHK

8 SAMSUNG ELECTRONICS CO., LTD.,
a Korean business entity;

9 SAMSUNG ELECTRONICS AMERICA,
INC., a New York corporation;

10 SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC, a Delaware
11 limited liability company,

12 Defendants.

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16 CONFIDENTIAL
17 ATTORNEYS' EYES ONLY
18 OUTSIDE COUNSEL
19 VIDEOTAPED DEPOSITION OF IMRAN CHAUDHRI
Redwood Shores, California
20 Friday, October 14, 2011
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23 Reported by:

LORRIE L. MARCHANT, CSR No. 10523, RPR, CRR, CCRR, CLR

24 JOB NO. 42879
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October 14, 2011

9:35 a.m.

Videotaped Deposition of IMRAN
CHAUDHRI, held at the offices of Quinn
Emanuel Urquhart & Sullivan, LLP, 555
Twin Dolphin Drive, 5th Floor, Redwood
Shores, California, before Lorrie L.
Marchant, a Certified Shorthand
Reporter, Registered Professional
Reporter, Certified Realtime Reporter,
California Certified Realtime Reporter
and Certified LiveNote Reporter.

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

FOR THE PLAINTIFF APPLE INC.:

MORRISON & FOERSTER

BY: MATTHEW KREEGER, ESQ.

425 Market Street

San Francisco, California 94105

FOR THE DEFENDANTS SAMSUNG:

QUINN EMANUEL URQUHART & SULLIVAN

BY: ALAN WHITEHURST, ESQ.

1101 Pennsylvania Avenue NW

Washington, D.C. 20004

and

BY: ALEX BAXTER, ESQ

MARGRET CARUSO, ESQ.

BRETT ARNOLD, ESQ.

555 Twin Dolphin Drive

Redwood Shores, California 94065

and

BY: MICHAEL ZELLER, ESQ.

865 South Figueroa Street

Los Angeles, California 90017

ALSO PRESENT:

Cyndi Wheeler, Apple IP Litigation Counsel

Alan Dias, Videographer

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1 (Marked for identification purposes,
2 Exhibit 570 through 572.)

3 THE VIDEOGRAPHER: We are on the video
4 record at 9:34 a.m. In the matter of Apple Inc.,
5 versus Samsung, in the United States District Court,
6 Northern District of California. Case No.
7 11-CV-01846-LHK.

8 We are located today at 555 Twin Dolphin
9 Drive, in the City of Redwood Shores, California.
10 Today is October 14, 2011, and the time is 9:35 a.m.

11 My name is Alan Dias from TSG Reporting.
12 Counsel, would you please identify yourself
13 for the record.

14 MR. WHITEHURST: Good morning. My name
15 Alan Whitehurst. And with me today is my colleague,
16 Alex Baxter. We are with the law firm Quinn
17 Emanuel, and we represent Samsung.

18 MR. KREEGER: Matthew Kreeger, Morrison &
19 Foerster, representing Apple. With me is
20 Cyndi Wheeler from Apple.

21 THE VIDEOGRAPHER: Will the court reporter
22 please swear in the witness.

23 THE REPORTER: Do you solemnly swear or
24 affirm under the penalties of perjury that the
25 testimony you are about to offer will be the truth,

1 Q. Would you agree, then, that more than one
2 year before the filing date of your patent
3 application that it was known to have user
4 interfaces with more than one window?

5 A. Yes.

6 Q. If you would please read aloud line 12 of
7 Column 10.

8 A. Starting a timer and -- shall I continue
9 on?

10 Q. What is a timer?

11 MR. KREEGER: Objection. Calls for a legal
12 conclusion.

13 Go ahead.

14 THE WITNESS: A timer, as I understand it,
15 is -- is something that counts down from a -- from a
16 starting value to zero, typically.

17 BY MR. WHITEHURST:

18 Q. If you would please read lines 13 and 14 of
19 Column 10, please.

20 A. Closing the first window in response to a
21 determination that the timer expired.

22 Q. What does it mean when it says "closing the
23 first window"?

24 MR. KREEGER: Objection. Calls for a legal
25 conclusion.

1 THE WITNESS: I don't really know.

2 BY MR. WHITEHURST:

3 Q. In line 14, what it does it mean when it
4 says "timer expired"?

5 MR. KREEGER: Same objection.

6 THE WITNESS: I don't know.

7 BY MR. WHITEHURST:

8 Q. Is it unclear in line 14 what it means when
9 it says "timer expired"?

10 A. I just don't know what it's referencing. I
11 understand the timer. I understand that the timer
12 expired. By taking you back to my earlier example,
13 I take to it mean that it's gone to zero.

14 Q. And would the timer expire when it reaches
15 zero?

16 A. A timer, like my understanding of timers,
17 would end at that point.

18 Q. If you would please read lines 15 through
19 17 of Column 10, starting with the word "wherein"
20 and ending with the word "system."

21 A. Wherein the first window does not close in
22 response to any input from a user input device of
23 the digital processing system.

24 Q. And what does this mean?

25 MR. KREEGER: Objection. Calls for a legal

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CERTIFICATE

STATE OF CALIFORNIA)
) : ss
COUNTY OF SONOMA)

I, Lorrie L. Marchant, a Certified Shorthand Reporter, a Registered Professional Reporter, a Certified Realtime Reporter, and a Certified Realtime Professional within and for the State of California, do hereby certify:

That IMRAN CHAUDHRI, the witness whose deposition is herein set forth, was duly sworn/affirmed by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

In witness whereof, I have hereunto set my hand this 15th day of October, 2011.

LORRIE L. MARCHANT, CSR, RPR, CRR, CLR, CCRR
CSR No. 10523

1 today's deposition. We are off the record at
2 6:53 p.m. The master disk will be held by TSG
3 Reporting.

4 (Time noted: 6:53 p.m.)

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IMRAN CHAUDHRI

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10 Subscribed and sworn to
11 before me this day
12 of 2011.

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