

EXHIBIT S

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 APPLE INC., a California
6 corporation,

7 Plaintiff,

8 vs.

CASE NO. 11-CV-01846-LHK

9 SAMSUNG ELECTRONICS CO., LTD.,
10 A Korean business entity;
11 SAMSUNG ELECTRONICS AMERICA,
12 INC., a New York corporation;
13 SAMSUNG TELECOMMUNICATIONS
14 AMERICA, LLC, a Delaware
15 limited liability company,

16 Defendants.
17 _____/

18 C O N F I D E N T I A L
19 A T T O R N E Y S ' E Y E S O N L Y
20 O U T S I D E C O U N S E L
21

22 VIDEOTAPED DEPOSITION OF RAVIN BALAKRISHNAN, Ph.D.
23 SAN FRANCISCO, CALIFORNIA
24 TUESDAY, AUGUST 16, 2011
25

26 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR
27 CSR LICENSE NO. 9830
28 JOB NO. 41176

1 TUESDAY, AUGUST 16, 2011

2 9:10 a.m.

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6 VIDEOTAPED DEPOSITION OF RAVIN BALAKRISHNAN,
7 Ph.D., taken at QUINN EMANUEL URQUHART &
8 SULLIVAN, 50 California Street, 22nd Floor,
9 San Francisco, California, pursuant to
10 Notice, before me, ANDREA M. IGNACIO HOWARD,
11 CLR, CCRR, RPR, CSR License No. 9830.
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1 A P P E A R A N C E S:

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3 FOR APPLE INC.:

4 MORRISON & FOERSTER

5 By: ANDREW E. MONACH, Esq.

6 DEOK KEUN AHN, Esq.

7 425 Market Street

8 San Francisco, California 94105

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12 FOR SAMSUNG ELECTRONICS CO. LTD:

13 QUINN EMANUEL URQUHART & SULLIVAN

14 By: KEVIN JOHNSON, Esq.

15 HENRY LIEN, Esq.

16 TODD BRIGGS, Esq.

17 MARK TUNG, Ph.D., Esq.

18 555 Twin Dolphin Drive

19 Redwood Shores, California 94065

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23 ALSO PRESENT: Alan Dias, Videographer

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1 SAN FRANCISCO, CALIFORNIA

2 TUESDAY, AUGUST 16, 2011

3 9:10 a.m.

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6 THE VIDEOGRAPHER: Good morning.

7 This is the beginning of Disk No. 1, of the
8 videotaped deposition of Dr. Balakrishnan, in the
9 matter of Apple versus Samsung, et al., in the United
10 States District Court, Northern District of
11 California, San Jose Division.

12 We are located today at 50 California Street,
13 in the City of San Francisco, California.

14 Today's August 16, 2011, and the time is
15 9:10 a.m.

16 My name is Alan Dias from TSG Reporting.
17 Here with me is Andrea Ignacio.

18 Counsel, would you please identify yourself
19 for the record.

20 MR. JOHNSON: This is Kevin Johnson on behalf
21 of Samsung.

22 MR. MONACH: Andrew Monach, representing
23 Apple and the witness.

24 MR. TUNG: I'm Mark Tung, representing
25 Samsung.

1 application and what a document means in that context.

2 MR. JOHNSON: Q. If -- going back to the
3 original two-by-four rectangle of 15, 16, 17, 18, 21,
4 22, 23, 24, if you look at that, is it fair to say
5 that this line right here is an edge of the electronic
6 document?

7 A The line --

8 MR. MONACH: Object.

9 Hang on a second.

10 THE WITNESS: I'm sorry.

11 MR. MONACH: Objection; vague and ambiguous;
12 incomplete hypothetical; calling for a legal
13 conclusion and a new opinion.

14 THE WITNESS: So, again, I haven't considered
15 this prior to this, you putting this in front of me.

16 Thinking on the fly here, so you're saying
17 this line -- the vertical line between --

18 MR. JOHNSON: Since the witness is pointing,
19 I just want to make sure you get what he's pointing
20 to.

21 Yeah.

22 THE WITNESS: The vertical line between 14
23 and 15, and 20 and 21, here, this --

24 Q That -- that's right, yeah.

25 A -- line.

1 Given this hypothetical scenario, where
2 you're saying the -- this two -- I'm sorry --
3 two-by-four grid of elements -- rectangle is an
4 electronic document in this hypothetical scenario,
5 that would be indeed, I guess, one boundary one
6 edge --

7 Q Okay.

8 A -- of that.

9 Q So let's just label that "edge" for me, just
10 so I can keep track of it after the deposition.
11 Just --

12 A What do you want me to call it?

13 Q Just call it "edge," and then maybe put it
14 down at the bottom and draw an arrow down to the line,
15 or something.

16 A Like this?

17 Q Yeah.

18 A Okay.

19 Q Okay. And then, is it fair to say that
20 the -- the -- the Blocks 14 and 20 are an area beyond
21 the edge --

22 MR. MONACH: Same --

23 MR. JOHNSON: Q. -- of the electronic
24 document?

25 MR. MONACH: Same objection.

1 THE WITNESS: So, again, considering this for
2 the first time here, I haven't thought this in detail,
3 if, in this hypothetical scenario, the document is
4 this two-by-four grid, labelled 15, 16, 17, 18, 21,
5 22, 23, 24, if that is the document, then anything
6 beyond that edge would be an area outside the document
7 beyond the edge of the document.

8 So given those hypotheticals, area 14 and 20
9 would be beyond the edge of the document, given that
10 scenario.

11 MR. JOHNSON: Okay.

12 Q So can you just label that "beyond the edge"?

13 A How -- just label each one of these?

14 Q Yeah, or just draw -- however you want.

15 A Well, we're getting a lot of drawings on this
16 thing, so I don't know. "Beyond."

17 Q Speaking of which, let me just mark the --
18 the grid as Exhibit 104.

19 A Put it on the bottom?

20 Q Thanks.

21 (Phone marked Balakrishnan Exhibit 104
22 for identification.)

23 MR. JOHNSON: Q. Can you look at the Galaxy
24 Tab, which is Exhibit 101, and pull up for me the
25 contacts application.

J U R A T

I, RAVIN BALAKRISHNAN, Ph.D., do hereby
certify under penalty of perjury that, I have read the
foregoing transcript of my deposition taken on
August 16, 2011; that I have made such corrections as
appear noted herein in ink, initialed by me; that my
testimony as contained herein, as corrected, is true
and correct.

DATED this ____ day of _____, 2011,
at _____.

SIGNATURE OF WITNESS