EXHIBIT 3

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         1   (The following ROUGH TRANSCRIPT of the

         2 deposition of MOON-SANG JEONG, taken on Thursday,

         3 November 17, 2011, is not a certified transcript and

         4 has not been edited by the court reporter;

         5 therefore, any reference to page and line numbers

         6 will not be accurate.)

         7   --oOo--

08:21:25   8   (Whereupon the Officer complied with

09:11:51   9 Federal Rule 30B(5)(A) and made the required

09:11:51 10 statement, which information is noted herein.)

08:22:01 11   --oOo--

08:57:50 12   THE REPORTER: Good morning. My name is

08:57:50 13 Sherri Starr of Merrill Corporation. Today's date

08:57:50 14 is November 17, 2011. The time is 8:57 a.m., and

08:57:50 15 the location is The Renaissance Seoul Hotel, Seoul,

08:57:50 16 Korea.

08:57:50 17   Counsel, please voice-identify yourselves

08:57:50 18 and state whom you represent.

08:57:53 19   MR. BASSETT: Dave Basset from Wilmer Hale

08:57:53 20 on behalf of defendant Apple.

08:57:54 21   MS. MAROULIS: Victoria Maroulis with

08:57:56 22 Quinn Emanuel representing Samsung and the witness.

08:57:56 23 With me is Austin Tarango of Quinn Emanuel and

08:57:56 24 Mr. Hankil Kang, of Samsung legal department.

08:57:56 25   THE REPORTER: Would all others present

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08:57:56 1 please state your name for the record.

10:08:26 8   MR. BASSETT: Q. And you're also not the

10:08:27 9   inventor of cell phones with MP3 players; correct?

10:08:38 10   A.   That is correct.

10:08:39 11   Q.   Were you the first to invent music

10:08:41 12   background play objects?

10:08:48 13   MS. MAROULIS: Objection. Vague.

10:08:56 14   THE WITNESS: Yes, it is my understanding

10:08:58 15   indeed that as of the time of my development I was

10:09:01 16   and am the first.

10:09:30 17   MR. BASSETT: Q. Applets were known to

10:09:31 18   programmers prior to 2005; correct?

10:09:35 19   MS. MAROULIS: Objection. Vague.

10:09:47 20   THE WITNESS: Yes, within the Java field,

10:09:50 21   the word "applet" had been in use.

10:09:54 22   MR. BASSETT: Q. Had it been in use only

10:09:56 23   within the Java field?

10:09:59 24   MS. MAROULIS: Objection. Vague. Calls

10:10:00 25   for speculation.

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10:10:09 1   THE WITNESS: No, that was not the case.

10:10:26 2   MR. BASSETT: Q. What is your

10:10:27 3   understanding what an applet is?

10:10:31 4   MS. MAROULIS: Objection. Vague. Calls

10:10:32 5   for a legal conclusion.

10:11:03 6   THE WITNESS: Again, speaking from an

10:11:04 7   engineer's perspective and with respect to the time

10:11:07 8   of my development work on this, my understanding as

10:11:10 9   to an applet was in reference to such things as

10:11:13 10   would comprise an application, such as: Smaller

10:11:17	11	functionalities, smaller classes of things, even a
10:11:22	12	smaller unit of an application or of applications.
10:11:26	13	That's what was meant by an applet.
10:11:29	14	MR. BASSETT: Q. In your understanding of
10:11:30	15	the term "applet" as an engineer in 2005, was an
10:11:36	16	applet independent of the operating system?
10:11:40	17	MS. MAROULIS: Objection. Vague. Calls
10:11:42	18	for a legal conclusion.
10:12:24	19	THE WITNESS: Well, speaking as an
10:12:25	20	engineer, an applet can be viewed as being either OS
10:12:30	21	independent or OS dependent, and in the case of the
10:12:35	22	Java community, one could so understand things to
10:12:40	23	be, but elsewhere, I've otherwise seen the term
10:12:44	24	used, this term applet being used in even OS
10:12:49	25	dependent platforms.

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10:12:54	1	MR. BASSETT: Q. And was that true in
10:12:55	2	2005?
10:12:57	3	MAIN INTERPRETER: One second.
10:12:59	4	MS. MAROULIS: Objection. Vague.
10:12:59	5	(Discussion between the main interpreter
10:13:02	6	and the check interpreter.)
10:13:19	7	MAIN INTERPRETER: Move on. I'm sorry.
10:13:21	8	MS. MAROULIS: Laura, do you have
10:13:22	9	something to say?
10:13:23	10	CHECK INTERPRETER: Can the check
10:13:25	11	interpreter have a moment?
10:13:56	12	MS. MAROULIS: Would counsel repeat the
10:13:57	13	question, please?

10:19:20 20 acoustics and otherwise. My good colleague in good

10:19:23 21 faith has not seemed to have heard the one operative

10:19:24 22 word -- the term.

10:19:27 23   CHECK INTERPRETER: May the check

10:19:29 24 interpreter have time to render?

10:19:31 25   MS. MAROULIS: Please render the

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10:19:33 1 translation.

10:19:34 2   CHECK INTERPRETER: Thank you. "Speaking

10:19:35 3 as an engineer, an applet can be viewed as either

10:19:40 4 operating system independent or operating system

10:19:43 5 dependent. In the case of the Java, it can be

10:19:50 6 agreed to be the OS independent, however, I've also

10:19:55 7 seen applet being used in an OS dependent platform."

10:20:05 8   MS. MAROULIS: I think we can move on.

10:20:06 9 Thank you for your patience, counsel.

10:20:10 10   MR. BASSETT: Q. Was that true in 2005?

10:20:15 11   MS. MAROULIS: Objection. Calls for

10:20:16 12 speculation.

10:20:27 13   THE WITNESS: You mean as to the word --

10:20:28 14 the fact that "applet" can be used with respect to

10:20:33 15 an OS dependent instance?

10:20:36 16   MR. BASSETT: Q. Correct.

10:20:38 17   A.   Yes, it was so used.

10:20:44 18   Q.   By whom?

10:20:47 19   MS. MAROULIS: Objection. Calls for

10:20:48 20 speculation. Lacks foundation.

10:21:14 21   THE WITNESS: Well, for instance, around

10:21:15 22 this 2005 time frame, I had, as an engineer, been

10:21:22	23	participating in developing the Qualcomm platform,
10:21:25	24	and when it comes to the Qualcomm platform, they use
10:21:29	25	only the Qualcomm chipsets. But within it and going

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10:21:32	1	about developing applications, they also for
10:21:34	2	instance use the word "applet."
10:21:37	3	CHECK INTERPRETER: Check interpreter:
10:21:39	4	For instance, around the 2005 time frame, as an
10:21:45	5	engineer, at that time Qualcomm platform was used
10:21:50	6	and it comes to Qualcomm platform, they used
10:21:54	7	Qualcomm chipsets and in that chipset, applications
10:22:00	8	were developed and the word "applet" were used in
10:22:06	9	that instance.
10:22:07	10	MR. BASSETT: Q. And when the word
10:22:08	11	"applet" was used in that instance, it was your
10:22:12	12	understanding that it was referring to something
10:22:14	13	that was operating system dependent?
10:22:18	14	MS. MAROULIS: Objection. Calls for
10:22:19	15	speculation.
10:23:05	16	THE WITNESS: Yes, from an engineer's
10:23:08	17	perspective, seeing as how the -- in the case of the
10:23:13	18	Qualcomm environment, the use of the term "applet"
10:23:17	19	in that case was something that applied with respect
10:23:20	20	to the Qualcomm platform only, so from that
10:23:22	21	perspective, the use of said word can be used also
10:23:26	22	in an OS dependent sense.
10:23:30	23	MR. BASSETT: Q. Are you aware of any
10:23:30	24	other instances in the 2005 time frame or earlier
10:23:35	25	where the word "applet" was used to mean something

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10:23:39	1	that was OS dependent?
10:24:07	2	A. Other than the Qualcomm case?
10:24:10	3	Q. Correct.
10:24:20	4	A. Well, in terms of what I've seen, I've
10:24:21	5	seen it used in the Qualcomm instance and otherwise
10:24:24	6	in the Java community but nothing beyond that, I
10:24:27	7	don't think.
10:24:28	8	Q. And in the Java community, "applet" means
10:24:33	9	something that is OS independent; correct?
10:24:35	10	MS. MAROULIS: Objection. Vague. Calls
10:24:36	11	for expert testimony.
10:25:01	12	THE WITNESS: Yes, speaking from an
10:25:03	13	engineer's perspective I do believe that to be the
10:25:05	14	sense in which Java employed it.
10:25:12	15	MR. BASSETT: Q. Sir, you will agree with
10:25:13	16	me that you were not the first to suggest using
10:25:16	17	applets for playing digital music files; correct?
10:25:19	18	MS. MAROULIS: Objection. Vague. Calls
10:25:21	19	for speculation.
10:25:41	20	THE WITNESS: Correct.
10:25:44	21	MR. BASSETT: Q. Prior to 2005, did you
10:25:47	22	investigate any features that may be on Yamaha
10:25:56	23	mobile phones?
10:26:00	24	MS. MAROULIS: Objection. Vague.
10:26:10	25	THE WITNESS: By that, do you mean

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14:37:11 3   for this witness at this time. As I said earlier,

14:37:14 4   I'm not going to close the deposition just because

14:37:16 5   of the late production from our perspective of those

14:37:19 6   Korean language documents.

14:37:21 7   MS. MAROULIS: I understand your position,

14:37:22 8   counsel. We confirmed with California during the

14:37:24 9   lunch break and all the documents that you marked

14:37:27 10 were produced on November 11, which is more than

14:37:31 11 five days before the deposition, with the exception

14:37:33 12 of the patent which was produced much earlier in I

14:37:35 13 think the first invention disclosures which was also

14:37:39 14 produced earlier, so no documents marked today were

14:37:42 15 produced after November 11.

14:37:44 16   MR. BASSETT: Just for the purposes of the

14:37:45 17 record, I double checked myself with the email that

14:37:48 18 came from your law firm that included these

14:37:52 19 documents and we received it two days ago. So

14:37:56 20 that's...

14:38:02 21   MS. MAROULIS: Okay. Beyond that, I don't

14:38:32 22 have any questions for the witness. We reserve the

14:38:35 23 right to review the transcript and sign and would

14:38:37 24 like to put this transcript under the highest level

14:38:39 25 of confidentiality, "Outside Counsel Eyes Only"

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14:38:45 1   under the protective order.

14:39:05 2   THE VIDEOGRAPHER: One second, please.

14:39:07 3   This marks the end of Videotape 3 in the

14:39:11 4   deposition of Moon-Sang Jeong. Going off the

14:39:13 5   record. The time is 2:39.

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