EXHIBIT B
FILED UNDER SEAL

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.   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   HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

19   DEPOSITION OF STEVEN CHRISTENSEN

20   Taken on behalf of the Defendants

21   October 26, 2011

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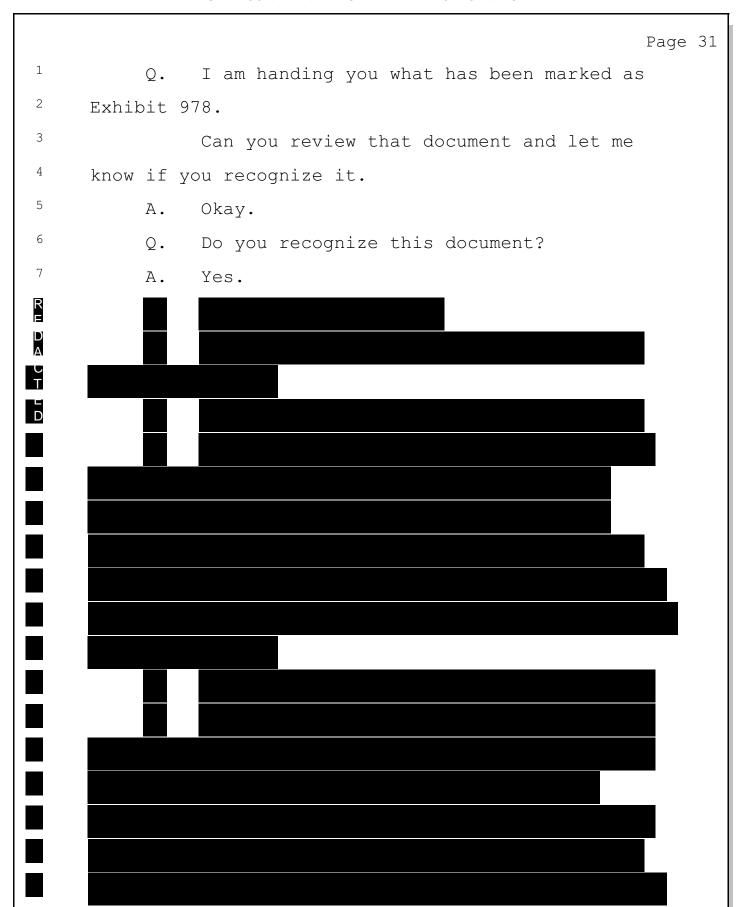25   Job Number: 42864

1   DEPOSITION OF STEVEN CHRISTENSEN

2   Taken on behalf of the Defendants

3   October 26, 2011

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5   BE IT REMEMBERED THAT, pursuant to the

6   California Rules of Civil Procedure, the deposition

7   of STEVEN CHRISTENSEN was taken before MICHELE J.

8   LUCAS, a Certified Shorthand Reporter, on October

9   26, 2011, commencing at the hour of 9:13 a.m., the

10 proceedings being reported at 1389 Center Drive

11 Medford, Oregon.

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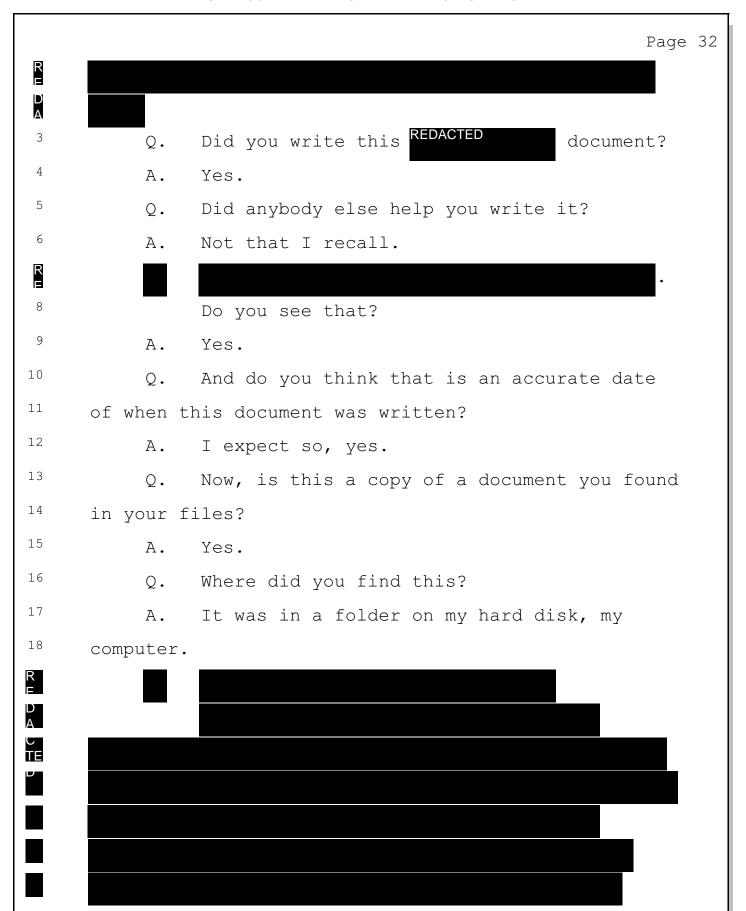16

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1   DEPOSITION OF STEVEN CHRISTENSEN

2   Wednesday, October 26, 2011

3   9:13 a.m.

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5   THE VIDEOGRAPHER: This is the start of

6   tape labeled No. 1 of the videotape deposition of

7   Steve Christensen in the matter of Apple vs. Samsung

8   in the court of U.S. District Court, Northern

9   District of California, San Jose Division, case

10   No. 11 CV 01846 LHK.

11   This deposition is being held at 1389

12   Center Drive in Medford, Oregon on October 26, 2011

13   at approximately 9:13 a.m.

14   My name is Steve Brown from TSG Reporting,

15   Incorporated. I am the legal video specialist. The

16   court reporter is Michele Lucas in association with

17   TSG Reporting.

18   Will counsel please introduce yourselves.

19   MR. BRIGGS: Todd Briggs from Quinn Emanuel

20   for Samsung.

21   THE VIDEOGRAPHER: Would the reporter

22   please swear in the witness.

23   MR. KRAMER: Karl Kramer from Morrison

24   Foerster on behalf of Apple, Inc. and the witness.

25

1   STEVEN CHRISTENSEN,

2   having been first duly sworn,

3   was examined and testified as follows:

4   EXAMINATION

5   BY MR. BRIGGS:

6   Q.   Good morning.

7   A.   Good morning.

8   Q.   Can you state your name for the record.

9   A.   Steven Christensen.

10   Q.   Where do you live, Mr. Christensen?

11   A.   Ashland, Oregon.

12   Q.   Where is Ashland?

13   A.   About ten miles south of here.

14   Q.   Where do you work?

15   A.   I work for a small startup company that I

16 am a cofounder. It is called Folium & Partners.

17   Q.   Do you work for Apple Computer?

18   A.   No.

19   Q.   Are you a consultant for Apple Computer?

20   A.   No.

21   Q.   Now, you have worked for Apple in the past,

22 correct?

23   A.   Yes.

24   Q.   And when was that?

25   A.   1982 through 1996.

1   The actual display of the battery level was

2   managed by the module that displays the battery

3   level.

4   BY MR. BRIGGS:

5   Q.   So in this example the battery module would

6   obtain information from the operating system about

7   the battery level, and then it could communicate that

8   information to the Control Strip, correct?

9   A.   No.

10   Q.   No?

11   How does that work?

12   MR. KRAMER: Objection. Vague and

13   ambiguous.

14   THE WITNESS: Okay. As I said before, the

15   battery module is a self contained piece of code, and

16   all it will do basically is ask the operating system

17   what the current battery level is and to convert that

18   into a display.

19   What causes that module to be redrawn is

20   the Control Strip calling the module and saying:

21   Draw yourself. In the process of drawing itself it

22   will make that inquiry of the operating system to see

23   what the battery level is.

24   (Exhibit 978 was marked for identification)

25   BY MR. BRIGGS:

1   Q.   I am handing you what has been marked as

2 Exhibit 978.

3   Can you review that document and let me

4 know if you recognize it.

5   A.   Okay.

6   Q.   Do you recognize this document?

7   A.   Yes.

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[REDACTED]

3   Q.   Did you write this **REDACTED** document?

4   A.   Yes.

5   Q.   Did anybody else help you write it?

6   A.   Not that I recall.

[REDACTED]

8   Do you see that?

9   A.   Yes.

10   Q.   And do you think that is an accurate date

11 of when this document was written?

12   A.   I expect so, yes.

13   Q.   Now, is this a copy of a document you found

14 in your files?

15   A.   Yes.

16   Q.   Where did you find this?

17   A.   It was in a folder on my hard disk, my
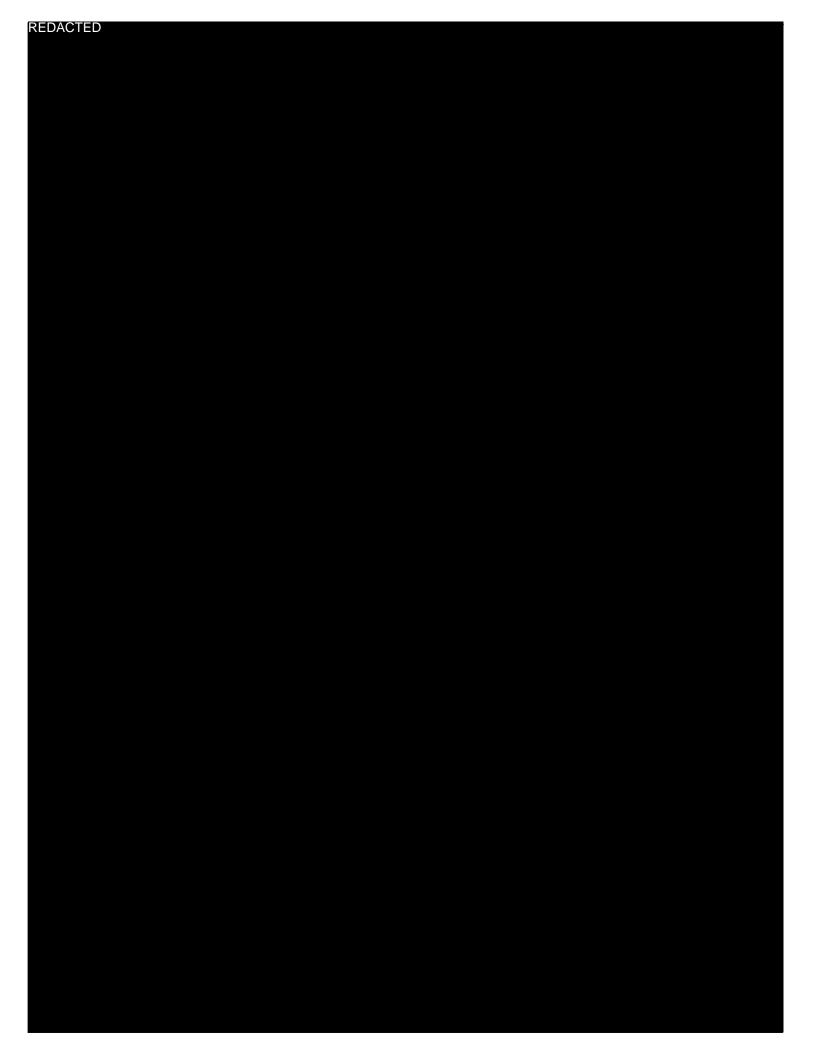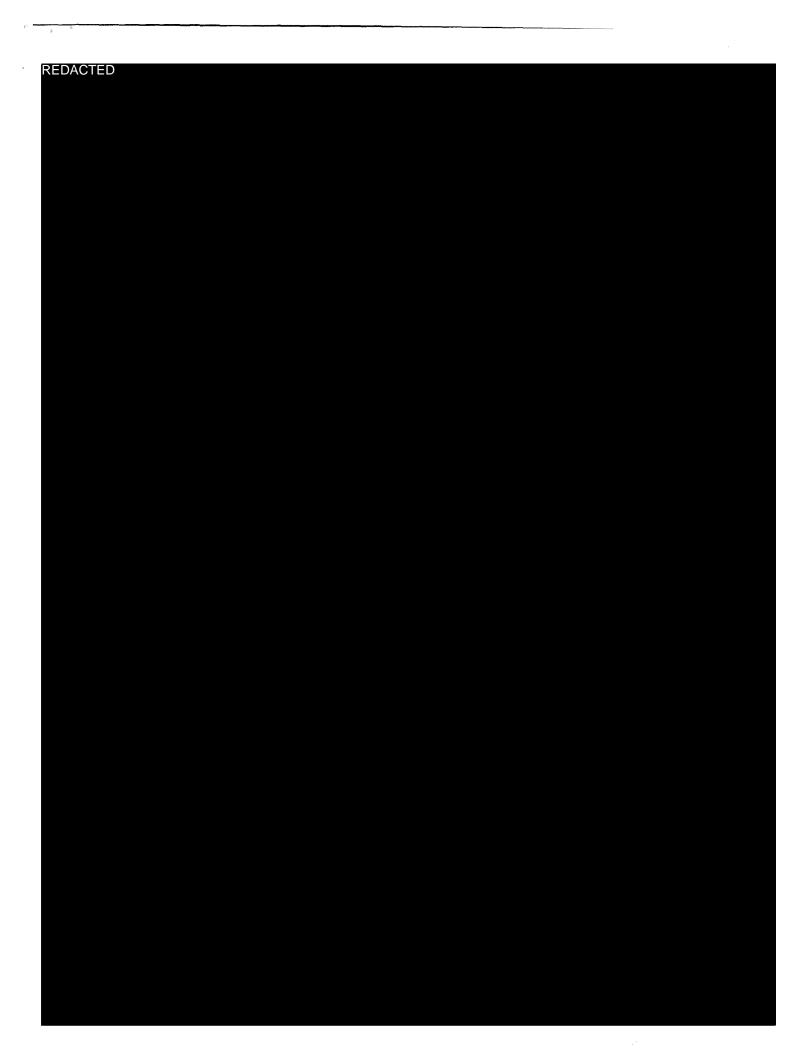
18 computer.

[REDACTED]

1   BY MR. BRIGGS:

2   Q.   Okay. The next clause states: "And

3   wherein each of the plurality of display areas is

4   associated with one of the plurality of individual

5   programming modules."

6   What does that part mean to you?

7   MR. KRAMER: Objection. Calls for a legal

8   conclusion, lacks foundation.

9   THE WITNESS: Again, my nonlegal reading is

10   that it is saying that each of the display areas that

11   is shown in the Control Strip in that graphic, if you

12   want, is generated by a particular module.

13   BY MR. BRIGGS:

14   Q.   So in this case what is an individual

15   programming module?

16   MR. KRAMER: Objection. Calls for legal

17   conclusion, lacks foundation.

18   THE WITNESS: In the case of the Control

19   Strip, it refers to one of these code modules that

20   are described in the ERS, the details of, you know,

21   what is required to implement and are loaded by the

22   Control Strip when the operating system starts up.

23   BY MR. BRIGGS:

24   Q.   Okay. Let's go to the next part of this

25   limitation.

1   It states: "The first window region and

2 the plurality of independent display areas

3 implemented in a window layer that appears on top of

4 application programming windows that may be

5 generated."

6   A.   I am sorry. Can you tell me what line that

7 is on.

8   Q.   Yeah. Let me start over.

9   It is on 28. It starts off, comma, "the."

10   A.   Okay.

11   Q.   So it states: "The first window region and

12 the plurality of independent display areas

13 implemented in a window layer that appears on top of

14 application programming windows that may be

15 generated."

16   What does that mean to you?

17   MR. KRAMER: Objection. Calls for a legal

18 conclusion, lacks foundation.

19   THE WITNESS: Okay. In the case of the

20 Control Strip it means to me that a layer is created

21 that is above, or is in front of, to be accurate, the

22 layers that contain the windows for application

23 programs, and the Control Strip creates a window that

24 lives in that layer so that it floats in front of the

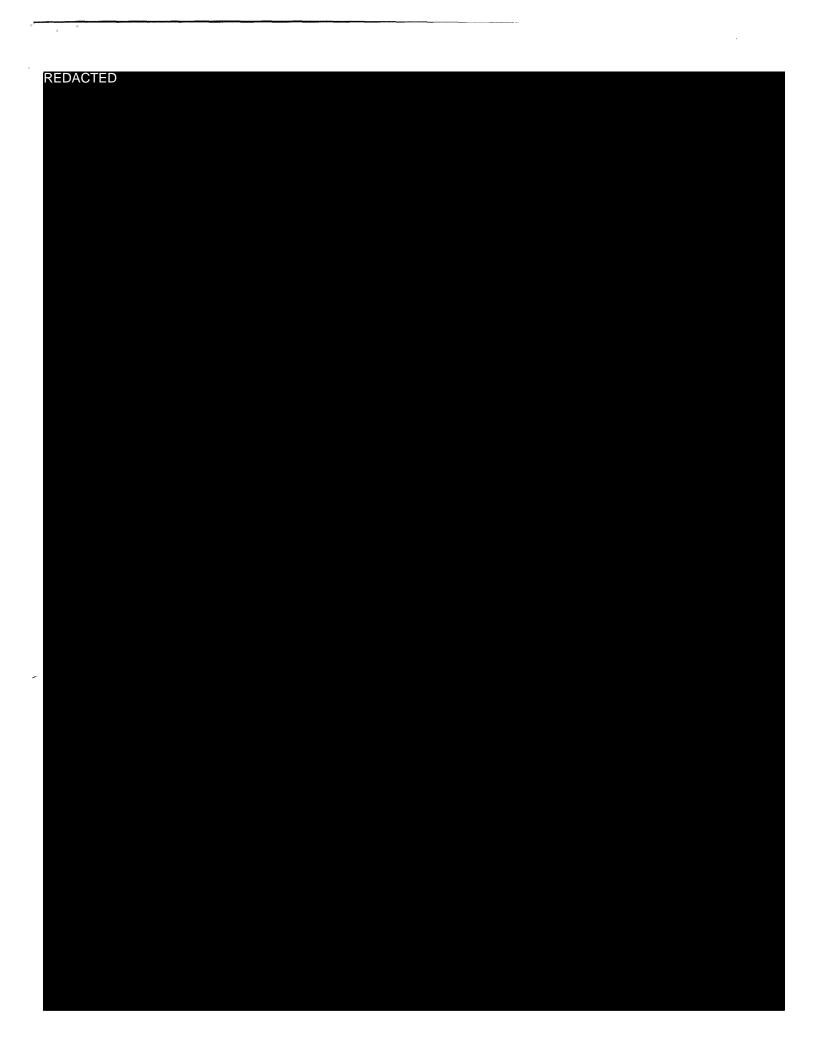25 application windows, and that the window contains a

1 number of display areas, and I think that is all. I

2 think that is enough of that, yes.

3 BY MR. BRIGGS:

4   Q.   Does that mean that any application windows

5 that are generated appear underneath the first window

6 region?

7   MR. KRAMER: Objection. Lacks foundation,

8 calls for a legal conclusion, vague and ambiguous.

9   THE WITNESS: It means that the Control

10 Strip window floats in front of the other windows,

11 and so if an application creates a window it will

12 appear behind the Control Strip window.

13 BY MR. BRIGGS:

14   Q.   And that's how the Control Strip worked on

15 the PowerBook computers, correct?

16   MR. KRAMER: Objection. Vague and

17 ambiguous.

18   THE WITNESS: The window floated in front

19 of the application window   the other application

20 windows, yes, and it was on the PowerBooks

21 originally, and also it migrated to desktop

22 McIntoshes over time.

23 BY MR. BRIGGS:

24   Q.   Let's move to the next portion of this

25 claim. It states: "An indicia generation logic

1   couple to the data display screen to execute at least

2   one of the plurality of individual programming

3   modules to generate information for display in one of

4   the plurality of display areas in the first window

5   region."

6   So what is the indicia generation logic?

7   MR. KRAMER: Objection. Calls for a legal

8   conclusion, lack of foundation.

9   THE WITNESS: I wouldn't have written it

10   that way. It sounds like it is overcomplex sounding,

11   but for the Control Strip what I understand it to be

12   is that a Control Strip is basically   has a list of

13   modules that are installed, and so it is calling them

14   to execute their code to draw their content in the

15   space that they have been provided.

16   BY MR. BRIGGS:

17   Q.   So you would say that the indicia

18   generation logic is part of the Control Strip?

19   MR. KRAMER: Objection. Calls for a legal

20   conclusion, lack of foundation.

21   THE WITNESS: My understanding that what it

22   implies would be part of the Control Strip, yes.

23   BY MR. BRIGGS:

24   Q.   So this same phrase it states: "An indicia

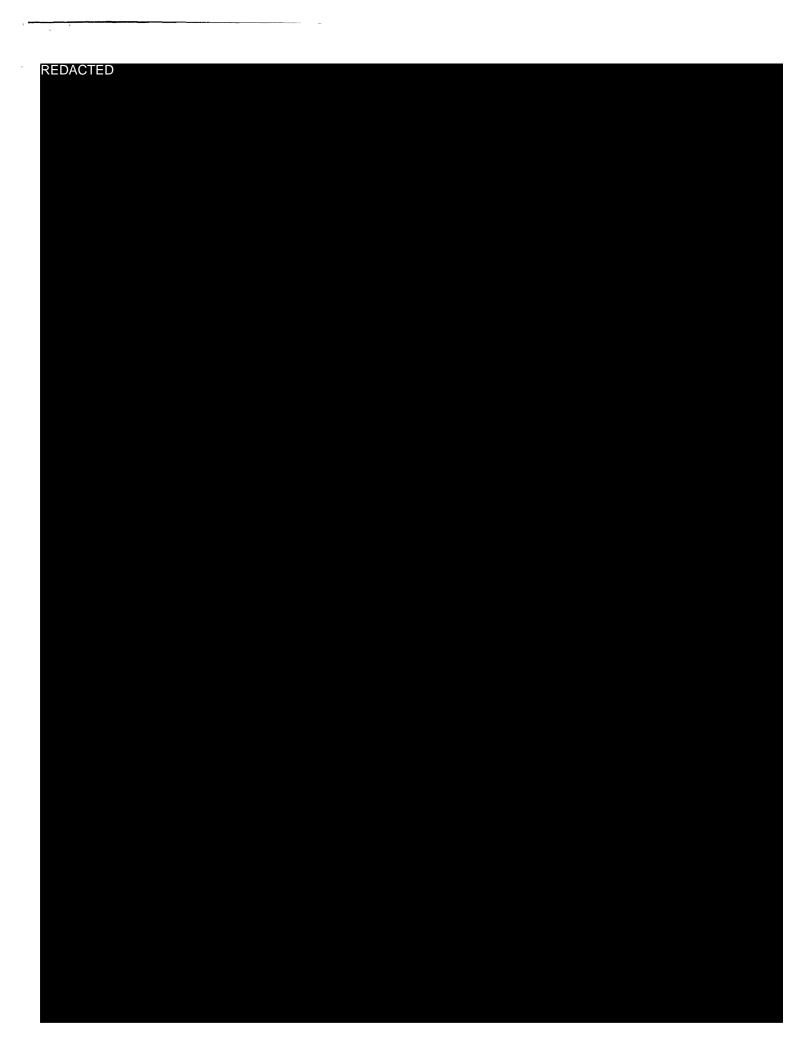25   generation logic coupled with the data display screen

REDACTED

REDACTED

REDACTED

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