

EXHIBIT 2

EXHIBIT P

FILED UNDER SEAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California
corporation,

Plaintiff,

vs.

CASE NO. 11-cv-01846-LHK

SAMSUNG ELECTRONICS CO.,
LTD., a Korean business
entity; SAMSUNG ELECTRONICS
AMERICA, INC., a New York
corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited
liability company,

Defendants.

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H I G H L Y C O N F I D E N T I A L
A T T O R N E Y S E Y E S O N L Y

VIDEOTAPED DEPOSITION OF BAS ORDING
REDWOOD SHORES, CALIFORNIA
TUESDAY, OCTOBER 25, 2011

BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR.
CSR LICENSE NO. 9830
JOB NO. 42883

1 Heather Moser of Apple.

2 MR. TUNG: Mark Tung of Quinn Emanuel for
3 Samsung. With me today is Alex Baxter, also of Quinn
4 Emanuel.

5 THE VIDEOGRAPHER: Will the court reporter
6 please swear in the witness.

7

8 BAS ORDING,

9 having been sworn as a witness,

10 by the Certified Shorthand Reporter,

11 testified as follows:

12

13 THE VIDEOGRAPHER: You may proceed.

14

15 EXAMINATION BY MR. TUNG

16 MR. TUNG: Q. Good morning.

17 A Good morning.

18 Q Can you state your full name and address for
19 the record.

20 A My full name is Bas Ordning. Address is
21 44 Newberg Street in San Francisco, California 94131.

22 Q And approximately how many times have you
23 been deposed before?

24 A Six times.

25 Q Have you ever testified at trial?

1 A No, I have not.

2 Q Okay. So let me lay some ground rules for a
3 deposition. You've probably heard these before.

4 Today I'll be asking you a series of
5 questions. Do you understand that you're under oath
6 today and must answer truthfully to the best of your
7 knowledge?

8 A I understand.

9 Q And do you understand that the court reporter
10 is taking down everything that we're saying to produce
11 a transcript, and because of that, that we should
12 attempt to not speak over each other so we get a clean
13 transcript? Do you understand?

14 A Yes.

15 Q And is there any reason that you are not able
16 to provide full and complete, accurate, truthful
17 testimony today?

18 A No.

19 Q And if you need a break at any point, feel
20 free to let me know. I'm happy to accommodate breaks.
21 The only thing I ask is, if there's a question
22 pending, if you would answer the question before
23 taking a break.

24 A I understand, yes.

25 Q Your counsel may object from time to time.

1 Unless he instructs you not to answer, you should
2 still answer the question; do you understand?

3 A I understand.

4 Q So are you a current Apple employee?

5 A Yes, I am.

6 Q And when did you start working for Apple?

7 A I started in 1998.

8 Q Have you been working for Apple continuously
9 since then?

10 A Yes, I have.

11 Q And what group did you start in when you
12 started working for Apple?

13 A I worked in the -- and still work in the user
14 interface group.

15 Q So has that changed during -- since 1998?

16 A No.

17 Q So when you started working at Apple, what
18 was your first project at Apple?

19 A I started working on the user interface for
20 Mac OS X at that time.

21 Q Okay. And how long did you work on the Mac
22 OS X user interface?

23 A Well, it's been for years, and I still do
24 that, too.

25 Q Did you take on additional projects since you

1 started that are not Mac OS X related?

2 A Yeah. So at some point we started -- I
3 worked on the iPhone project as well.

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[REDACTED]

11 Q Does Mac OS X use a touch interface?

12 MR. HUNG: Objection; vague.

13 THE WITNESS: Well, the current user
14 interface for the Mac OS X, as far as I know, doesn't
15 use a touch screen.

16 MR. TUNG: Q. Have you worked on a touch
17 screen interface for Mac OS X?

18 A No, I have not.

19 Q Have you worked on a touch screen interface
20 for the iPhone?

21 A Yes, I have.

22 Q And so is it -- is it a -- is it a reasonable
23 distinction to say that Mac OS X does not have a touch
24 screen interface, whereas the iPhone does have a touch
25 screen interface?

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CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO HOWARD, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings which took place;

That I am a disinterested person to the said action.

IN WITNESS WHEREOF, I have hereunto set my hand this 25th day of October, 2011.

ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830