

## **EXHIBIT 3**

**EXHIBIT Q**

**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.  
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18 HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

19 DEPOSITION OF STEVEN CHRISTENSEN

20 Taken on behalf of the Defendants

21 October 26, 2011  
22  
23  
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25 Job Number: 42864

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 patent.

2 Q. Do you have any views on the patent system  
3 in general? I mean some people don't like patents.  
4 Some people don't like software patents.

5 Do you have any views like that?

6 A. I don't really have an opinion. They just  
7 are.

8 Q. Do you think they are a good thing or bad  
9 thing?

10 A. I think patents are fine.

11 Q. Do you have any other patents?

12 A. I had done a second patent filing for  
13 another company a few years later. I found out  
14 recently that the company allowed it to lapse a few  
15 years ago.

16 Q. Did that patent relate to windows or  
17 control strips or anything like what we have been  
18 discussing today?

19 A. No.

20 Q. Do you know -- did you ever receive any  
21 awards for the 002 patent?

22 A. No.

23 Q. Any -- did you receive any kind of  
24 recognition for the 002 patent?

25 A. I think the filing happened after I left

1 Apple. So, no. Or the issuance was after I left  
2 Apple.

3 Q. Do you know if the Control Strip led to  
4 success of any, commercial success, of any Apple  
5 products or anything like that?

6 MR. KRAMER: Objection. Lack of  
7 foundation, calls for speculation.

8 THE WITNESS: I have no idea if it improved  
9 any product's success.

10 BY MR. BRIGGS:

11 Q. Did you ever see any reports on -- from  
12 consumers saying they liked or didn't like Control  
13 Strip?

14 A. I don't remember. There were probably  
15 reviews in magazines at the time, but I don't  
16 remember now.

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[REDACTED]

[REDACTED]

RE  
DA  
CT

[REDACTED]

4 Q. Do you still own -- or do you own Apple  
5 stock?

6 A. No.

7 Q. And today do you develop software for Apple  
8 products?

9 A. I develop software for IOS devices, which  
10 is I-Phone and I-Pad, and my company in general also  
11 develops for windows phone seven.

12 Q. At a high level what do you develop for IOS  
13 and windows?

14 A. At a high level. Applications.

15 Q. Applications?

16 A. Yes.

17 Q. Are there any specific applications?

18 A. They are related to publishing and audio  
19 books, not one single title.

20 MR. BRIGGS: Can we take a break, and then  
21 I think I can wrap it up in another half hour at the  
22 most.

23 THE VIDEOGRAPHER: The time is 3:19, and we  
24 are off the record.

25 (Recess taken)

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CERTIFICATE

I, Michele J. Lucas, do hereby certify that pursuant to the Rules of Civil Procedure, the witness named herein appeared before me at the time and place set forth in the caption herein; that at the said time and place, I reported in stenotype all testimony adduced and other oral proceedings had in the foregoing matter; and that the foregoing transcript pages constitute a full, true and correct record of such testimony adduced and oral proceeding had and of the whole thereof.

IN WITNESS HEREOF, I have hereunto set my hand this 27th day of October, 2011.

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/Signed August, 2013  
Michele J. Lucas Commission Expiration