

EXHIBIT D

EXHIBIT 6

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

19 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
20 VIDEOTAPED DEPOSITION OF EUGENE WHANG
21 THURSDAY, OCTOBER 27, 2011
22
23

24 REPORTED BY:
25 JANIS JENNINGS, CSR 3942, CLR, CCRR

1 EUGENE ANTONY WHANG,
2 The deponent herein, was sworn and
3 testified as follows:
4

5 EXAMINATION

6 BY MS. NEILL:

7 Q. Good morning.

8 A. Good morning.

9 Q. So can you please state your full name for
10 the record.

11 A. Yep. Eugene Antony Whang.

12 Q. Okay. And can you please spell that.

13 A. Eugene, E-u-g-e-n-e; Antony, A-n-t-o-n-y;
14 and Whang, W-h-a-n-g.

15 Q. And have you ever gone by any other name?

16 A. No.

17 Q. And, Mr. Whang, where do you currently
18 reside?

19 A. In San Francisco.

20 Q. Can you give me address, please.

21 A. Yep. 77 Oakwood Street.

22 Q. And that is San Francisco, California?

23 A. Yes.

24 Q. Okay. And are you currently employed?

25 A. Yes.

1 Q. Who is Rix Chan, R-i-x C-h-a-n?

2 A. I believe Rix was a project manager of
3 some sort. I can't remember exactly his exact role;
4 but, yeah.

5 Q. Does he work in the industrial design
6 group?

7 A. No.

8 Q. Does he work in the engineering group?

9 A. I'm actually not sure which group he
10 worked in.

11 Q. Do you know if he's still at Apple?

12 A. He's not at Apple.

13 Q. Do you know where he is?

14 A. No.

15 Q. Do you know when he left?

16 A. No.

17 Q. And who is Gang -- and I may pronounce
18 this wrong -- Xu? X-u.

19 A. I don't know.

20 Q. Is he an industrial designer, or she?

21 A. No.

22 Q. Do you know if he or she is still at
23 Apple?

24 A. I don't know.

25 Q. And who is Eugene Kim?

1 A. Eugene Kim is I believe an electrical
2 engineer.

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[REDACTED]

7 Q. And who is Brian Huppi, H-u-p-p-i?

8 A. I believe Brian was an electrical engineer
9 as well.

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[REDACTED]

13 Q. Is he still at Apple?

14 A. I don't think so.

15 Q. Do you know where he is now?

16 A. No.

17 Q. And who is Ken McAlpine?

18 A. Ken used to work at Apple. I can't
19 remember what his exact position was.

20 Q. Was he an industrial designer?

21 A. No.

22 Q. Do you know when he left Apple?

23 A. No.

24 Q. Was it within the last year?

25 A. It was -- it was -- it was before, yeah.

1 Q. Do you know if it was more than two years
2 ago?

3 A. It was -- it was more than two years ago,
4 yeah.

5 Q. Do you know if it was more than three
6 years ago?

7 A. That's where I'm not quite sure.

8 Q. Got it. Okay.

9 MS. NEILL: I'd like to -- actually,
10 I'll just give you what was previously marked as
11 Exhibit No. 6 in this case. It's United States
12 design patent 593,087.

13 BY MS. NEILL:

14 Q. So just to be clear about the questions
15 I'm going to ask, you are aware that -- did you
16 become aware at some point that there was a dispute
17 between Apple and Samsung regarding certain
18 intellectual property?

19 A. Yeah, I think I read it on the web or
20 something, yeah.

21 Q. Okay. So to the extent that I'm asking
22 you questions about certain documents here today,
23 unless I specify otherwise, I'm generally asking
24 about your knowledge and information that you had
25 prior to that time and not anything that you've

1 CERTIFICATE OF REPORTER

2
3 I, JANIS L. JENNINGS, a Certified
4 Shorthand Reporter of the State of California, do
5 hereby certify:

6 That the foregoing proceedings were taken
7 before me at the time and place herein set forth;
8 that any witnesses in the foregoing proceedings,
9 prior to testifying, were placed under oath; that a
10 verbatim record of the proceedings was made by me
11 using machine shorthand which was thereafter
12 transcribed under my direction; further, that the
13 foregoing is an accurate transcription thereof.

14 I further certify that I am neither
15 financially interested in the action nor a relative
16 or employee of any attorney of any of the parties.

17 IN WITNESS WHEREOF, I have this date
18 subscribed my name.

19
20 Dated: October 27, 2011
21

22
23 JANIS JENNINGS

24 CSR NO. 3942, CLR, CCRR
25