## **Exhibit C**

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Page 1
1
                 UNITED STATES DISTRICT COURT
2
               NORTHERN DISTRICT OF CALIFORNIA
3
                       SAN JOSE DIVISION
    APPLE INC., a California
    corporation,
5
6
               Plaintiff,
7
                                  Case No. 11-CV-01846-LHK
    VS.
    SAMSUNG ELECTRONICS CO., LTD.,
    a Korean business entity;
    SAMSUNG ELECTRONICS AMERICA,
     INC., a New York corporation;
10
    SAMSUNG TELECOMMUNICATIONS
    AMERICA, LLC, a Delaware
11
     limited liability company,
12
               Defendants.
13
14
15
16
                         CONFIDENTIAL
17
                      ATTORNEYS' EYES ONLY
18
                        OUTSIDE COUNSEL
19
           VIDEOTAPED DEPOSITION OF IMRAN CHAUDHRI
                  Redwood Shores, California
20
                   Friday, October 14, 2011
21
22
23
    Reported by:
    LORRIE L. MARCHANT, CSR No. 10523, RPR, CRR, CCRR, CLR
24
    JOB NO. 42879
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Page 3
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                    APPEARANCES:
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3
    FOR THE PLAINTIFF APPLE INC.:
4
          MORRISON & FOERSTER
               MATTHEW KREEGER, ESQ.
5
          425 Market Street
          San Francisco, California 94105
6
7
8
    FOR THE DEFENDANTS SAMSUNG:
9
          QUINN EMANUEL URQUHART & SULLIVAN
               ALAN WHITEHURST, ESQ.
10
          1101 Pennsylvania Avenue NW
          Washington, D.C. 20004
11
12
    and
13
          BY: ALEX BAXTER, ESQ
               MARGRET CARUSO, ESQ.
14
               BRETT ARNOLD, ESO.
          555 Twin Dolphin Drive
15
          Redwood Shores, California 94065
16
17
    and
18
               MICHAEL ZELLER, ESQ.
          BY:
19
          865 South Figueroa Street
          Los Angeles, California 90017
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21
22
    ALSO PRESENT:
23
          Cyndi Wheeler, Apple IP Litigation Counsel
24
          Alan Dias, Videographer
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Page 4
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              (Marked for identification purposes,
2
              Exhibit 570 through 572.)
              THE VIDEOGRAPHER: We are on the video
    record at 9:34 a.m. In the matter of Apple Inc.,
    versus Samsung, in the United States District Court,
    Northern District of California. Case No.
    11-CV-01846-LHK.
              We are located today at 555 Twin Dolphin
    Drive, in the City of Redwood Shores, California.
10
    Today is October 14, 2011, and the time is 9:35 a.m.
11
             My name is Alan Dias from TSG Reporting.
12
              Counsel, would you please identify yourself
13
    for the record.
14
              MR. WHITEHURST: Good morning. My name
15
    Alan Whitehurst. And with me today is my colleague,
16
    Alex Baxter. We are with the law firm Ouinn
17
    Emanuel, and we represent Samsung.
18
             MR. KREEGER: Matthew Kreeger, Morrison &
19
    Foerster, representing Apple. With me is
20
    Cyndi Wheeler from Apple.
21
              THE VIDEOGRAPHER: Will the court reporter
22
    please swear in the witness.
23
              THE REPORTER: Do you solemnly swear or
24
    affirm under the penalties of perjury that the
25
    testimony you are about to offer will be the truth,
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Page 5

- the whole truth and nothing but the truth?
- THE WITNESS: I do.
- THE VIDEOGRAPHER: You may proceed.
- EXAMINATION BY MR. WHITEHURST
- BY MR. WHITEHURST:
- <sup>6</sup> Q. Good morning, Mr. Chaudhri.
- A. Good morning.
- Q. My name is Alan Whitehurst, and I will be
- 9 taking your deposition today.
- Could you please state your full name and
- address for the record.
- 12 A. My name is Imran Chaudhri. My address is
- 57 Beaumont, San Francisco, California 94118.
- Q. And before the deposition, I marked as
- Exhibit 570 a copy of your Deposition Notice.
- Have you testified in a deposition before?
- $^{17}$  A. I have.
- 18 Q. How many times?
- A. Once.
- O. And what case was that for?
- $^{21}$  A. It was a -- a case involving Motorola.
- Q. Was that for a litigation between Motorola
- and Apple?
- A. I believe so.
- Q. And when was that deposition?

- R E D
- Q. If you would look at the figures in this
- patent, for example, Figure 7.
- Is Figure 7 a picture of the user interface
- 6 for Mac OS X?
- A. It's a drawing that looks like it could be.
- $^{8}$  O. And would the user interface in Mac OS X
- 9 look like Figure 7?
- 10 A. I don't know what this is trying to be, but
- there are elements of it that look like Mac OS X for
- sure.
- Q. Can you turn to Figure 8, please.
- What is Figure 8?
- A. I understand Figure 8 to be an indicator of
- battery level over the window that we were just
- looking at.
- Q. And does Mac OS X have a battery level
- 19 indicator?
- A. There are battery level indicators in Mac
- $^{21}$  OS X.
- Q. And does the battery level indicator in Mac
- OS X look like Figure 8?
- A. It does not look like Figure 8.
- Q. What does the battery level indicator look

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                         CERTIFICATE
2.
         STATE OF CALIFORNIA )
3
                                    SS
        COUNTY OF SONOMA
5
          I, Lorrie L. Marchant, a Certified Shorthand
    Reporter, a Registered Professional Reporter, a
    Certified Realtime Reporter, and a Certified
    Realtime Professional within and for the State of
    California, do hereby certify:
10
          That IMRAN CHAUDHRI, the witness whose
11
    deposition is herein set forth, was duly
12
    sworn/affirmed by me and that such deposition is a
13
    true record of the testimony given by such witness.
14
          I further certify that I am not related to any
15
    of the parties to this action by blood or marriage
16
    and that I am in no way interested in the outcome of
17
    this matter.
18
          In witness whereof, I have hereunto set my hand
19
    this 15th day of October, 2011.
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21
22
23
            LORRIE L. MARCHANT, CSR, RPR, CRR, CLR, CCRR
24
            CSR No. 10523
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