

Exhibit D

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
22
23
24

25 Job Number: 42864

1 APPEARANCES

2
3 Appearing on behalf of the Plaintiff and the
4 witness:

5 KARL J. KRAMER, ESQ.
6 Morrison & Foerster
7 755 Page Mill Road
8 Palo Alto, California 94304
9

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13 Appearing on behalf of the Defendants:

14 TODD M. BRIGGS, ESQ.
15 Quinn Emanuel Urquhart & Sullivan
16 555 Twin Dolphin Drive
17 Redwood Shores, California 94065
18

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21
22 ALSO PRESENT: Steve Brown, Videographer
23
24
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 Q. So if I were to ask you if you had an
2 opinion as to whether any of Samsung's products
3 infringed any of the claims of the 002 patent, would
4 you have an opinion?

5 A. I have no opinion.

6 Q. And you have never done any sort of
7 analysis to determine whether any Samsung products
8 meet the claims of the 002 patent?

9 A. No.

10 (Exhibit 984 was marked for identification)

11 BY MR. BRIGGS:

12 Q. I am going to hand you what has been marked
13 as Exhibit 984.

14 MR. KRAMER: I don't have a copy of that
15 one. If you could hand me that, that would be great.

16 Thanks, Todd.

17 BY MR. BRIGGS:

18 Q. Can you review this document and let me
19 know when you are done.

20 A. I have.

21 Q. So you are familiar with this document?

22 A. I am.

23 Q. What is it?

24 A. It is the "read me" file that accompanied
25 Super Clock.

1 CERTIFICATE

2
3 I, Michele J. Lucas, do hereby certify that pursuant
4 to the Rules of Civil Procedure, the witness named herein
5 appeared before me at the time and place set forth in the
6 caption herein; that at the said time and place, I reported
7 in stenotype all testimony adduced and other oral
8 proceedings had in the foregoing matter; and that the
9 foregoing transcript pages constitute a full, true and
10 correct record of such testimony adduced and oral proceeding
11 had and of the whole thereof.

12
13 IN WITNESS HEREOF, I have hereunto set my hand this
14 27th day of October, 2011.

15
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18
19 _____
20 /Signed August, 2013
21 Michele J. Lucas Commission Expiration
22
23
24
25