

# EXHIBIT P

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE INC., a California corporation,  
Plaintiff,

v.

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.

Case No. 11-cv-01846-LHK

**EXPERT REPORT OF RAVIN  
BALAKRISHNAN, PH.D.  
REGARDING INFRINGEMENT  
OF U.S. PATENT NO. 7,469,381**

**\*\*CONFIDENTIAL – CONTAINS MATERIAL DESIGNATED AS HIGHLY  
CONFIDENTIAL – ATTORNEYS’ EYES ONLY PURSUANT  
TO A PROTECTIVE ORDER\*\***

1 of Bas Ording, the named inventor of the '381 patent, as well as certain exhibits marked during  
2 that deposition. In addition, I reviewed portions of the deposition transcripts of Wookyun Koh  
3 and Seung Yun Lee, as well as certain exhibits marked during those depositions.

4 16. I have also reviewed Samsung's responses to Apple Interrogatories Nos. 2  
5 (regarding Samsung's non-infringement contentions), 16 (regarding Samsung's design-around  
6 contentions), and 79 (regarding Samsung's basis for any contention that Apple does not practice  
7 Apple's patents).

8 17. I have examined the following Samsung products: the Captivate; Continuum;  
9 Droid Charge; Epic 4G; Exhibit 4G; Fascinate; Galaxy Ace; Galaxy Prevail; Galaxy S (i9000);  
10 Galaxy S 4G; Galaxy S II (including its i9100, AT&T, and Epic 4G Touch variants); Galaxy S  
11 Showcase (i500); Galaxy Tab 7.0; Galaxy Tab 10.1<sup>1</sup>; Gem; Gravity Smart; Indulge; Infuse 4G;  
12 Intercept; Mesmerize; Nexus S; Nexus S 4G; Replenish; Sidekick; and Vibrant.

13 18. In addition, I have reviewed technical specifications for the aforementioned  
14 devices from Samsung's website. These portions of Samsung's website, which generally identify  
15 information such as the type of display on the device, the version of the Android platform on the  
16 device, and a device's memory capacity, were printed and labeled with the following Bates  
17 numbers: APLNDC-Y0000066729 – 66827; and APLNDC-Y0000066830 – 66909. I have also  
18 reviewed portions of the user manuals for these devices. The manuals were printed and labeled  
19 with the following Bates numbers: APLNDC-Y0000056289 – 56566; APLNDC-Y0000056784 –  
20 66728.

21 19. I have also reviewed portions of the publicly available Android source code and  
22 related documentation available at the Android developers website located at the following URL:  
23 <http://developer.android.com/index.html>, as well as portions of the Samsung proprietary source  
24 code that were produced by Samsung in this litigation prior to the close of fact discovery on  
25 March 8, 2012. I have been informed that although Apple requested a production of all of the  
26 Samsung source code for all of the Samsung products accused of infringement and that Samsung

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27 <sup>1</sup> References to the "Galaxy Tab 10.1" include both the wifi and LTE variants.  
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**AA. Supplementation**

267. I reserve the right to supplement this report with new information and/or documents that may be discovered or produced in this case, or to address any new claim constructions offered by Samsung or ordered by the Court.

268. In connection with my anticipated testimony in this action, I may use as exhibits various documents produced in this case that refer or relate to the matters discussed in this report. In addition, I may have demonstrative exhibits prepared to assist in the presentation of my testimony and opinions as set forth or cited in my report.

Dated: March 22, 2012

  
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RAVIN BALAKRISHNAN