

Exhibit 3

EXHIBIT K
FILED UNDER SEAL

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

APPLE INC., a California corporation,)
 PLAINTIFF,) CASE NO.
 VS.) 11-CV-01846LHK

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.)
 _____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

DEPOSITION OF SANJAY SOOD, Ph.D.

LOS ANGELES, CALIFORNIA

FRIDAY, APRIL 20, 2012

REPORTED BY:

CHRISTY CANNARIATO, CSR #7954, RPR, CRR

JOB NO.: 48726

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1 very important in terms of formulating a survey?

2 A. Definitely. That's what I struggle with
3 all the time when I'm designing surveys.

4 Q. So can you turn to page 36202. Do you see
5 that this slide is basically looking at the issue of 02:05
6 overall satisfaction with iPhone?

7 A. Yes.

8 Q. And you see the US part there. There are
9 percentages ranging from 86 percent to 94 percent?

10 A. Yes. 02:05

11 Q. Would you consider that a high level of
12 satisfaction?

13 A. Yes.

14 Q. And we agreed that consumers think that
15 the functionalities that we talked about earlier, the 02:06
16 web browsing and checking one's e-mail, that those
17 functions are important to consumers.

18 A. Absolutely.

19 MR. PLUNKETT: Objection.

20 Mischaracterizes. Vague? 02:06

21 A. I think that people make decisions based
22 on multiple components of the product. So functional
23 features are going to be important. Design is going
24 to be important. Price is going to be important.

25 Carrier is going to be important. All of those things 02:06

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24 Q. You can see why I'm curious about those
25 questionnaires.

02:28

1 A. Yes.

2 Q. So any luck in getting the questionnaires?

3 A. Not yet.

4 MR. PLUNKETT: So I will just note that
5 counsel had the opportunity ask for the questionnaires 02:28
6 before this deposition. Presumably you knew before
7 today that you had questions about the questionnaires
8 and that they weren't there. Right?

9 MS. HUTNYAN: Well, presumably you knew in
10 furnishing Dr. Sood's report the dictates of Rule 26 02:29
11 which require all the bases and conclusions to be
12 included with the report. So that I'm supposed to
13 catch you and identify the things that are missing
14 before I've gotten a chance to depose Dr. Sood really
15 isn't a very good answer to the question. 02:29

16 MR. PLUNKETT: Counsel, you can meet and
17 confer before a deposition if there's documents that
18 you need and don't have. So it's not the witness's
19 responsibility today, and you've made several comments
20 on the record about it, to have brought those with 02:29
21 him. It's an issue between counsel. And you did not
22 meet and confer on it prior to this deposition, and
23 you had the opportunity to. That's the point I'm
24 making.

25 MS. HUTNYAN: I have never once said 02:29