

Exhibit 32

to Motorola's Responsive Claim Construction Brief

August 18, 2011

In The Matter Of:

Motorola Mobility, Inc.

vs.

Apple, Inc.

Bas Ordning

August 3, 2011

CONFIDENTIAL

MERRILL CORPORATION

LegalLink, Inc.

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Bas Ordng August 3, 2011

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

vs.

APPLE INC.,

Defendant.

_____ /

APPLE INC.,

Counterclaim Plaintiff,

vs.

MOTOROLA, INC. and.
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

_____ /

Deposition of

BAS ORDING

Volume I, Pages 1-198

Wednesday, August 3, 2011

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REPORTED BY: JOHN WISSENBACH, RDR, CRR, CBC, CCP,

CLR, CSR 6862

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14:35:53 1 Q. With regard to interacting with a touch
14:35:55 2 screen, a gesture is defined as a -- as the movement
14:36:00 3 of the user's contact along the touch screen?

14:36:05 4 MS. HO: Objection; vague, legal
14:36:10 5 conclusion.

14:36:12 6 THE WITNESS: Yeah, from my perspective,
14:36:13 7 that -- it could be. That could be true.

14:36:16 8 BY MR. PASTOR:

14:36:16 9 Q. Are you aware --

14:36:16 10 A. But it could be other things, too.

14:36:19 11 Q. Such as?

14:36:20 12 A. Like I said before, it could -- like
14:36:22 13 tapping or --

14:36:23 14 Q. Tapping could be a gesture with the touch
14:36:26 15 screen?

14:36:26 16 A. It could. A gesture can be different
14:36:31 17 things.

14:36:31 18 Q. Tapping would still be repeated contact,
14:36:36 19 though, right?

14:36:38 20 MS. HO: Objection; vague, and to the
14:36:40 21 extent it mischaracterizes.

14:36:44 22 THE WITNESS: Well, what I'm saying is
14:36:46 23 gestures can be different things, in my opinion.

14:36:48 24 BY MR. PASTOR:

14:36:49 25 Q. Right. Well, but regard --

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14:36:49 1 A. So --

14:36:50 2 Q. -- with regard to interacting with a touch
14:36:53 3 screen. Forget the normal, you know, meaning of
14:36:55 4 "gesture" that you may have in your head, which my
14:36:59 5 questions are limited to just interacting with a
14:37:01 6 touch screen. And so you're not saying that the
14:37:07 7 movement of the user has to be continuous contact;
14:37:18 8 is that correct?

14:37:18 9 A. Yeah, I'm saying that it doesn't
14:37:21 10 necessarily have to be continuous contact there.

14:37:22 11 Q. Right. And I'm not --

14:37:24 12 A. So --

14:37:24 13 Q. I'm not saying that it is, either. Right.
14:37:29 14 My -- the definition I posed to you didn't require
14:37:32 15 that the contact be continuous.

14:37:34 16 A. Okay.

14:37:34 17 Q. With that understanding in mind, would you
14:37:38 18 agree now that with regard to interacting with the
14:37:41 19 touch screen, that it would be the movement of the
14:37:44 20 user's contact with the touch screen?

14:37:47 21 MS. HO: Objection; vague, calls for a
14:37:53 22 legal conclusion.

14:37:53 23 THE WITNESS: Well, I'm not sure if it's
14:37:54 24 just about movement, either.

14:37:57 25 BY MR. PASTOR: