

EXHIBIT 27

In The Matter Of:

Motorola Mobility, Inc.

vs.

Apple, Inc.

Imran Chaudhri

July 29, 2011

CONFIDENTIAL

MERRILL CORPORATION

LegalLink, Inc.

311 South Wacker Drive
Suite 300
Chicago, IL 60606
Phone: 312.386.2000
Fax: 312.386.2275

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

MOTOROLA MOBILITY, INC.,

Plaintiff,

vs.

No. 1:10cv023580-Civ-UU

APPLE INC.,

Defendant.

_____/

APPLE INC.

Counterclaim Plaintiff

vs.

MOTOROLA, INC. and MOTOROLA
MOBILITY, INC.

Counterclaim Defendant.

_____/

*** CONFIDENTIAL ***

DEPOSITION OF IMRAN CHAUDHRI

July 29, 2011

Reported by:
Natalie Y. Botelho
CSR No. 9897

09:24:23 1 A. No.

09:24:24 2 Q. What about after you or the other

09:24:31 3 inventors learned that it was being asserted in this

09:24:33 4 litigation? Did you speak with the other inventors

09:24:38 5 about '849 patent at that time?

09:24:40 6 A. No.

09:24:40 7 Q. If you wanted to figure out when you and

09:24:52 8 the other inventors conceived of what was disclosed

09:24:55 9 in the '849 patent, do you have an understanding as

09:24:57 10 to how you would go about doing that?

09:25:00 11 MS. HO: Vague.

09:25:12 12 THE WITNESS: I could probably narrow it

09:25:19 13 down to when we started prototyping some concepts.

09:25:26 14 MR. PASTOR: Q. Which concepts?

09:25:31 15 A. We had several concepts.

09:25:35 16 Q. Go ahead and list them.

09:25:37 17 A. Every one of them?

09:25:38 18 Q. The ones that you're referring to in your

09:25:40 19 last answer.

09:25:43 20 A. The ones that I can remember involved a

09:25:57 21 circular lock that had to be rotated from one

09:26:14 22 position to another. Another one involved sliding

09:26:30 23 one image on a slider or a line, whatever you want

09:26:42 24 to call it. There was others, as well, that didn't

09:26:50 25 necessarily have lines, just had arrows showing

09:26:54 1 directions of where and how you should slide it.
09:27:03 2 And then there were others that allowed you to make
09:27:16 3 shapes that you then replicate to unlock it. Those
09:27:24 4 are the ones I remember, things -- as things we
09:27:31 5 considered.
09:27:35 6 Q. Did any of the concepts that you listed in
09:27:37 7 your last answer have a internal name?
09:27:42 8 MS. HO: Vague.
09:27:54 9 THE WITNESS: Not individually, no.
09:27:55 10 MR. PASTOR: Q. Okay. As a whole, was
09:27:59 11 the user interface design that you were working on,
09:28:06 12 was there a project name that you referred to that
09:28:09 13 was internal at Apple?
09:28:11 14 MS. HO: Vague.
09:28:17 15 THE WITNESS: That part of what we were
09:28:18 16 doing was simply referred to as "lock" and "unlock."
09:28:25 17 MR. PASTOR: Q. Okay. And was there a
09:28:27 18 larger user interface project that the lock and
09:28:30 19 unlock was part of?
09:28:33 20 MS. HO: Vague.
09:28:39 21 THE WITNESS: It was a part of iPhone,
09:28:42 22 what became to be known as iPhone.
09:28:45 23 MR. PASTOR: Q. I'm now asking what the
09:28:47 24 internal name was before it became known as the
09:28:48 25 iPhone.

12:46:22 1 this: Assuming that "gesture" is defined to be a
12:46:32 2 motion of the object/appendage making contact with
12:46:35 3 the touchscreen, okay, and "predefined gesture"
12:46:41 4 means that there is a confined or existing version
12:46:49 5 of that type of gesture that must be replicated,
12:46:52 6 okay, assuming that, you would agree that all of the
12:47:00 7 examples I provided are examples of "predefined
12:47:04 8 gesture"?

12:47:04 9 MS. HO: Legal conclusion, incomplete
12:47:06 10 hypothetical.

12:47:12 11 THE WITNESS: I don't know if I'm
12:47:13 12 comfortable making a comment on something that's an
12:47:22 13 assumption.

12:47:25 14 MR. PASTOR: Q. Do you disagree with what
12:47:26 15 I've said?

12:47:30 16 A. I just don't think I have enough to go on.

12:47:38 17 Q. What would -- what else would you need?

12:47:49 18 A. I think if you were to give me an example
12:47:52 19 of something that was more concrete.

12:47:57 20 Q. Such as...?

12:47:59 21 A. I don't know. Something that wasn't an
12:48:03 22 assumption.

12:48:04 23 Q. Well, have -- the -- the other examples
12:48:11 24 that you gave earlier today as a earlier user
12:48:17 25 interface lock/unlock designs, the circular lock,

12:48:21 1 could you describe the gesture that was required in
12:48:23 2 the circular lock?

12:48:27 3 A. Sure. The gesture in the circular lock
12:48:41 4 was to rotate a -- an image on the screen from one
12:48:57 5 position to another position.

12:49:00 6 Q. Okay. And what would the gesture be, or
12:49:03 7 what -- strike that.

12:49:04 8 What was the gesture that you intended the
12:49:07 9 user to make to be able to do that?

12:49:17 10 A. Well, I don't think it was clearly defined
12:49:22 11 at that point. It could be -- could have been
12:49:28 12 things that we were considering was using multiple
12:49:35 13 fingers to twist or using a single finger to rotate.
12:49:45 14 Could be multiples at that point.

12:49:47 15 Q. Those two examples you've just provided
12:49:50 16 were different examples of gestures?

12:49:57 17 A. They could be.

12:50:06 18 Q. And for the other examples that you were
12:50:12 19 considering for the lock/unlock interface, you said
12:50:16 20 one was to make shapes. What was the gesture that
12:50:19 21 was required with that design?

12:50:29 22 A. I wouldn't necessarily say that there was
12:50:32 23 a gesture necessary with that.

12:50:35 24 Q. Why not?

12:50:40 25 A. Because a gesture could -- can sometimes

13:14:11 1 Q. Let's start with, "It can move under your
13:14:13 2 finger." What do you mean by that?
13:14:15 3 A. What I mean by "moving under your finger"
13:14:17 4 is that if you take, for example, an image that is
13:14:42 5 like an icon, for example, that can be moved around,
13:14:50 6 and it will stay under your finger.
13:14:58 7 Q. Is that something that is consistent with
13:15:02 8 figure 5A and figure 5B?
13:15:06 9 MS. HO: Vague.
13:15:08 10 MR. PASTOR: Q. Next page.
13:15:09 11 MS. HO: Vague, legal conclusion.
13:15:13 12 MR. PASTOR: Q. What you just described,
13:15:14 13 is this a -- consistent with what you just
13:15:16 14 described?
13:15:18 15 MS. HO: Same objections.
13:15:19 16 THE WITNESS: Not exactly. I was going
13:15:20 17 for something a little bit more general. When I was
13:15:25 18 talking about moving an image under your finger,
13:15:28 19 it's just anything and moving it anywhere. That's
13:15:33 20 generally what "moving an image under your finger"
13:15:37 21 means to me. There's other behaviors and stuff that
13:15:42 22 are involved with letting the image go or things
13:15:47 23 that happen to the image while you are dragging it.
13:15:57 24 MR. PASTOR: Q. What do you mean?
13:16:03 25 A. Sometimes an image can scale up to

13:16:07 1 indicate that it's being dragged. Sometimes it can
13:16:12 2 stretch to indicate it's pinned to one side.
13:16:18 3 Sometimes when you let it go, it can fall. There's
13:16:21 4 a bunch of different types of behaviors like that.
13:16:25 5 Q. So you're stating that distorting an image
13:16:28 6 is an example of moving it?
13:16:38 7 MS. HO: Objection to the extent it
13:16:39 8 mischaracterizes.
13:16:42 9 THE WITNESS: It can be. In my work I've
13:16:47 10 done things like that.
13:16:49 11 MR. PASTOR: Q. Can you give an example
13:16:50 12 of the work that you've done that are an example
13:16:54 13 like that?
13:16:57 14 A. In where the image is distorted or scaled?
13:17:03 15 Q. In which -- yeah, movement by distortion.
13:17:23 16 A. Yeah, so on iPad, on an iOS 5, we have
13:17:34 17 some gestures that allow you to move from within one
13:17:43 18 application to another application. And those are
13:17:49 19 four finger gestures where you take effectively the
13:17:54 20 entire image of the screen and you swipe in a
13:18:00 21 direction. And the instance that I'm thinking about
13:18:07 22 related to your question is when you are at the
13:18:11 23 beginning or the first application in that array,
13:18:15 24 the image stretches to let you know that that is the
13:18:22 25 first image.

1 CERTIFICATE OF REPORTER

2

3 I, Natalie Y. Botelho, a Certified
4 Shorthand Reporter, hereby certify that the witness
5 in the foregoing deposition was by me duly sworn to
6 tell the truth, the whole truth, and nothing but the
7 truth in the within-entitled.

8 The said deposition was taken down in
9 shorthand by me, a disinterested person, at the time
10 and place therein stated, and that the testimony of
11 said witness was thereafter reduced to typewriting,
12 by computer, under my direction and supervision;

13 That before completion of the deposition
14 review of the transcript [X] was was not
15 requested. If requested, any changes made by the
16 deponent (and provided to the reporter) during the
17 period allowed are appended hereto.

18 I further certify that I am not of counsel
19 or attorney for either or any of the parties to the
20 said deposition, nor in any way interested in the
21 event of this cause, and that I am not related to
22 any of the parties thereto.

23 DATED: August 10, 2011

24

25 Natalie Y. Botelho, CSR No. 9897