

Exhibit 3

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

3
4 APPLE, INC., a California Corporation

5 vs. CN:11-CV-01846-LHK

6 SAMSUNG ELECTRONICS COMPANY,

7 LTD, a Korean business entity; SAMSUNG

8 ELECTRONICS AMERICA, INC., a New

9 York Corporation; SAMSUNG

10 TELECOMMUNICATIONS AMERICA, LLC,

11 a Delaware Limited Liability Company.

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15 The videorecorded deposition of RAVIN

16 BALAKRISHNAN, PH.D., was held on Friday, April 20,

17 2012, commencing at 9:07 A.M., at the Law Offices of

18 Quinn Emanuel, 1299 Pennsylvania Avenue, N.W., Suite

19 825, Washington, D.C., before Ronda J. Thomas, a

20 Notary Public.

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23 REPORTED BY:

24 Ronda J. Thomas, RPR, CLR

25 JOB NO. 48807

1 Morrison and Foerster on behalf of the plaintiff, 09:08
2 Apple. 09:08
3 MR. AHN: Matthew Ahn of Morrison and 09:08
4 Forester on behalf of Apple. 09:08
5 MR. BUSEY: And, also, I'm representing the 09:08
6 witness. 09:08
7 THE VIDEOGRAPHER: Will the court reporter 09:08
8 please swear the witness. 09:08
9 Whereupon, 09:08
10 RAVIN BALAKRISHNAN, PH.D., 09:08
11 called as a witness, having been first duly sworn to tell 09:08
12 the truth, the whole truth, and nothing but the truth, was 09:08
13 examined and testified as follows: 09:08
14 EXAMINATION BY MR. JOHNSON: 09:08
15 Q Good morning, Dr. Balakrishnan. 09:08
16 A Good morning. 09:09
17 Q How many times have you been deposed now? 09:09
18 A I don't have a precise count. I would say 09:09
19 somewhere between half a dozen and ten. 09:09
20 (Brief pause.) 09:09
21 Q Sorry about that. 09:09
22 Is the bulk of your consulting work now for 09:09
23 Apple? 09:09
24 MR. BUSEY: Objection just to form. 09:09
25 A The current litigation consulting I'm doing 09:09

1 Q Well, does the array of tiles move back in 03:46
2 the opposite direction after the user lifts her finger? 03:46

3 A In which image are you talking about? 03:46

4 Q I'm just talking about in the operation of 03:46
5 LaunchTile. 03:46

6 A It may or may not, depending on where the 03:46
7 finger is and where the, that blue, blue widget or blue 03:46
8 circle is relative to where you lift the finger up. 03:46

9 MR. JOHNSON: Let's go ahead and take a 03:46
10 break. 03:46

11 THE WITNESS: Thank you. 03:46

12 THE VIDEOGRAPHER: This is the end of tape 03:46
13 4. We're off the record at 15:46. 03:46

14 (Off the record.) 03:57

15 THE VIDEOGRAPHER: This is the beginning of 03:58
16 tape 5. We're back on the record at 15:58. 03:58

17 BY MR. JOHNSON: 03:58

18 Q What's your definition of electronic 03:58
19 document as it's used in the '381 patent today? 03:58

20 MR. BUSEY: Objection to the extent it 03:58
21 calls for a legal conclusion. 03:58

22 (Witness reading.) 03:58

23 A I believe the term is understood in this 04:00
24 case to be the plain and ordinary meaning of electronic 04:00
25 document. 04:00

1 DISTRICT OF COLUMBIA, to wit:

2 I, RONDA J. THOMAS, a Notary Public of the
3 District of Columbia, do hereby certify that the
4 within-named witness personally appeared before me
5 at the time and place herein set out, and after
6 having been duly sworn by me, according to law, was
7 examined by counsel.

8 I further certify that the examination was
9 recorded stenographically by me and this transcript
10 is a true record of the proceedings.

11 I further certify that I am not of counsel to
12 any of the parties, nor in any way interested in the
13 outcome of this action.

14 As witness my hand and notarial seal this
15 21st day of April, 2012.

16 _____
RONDA J. THOMAS

17 Notary Public
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24 My Commission Expires:

25 August 31, 2013