

# Exhibit J

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION  
4

5 APPLE INC., a California  
6 corporation,

7 Plaintiff,

8 vs.

CASE NO. 11-CV-01846-LHK

9 SAMSUNG ELECTRONICS CO., LTD.,  
10 A Korean business entity;  
11 SAMSUNG ELECTRONICS AMERICA,  
12 INC., a New York corporation;  
13 SAMSUNG TELECOMMUNICATIONS  
14 AMERICA, LLC, a Delaware  
15 limited liability company,

16 Defendants.  
17 \_\_\_\_\_/

18 C O N F I D E N T I A L  
19 A T T O R N E Y S ' E Y E S O N L Y  
20 O U T S I D E C O U N S E L  
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22 VIDEOTAPED DEPOSITION OF RAVIN BALAKRISHNAN, Ph.D.  
23 SAN FRANCISCO, CALIFORNIA  
24 TUESDAY, AUGUST 16, 2011  
25

26 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR  
27 CSR LICENSE NO. 9830  
28 JOB NO. 41176

1 TUESDAY, AUGUST 16, 2011

2 9:10 a.m.

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6 VIDEOTAPED DEPOSITION OF RAVIN BALAKRISHNAN,  
7 Ph.D., taken at QUINN EMANUEL URQUHART &  
8 SULLIVAN, 50 California Street, 22nd Floor,  
9 San Francisco, California, pursuant to  
10 Notice, before me, ANDREA M. IGNACIO HOWARD,  
11 CLR, CCRR, RPR, CSR License No. 9830.

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1 SAN FRANCISCO, CALIFORNIA

2 TUESDAY, AUGUST 16, 2011

3 9:10 a.m.

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6 THE VIDEOGRAPHER: Good morning.

7 This is the beginning of Disk No. 1, of the  
8 videotaped deposition of Dr. Balakrishnan, in the  
9 matter of Apple versus Samsung, et al., in the United  
10 States District Court, Northern District of  
11 California, San Jose Division.

12 We are located today at 50 California Street,  
13 in the City of San Francisco, California.

14 Today's August 16, 2011, and the time is  
15 9:10 a.m.

16 My name is Alan Dias from TSG Reporting.  
17 Here with me is Andrea Ignacio.

18 Counsel, would you please identify yourself  
19 for the record.

20 MR. JOHNSON: This is Kevin Johnson on behalf  
21 of Samsung.

22 MR. MONACH: Andrew Monach, representing  
23 Apple and the witness.

24 MR. TUNG: I'm Mark Tung, representing  
25 Samsung.

1 A P P E A R A N C E S:

2

3 FOR APPLE INC.:

4 MORRISON & FOERSTER

5 By: ANDREW E. MONACH, Esq.

6 DEOK KEUN AHN, Esq.

7 425 Market Street

8 San Francisco, California 94105

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12 FOR SAMSUNG ELECTRONICS CO. LTD:

13 QUINN EMANUEL URQUHART & SULLIVAN

14 By: KEVIN JOHNSON, Esq.

15 HENRY LIEN, Esq.

16 TODD BRIGGS, Esq.

17 MARK TUNG, Ph.D., Esq.

18 555 Twin Dolphin Drive

19 Redwood Shores, California 94065

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23 ALSO PRESENT: Alan Dias, Videographer

24

25

1 did zoom in. But whether or not it has to be zoomed  
2 in, I need to spend a bit more time making sure  
3 whether it has to or not. I have not done that right  
4 now on this device.

5 MR. JOHNSON: Okay.

6 THE WITNESS: So, on this device, I went  
7 through the -- the preamble. It's clearly a  
8 computer-implemented method. It has a device with a  
9 touchscreen display. It is displaying right now a  
10 first portion of an electronic document. The  
11 electronic document here happens to be a photograph or  
12 an image, some kind of a picture of something.

13 MR. JOHNSON: Q. Is the electronic doc --  
14 what -- what does an "electronic document" mean in the  
15 context of this patent?

16 MR. MONACH: Object to form to the extent  
17 it's calling for a legal conclusion, but you can give  
18 your views on that.

19 THE WITNESS: In the context of this patent,  
20 my understanding, having read the patent and the  
21 claims, is the electronic document is some visual  
22 representation on the screen that has a defined length  
23 and a width, as an example, or defined set of  
24 boundaries, because they may not have to be a  
25 rectangular set of boundaries.

1 MR. JOHNSON: Q. So can it -- it can be  
2 anything with a defined length and width?

3 A It could be any visually represented thing  
4 with a defined boundary. I'd rather use the word  
5 "boundaries," because length and width may connote a  
6 rectangular thing. It may not be a rectangle,  
7 necessarily.

8 Q Okay. So an electronic document is anything  
9 that can be visually represented with a defined  
10 boundary?

11 MR. MONACH: Object to the form of the  
12 question; object as calling for a legal conclusion.

13 THE WITNESS: In the context of this patent  
14 and the claims, reading the patent and the claims, I  
15 would say that would be a -- my definition of an  
16 electronic document would be something visually  
17 representable on the screen that -- that has a defined  
18 set of boundaries.

19 MR. JOHNSON: Okay.

20 Q How about the next limitation?

21 A Okay. So, as I said earlier, it's got a  
22 first portion of an electronic document. We already  
23 went through that.

24 Q And -- and -- I'm sorry.

25 A I'm sorry.

1 CERTIFICATE OF REPORTER

2  
3  
4  
5 I, ANDREA M. IGNACIO HOWARD, hereby certify  
6 that the witness in the foregoing deposition was by me  
7 duly sworn to tell the truth, the whole truth, and  
8 nothing but the truth in the within-entitled cause;  
9

10 That said deposition was taken in shorthand  
11 by me, a Certified Shorthand Reporter of the State of  
12 California, and was thereafter transcribed into  
13 typewriting, and that the foregoing transcript  
14 constitutes a full, true and correct report of said  
15 deposition and of the proceedings which took place;  
16

17 That I am a disinterested person to the said  
18 action.  
19

20 IN WITNESS WHEREOF, I have hereunto set my  
21 hand this 17th day of August, 2011.  
22

23 \_\_\_\_\_  
24 ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830  
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Confidential Attorneys' Eyes Only Outside Counsel

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J U R A T

I, RAVIN BALAKRISHNAN, Ph.D., do hereby certify under penalty of perjury that, I have read the foregoing transcript of my deposition taken on August 16, 2011; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

DATED this 20th day of September, 2011,  
at Toronto, Ontario, Canada.



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SIGNATURE OF WITNESS