

Exhibit Q

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

4 APPLE INC., a California  
corporation,

5  
6 Plaintiff,

7 vs. Case No. 11-CV-01846-LHK

8 SAMSUNG ELECTRONICS CO., LTD.,  
a Korean business entity;

9 SAMSUNG ELECTRONICS AMERICA,  
INC., a New York corporation;

10 SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC, a Delaware  
11 limited liability company,

12 Defendants.

-----/

13  
14  
15  
16 CONFIDENTIAL  
17 ATTORNEYS' EYES ONLY  
18 OUTSIDE COUNSEL

19 VIDEOTAPED DEPOSITION OF IMRAN CHAUDHRI  
Redwood Shores, California  
20 Friday, October 14, 2011  
21  
22

23 Reported by:

LORRIE L. MARCHANT, CSR No. 10523, RPR, CRR, CCRR, CLR

24 JOB NO. 42879  
25

1                   October 14, 2011

2                   9:35 a.m.

3

4   Videotaped Deposition of IMRAN  
5   CHAUDHRI, held at the offices of Quinn  
6   Emanuel Urquhart & Sullivan, LLP, 555  
7   Twin Dolphin Drive, 5th Floor, Redwood  
8   Shores, California, before Lorrie L.  
9   Marchant, a Certified Shorthand  
10   Reporter, Registered Professional  
11   Reporter, Certified Realtime Reporter,  
12   California Certified Realtime Reporter  
13   and Certified LiveNote Reporter.

14

15

16

17

18

19

20

21

22

23

24

25

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

2

3 FOR THE PLAINTIFF APPLE INC.:

4

MORRISON & FOERSTER

BY: MATTHEW KREEGER, ESQ.

5

425 Market Street

San Francisco, California 94105

6

7

8 FOR THE DEFENDANTS SAMSUNG:

9

QUINN EMANUEL URQUHART & SULLIVAN

BY: ALAN WHITEHURST, ESQ.

10

1101 Pennsylvania Avenue NW

Washington, D.C. 20004

11

12 and

13

BY: ALEX BAXTER, ESQ

MARGRET CARUSO, ESQ.

14

BRETT ARNOLD, ESQ.

555 Twin Dolphin Drive

15

Redwood Shores, California 94065

16

17 and

18

BY: MICHAEL ZELLER, ESQ.

19

865 South Figueroa Street

Los Angeles, California 90017

20

21

22 ALSO PRESENT:

23

Cyndi Wheeler, Apple IP Litigation Counsel

24

Alan Dias, Videographer

25

---oOo---

1 (Marked for identification purposes,  
2 Exhibit 570 through 572.)

3 THE VIDEOGRAPHER: We are on the video  
4 record at 9:34 a.m. In the matter of Apple Inc.,  
5 versus Samsung, in the United States District Court,  
6 Northern District of California. Case No.  
7 11-CV-01846-LHK.

8 We are located today at 555 Twin Dolphin  
9 Drive, in the City of Redwood Shores, California.  
10 Today is October 14, 2011, and the time is 9:35 a.m.

11 My name is Alan Dias from TSG Reporting.  
12 Counsel, would you please identify yourself  
13 for the record.

14 MR. WHITEHURST: Good morning. My name  
15 Alan Whitehurst. And with me today is my colleague,  
16 Alex Baxter. We are with the law firm Quinn  
17 Emanuel, and we represent Samsung.

18 MR. KREEGER: Matthew Kreeger, Morrison &  
19 Foerster, representing Apple. With me is  
20 Cyndi Wheeler from Apple.

21 THE VIDEOGRAPHER: Will the court reporter  
22 please swear in the witness.

23 THE REPORTER: Do you solemnly swear or  
24 affirm under the penalties of perjury that the  
25 testimony you are about to offer will be the truth,

1 Q. Would you agree, then, that more than one  
2 year before the filing date of your patent  
3 application that it was known to have user  
4 interfaces with more than one window?

5 A. Yes.

6 Q. If you would please read aloud line 12 of  
7 Column 10.

8 A. Starting a timer and -- shall I continue  
9 on?

10 Q. What is a timer?

11 MR. KREEGER: Objection. Calls for a legal  
12 conclusion.

13 Go ahead.

14 THE WITNESS: A timer, as I understand it,  
15 is -- is something that counts down from a -- from a  
16 starting value to zero, typically.

17 BY MR. WHITEHURST:

18 Q. If you would please read lines 13 and 14 of  
19 Column 10, please.

20 A. Closing the first window in response to a  
21 determination that the timer expired.

22 Q. What does it mean when it says "closing the  
23 first window"?

24 MR. KREEGER: Objection. Calls for a legal  
25 conclusion.

1 THE WITNESS: I don't really know.

2 BY MR. WHITEHURST:

3 Q. In line 14, what it does it mean when it  
4 says "timer expired"?

5 MR. KREEGER: Same objection.

6 THE WITNESS: I don't know.

7 BY MR. WHITEHURST:

8 Q. Is it unclear in line 14 what it means when  
9 it says "timer expired"?

10 A. I just don't know what it's referencing. I  
11 understand the timer. I understand that the timer  
12 expired. By taking you back to my earlier example,  
13 I take to it mean that it's gone to zero.

14 Q. And would the timer expire when it reaches  
15 zero?

16 A. A timer, like my understanding of timers,  
17 would end at that point.

18 Q. If you would please read lines 15 through  
19 17 of Column 10, starting with the word "wherein"  
20 and ending with the word "system."

21 A. Wherein the first window does not close in  
22 response to any input from a user input device of  
23 the digital processing system.

24 Q. And what does this mean?

25 MR. KREEGER: Objection. Calls for a legal

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE

STATE OF CALIFORNIA )  
 ) : ss  
COUNTY OF SONOMA )

I, Lorrie L. Marchant, a Certified Shorthand Reporter, a Registered Professional Reporter, a Certified Realtime Reporter, and a Certified Realtime Professional within and for the State of California, do hereby certify:

That IMRAN CHAUDHRI, the witness whose deposition is herein set forth, was duly sworn/affirmed by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

In witness whereof, I have hereunto set my hand this 15th day of October, 2011.

-----  
LORRIE L. MARCHANT, CSR, RPR, CRR, CLR, CCRR  
CSR No. 10523



1 today's deposition. We are off the record at  
2 6:53 p.m. The master disk will be held by TSG  
3 Reporting.

4 (Time noted: 6:53 p.m.)

5 ---oOo---

6

7

8

---

IMRAN CHAUDHRI

9

10 Subscribed and sworn to  
11 before me this day  
12 of 2011.

13

---

14

15

16

17

18

19

20

21

22

23

24

25