

# **EXHIBIT 6**

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

Civil Action No.: 11-CV-01846-LHK

APPLE, INC., a California corporation,  
Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,  
a Korean business entity;  
SAMSUNG ELECTRONICS AMERICA, INC.,  
a New York corporation; and  
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC,  
a Delaware limited liability company,  
Defendants.

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CONTINUED VIDEOTAPED 30(b)(6) and PERSONAL

DEPOSITION OF:

WOOKYUN KHO

VOLUME 2

Sunday, March 4, 2012  
Kim & Chang  
Seoul, South Korea  
9:05 a.m. to 3:47 p.m.

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1 APPEARANCES:

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3 ON BEHALF OF PLAINTIFF, APPLE, INC.:

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9 ON BEHALF OF DEFENDANT, SAMSUNG:

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15 Also present:

16 TED K. KIM, LEAD INTERPRETER  
 JAMES VICTORY, CHECK INTERPRETER  
 PAUL HISCHIER, VIDEOGRAPHER  
 TRACEY LOCASTRO, COURT REPORTER  
 STEPHANIE KIM, MORRISON & FOERSTER  
 EDWARD KIM, SAMSUNG

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1 I N D E X

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3 Witness: Page

4 WOOKYUN KHO Examination By Mr. Ahn 142

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8 E X H I B I T S

9

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Exhibit 2122	Bates numbers SAMNDCA 10825891 through 10825893	208
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1 P R O C E E D I N G S

2 - - -

3 VIDEOGRAPHER: My name is Paul Hischier, a

4 videographer with American Realtime Court

5 Reporters/Asia.

6 Today's date is March 4th, 2012. And the

7 time is approximately 9:05. This deposition is

8 being held at the office of Kim and Chang

9 located at the Jeongdong building in Seoul,

10 South Korea.

11 The caption of this case is Apple, Inc.

12 versus Samsung Electronics Company, Limited held

13 in the U.S. District Court, Northern District of

14 California, San Jose Division with a civil

15 action number of 11-CV-01846-LHK. The name of

16 the witness is Wookyun Kho, testifying in his

17 capacity as 30(b)(6) and personal capacity.

18 The court reporter today is Tracey LoCastro,

19 also with American Realtime Court

20 Reporters/Asia.

21 At this time I'd like to ask all counsel and

22 interpreters to please state their appearances

23 and whom they represent for the record.

24 MR. AHN: Matthew Ahn of Morrison and

25 Foerster on behalf of Apple, Inc. With me today

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1 is Stephanie Kim.

2 MR. TUNG: Mark Tung from Quinn Emanuel for

3 Samsung and the witness. With me is Ed Kim from

4 Samsung.

5 LEAD INTERPRETER: Ted Kim, main

6 interpreter.

7 CHECK INTERPRETER: James Victory, check

8 interpreter.

9 VIDEOGRAPHER: Counsel, please state any

10 stipulations or statements you have on the

11 record.

12 MR. AHN: We understand the court reporter

13 is not authorized to administer oaths in this

14 venue; nevertheless, we request that she

15 administer the oath, and we stipulate that we

16 waive any objections to the validity of the

17 deposition based on the oaths.

18 VIDEOGRAPHER: At this time will the court

19 reporter please swear in the witness and

20 interpreters.

21 COURT REPORTER: Do you solemnly swear or

22 affirm that you will well and truly interpret

23 the questions propounded by counsel and the

24 answers given by the witness from Korean to

25 English and English to Korean to the best of

<p style="text-align: right;">Page 142</p> <p>1 your ability?</p> <p>2 LEAD INTERPRETER: I do.</p> <p>3 CHECK INTERPRETER: I do.</p> <p>4 WOOKYUN KHO,</p> <p>5 after having been duly sworn by the reporter, pursuant</p> <p>6 to stipulation of counsel, was examined and testified</p> <p>7 through the interpreter as follows:</p> <p>8 THE WITNESS: Yes.</p> <p>9 EXAMINATION</p> <p>10 BY MR. AHN:</p> <p>11 Q. Good morning, Mr. Kho.</p> <p>12 A. Good morning.</p> <p>13 Q. We've already met off the record, but I</p> <p>14 wanted to introduce myself again. My name is Matthew</p> <p>15 Ahn, and I'm an attorney representing Apple.</p> <p>16 A. Yes.</p> <p>17 Q. I believe you were previously deposed on</p> <p>18 January 12th; is that right?</p> <p>19 A. Yes, that's correct.</p> <p>20 Q. Today will be essentially the same as that</p> <p>21 first time. I'm going to ask you a number of</p> <p>22 questions, and your counsel may occasionally object,</p> <p>23 but unless he instructs you not to answer the question</p> <p>24 you should still answer my questions.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 143</p> <p>1 Q. If you don't ask me for a clarification of</p> <p>2 my question, I'll assume that you've understood it; is</p> <p>3 that fair?</p> <p>4 A. Yes. I understand.</p> <p>5 Q. We're continuing the deposition that started</p> <p>6 on January 12th; do you understand that?</p> <p>7 A. Yes.</p> <p>8 Q. Samsung has also designated you as its</p> <p>9 corporate 30(b)(6) witness on certain topics. Are you</p> <p>10 aware that you've been designated by Samsung as that</p> <p>11 witness?</p> <p>12 A. Yes, I am.</p> <p>13 MR. AHN: Mr. Tung, just to confirm, I</p> <p>14 believe that Samsung has designated Mr. Kho on</p> <p>15 the following topics: From set number 5, topic</p> <p>16 number 84; for set number 6, topics number 14,</p> <p>17 21, 22, 13, 23 and 24. Is that correct?</p> <p>18 MR. TUNG: Those are the topics listed in</p> <p>19 Rachel Kassabian's letter to Mia Mazza of</p> <p>20 February 24th, 2012. In that letter there is a</p> <p>21 column of designee, and in that designee column</p> <p>22 we've indicated the portions of those topics for</p> <p>23 which Mr. Kho has been designated.</p> <p>24 With that understanding, I think it's</p> <p>25 correct.</p>
<p style="text-align: right;">Page 144</p> <p>1 (Exhibit 2121 was marked for</p> <p>2 identification.)</p> <p>3 BY MR. AHN:</p> <p>4 Q. I've had marked as Exhibit 2121 the letter</p> <p>5 that you just referenced. Mr. Kho, I'm handing you a</p> <p>6 letter from Rachel Kassabian dated February 24th, 2012.</p> <p>7 Have you ever seen Exhibit 2121 before?</p> <p>8 A. Yes, I have.</p> <p>9 Q. Do you understand that you have been</p> <p>10 designated to testify on the topics listed in this</p> <p>11 letter?</p> <p>12 A. Yes, I do.</p> <p>13 Q. What did you do to prepare as a 30(b)(6)</p> <p>14 witness for today?</p> <p>15 MR. TUNG: Objection, vague, calls for a</p> <p>16 narrative.</p> <p>17 And I caution the witness not to reveal any</p> <p>18 attorney-client privileged materials and</p> <p>19 communications. But you can answer the question</p> <p>20 as to your specific preparation on 30(b)(6)</p> <p>21 topics to the extent that that preparation is</p> <p>22 not privileged.</p> <p>23 A. For what much of it I knew it already</p> <p>24 because I talked about those. As for the portions that</p> <p>25 I did not exactly know or I was not quite certain, then</p>	<p style="text-align: right;">Page 145</p> <p>1 I tried to verify those by making calls separately with</p> <p>2 those people who are involved.</p> <p>3 BY MR. AHN:</p> <p>4 Q. Can you identify those people?</p> <p>5 A. There was the principal engineer --</p> <p>6 LEAD INTERPRETER: J-e-o-n-g S-i-k</p> <p>7 S-e-o-n-g, a common spelling.</p> <p>8 A. Senior engineer --</p> <p>9 LEAD INTERPRETER: S-a-n-g H-y-e-o-p L-e-e,</p> <p>10 a common spelling.</p> <p>11 BY MR. AHN:</p> <p>12 Q. Anyone else?</p> <p>13 A. No. I contact these two people and I was</p> <p>14 able to verify.</p> <p>15 Q. What did you discuss with Jeong Sik Seong?</p> <p>16 MR. TUNG: Objection, vague.</p> <p>17 A. What I did to verify with the principal</p> <p>18 engineer Jeong Sik Seong was there were some areas</p> <p>19 which I was not quite certain, those related to some</p> <p>20 portions related to schedule, so I placed a call to him</p> <p>21 and I was able to verify that.</p> <p>22 BY MR. AHN:</p> <p>23 Q. The schedule for what?</p> <p>24 A. Schedule as to the development of bounce</p> <p>25 effect prototype.</p>

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<p style="text-align: right;">Page 198</p> <p>1 BY MR. AHN: 2 Q. Is it Samsung? 3 MR. TUNG: Same objections. 4 A. I do not really know for certain. 5 BY MR. AHN: 6 Q. Is it the law firm of Quinn Emanuel? 7 MR. TUNG: Same objections. 8 A. I do not really know for certain. 9 BY MR. AHN: 10 Q. Where do you expect to receive payment from? 11 MR. TUNG: Same objections. 12 A. Well, I haven't given any particular thought 13 to it. I do not really know. 14 BY MR. AHN: 15 Q. Who is it that you submit your invoice to? 16 MR. TUNG: Same objections. 17 A. I don't think I can answer without 18 infringing on the privilege. 19 MR. AHN: Let's see if we can shortcut this. 20 Mr. Tung, can you identify the source of 21 compensation to Mr. Kho for his time here today? 22 MR. TUNG: So I'm okay to say that the funds 23 for his compensation ultimately come from 24 Samsung. 25 BY MR. AHN:</p>	<p style="text-align: right;">Page 199</p> <p>1 Q. Mr. Kho, do you understand that the 2 compensation for your time today will ultimately be 3 derived from Samsung? 4 A. I think that's correct based on what was 5 mentioned a little while ago. 6 Q. Can you tell me any particular step you took 7 prior to January 12th, 2012 to pursue dental school? 8 MR. TUNG: Objection, vague, beyond the 9 scope. 10 A. Well, if I were to put it simply, I took an 11 exam and based on the exam results, I applied to a 12 school and I was then admitted. And so I can tell you 13 those are the steps that I took in order to enter into 14 this school. 15 BY MR. AHN: 16 Q. When did you take that exam? 17 MR. TUNG: Objection, beyond the scope. 18 A. August of last year. 19 BY MR. AHN: 20 Q. When did you receive the results? 21 MR. TUNG: Same objections. 22 A. End of September, end of September of last 23 year. 24 BY MR. AHN: 25 Q. And when did you decide to attend a dental</p>
<p style="text-align: right;">Page 200</p> <p>1 school? 2 MR. TUNG: Objection, beyond the scope. 3 A. Summer of 2009, I think it was around that 4 time. 5 BY MR. AHN: 6 Q. Did you discuss your desire to attend a 7 dental school with anyone at Samsung? 8 MR. TUNG: Objection, beyond the scope. 9 And please omit from your answer any 10 discussions with attorneys. 11 A. No, I never did. 12 BY MR. AHN: 13 Q. Did you omit from your answer any 14 discussions with attorneys? 15 MR. TUNG: So I'm going to instruct him not 16 to answer the question. 17 BY MR. AHN: 18 Q. Are you following your counsel's 19 instruction? 20 A. No, there is no such -- any such instance 21 particularly, so I think I could go ahead and answer. 22 There is nothing I omitted. 23 Q. Have you heard of something called EdgeGlow? 24 MR. TUNG: Objection, vague. 25 A. Yes, I have.</p>	<p style="text-align: right;">Page 201</p> <p>1 BY MR. AHN: 2 Q. What is EdgeGlow? 3 MR. TUNG: Objection, vague, beyond the 4 scope. 5 A. It's the name of a source code in Android 6 platform. 7 BY MR. AHN: 8 Q. What does that source code do? 9 MR. TUNG: Objection, vague, beyond the 10 scope. 11 A. At the time of scrolling a list, once the 12 top or the bottom, the tip of the top or the bottom is 13 reached, there's this effect that shows as if light is 14 spread, being spread out. And my understanding is that 15 it is this EdgeGlow that draws such an image. 16 BY MR. AHN: 17 Q. When's the first time you saw the EdgeGlow 18 in a Samsung product? 19 MR. TUNG: Objection, vague, lacks 20 foundation, beyond the scope. 21 A. EdgeGlow is originally a file that's in 22 Android platform and it started with the Gingerbread, 23 from Gingerbread on. And I do not have a precise 24 recollection. And I would have seen this from -- this 25 code from Gingerbread on and I do not have a precise</p>

<p style="text-align: right;">Page 202</p> <p>1 recollection exactly when I saw that.  2 BY MR. AHN:  3 Q. Does the EdgeGlow manifest itself as blue  4 bars in the direction of the desired scroll?  5 MR. TUNG: Objection, vague, assumes facts,  6 beyond the scope.  7 A. What counsel just said is somewhat similar,  8 but I think that's a wrong description.  9 BY MR. AHN:  10 Q. Have you ever seen something like a blue  11 glow that manifests itself when a user tries to scroll  12 beyond the edge of a list?  13 MR. TUNG: Objection, vague, assumes facts,  14 beyond the scope.  15 A. So while scrolling the list, once the tip of  16 the top or the bottom is reached, I have seen a blue  17 light being shown or drawn in order to show or let know  18 that the end had been reached.  19 BY MR. AHN:  20 Q. What do you call that?  21 MR. TUNG: Objection, vague, beyond the  22 scope.  23 A. I call this bounce effect or lighting  24 effect.  25 BY MR. AHN:</p>	<p style="text-align: right;">Page 203</p> <p>1 Q. Did you work on it?  2 MR. TUNG: Objection, vague, beyond the  3 scope.  4 A. Considering that EdgeGlow was created by  5 Google, there is nothing particularly I did in terms of  6 my creating it, but there are -- there is or are some  7 details that I made corrections of.  8 BY MR. AHN:  9 Q. When did you make those corrections?  10 CHECK INTERPRETER: The checker's rendition  11 of what's been rendered as a "correction" would  12 be "revision."  13 MR. AHN: Let me re-ask my question then.  14 BY MR. AHN:  15 Q. When did you make those revisions or  16 corrections?  17 MR. TUNG: Objection, vague, beyond the  18 scope.  19 A. Although I do not recall exactly, I think  20 that was done in 2011.  21 BY MR. AHN:  22 Q. Approximately the summer of 2011?  23 MR. TUNG: Same objections.  24 A. I think it would have been earlier than  25 that.</p>
<p style="text-align: right;">Page 204</p> <p>1 BY MR. AHN:  2 Q. I want to make sure we're talking about the  3 same thing. I've seen a glow that appears, for  4 example, at the top center of a list. And I've also  5 seen blue bars that can appear. Are those both  6 referred to as EdgeGlow?  7 MR. TUNG: Objection, vague, lacks  8 foundation, beyond the scope.  9 A. Well, as for the blue bar you just  10 mentioned, I would not exactly know where that appears.  11 And as far as the glow that appears in the middle, I  12 think that would be the case. And as far as the blue  13 bar that you just mentioned, depending on the location,  14 it could be the case or it may not be.  15 BY MR. AHN:  16 Q. Have you ever seen blue bars as an indicator  17 for when no further scrolling is possible in a Samsung  18 Android phone?  19 MR. TUNG: Objection, beyond the scope.  20 A. Yes, I have.  21 BY MR. AHN:  22 Q. Where did you see it?  23 MR. TUNG: Objection, vague, beyond the  24 scope.  25 A. I saw that in Samsung products.</p>	<p style="text-align: right;">Page 205</p> <p>1 BY MR. AHN:  2 Q. Which products?  3 MR. TUNG: Same objections.  4 A. Galaxy Nexus.  5 BY MR. AHN:  6 Q. Any other products?  7 MR. TUNG: Same objections.  8 A. I saw this in most of the other Android  9 cellular phones and tablets.  10 BY MR. AHN:  11 Q. What is the purpose -- strike that.  12 What do you refer to the blue bars as?  13 MR. TUNG: Objection, vague, beyond the  14 scope.  15 A. Well, there is no special or specific name  16 used in calling it internally, considering it's so  17 small, but if you have to call it something, I think it  18 could be called something like edge.  19 BY MR. AHN:  20 Q. When was that feature implemented in  21 Samsung's products?  22 MR. TUNG: Objection, vague, lacks  23 foundation, beyond the scope.  24 A. This applicable functionality was not  25 created by Samsung, but rather at Google.</p>

<p style="text-align: right;">Page 206</p> <p>1 BY MR. AHN: 2 Q. When was that feature implemented in 3 Samsung's products? 4 MR. TUNG: Objection, vague, lacks 5 foundation, beyond the scope, asked and 6 answered, assumes facts. 7 A. Well, if you are saying implement, it would 8 mean coming up with or creating that feature, and 9 Samsung has never implemented this applicable item. It 10 was just the case that the code that was provided by 11 Google was used, and Samsung never implemented it. 12 CHECK INTERPRETER: Checker's rendition. 13 "Well, if you are saying implemented would 14 mean coming up with or creating that feature, 15 and Samsung has not implemented it in that 16 sense. It was just the case that the code was 17 provided to us by Google, and Samsung did not 18 implement it in that way." 19 BY MR. AHN: 20 Q. Was the bounce effect removed from Samsung's 21 products at any point? 22 MR. TUNG: It's beyond the scope. It's 23 vague. It assumes facts. 24 And give you an instruction not to reveal 25 any communications with attorneys, but you can</p>	<p style="text-align: right;">Page 207</p> <p>1 answer the question as to knowledge that you 2 have that did not come from attorneys. 3 A. No, it has never been removed. 4 BY MR. AHN: 5 Q. So if I purchase a Samsung Android product 6 today, it will exhibit a bounce effect in the contacts 7 application; is that right? 8 MR. TUNG: Objection, vague, beyond the 9 scope, incomplete hypothetical, lacks 10 foundation. 11 A. As I told you in the morning, if we were to 12 go by the definition for bounce effect to be a series 13 of effects that let you know that the end has been 14 reached at the end of a list, in that case, I think, 15 when you purchase a Samsung phone that is currently 16 being sold you would be able to see the bounce effect 17 in the contacts application. 18 CHECK INTERPRETER: Checker's rendition 19 would not have the phrase "a series of effects." 20 LEAD INTERPRETER: I stand by my 21 interpretation. 22 CHECK INTERPRETER: I understand. 23 MR. AHN: Let's take a break. 24 VIDEOGRAPHER: I'm going to go ahead and 25 change tapes here.</p>
<p style="text-align: right;">Page 208</p> <p>1 This marks the end of videotape number 2 in 2 the deposition of Wookyun Kho. Going off the 3 record. The time is 2:40. 4 (A recess was taken.) 5 VIDEOGRAPHER: Back on the record. This 6 marks the beginning of videotape number 3 in the 7 deposition of Wookyun Kho. The time is 2:58. 8 MR. TUNG: I just wanted to designate this 9 transcript highly confidential, for attorneys' 10 eyes only and reserve the right for the witness 11 to submit errata after his review of the 12 transcript. 13 (Exhibit 2122 was marked for 14 identification.) 15 BY MR. AHN: 16 Q. I've handed you what has been marked as 17 Exhibit 2122. Exhibit 2122 is an e-mail from Wookyun 18 Kho to the e-mail zaharang@nemustech.com dated August 19 29th, 2011 bearing the Bates numbers SAMNDCA 10825891 20 through 10825893. 21 Do you recognize Exhibit 2122? 22 A. Yes. 23 Q. What is Exhibit 2122? 24 A. This has to do with putting a request to 25 make corrections on the errors related to EdgeGlow.</p>	<p style="text-align: right;">Page 209</p> <p>1 And this is being asked of NemusTech. 2 Q. I'd like to direct your attention to the 3 second page of this document which has two images side 4 by side. Do you see that? 5 A. Yes, I do. 6 Q. It's a little bit difficult to see because 7 this is in black and white, but in the upper right it 8 appears that there's some kind of shading there over 9 the word "organization." 10 Do you see that? 11 A. Yes, I do. 12 Q. Is this what you refer to as EdgeGlow? 13 MR. TUNG: Objection, vague. 14 A. That would be correct partially. 15 BY MR. AHN: 16 Q. What is incorrect about it? 17 A. In terms of the functionality it is correct, 18 but the shape or the form is wrong. 19 Q. What do you mean that the form is wrong? 20 A. Well, originally it should not come out in 21 this shape. So since it came out wrong, the e-mail has 22 to do making a request as to that. So what is shown 23 like this is in a wrong shape. 24 Q. Is the shading over the word "organization" 25 supposed to be in blue?</p>



<p style="text-align: right;">Page 210</p> <p>1 MR. TUNG: Objection, vague.</p> <p>2 A. It is to be a different shape that has a</p> <p>3 blue color or light.</p> <p>4 BY MR. AHN:</p> <p>5 Q. What do you mean "it is to be a different</p> <p>6 shape"?</p> <p>7 A. Just as the words mean, well, because the</p> <p>8 shape is wrong, it has to be in a different shape.</p> <p>9 Q. What shape is it supposed to be?</p> <p>10 MR. TUNG: Objection, vague.</p> <p>11 (Discussion held between Lead Interpreter</p> <p>12 and Check Interpreter.)</p> <p>13 A. The both edges should be more depressed, and</p> <p>14 the center shape -- center portion should be a little</p> <p>15 fatter or more convex so that it should look as if the</p> <p>16 light is shown to be coming out from there. It should</p> <p>17 be in that image shape.</p> <p>18 BY MR. AHN:</p> <p>19 Q. Why were you communicating with someone at</p> <p>20 NemusTech about this issue?</p> <p>21 MR. TUNG: Objection, vague.</p> <p>22 A. There is a library that was created by</p> <p>23 NemusTech. And that library uses the EdgeGlow image.</p> <p>24 And since the image being referred to is wrong, I am</p> <p>25 making a request to make a correction to refer to the</p>	<p style="text-align: right;">Page 211</p> <p>1 exact image.</p> <p>2 BY MR. AHN:</p> <p>3 Q. What is NemusTech's role in the creation of</p> <p>4 software for use on Samsung's products?</p> <p>5 MR. TUNG: Objection, vague.</p> <p>6 A. My understanding of that is that it has to</p> <p>7 do with helping out with the software development work,</p> <p>8 basically.</p> <p>9 BY MR. AHN:</p> <p>10 Q. Why is that work sent out to NemusTech</p> <p>11 instead of being performed at Samsung?</p> <p>12 A. Well, I'm wondering here whether it's</p> <p>13 because of the lack of manpower. Or in this field,</p> <p>14 instances like this are quite numerous where you would</p> <p>15 hire such suppliers. And I don't think there is any</p> <p>16 other specific reason.</p> <p>17 (Exhibit 2123 was marked for</p> <p>18 identification.)</p> <p>19 BY MR. AHN:</p> <p>20 Q. I'm going to hand you what has been marked</p> <p>21 as Exhibit 2123.</p> <p>22 Exhibit 2123 is a document entitled iPhone 4</p> <p>23 Announce Report, bearing the Bates numbers</p> <p>24 S-ITC-7761147 through 7761184.</p> <p>25 Have you ever seen Exhibit 2123 before?</p>
<p style="text-align: right;">Page 212</p> <p>1 A. I do not have any precise recollection</p> <p>2 whether I saw this or not. I probably would have</p> <p>3 received this through e-mail, but I don't think I</p> <p>4 looked at it.</p> <p>5 Q. Do you receive this type of document --</p> <p>6 strike that.</p> <p>7 In connection with your responsibilities at</p> <p>8 Samsung, did you receive documents of this type at any</p> <p>9 point?</p> <p>10 MR. TUNG: Objection, vague and beyond the</p> <p>11 scope.</p> <p>12 A. I occasionally receive e-mails as to the</p> <p>13 items that would be benchmarked in regards to the</p> <p>14 competitor's products.</p> <p>15 BY MR. AHN:</p> <p>16 Q. How many documents like Exhibit 2123 did you</p> <p>17 see in your time at Samsung?</p> <p>18 MR. TUNG: Objection, vague, beyond the</p> <p>19 scope, calls for speculation.</p> <p>20 A. Considering that I would have received</p> <p>21 something like this from each time a new product came</p> <p>22 out as to the competitors' products or the details that</p> <p>23 would be benchmarked, so they would number quite a lot.</p> <p>24 And I think it would be difficult for me to put a</p> <p>25 number on it.</p>	<p style="text-align: right;">Page 213</p> <p>1 BY MR. AHN:</p> <p>2 Q. So you have documents like Exhibit 2123 for</p> <p>3 every single competitor product?</p> <p>4 MR. TUNG: Objection, vague,</p> <p>5 mischaracterizes testimony, assumes facts,</p> <p>6 beyond the scope.</p> <p>7 A. Considering that there are just way too many</p> <p>8 products, I don't think I would have received such for</p> <p>9 all of the products, but my recollection is that I</p> <p>10 would have received such benchmarking materials like</p> <p>11 this always as to some of the major competitors'</p> <p>12 representative model products.</p> <p>13 MR. AHN: I'm going to hand you what's been</p> <p>14 marked as Exhibit 2124.</p> <p>15 Exhibit 2124 has the title Samsung Android</p> <p>16 Basic Scenario, bears the Bates numbers SAMNDCA</p> <p>17 10105935 through 10106017.</p> <p>18 (Exhibit 2124 was marked for</p> <p>19 identification.)</p> <p>20 BY MR. AHN:</p> <p>21 Q. Have you ever seen Exhibit 2124 before?</p> <p>22 A. As for this document, I do not know whether</p> <p>23 it was this exact document or not, but I think I have</p> <p>24 seen a document that's similar to this.</p> <p>25 Q. What is Exhibit 2124?</p>