

# Exhibit 32

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE, INC., a California )  
corporation, )  
Plaintiff, )

VS. ) NO. 11-cv-01846-LHK

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

ORAL AND VIDEOTAPED DEPOSITION OF  
JUSTIN DENISON  
JANUARY 25, 2012  
HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Job No: 45459

09:09 1 P R O C E E D I N G S

09:09 2 MR. BRINKMAN: We'll mark the deposition  
09:09 3 as confidential.

09:10 4 THE VIDEOGRAPHER: We're now on record.  
09:10 5 The date is January 25th, 2012. The time is 9:09 a.m.  
09:10 6 I'm Richard Buckelew, the videographer. The court  
09:10 7 reporter is Therese Casterline.

09:10 8 This is the deposition of Justin Denison  
09:10 9 in the case of Apple, Incorporated versus Samsung  
09:10 10 Electronics Company.

09:10 11 Counsel will please introduce themselves,  
09:10 12 after which the court reporter will swear in the  
09:10 13 witness.

09:10 14 MR. McELHINNY: My name is Harold  
09:10 15 McElhinny. I'm here with Julia Kripke, and we  
09:10 16 represent Apple, from Morrison & Foerster.

09:11 17 MR. BRINKMAN: My name is Paul  
09:11 18 Brinkmanship from Quinn Emanuel. We represent Samsung.

09:11 19 MS. HAN: Julie Han from Samsung.

09:11 20 JUSTIN DENISON,  
09:11 21 having been first duly sworn, testified as follows:

09:11 22 EXAMINATION

09:11 23 BY MR. McELHINNY:

09:11 24 Q. Good morning, Mr. Denison. You heard me; I  
09:11 25 introduced myself before the deposition started. My

12:17 1 Q. Can you explain to me, based on your superior  
12:17 2 knowledge here, why attracting first-time smartphone  
12:18 3 buyers is the first step in your approach to achieving  
12:18 4 these goals?

12:18 5 A. I'm not sure that that -- the way it's  
12:18 6 depicted means that it's the first step, per se.

12:18 7 Q. Okay. Can you tell me why attracting  
12:18 8 first-time smartphone buyers is part of your approach  
12:18 9 toward achieving these goals?

12:18 10 A. Certainly, it -- it has been STA's view that  
12:18 11 there are a significant number of people that have yet  
12:18 12 to buy their first smartphone, and so we view them as  
12:18 13 a -- pardon me -- as a -- a market of attractive  
12:19 14 smartphone buyers.

12:19 15 Q. Is it easier to sell phones to first-time  
12:19 16 buyers than it is to second-time buyers?

12:19 17 A. Is it easier? I don't know what you mean by  
12:19 18 easier.

12:19 19 Q. Are there -- are there things about first-time  
12:19 20 buyers that make them a more likely sales audience?

12:19 21 A. Again, I just think that there are a  
12:19 22 significant number of people who don't own a smartphone  
12:19 23 that we believe will buy a smartphone. And as we want  
12:19 24 to become number 1 in the smartphone market, that's an  
12:20 25 attractive pool of people. I don't know how else to

12:28 1 Q. That -- on -- on subsection a here where it  
12:28 2 says, consumers are local -- loyal to an ecosystem once  
12:28 3 they enter -- ecosystem means operating system; is that  
12:29 4 fair?

12:29 5 A. I think there's an implied association here  
12:29 6 between, you know, operating system, as well as, you  
12:29 7 know, any services that come with that operating  
12:29 8 system.

12:29 9 Q. Okay. If you look at the next page, the title  
12:29 10 is, Focus on Preventing Smartphone Buyers from Becoming  
12:29 11 Apple Loyalists. Do you see that?

12:29 12 A. I do.

12:29 13 Q. And -- and does that accurately describe one  
12:29 14 of STA's focuses in 2011?

12:29 15 A. So going back to the previous page, page 14,  
12:29 16 the chart on the left-hand side indicates that repeat  
12:30 17 purchase behavior is about equal -- in fact, it's a  
12:30 18 little higher -- for Android owners than iOS owners.

12:30 19 That -- that chart seems to imply that  
12:30 20 once you become either an Android or Apple owner, you  
12:30 21 have a high likelihood of repurchasing that same  
12:30 22 device.

12:30 23 Q. So -- so the key opportunity is at entry?

12:30 24 A. Certainly, again, we've talked about  
12:30 25 first-time smartphone buyers being an important segment

12:30 1 for us, for many reasons.

12:30 2 THE WITNESS: Is now a good time to break  
12:30 3 for lunch?

12:30 4 MR. McELHINNY: Sure -- no, no -- I'm  
12:30 5 going to torture you with one -- I think I've got one  
12:30 6 page left, and then we can finish the document. How's  
12:30 7 that?

12:30 8 THE WITNESS: Okay.

12:30 9 MR. McELHINNY: I mean, let's see what  
12:31 10 I --

12:31 11 Let's go to lunch.

12:31 12 THE WITNESS: All right. Thanks.

12:31 13 THE VIDEOGRAPHER: We're now going off the  
12:31 14 record at 12:30 p.m.

12:31 15 (Recess 12:30-1:36 p.m.)

13:37 16 THE VIDEOGRAPHER: We're now back on  
13:37 17 record at 1:36 p.m.

13:37 18 MR. McELHINNY: Next in order, please.

13:37 19 (Exhibit Number 1260 marked.)

13:37 20 Q. Mr. Denison, you've been handed a  
13:38 21 multiple-page document --

13:38 22 THE VIDEOGRAPHER: Your mike.

13:38 23 Q. Mr. Denison, you've been handed a  
13:38 24 multiple-page document, which has been marked as  
13:38 25 Exhibit 1280. It bears the title Samsung Competitive

1                               IN THE UNITED STATES DISTRICT COURT  
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5     APPLE, INC., a California     )  
6     corporation,                    )  
7                                    )  
8                                Plaintiff,                    )  
9                                    )  
10    VS.                             )    NO. 11-cv-01846-LHK  
11                                    )  
12    SAMSUNG ELECTRONICS CO.,     )  
13    LTD., a Korean business     )  
14    entity; SAMSUNG ELECTRONICS   )  
15    AMERICA, INC., a New York    )  
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17    TELECOMMUNICATIONS AMERICA, )  
18    LLC, a Delaware limited     )  
19    liability company,            )  
20                                    )  
21                                Defendants.                    )

22                                       REPORTER'S CERTIFICATION  
23                               ORAL AND VIDEOTAPED DEPOSITION OF JUSTIN DENISON  
24                                       JANUARY 25, 2012  
25                               I, Therese J. Casterline, Registered Merit  
Reporter, Certified Realtime Reporter, Certified  
Shorthand Reporter in and for the State of Texas, do  
hereby certify that there came before me on the 25th  
day of January, 2012, at the offices of Regus, located  
at 4514 Cole Avenue, Suite 600, Dallas, Texas, the  
following named person, to wit: JUSTIN DENISON, who  
was duly sworn to testify the truth, the whole truth,

1 and nothing but the truth of knowledge touching and  
2 concerning the matters in controversy in this cause;  
3 and that he was thereupon examined upon his oath and  
4 his examination reduced to typewriting under my  
5 supervision; that the deposition is a true record of  
6 the testimony given by the witness, that review by the  
7 witness was requested on the record, and signature of  
8 the witness is to be signed before any notary public.

9 I further certify that I am neither attorney  
10 nor counsel for nor related to any of the parties to  
11 the action in which this deposition is taken, and  
12 further that I am not a relative or employee of any  
13 attorney or counsel employed by the parties hereto, or  
14 financially interested in this action.

15 Given under my hand on this the 25th day of  
16 January, 2012.

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19 Therese J. Casterline, Texas CSR  
5001, Expiration Date: 12-31-13  
20 Firm Registration No. 615  
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747 Third Avenue  
21 New York, New York 10017  
(877) 702-9580

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