

EXHIBIT 3

FILED UNDER SEAL

In The Matter Of:

APPLE, INC.,

v.

SAMSUNG ELECTRONICS CO., LTD.

JUHO LEE, Ph.D. - Vol. 1

December 3, 2011

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JUHO LEE, Ph.D. - 12/3/2011

Page 141

16:34:18 1 group 1 of 3GPP RAN. But as to other areas than
16:34:30 2 that, I am only involved in the overall directions
16:34:34 3 in that regard.

16:34:39 4 Q. Only involved in the overall directions of
16:34:41 5 what?

16:34:45 6 A. I was referring to other fields outside of
16:34:49 7 RAN 1 field.

16:34:51 8 Q. Other 3GPP fields, you mean?

16:35:00 9 A. I was referring to RAN, 3GPP RAN, and
16:35:04 10 within RAN there is RAN 1 and other. When I was
16:35:19 11 referring to giving overall directions, I was
16:35:22 12 referring to my involvement in the other RAN working
16:35:26 13 groups than RAN 1.

16:35:30 14 Q. Do you do any work for the DMC R&D center
16:35:34 15 that is not related to technical development with
16:35:38 16 the 3GPP working groups?

16:35:52 17 MR. MACK: Objection, vague.

16:36:02 18 THE WITNESS: There is nothing else that I
16:36:03 19 am involved other than my involvement with 3GPP.

16:36:18 20 BY MS. HERRIOT:

16:36:18 21 Q. Do you know how Samsung determines which
16:36:20 22 patent or patents applications to declare to ETSI?

16:36:37 23 MR. MACK: Just caution the witness not to
16:36:38 24 reveal the substance of any attorney-client

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JUHO LEE, Ph.D. - 12/3/2011

Page 142

16:36:40 1 privileged communications.

16:36:44 2 THE WITNESS: I have no knowledge in that
16:36:45 3 regard.

16:36:46 4 BY MS. HERRIOT:

16:36:48 5 Q. Just to change direction briefly, is the
16:36:50 6 DMC R&D center the same as the standardization group
16:36:54 7 you mentioned at the time beginning of this
16:36:56 8 deposition?

16:37:08 9 A. The standardization group is within the
16:37:12 10 DMC R&D center.

16:37:17 11 Q. And are you in charge of the
16:37:19 12 standardization group within the DMC R&D center?

16:37:36 13 A. I am in charge of the 3GPP RAN field
16:37:39 14 within the standardization group.

16:37:42 15 Q. Who is in charge of the standardization
16:37:43 16 group?

16:37:57 17 A. Senior vice-president of Joon Ho Park.

16:38:09 18 Q. Can you spell that?

16:38:15 19 THE INTERPRETER: It's J-o-o-n, H-o,
16:38:18 20 P-a-r-k.

16:38:21 21 BY MS. HERRIOT:

16:38:22 22 Q. What other groups are there within the DMC
16:38:24 23 R&D center?

16:38:33 24 A. I don't recall them all.

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JUHO LEE, Ph.D. - 12/3/2011

Page 143

16:38:34 1 Q. Can you name the ones you recall?

16:38:46 2 A. There is patent application group within

16:38:49 3 the DMC R&D center.

16:38:54 4 CHECK INTERPRETER: Patent prosecution.

16:38:59 5 THE WITNESS: Patent prosecution group.

16:39:02 6 BY MS. HERRIOT:

16:39:02 7 Q. Do you recall any other groups?

16:39:12 8 A. I can't come up with the exact names of

16:39:14 9 other groups because I don't have much contact with

16:39:16 10 them.

16:39:19 11 Q. Do you have much contact with the patent

16:39:20 12 prosecution group?

16:39:29 13 MR. MACK: Objection, vague.

16:39:41 14 THE WITNESS: The patent prosecution gets

16:39:45 15 to be included in the process of technical

16:39:49 16 development. So in the course of my work, I get to

16:39:52 17 contact them, the people who are with that side.

16:39:56 18 BY MS. HERRIOT:

16:39:57 19 Q. Is the patent prosecution group involved

16:39:59 20 in reviewing technical submissions to 3GPP?

16:40:15 21 MR. MACK: Objection, vague, calls for

16:40:16 22 speculation. Caution the witness not to reveal the

16:40:19 23 substance of any attorney-client privileged

16:40:21 24 communications.

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JUHO LEE, Ph.D. - 12/3/2011

Page 144

16:40:31 1 THE WITNESS: At the time of submission of
16:40:33 2 technical contributions to 3GPP, we make the
16:40:41 3 decision.

16:40:44 4 CHECK INTERPRETER: On our own.

16:40:47 5 THE WITNESS: On our own.

16:40:49 6 BY MS. HERRIOT:

16:40:50 7 Q. Does the patent prosecution group ever
16:40:51 8 review technical submissions that Samsung makes to
16:40:55 9 3GPP?

16:41:12 10 MR. MACK: Just caution the witness not to
16:41:13 11 reveal the contents of any attorney-client
16:41:14 12 privileged communications.

16:41:19 13 THE WITNESS: No, that's not the case.

16:41:24 14 BY MS. HERRIOT:

16:41:24 15 Q. Do you know who is responsible for making
16:41:26 16 the determination of which patents or patent
16:41:28 17 applications to declare to ETSI?

16:41:40 18 MR. MACK: Objection, vague, calls for
16:41:41 19 speculation.

16:41:45 20 THE WITNESS: I don't know.

16:41:47 21 BY MS. HERRIOT:

16:41:50 22 Q. Is your contact with the patent
16:41:51 23 prosecution group related to filing patent
16:41:55 24 applications?