

EXHIBIT T
FILED UNDER SEAL

1 investigation relating to the designs of another
2 company?

3 MR. HUNG: Objection. Vague.

4 THE WITNESS: Can you state the question
5 again. Sorry.

6 BY MS. NEILL:

7 Q. Sure. Have you ever done any
8 investigation of a design of another company?

9 A. Not that I'm aware of.

10 Q. Have you ever created any designs with
11 another company's name on them besides Apple?

12 A. I believe we did something once for a
13 phone as an exercise.

14 Q. Can you describe that.

15 A. I don't -- I don't really remember what it
16 looks like because it was so long ago, but I do
17 remember us -- it felt like a really long time
18 ago -- having an exercise where we -- we modeled
19 a -- I thought it was a phone based on another --
20 like a -- some other design language, just as an
21 exercise.

22 Q. What do you mean by "design language"?

23 A. Well, some companies can have a very
24 specific style of design in their products. And
25 sometimes that is very recognizable, and sometimes

1 in some companies' kind of product lines it's --
2 it's not. So sometimes that's referred to as a
3 "design language" or a "design style."

4 Q. And do you remember what company it was,
5 the design language you were modeling off of?

6 A. Well, that one model, I believe, was Sony.

7 Q. Okay. And do you recall when that was?

8 A. I don't.

9 Q. Do you have any approximation?

10 A. I mean, it feels like early 2000s to me.

11 MS. NEILL: I will mark as Exhibit -- I
12 believe we are at 1073 -- a series of documents
13 starting with APLNDC-NCC00000200 and ending with
14 206.

15 (Whereupon, Whang Exhibit 1073 was marked
16 for identification.)

17 BY MS. NEILL:

18 Q. Do the images here that you see in front
19 of you reflect the exercise you were referring to?

20 A. Yeah. The -- the first set of images do.
21 They are -- I kind of can remember -- remember this
22 model now.

23 Q. When you say "the first set of images" --
24 I'm sorry -- can you maybe give us a page number.

25 A. Yes. So 205 seems to be, like, a fairly

1 different version, and I don't --I don't quite
2 remember that one. 206 goes back to the initial
3 design I was talking about.

4 Q. Is the design depicted in 206 a Sony
5 design?

6 A. Do you mean is it something that Sony had
7 produced already?

8 Q. Yes.

9 A. No.

10 Q. Does it reflect Sony design language?

11 A. It's a difficult question because it's
12 shifted around so much over the years, but I would
13 say no. I mean, the only thing that, to me, to my
14 eye, reminds me of old Sony products is the
15 asymmetrical buttons down on the front face on --

16 Q. Which page are you referring to?

17 A. Sorry. 202. Those kind of buttons on a
18 diagonal within the diagonal recess, the confusing
19 buttons.

20 And the other detail that would make me
21 think of some previous Sony stuff -- there's no good
22 image of it, but if you go to 203, you can see on
23 the side there is a little feature that kind of
24 grows out of that surface, and I believe it's like a
25 dial. That is -- that kind of reminds me of some --

1 some Sony stuff.

2 Q. So what you referred to, the asymmetrical
3 buttons and this dial, is that the only -- the only
4 features that you see here that reflect Sony design
5 language?

6 A. To me, yes.

7 Q. Why did you all include the Sony logo on
8 these designs?

9 A. I'm not sure.

10 MS. NEILL: I will mark as Exhibit 1074
11 another series of images.

12 THE WITNESS: I just wanted to state that
13 the top image, the 020 -- or the 2001 seems to be a
14 different thing.

15 BY MS. NEILL:

16 Q. And what does that appear to be to you?

17 A. Well, that one has an Apple logo on the
18 back that says "iPod."

19 Q. And does it also reflect the same design
20 language evident in the others or not?

21 A. No.

22 (Whereupon, Whang Exhibit 1074 was marked
23 for identification.)

24 MS. NEILL: Sorry --

25 DEPOSITION REPORTER: I'm marking it right

1 now.

2 BY MS. NEILL:

3 Q. How is -- how is that one different?

4 A. I've only got one view of the image here,
5 so it's hard to -- it's hard to really comment.
6 Just, you know, it has an Apple logo. It says
7 "iPod." The plastic appears to be a lighter color.
8 I'm not sure if it's plastic or glass or what. But
9 looking at that view, to me, it looks quite a bit
10 different.

11 Q. Would seeing these images in color help
12 your understanding and your recollection?

13 A. They might. Color or high resolution or
14 the actual model.

15 MS. NEILL: Sorry. I'm going to go back
16 to saying what I was entering as an exhibit. 1074
17 is APL NDC-NCC00000208 through 215.

18 BY MS. NEILL:

19 Q. So do these images also reflect the
20 exercise you were referring to using the design
21 language of another company?

22 MR. HUNG: Objection. Vague.

23 THE WITNESS: It seems to be of -- of --
24 of the same exercise.

25 BY MS. NEILL: