

Exhibit A

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

4 APPLE INC., a California §
Corporation, §
5 §
Plaintiff, §
6 §

7 Vs. § Case No. § 11-CV-01846-LHK
§

8 SAMSUNG ELECTRONICS CO., §
LTD., a Korean business §
9 entity; SAMSUNG ELECTRONICS §
AMERICA, INC., a New York §
10 corporation; SAMSUNG §
TELECOMMUNICATIONS AMERICA, §
11 LLC, a Delaware limited §
liability company, §
12 §

13 Defendants. §

14 HIGHLY CONFIDENTIAL
15 UNDER THE PROTECTIVE ORDER

16
17 DEPOSITION OF JUSTIN DENISON
Dallas, Texas
18 Wednesday, September 21st, 2011
19
20
21
22

23 Reported by:

24 Daniel J. Skur, Notary Public and CSR

25 JOB NO. 41964

P R O C E E D I N G S

1
2 VIDEOGRAPHER: This is tape 1 in the
3 video deposition of Justin Denison. Today
4 is Wednesday, September 21st, 2011. We're
5 now on record at approximately 9:36 a.m.
6 Will the attorneys please introduce
7 themselves for the record.

8 MR. HUNG: Richard Hung of Morrison
9 & Foerster on behalf of Apple, Inc. With
10 me today is Diana Kruze, also of Morrison &
11 Foerster and also for Apple.

12 MS. MAROULIS: Victoria Maroulis
13 with Quinn Emanuel, counsel for Samsung,
14 and with me is Mark Tung of Quinn Emanuel,
15 Cindy Moreland of STA, and we have an
16 interpreter, Ann Park.

17 JUSTIN DENISON,
18 having been duly sworn, testified as follows:

EXAMINATION

19
20 BY MR. HUNG:

21 Q. Morning, Mr. Denison.

22 A. Morning.

23 MR. HUNG: Before we get started, I
24 did have a discussion with Ms. Maroulis,
25 and I just wanted to note a couple of

1 MS. MAROULIS: Objection, vague.

2 A. Again, my understanding is that
3 there were substantive discussions where
4 infringement claims were made, specifically on
5 September -- on or around September 2010, claim
6 charts were presented. I do not know exactly
7 which products were raised with respect to
8 those claim charts.

9 BY MR. HUNG:

10 Q. In Exhibit 234, there was a
11 statement that says, quote, Samsung denied
12 copying and denied infringement.

13 What is the basis for that
14 statement?

15 A. So my understanding, based on
16 conversations with parties that were familiar
17 and/or took place in those conversations,
18 asserted that Samsung had not been copying or
19 infringing on Apple intellectual property.

20 Q. I believe you testified that the
21 '381 patent was identified in a presentation
22 that was exchanged between the parties in the
23 context of these discussions; is that correct?

24 MS. MAROULIS: Objection, asked and
25 answered.

1 C E R T I F I C A T E
 2 STATE OF TEXAS)
)
 3 COUNTY OF DALLAS)
 4

5 I, Daniel J. Skur, a Notary Public
 6 within and for the State of Texas, do
 7 hereby certify:

8 That JUSTIN DENISON, the witness
 9 whose deposition is hereinbefore set forth,
 10 was duly sworn by me and that such
 11 deposition is a true record of the
 12 testimony given by such witness.

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

18 IN WITNESS WHEREOF, I have hereunto
 19 set my hand this 21st day of September,
 20 2011.

21 _____
 22 Daniel J. Skur
 23 Notary Public, State of Texas.
 My Commission Expires 7/10/2014
 24
 25