

EXHIBIT 11

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

4 APPLE INC., a California
corporation,

5 Plaintiff,

Case No.

6 vs.

11-CV-01846-LHK

7
8 SAMSUNG ELECTRONICS CO., LTD.,
a Korean business entity;
9 SAMSUNG ELECTRONICS AMERICA,
INC., a New York corporation;
10 SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC, a Delaware
Limited liability company,

11 Defendants.

12
13
14
15 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
16 PURSUANT TO THE PROTECTIVE ORDER

17
18 VIDEOTAPED DEPOSITION OF CHRISTOPHER D. PREST
19 Redwood Shores, California
20 Thursday, March 8, 2012
21

22
23 REPORTED BY:

24 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR
25 JOB NO. 46063

09:07

1 Foerster for Apple.

2 THE VIDEOGRAPHER: Will the court
3 reporter please swear in the witness.
4

09:07

5 CHRISTOPHER PREST,
6 having first been duly sworn, testified
7 as follows:
8

9 EXAMINATION

10:09

10 BY MR. KIDMAN:

11 Q. Good morning.

12 A. Good morning.

13 Q. Could you state your name for the
14 record, please.

09:07

15 A. My name is Christopher Prest.

16 Q. And what's your home address?

17 A. My home address is 522 Ashbury Street,
18 San Francisco.

19 Q. And by whom are you employed?

09:07

20 A. I'm employed by Apple.

21 Q. And how long have you been employed by
22 Apple?

23 A. I started work -- working for Apple in
24 August 2005.

09:08

25 Q. And what's your current position at

09:08

1 Apple?

2 A. I am a manager within the iPod/iPhone
3 Product Design Team.

4 Q. What was your position when you first
5 started at Apple in August of 2005?

09:08

6 A. Product design engineer.

7 Q. And when you first started at Apple in
8 August of 2005 as a design engineer, were you in
9 the Product Design Group?

10 A. Yes.

09:08

11 Q. Have you held any other positions at
12 Apple other than the two you've told me about?

13 A. No.

14 Q. When did you become a manager in the
15 iPod/iPhone Product Design Team?

09:09

16 A. Approximately one year ago.

17 Q. And when you -- strike that.
18 As a design engineer in the Product
19 Design Group, what were your -- your general
20 duties and responsibilities?

09:09

21 A. Mechanical design of Apple products.

22 Q. And when you say "mechanical design of
23 Apple products," what do you mean by that?

24 A. Design of components within Apple
25 products, and also general architecture and

09:09

1 Q. Do you recall any work that you did in 09:43
2 terms of evaluating and developing materials for
3 manufacturing techniques with respect to
4 iPhone 3G?

5 A. I would have conducted some glass 09:43
6 material investigations, but they may have
7 been -- they may have been tied to N82 as opposed
8 to N88. The glass component was very similar.

9 Q. Anything else that you recall with
10 respect to iPhone 3G? 09:44

11 A. No.

12 Q. And what work did you do in terms of
13 evaluating and developing materials and
14 manufacturing techniques on iPhone 4?

15 A. I was involved in evaluating the glass 09:44
16 material.

17 Q. Anything else?

18 A. And coatings applied to the glass.

19 Q. Anything else?

20 A. Not that I recall. 09:44

21 Q. What evaluation of the cover glass
22 material for iPhone 3D did you perform?

23 MR. DANIS: Did you say 3D?

24 MR. KIDMAN: I'm sorry. Yeah.

25 //

1 STATE OF CALIFORNIA)

2 :ss

3 COUNTY OF SAN MATEO)

4 I, CYNTHIA MANNING, a Certified Shorthand
5 Reporter of the State of California, do hereby
6 certify:

7 That the foregoing proceedings were taken
8 before me at the time and place herein set forth;
9 that any witnesses in the foregoing proceedings,
10 prior to testifying, were placed under oath; that
11 a verbatim record of the proceedings was made by
12 me using machine shorthand which was thereafter
13 transcribed under my direction; further, that the
14 foregoing is an accurate transcription thereof.

15 I further certify that I am neither
16 financially interested in the action, nor a
17 relative or employee of any attorney of any of
18 the parties.

19
20 IN WITNESS WHEREOF, I have subscribed
21 my name this 8th day of March 2012.

22
23
24 CYNTHIA MANNING, CSR No. 7645, CCRR, CLR
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