

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before The Honorable Monica Bhattacharyya
Administrative Law Judge

In the Matter of) Inv. No.
) 337-TA-1331
CERTAIN OUTDOOR AND SEMI-OUTDOOR)
ELECTRONIC DISPLAYS, PRODUCTS)
CONTAINING SAME, AND COMPONENTS)
THEREOF)
)

DEPOSITION OF CHRISTOPHER BOLTON

Thursday, February 23, 2023 8:39 a.m.

Goodwin Proctor LLP

100 Northern Avenue, Boston, MA

Reported by:

Janet McHugh, RMR, CRR, CLR

JOB NO. 14001

DIGITAL EVIDENCE GROUP

1730 M Street, NW, Suite 812

Washington, D.C. 20036

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1 Deposition of CHRISTOPHER BOLTON, held at
2 the offices of Goodwin Proctor LLP, 100
3 Northern Avenue, Boston, Massachusetts, pursuant
4 to Agreement, before Janet McHugh, a Registered
5 Merit Reporter, Certified Realtime Reporter,
6 Certified LiveNote Reporter, and a Notary Public
7 within and for the Commonwealth of Massachusetts.

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1 APPEARANCES:

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21 ALSO PRESENT:

22 Bob Giannini, Videographer

1 enclosure system that used direct air cooling.
2 It was the same principle as the Titan CTA
3 outdoor, but it was repurposed for a direct
4 sunlight readable product, so it had all the
5 extra sun -- loading, solar loading from the sun.

6 Pearl Island was a project where -- as I
7 say, it was a design project. And we looked to
8 use a cross-flow heat exchanger that we had used
9 previously in telecom cabinets. I was looking
10 for something that was more efficient than some
11 of the previous ones, so that had a polycarbonate
12 twin-wall cross-flow heat exchanger.
13 Polycarbonate is very good at transferring heat
14 from one flow to the other. And we worked with
15 MRI on that.

16 The next one, 13, this was another
17 drive-through system. We worked with a company
18 in California called Delphi, and that used full
19 air-conditioning units, similar to what we had
20 done in Las Vegas. They wanted to put these
21 in -- south facing in Phoenix and some really,
22 really hot drive-through environments.

1 Q. Do you use the phrase "Las Vegas
2 project" interchangeably with the "Outdoor
3 Promotions project"?

4 A. I do.

5 Q. Did all of the cooling systems for the
6 Las Vegas project use air-conditioning units?

7 A. They did.

8 Q. Were those closed-loop systems?

9 A. They were.

10 Q. Each of the units built for the Las
11 Vegas project used a closed-loop air-conditioning
12 system?

13 A. They were four identical displays.

14 Q. Did the four identical displays built
15 for the Las Vegas project all make use of
16 closed-loop air-conditioning cooling systems?

17 A. They did.

18 MR. MACHLEIDT: Let's go to Exhibit 5.

19 (Document Bates-stamped

20 BOLTON000195 through -0196 marked Exhibit

21 5.)

22 THE WITNESS: Thank you.

1 correct. But whether he came to the Vertigo
2 booth, I don't know.

3 Q. If Mr. Young had come to the Vertigo
4 booth, he would have been able to see the
5 conceptual images you're referring to?

6 A. He would.

7 Q. There's a reference in that first
8 sentence to a "dedicated 70-inch LCD enclosure
9 system."

10 A. Yes.

11 Q. What do you mean by a "dedicated
12 70-inch LCD enclosure system"?

13 A. So the format that we were developing
14 for Outdoor Promotions was specific to Las Vegas
15 strip. That wedge arrangement is not a standard
16 in any other market.

17 And the reason it was specific to Las Vegas
18 strip is Las Vegas didn't have traffic
19 restrictions of being able to show moving images
20 to vehicles, whereas most cities in the world,
21 you weren't allowed to show moving images to
22 vehicular traffic, you could only show it to

1 pedestrian traffic.

2 So the format, which I call a six-sheet
3 poster box, which was an international format
4 started in Europe -- Vertigo was very much
5 involved in bringing it into the North American
6 culture with the projects that we brought over
7 from Europe -- that format is not a wedge. It's
8 a back-to-back freestanding unit.

9 And as such, it wouldn't work with an air
10 conditioner, because an air conditioner is just a
11 big lump, you know. It works on a wedge, where
12 you've got two screens and you can put the air
13 conditioner on the back, but it doesn't work for
14 the rest of the market.

15 So I was looking for alternatives that would
16 satisfy the general market beyond Outdoor
17 Promotions, the JCDecaux and the ClearChannels
18 and the CBS Outdoors of the world.

19 And that's where I believed MRI could help
20 provide screens for us for that market. That was
21 the -- at that point, there was 7 million poster
22 boxes in the world. That's a rough market