

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)

)

REMOTE VIDEOTAPED DEPOSITION OF SUNG KI KIM

March 31, 2023

10:05 a.m. (Pacific Standard Time)

Reported by: Eileen Mulvenna, CSR/RMR/CRR

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1 was not fixed.

2 MR. WOO: Counsel, excuse me. Are we
3 done with Exhibit 1? Can we take it down?

4 MR. REED: Yes, we can take down
5 Exhibit 1. Thank you, Counsel.

6 BY MR. REED:

7 Q. In addition to you, how many others
8 worked on the design of the cooling systems for
9 Samsung's OH products?

10 A. Is your question asking for all -- all
11 of the individuals, even those who participated
12 briefly?

13 Q. No, I'd like to be more narrow than
14 that. Can you identify the names of anyone else
15 that contributed to the concept for the cooling
16 systems for Samsung's OH products?

17 A. These following individuals are those
18 that had workload in this task that of 30 percent or
19 more, and they are: Jin Hyun Cho, Seul Woo Kim,
20 Sung Soo Lee, Dong Kyu Lee, Jin Seok Kim, and Joon
21 Kang.

22 Q. When did your work on Samsung's

1 outdoor LCD displays begin?

2 A. I think it was around 2005. At that
3 time frame, there was a first -- there was a first
4 outdoor display product that was reviewed.

5 No, not regarding product. There was
6 a research that was conducted for development.

7 Q. Okay. So the record was clear, you
8 began working on outdoor LCD displays in 2005 at a
9 time that research for the outdoor display product
10 was being conducted; is that correct?

11 A. Yes, that's correct.

12 Q. And was there an actual outdoor
13 display product on the market at that time?

14 A. To my recollection, no, there wasn't
15 any.

16 Q. What was Samsung's first outdoor
17 product?

18 A. I don't recall that particular model
19 name or number, but I believe around 2010 through
20 2012, that time frame is when the first outdoor
21 product was launched.

22 Q. Was that an outdoor LCD display

1 product?

2 A. Yes, that's correct.

3 Q. Was that the OHD product or a
4 different product?

5 A. I don't think that was an OHD product.

6 Q. Did that product have the name -- the
7 OH name, or did it have a different name?

8 A. I don't really recall.

9 Q. What type of thermal management system
10 did that first product launched in 2010 to 2012 time
11 frame have?

12 A. Compress cooling system. That was --
13 (English) compression expansion.

14 That was a compression expansion
15 cooling system that was used for the display as well
16 as electronic components.

17 Q. And what do you mean by "compression
18 expansion cooling system"?

19 A. That's a technology where the theory
20 is the same as the general air-conditioning.

21 Q. So it was a refrigeration-type system?

22 A. Yes, that's correct.

1 Q. Did you work on designing the thermal
2 management system for that product?

3 A. At that time, I did not.

4 Q. Who did work on that system or do --
5 (Cross talk.)

6 Q. -- the design for that system?

7 A. If you are asking who designed the
8 mechanical design, then I do not recall. And if
9 you're asking about the concept of the heat
10 dissipation, then they were Jin Hyun Cho, Kim Seul
11 Woo, and Kim Sin Seop.

12 Q. Was the OHD product Samsung's next
13 outdoor product after the one that we've been
14 discussing that was launched in 2010 to 2012?

15 THE INTERPRETER: Mr. Reed, can I have
16 the first portion once more? I didn't quite
17 get that.

18 MR. REED: Of course.

19 Was Samsung's OHD product the next
20 product launched after the one that used the
21 refrigeration system?

22 THE WITNESS: It is true that OHD is

1 the next product. However, from 2013 to
2 2015, I did not work for the VD business
3 division, and I was dispatched to a medical
4 machine -- medical equipment business
5 division, and while I was gone, it was Jin
6 Hyun Cho who took over the OHD products in my
7 absence.

8 BY MR. REED:

9 Q. Was design work on the OHD product
10 already in progress before 2013 when you changed
11 divisions?

12 A. I don't think so. That's not what I
13 recall.

14 Q. When was the OHD product introduced to
15 the market?

16 A. I don't know the exact date, but my
17 understanding is that it was prior to 2016.

18 Q. It was prior to the date that you
19 rejoined the VD division, visual display division?

20 A. Yes, that's correct.

21 Q. Okay. So you did not work on
22 designing the concept for the cooling system for the

1 OHD product; is that right?

2 A. There were OH products in the market
3 in 2016. Because at the time I worked on any
4 [REDACTED] that may have -- that may have arisen on the
5 products that were already in the market, and I
6 worked on resolving these issues.

7 Q. Other than that work that you just
8 mentioned, did you have any involvement in designing
9 the concept for the cooling system for the OHD
10 product?

11 MR. WOO: Object to the form.

12 Madam interpreter, if you could just
13 pause just briefly so that we have a chance
14 to consider the question and an objection.

15 THE INTERPRETER: Yes, I'll pause a
16 little bit.

17 (Interpreter translates.)

18 THE WITNESS: Are you asking prior to
19 2016 have I?

20 BY MR. REED:

21 Q. That's correct.

22 A. No, not to my recollection.

1 Q. You mentioned [REDACTED] for the OHD
2 product. Can you explain what happened to that
3 product?

4 A. Yes, I will do so.

5 [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] That was the problem.

10 Q. So did that problem require a [REDACTED]
11 of the thermal management system for the OH
12 products?

13 A. No, [REDACTED] was not done. What was
14 done was that the [REDACTED]
[REDACTED].

16 Q. And this [REDACTED]
17 was required because of the [REDACTED] that had been
18 experienced for the OHD product; is that right?

19 MR. WOO: Object to the form.

20 THE WITNESS: How do I answer this
21 when attorney says that?

22

1 BY MR. REED:

2 Q. Please answer my questions unless
3 you're instructed not to by your attorney. He may
4 object from time to time, but unless he instructs
5 you not to answer, then you may answer.

6 (Interpreter translates.)

7 MS. OLESEK: And you may leave out of
8 your answer a communication with an attorney.

9 (Interpreter translates.)

10 THE WITNESS: That [REDACTED]
[REDACTED] due to [REDACTED] happening in the
12 market.

13 BY MR. REED:

14 Q. And were there additional changes made
15 to the -- well, strike that.

16 What was -- what product was the OHD
17 product replaced by?

18 A. As far as that particular product is
19 concerned, it was OHD and continued to be OHD. It's
20 just that in the midst of that, [REDACTED]
[REDACTED]. And my understanding of the product that
22 follow OHD was the OHF.

1 Q. When was that OHF product introduced
2 to the market?

3 A. Maybe 2017. I don't know that
4 exactly.

5 Q. And what was different about the
6 cooling system for the OHF product versus the
7 earlier OHD product?

8 A. In the beginning for 46-inch OHD
9 product, the [REDACTED] was used, and
10 that was what was used for [REDACTED] and
11 there --

12

13 CHECK INTERPRETER: [REDACTED].

14 THE WITNESS: (English) [REDACTED]

15 [REDACTED].

16 THE INTERPRETER: Spreading. Okay.

17 Heat -- let me correct that.

18 THE WITNESS: In the beginning for

19 46-inch OHD product, the [REDACTED]

20 [REDACTED] was used for [REDACTED]

21 system, and then thereafter [REDACTED] was

22 used for the purpose of [REDACTED].

1 sell our products to, I had heard that there was
2 another company that sells similar product as ours.

3 Q. And [REDACTED] was that competitor that sells
4 similar products to Samsung?

5 A. To my recollection, [REDACTED] was one of the
6 competitors along with other companies.

7 Q. Have you -- were you ever involved in
8 disassembly of an [REDACTED] product?

9 A. I was not personally involved when
10 that was being disassembled, but I have seen
11 disassembled product.

12 (Check interpreter translates.)

13 THE INTERPRETER: Strike that.

14 THE WITNESS: I was not personally
15 involved when that was being disassembled,
16 but I receive disassembled related report.

17 BY MR. REED:

18 Q. Have you ever read any [REDACTED] patents?

19 A. Personally, on my own or via that
20 report that I told you about?

21 (Check interpreter translates.)

22 THE WITNESS: From where?