

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Monica Bhattacharyya
Administrative Law Judge

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

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VIDEOTAPED DEPOSITION OF SUNGSU LEE
SEOUL, SOUTH KOREA
MONDAY, MARCH 20, 2023
9:13 A.M.

Reported by: Leslie A. Todd, CSR No. 5129 and RPR

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1 correct statement.

2 A I think that is a correct statement
3 since it is being mentioned on this document as
4 well as on other documents we saw today.

5 MR. REED: Okay. Let's take a
6 five-minute break.

7 THE VIDEOGRAPHER: We are going off
8 the record. The time is 7:14 p.m.

9 (Recess.)

10 (S. Lee Exhibit No. 13 was marked
11 for identification.)

12 THE VIDEOGRAPHER: We're back on the
13 record. The time is 7:21 p.m.

14 BY MR. REED:

15 Q All right, Mr. Lee, I've handed you a
16 document marked as Exhibit 13, which has the
17 number SEITC0035224.

18 Do you recognize this document?

19 A Yes, I know about this document.

20 Q Did you review this document in
21 preparation for your deposition today?

22 A Yes, I did review this document.

1 Q Is this document showing an analysis
2 of an 86-inch outdoor [REDACTED] product?

3 A On the title it says "Review of X
4 Company Outdoor 86-Inch."

5 Q Okay. Could you turn to the last
6 page of the document, please. It has number
7 SEITC0035257.

8 A Okay.

9 Q Do you see the photo of the label on
10 that page?

11 A Yes, I see.

12 Q And can you tell from that label that
13 that is an [REDACTED] 86-inch outdoor display?

14 A Yes, it says [REDACTED] on it.

15 (S. Lee Exhibit No. 14 was marked
16 for identification.)

17 BY MR. REED:

18 Q Okay. I'm handing you a document
19 marked Exhibit 14. It has the number
20 SEITC0035259.

21 Mr. Lee, do you recognize this
22 document as showing photos of disassembly of

1 [REDACTED] 86-inch product?

2 A I don't think this is 86-inch
3 product. It looks smaller.

4 Q Okay. What do you understand this
5 series of photos as showing?

6 A I don't know the specific model name.

7 Q Do you have an understanding as to
8 the size of the [REDACTED] product that is shown in
9 these photographs?

10 A It looks as though it is a midsize.
11 However, I don't know the exact inch.

12 Q If you turn to page 35261 -- I'm
13 sorry -- page 35262.

14 Do you see the photographs on that
15 page?

16 A Yes, I see that.

17 Q Can you identify the individuals in
18 that photograph?

19 A Oh, as to the person to the right
20 behind a person who is wearing glasses, look like
21 Dong-Kyu Lee, a pro, but as to the person to his
22 left who is situated in the front, I don't know

1 who that is.

2 Q So the individual wearing glasses is
3 Dong-Kyu Lee?

4 A Yes, that's correct.

5 Q And you do not know the person in the
6 foreground.

7 A I'm sure that he does not work in the
8 thermal analysis group that I belong to, but he
9 could be in another part. But I don't know who
10 it is or where he works.

11 Let me correct that as thermal
12 analysis part that I work.

13 Q Can you turn to the next page,
14 please. Page 35263.

15 Please identify the individuals in
16 that photo on the left.

17 A The person who is wearing the
18 employee tag around his neck, which is left side
19 of the photo, I think his name is Nam-ki Lee,
20 pro, who belongs to the Mecha Group -- who used
21 to work for Mecha Group, although I'm not
22 absolutely sure.

1 LEAD INTERPRETER: Interpreter

2 spelling: N-A-M, K-I, L-E-E.

3 BY MR. REED:

4 Q And who's the individual on the left
5 in that photo?

6 A That I don't know.

7 Q Were you present during this analysis
8 shown in Exhibit 14?

9 A My recollection is that I was also
10 there.

11 Q If you turn back to page 25262, whose
12 hands are those shown in that photo?

13 A Are you talking about the person
14 located to the most left of the photo?

15 Q Yes, that's correct.

16 A I don't know.

17 As I saw the other photo with the
18 person wearing the employee tag, based on that,
19 I'm thinking the person who is the most forefront
20 on this photo is Nam-ki Lee, I'm thinking.

21 Q Other than Nam-ki Lee and Dong-Kyu
22 Lee, who else was present during this analysis?

1 A Although I do not recall specifically
2 who were the attendants -- attendees were at this
3 occasion. However, [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10 Q And you expect that it was -- that
11 was done for this analysis?

12 A Typically, [REDACTED]

[REDACTED]

[REDACTED] So I'm thinking that was the
15 same for this occasion as well.

16 Q When did this analysis occur?

17 A As to the exact time frame, I do not
18 recall.

19 Q Could you provide me with an
20 estimate?

21 A Since the Exhibit 13 stated that was
22 March 2016, so I'm thinking this was done around

1 the same or similar time frame.

2 Q And is this a Samsung facility shown
3 in these photographs? In Exhibit 13 -- 14. I'm
4 sorry.

5 A Yes, this is the [REDACTED] of
6 Samsung Electronics.

7 Q So the photos in Exhibit 14 were
8 taken at the [REDACTED] of Samsung Electronics?

9 A Yes, that's correct.

10 Q And that's here in [REDACTED]?

11 A That's correct.

12 Q If you turn back to Exhibit 13, was
13 this analysis also performed at the [REDACTED]
14 of Samsung Electronics?

15 A Yes, typically [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

19 Q Do you work in Suwon?

20 A Yes, I work at Suwon campus.

21 Q And that's the campus where [REDACTED] or
22 Samsung's product development for its outdoor

1 displays occurs?

2 A Development is done at [REDACTED].

3 Q How did Samsung acquire the 86-inch
4 [REDACTED] product in Exhibit 13?

5 A As to that, I don't really know.

6 Q And how did Samsung acquire the
7 midsize [REDACTED] product in Exhibit 14?

8 A I don't know that either.

9 Q During the deposition today, did you
10 have any conversations with your attorney during
11 any of the breaks?

12 A Yes, I had conversations.

13 Q And what did you discuss with your
14 attorney during the deposition?

15 A One thing I remember is that in the
16 beginning portion of the deposition, I was asked
17 a question regarding whether or not I had
18 discussions with engineers around me in regards
19 to this case, and I answered that I did not.

20 And my attorney reminded me that --
21 the discussion I had with Sang-in Lee and Jongpil
22 Seo in regards to drawings. The question I posed