

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 WUNKIL LEE
SEOUL, SOUTH KOREA
TUESDAY, MARCH 21, 2023
9:26 A.M.

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

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1 that that portion had a temperature increase
2 creating sheet --

3 CHECK INTERPRETER: Warping. Sheet
4 warping.

5 LEAD INTERPRETER: Oh.

6 THE WITNESS: -- sheet warping.

7 (Exhibit No. 8 was marked for
8 identification.)

9 BY MR. MACHLEIDT:

10 Q Please look through Exhibit 8. Let
11 me know when you're finished.

12 A (Peruses document.)

13 Q While you do that, Exhibit 8 has the
14 Bates SEITC0035259. All of these are always just
15 the beginning Bates numbers.

16 A Yes, I looked through it.

17 Q Have you seen Exhibit 8 before today?

18 A I don't think it was the exactly same
19 document, but I've seen it before.

20 Q What is shown in Exhibit 8?

21 MS. BIRBACH: Objection. Scope.

22 THE WITNESS: It's a product.

1 BY MR. MACHLEIDT:

2 Q What product is shown in Exhibit 8?

3 MS. BIRBACH: Objection. Scope.

4 THE WITNESS: It's a display product.

5 BY MR. MACHLEIDT:

6 Q Whose company -- strike that.

7 Do you know what company makes the
8 display product shown in Exhibit 8?

9 MS. BIRBACH: Objection. Scope.

10 THE WITNESS: I'm not exactly sure,
11 but it may have been [REDACTED]

12 BY MR. MACHLEIDT:

13 Q When did you see Exhibit 8 in the
14 past or a document that is similar to Exhibit 8?

15 MS. BIRBACH: Objection. Scope.

16 THE WITNESS: I think it was quite a
17 while back.

18 BY MR. MACHLEIDT:

19 Q To the best of your recollection,
20 when you say "quite a while back," what do you
21 mean?

22 MS. BIRBACH: Same objection.

1 THE WITNESS: Although I'm not exactly
2 sure, maybe seven years.

3 BY MR. MACHLEIDT:

4 Q Why maybe seven years ago did you see
5 photos similar to what are shown in Exhibit 8?

6 MS. BIRBACH: Objection. Scope.

7 THE WITNESS: I think I've seen that
8 as part of document relating to our products
9 competitiveness.

10 BY MR. MACHLEIDT:

11 Q You saw photos similar to what are
12 shown in Exhibit 8 as part of your review maybe
13 seven years ago of a document relating to
14 Samsung's competitiveness. Is that fair to say?

15 MS. BIRBACH: Objection. Scope and
16 mischaracterizes testimony.

17 THE WITNESS: Is your question asking
18 me whether or not I did this analysis?

19 BY MR. MACHLEIDT:

20 Q Is it correct that you recall seeing
21 photos similar to what are shown in Exhibit 8 as
22 part of a review relating to Samsung's

1 competitiveness?

2 MS. BIRBACH: Objection. Scope.

3 THE WITNESS: No.

4 BY MR. MACHLEIDT:

5 Q What was the context of your review
6 of photos similar to what we see in Exhibit 8
7 seven or so years ago?

8 MS. BIRBACH: Objection to scope.

9 THE WITNESS: Well, this product here
10 is very similar to the one I would see on the
11 street that I frequently pass, and structure of
12 this product is very similar to that product.

13 (Interpreters conferring.)

14 CHECK INTERPRETER: So it might be
15 slightly different.

16 So this product is very similar to the
17 structure of the product that I saw back then in
18 the path that I used frequently.

19 MR. MACHLEIDT: I don't want to
20 interrupt. Let me know when you're done.

21 CHECK INTERPRETER: I'm done. Oh,
22 sorry.

1 BY MR. MACHLEIDT:

2 Q Seven or so years ago, do you recall
3 seeing photos of a product similar to what is in
4 Exhibit 8?

5 MS. BIRBACH: Objection. Scope.

6 THE WITNESS: Yes, I think I did.

7 BY MR. MACHLEIDT:

8 Q Were you involved in any analysis of
9 the product that we see shown in Exhibit 8?

10 MS. BIRBACH: Objection. Scope.

11 THE WITNESS: No.

12 BY MR. MACHLEIDT:

13 Q To the best of your knowledge, the
14 product that is reflected in Exhibit 8, does
15 Samsung consider it to be a competitive product
16 with the Samsung outdoor displays?

17 (Interpreters conferring.)

18 MS. BIRBACH: Can I object now? Are
19 you done?

20 CHECK INTERPRETER: Mm-hmm.

21 MS. BIRBACH: Objection to form and
22 scope.