IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF TEXAS

WACO DIVISION

JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD., AND OBERT, INC., PLAINTIFFS,	)( )( )(	CIVIL ACTION NO. 6:20-CV-18-ADA
VS.	)(	
CH LIGHTING TECHNOLOGY CO., LTD., ELLIOTT ELECTRIC SUPPLY, INC., AND SHAOXING RUISING LIGHTING CO., LTD., DEFENDANTS.	)( )( )(	NOVEMBER 1, 2021 8:28 A.M.

JURY TRIAL TRANSCRIPT

BEFORE THE HONORABLE ALAN D ALBRIGHT

UNITED STATES DISTRICT JUDGE

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(Proceedings recorded by mechanical stenography, transcript produced on a CAT system.)

next --

THE COURT: I mean, after we're done, I'm going to give them my life story, but --

MR. DAY: It would have been short, Your Honor.

(Laughter.)

THE COURT: I just wanted them to know your name.

MR. DAY: So what we're going to do next is read a response to written questions called interrogatories from the Defendants into the record.

So --

THE COURT: Let me go ahead and explain that.

Ladies and gentlemen, during the course of litigation, the lawyers -- the rules permit the lawyers to send questions to the other side. And those questions, when they are returned, are also under oath. They're not oral like what a deposition is or what you've seen, but the answers to the questions are -- are -- there's a person who's taken an oath on behalf of, in this case, the company, and so you should -- again, it's entirely up to you to decide what amount of credibility to give them.

But in terms of dignity, these answers have been given under oath, and you can consider them in that manner.

MR. DAY: So the question we're reading into the record is Interrogatory No. 13, which reads: On a product-by-product basis, identify, A, by model number and

manufacturer, the power protection integrated circuit in each of these accused products and substantially similar products, and, B, the technical documents relating to power protection integrated circuit in A.

And then I'm going to go to the response by CH Lighting and Ruising, which reads: The following table shows all leakage current integrated circuits that have been integrated -- incorporated into each of CH's accused product series.

And just to make sure I have that correct, the word was "incorporated," not "integrated."

The columns in the table read: DIO8270, DIO8276, and LT2600.

In the first row, CH1152S, all three columns are checked.

In the row reading CH1152AS, the columns for DIO8276 and LT2600 are checked.

The row marked CH1180AX reads: No leakage current IC.

The row marked CCH1157S, the columns marked DIO8270 and LT2600 are checked.

For the row CH1152, it reads: No leakage current IC other than for one specific product in the series, CH1152-42W-FA8-24M, which uses LT2600.

For the remaining rows in the chart, CH1156,

CH1155C, CH1155, CH1198, CH1118, and CH1128 all read: No leakage current IC.

The interrogatory response continues: DIO8270 and DIO8276 are provided by DIOO.

LT2600 is provided by Lumixess.

Additionally, the LED tube products that CH has manufactured for GE in China uses LT2600G provided by Lumixess.

And, Your Honor, there's a list of technical documents following that. Will you require us to read that into the record, as well?

THE COURT: I would not.

MR. DAY: Okay. Thank you, Your Honor.

And with that, Plaintiffs call Dr. Brian D'Andrade.

(Witness sworn.)

DR. BRIAN D'ANDRADE, PLAINTIFFS' WITNESS, SWORN

DIRECT EXAMINATION

BY MR. DAY:

Q. Good afternoon, Dr. D'Andrade.

A. Good afternoon.

Q. Can you please introduce yourself to the jury?

A. Hi. I'm Brian D'Andrade. I'm from Bowie, Maryland. I'm a consultant, and I work for a firm called Exponent Incorporated.

CERTIFICATION

I HEREBY CERTIFY that the foregoing is a true and correct transcript from the stenographic notes of the proceedings in the above-entitled matter to the best of my ability.

/S/ Shelly Holmes
SHELLY HOLMES, CSR, TCRR
CERTIFIED SHORTHAND REPORTER
State of Texas No.: 7804
Expiration Date: 10/31/2023

11/1/2021
Date