

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

COLT INTERNATIONAL CLOTHING INC.	)	
DBA COLT LED,	)	CASE NO.
	)	2:16-CV-03040 AB (JEMX)
PLAINTIFF,	)	
	)	
VS.	)	
	)	
	)	
QUASAR SCIENCE, LLC, ET AL.,	)	
DEFENDANTS.	)	
_____	)	

VIDEOTAPED DEPOSITION OF ZHANG YA JUN

TAKEN ON

FRIDAY, OCTOBER 12, 2018

Sandra Mitchell
C.S.R. 12553
Job No. 4118

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DEFENDANTS.	)	
_____	)	

VIDEOTAPED DEPOSITION OF ZHANG YA JUN, taken on
behalf of the Defendant, at 12100 Wilshire Boulevard,
Suite 1700, Los Angeles, California, commencing at
9:07 a.m., Friday, October 12, 2018, before Sandra Mitchell,
C.S.R. 12553, pursuant to Notice.

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15
16
17 Also Present:

18 MICHELLE TAN, MANDARIN INTERPRETER

19 MICHELLE BARTFAY, VIDEOGRAPHER

20 BRADLEY BRUNON

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I-N-D-E-X

WITNESS

ZHANG YA JUN

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(NONE)

1	LOS ANGELES, CALIFORNIA, FRIDAY, OCTOBER 12, 2018	00:00:02
2	AT 9:07 A.M.	
3		
4	THE VIDEOGRAPHER: Good morning. We're now on	
5	the record. My name is Michelle Bartfay. I am a	09:07:10
6	certified legal video specialist for Sommerhauser	
7	Reporting Services. Today is October 12, 2018. Current	
8	time is 9:07 a.m. This video deposition is being taken	
9	at 12100 Wilshire Boulevard, Los Angeles, California.	
10	The name of the case is called International Clothing	09:07:33
11	Inc. versus Quasar Science, LLC, et al., and counter	
12	claims in the United States District Court, Central	
13	District of California, Case No. 2:16-CV-03040 AB	
14	(JEMX). The name of the deponent is Zhang Ya Jun.	
15	Will the attorneys please introduce yourselves	09:07:59
16	and say whom you represent.	
17	MR. CUNNINGHAM: My name is Kelly Cunningham.	
18	I represent Colt LED, the plaintiff in this case.	
19	MR. BARANOV: I'm Michael Baranov of	
20	Baranov & Wittenberg, and I represent Quasar Science and	09:08:08
21	Cinelease.	
22	MR. GROSS: Clark Gross representing Quasar.	
23	THE VIDEOGRAPHER: The court reporter today is	
24	Sandra Mitchell, and she will now swear in the	
25	interpreter.	09:08:22

1	(MICHELLE TAN sworn to interpret from	09:08:24
2	English into Mandarin and from	
3	Mandarin into English to the best of	
4	her ability.)	
5		09:08:46
6	ZHANG YA JUN,	
7	having been duly sworn,	
8	was examined and testified as follows:	
9		
10	EXAMINATION	09:08:46
11	BY MR. CUNNINGHAM:	
12	Q Good morning, Mr. Jun.	
13	A Good morning.	
14	Q Would you please spell your name for the court	
15	reporter.	09:09:01
16	A (In English) Y-A J-U-N, my first name. My	
17	last name is Z-H-A-N-G.	
18	(Through Interpreter) My first name is	
19	Y-A-J-U-N. My last name is Z-H-A-N-G.	
20	Q Also, let me just establish for the record that	09:09:24
21	you do speak English and you speak Mandarin Chinese; is	
22	that correct?	
23	A Mandarin Chinese.	
24	Q Yes. And just get right into the questions.	
25	Have you been deposed before in the	09:09:53

1	United States?	09:09:55
2	A The deposition like this one?	
3	Q Yes.	
4	A No.	
5	Q Well, in the United States a deposition like	09:10:08
6	this is an important part of a piece of litigation. It	
7	is as important as if we're in court, and the statements	
8	you make today are under oath.	
9	Do you understand that?	
10	A I understand. However, I have one question.	09:10:45
11	Q Of course.	
12	A So you are the attorney for Colt. So I don't	
13	know whom the other two attorneys are.	
14	Q I'll let you know. These two attorneys are for	
15	the other parties in the case; that's Quasar Science and	09:11:18
16	Cinelease, Inc.	
17	Because I'm asking you questions in the	
18	deposition, they are entitled to ask you follow-up	
19	questions after I'm done asking my questions.	
20	A Okay.	09:11:51
21	Q Also in the deposition, the court reporter will	
22	take down each of your answers, and as a result I ask	
23	that you answer clearly. If I'm asking a yes or no	
24	question, please answer yes or no, and don't just answer	
25	with a gesture or a nod of the head.	09:12:09

1	A	Yes.	09:12:30
2	Q	Are you under any medication today?	
3	A	No.	
4	Q	All right. What is your title at the company	
5		you work at?	09:12:48
6	A	I'm the founder and the investor.	
7	Q	And the company's name is?	
8	A	I have two companies. One is Dongguan City	
9		Liyang Lighting.	
10	THE INTERPRETER:	Interpreter will interpret	09:13:39
11		the name literally because the witness just said that he	
12		has not translated the company's name into English. So	
13		interpreter shall give interpretation as -- as Dongguan	
14		City -- the spelling is D-O-N-G-G-U-A-N, City Liyang,	
15		L-I-Y-I-N-G, Lighting Company.	09:14:05
16	Q	Very good. And that is one company. What is	
17		the name of the other company?	
18	A	Another name is Dongguan City, Laysion, the	
19		spelling is L-A-Y-S-I-O-N, Lighting Company.	
20	THE INTERPRETER:	Witness just request	09:15:07
21		interpreter to read out the entire Chinese name. The	
22		chinese name is D-O-N-G-G-U-A-N-G S-H-I, Leixingxing,	
23		L-E-I-X-I-N-G-X-I-N-G, Lighting. Interpreter clarify	
24		the answer with the -- next word is Z-H-A-O-M-I-N-G.	
25		Next word is G-O-N-G-S-I.	09:15:51

1 MR. BARANOV: Kelly, if I could interject for 09:15:59
2 one second to make this a more accurate proceeding.
3 Because we are dealing with Mandarin Chinese, an
4 alphabet which is somewhat different from our Latin
5 characters, may I suggest is that we request the witness 09:16:12
6 to write the names off, each of the companies, as well
7 as his legal name as he's using it in the People's
8 Republic of China, and as the companies are registered
9 there. And then we can mark the Chinese spellings as
10 Exhibits A, B and C, if that's okay. 09:16:34

11 MR. CUNNINGHAM: Can we do that later with the
12 correction of the deposition transcript or do you want
13 him to do that in the deposition here?

14 MR. BARANOV: I will do it during the
15 deposition so we know what he is referring to and we 09:16:46
16 have an accurate record of his testimony.

17 (Whereupon, Bradley Brunon entered the room.)

18 MR. CUNNINGHAM: First, for the record, let me
19 point out that time Bradley Brunon entered the room.
20 Bradley Brunon is here on behalf of Colt LED as well. 09:17:00

21 BY MR. CUNNINGHAM:

22 Q All right. It has been requested that you
23 write down your name and your company's in your Mandarin
24 characters, and we'll include it as one the exhibits of
25 the deposition. 09:17:25

1	MR. CUNNINGHAM: We can make that Exhibit 1.	09:17:50
2	THE WITNESS: I'm trying to look for the full	
3	name of the company.	
4	MR. BARANOV: Thank you.	
5	BY MR. CUNNINGHAM:	09:21:14
6	Q Thank you, Mr. Zhang. Let me just ask, the	
7	first line is the name of?	
8	A (In English) Liying.	
9	Q Very good. And the second line is the name of?	
10	A (In English) Lejing.	09:21:19
11	Q And it was also requested that you also write	
12	out your actual name, your own personal name, as the	
13	third line.	
14	THE WITNESS: In Chinese or?	
15	BY MR. CUNNINGHAM:	09:21:42
16	Q Yeah, in Mandarin. Thank you.	
17	Thank you.	
18	MR. CUNNINGHAM: Can I have this marked as	
19	Exhibit 1.	
20	(Exhibit 1 was marked for	09:22:07
21	identification by the Court Reporter	
22	and is attached hereto.)	
23	BY MR. CUNNINGHAM:	
24	Q All right. Can you tell me where you went to	
25	college? University?	09:22:12

1	A (In English) University of Iowa. And	09:22:14
2	Michigan, and I transferred to University of Iowa.	

3 Q Very good. So you spent -- you graduated from
4 the University of Iowa?

5	A (In English) No.	09:22:28
---	--------------------	----------

6 Q How many years did you spend at the University
7 of Iowa?

8 | A (In English) In Iowa City, you mean?

9	Q	Yes.
---	---	------

10	A (In English) One and a half years.	09:22:37
----	--------------------------------------	----------

11 Q And what did you study?

12 | A (In English) Business.

13 Q And --

14 | A (In English) And E.S.L.

15	Q And did you get any college degree here in the	09:22:46
16	United States?	

17	A	(In English)	No.
----	---	--------------	-----

18 Q Have you gotten any college degree in China?

19	A	(In English)	Not now.
----	---	--------------	----------

20	Q And in China, what is the -- what do your two	09:22:57
21	businesses do?	

22	A	(In English)	Lighting.
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23 THE VIDEOGRAPHER: Can you just bring your
24 microphone up because your string is rubbing on it, so
25 just higher.

1	THE WITNESS: (In English) Sorry.	09:23:23
2	THE VIDEOGRAPHER: That's okay. Thank you.	
3	BY MR. CUNNINGHAM:	
4	Q Lighting manufacturing?	
5	A (In English) Uh-huh.	09:23:29
6	Q Have you ever met a -- have you ever spoken to	
7	a person named Andy Lau?	
8	A (In English) Yes.	
9	Q When do you believe was the first time you	
10	spoke to a person named Andy Lau?	09:23:41
11	A (In English) 2013, probably. 2013 or 2012. I	
12	can't remember exactly date. Maybe 2013.	
13	Q Okay.	
14	A (In English) 2013.	
15	Q And what did he talk about?	09:24:01
16	A (In English) Make lighting and American	
17	marketing. Lighting. For lighting.	
18	Q And did he ask you to do anything at that time?	
19	A (In English) Just make LED lamp and bubble,	
20	like that.	09:24:22
21	Q Okay. The tubing around the LED lamp? What do	
22	you mean by "bubble"?	
23	A Yeah. Both the tubical style of lighting and	
24	the bubble type.	
25	Q Like a bulb?	09:24:48

1	A	Small bulb.	09:24:52
2	Q	Yes. Did he bring any products with him for	
3		you to use as a example?	
4	A	Initially he did not do so. He was only	
5		looking at the products we had in our factory and asking	09:25:22
6		us to produce products.	
7	Q	Okay. And did he ever come to you with a	
8		product and ask you to produce a product like that?	
9	A	Not at the time.	
10	Q	Okay. So when did you -- so you produced	09:25:50
11		product for Mr. Lau for a while?	
12	A	(In English) You mean Andy?	
13	Q	Yes.	
14	A	(In English) Andy? Yes.	
15	Q	And I understand that at some point he did	09:26:14
16		bring a product to you and ask you to copy the product?	
17	A	The situation was like this: Initially we were	
18		producing some general type of products. Later he must	
19		had gotten to know some of the lighting professionals in	
20		Hollywood. He then said that producing lighting for a	09:27:04
21		movie shooting will generate a huge profit. And then he	
22		asked us to produce the high-resolution type of	
23		lighting.	
24	Q	Very good. And he -- did he ever bring any	
25		products to you to -- to take apart and copy?	09:27:46

1 A In the beginning he only instructed us with 09:28:10
2 some simple target. And then we created the product
3 according to his instruction, but he was not satisfied
4 with that. And following that he sent us some drawings.
5 Q And do you recall what was in the drawings? 09:28:42
6 THE INTERPRETER: Interpreter need to clarify.
7 Interpreter need to make correction of
8 interpretation. Earlier when witness said that
9 Mr. Lau -- What Mr. Lau sent was not drawing, they were
10 pictures. 09:29:06
11 BY MR. CUNNINGHAM:
12 Q Photos? Photographs?
13 A Correct.
14 Q All right. And of the pictures, do you recall
15 what the pictures included? 09:29:17
16 A A tube. A lighting tube.
17 Q Did you produce any drawings to us or photos to
18 us -- did you produce those photos to us when we asked?
19 A I think so.
20 Q Okay. Yeah, I don't recall seeing any early 09:29:53
21 photos.
22 All right. So at some point, then, you have --
23 you got a sample from them, from Mr. Andy Lau?
24 A Yes.
25 Q And you had your employees take it apart and 09:30:22

1 look at it and copy it? 09:30:27

2 A We took apart a section of it, the first
3 section of it.

4 Q Okay. Can you describe what parts were in it
5 when -- the section you took apart? 09:31:01

6 A There is a switch that you turn on/off.

7 Q On/off?

8 A Not on/off. Switch for color switching.

9 Q Color of the lights?

10 A Correct. 09:31:34

11 Q The lights were LED, by the way?

12 MR. GROSS: Mr. Cunningham, after your
13 question.

14 THE WITNESS: Yes.

15 MR. GROSS: I was just going to suggest that we 09:31:46
16 remind the witness that all testimony has to be of his
17 personal knowledge, and not to turn to other people in
18 the room for help with the questions.

19 THE WITNESS: (In English) Oh, okay.

20 BY MR. CUNNINGHAM: 09:32:13

21 Q When you turn to Alex, it's hard to determine
22 whether -- what you're getting from Alex, so we're
23 trying to get your personal knowledge.

24 A Yes, I was only asking for the name because I
25 have forgotten the name of that part. 09:32:37

1	Q	Understood.	09:32:42
2		Let me hand you some photos that you did give	
3		me. This is Exhibit 2.	
4		(Exhibit 2 was marked for	
5		identification by the Court Reporter	09:33:24
6		and is attached hereto.)	
7		THE WITNESS: This must be -- picture must be	
8		provided through a memo. I did not provide that.	
9		BY MR. CUNNINGHAM:	
10	Q	Very good. Do you recognize what it is?	09:33:42
11	A	Yes.	
12	Q	And what do you -- what is shown in this	
13		picture?	
14	A	Tubes.	
15	Q	Okay. Tubes for what company?	09:34:01
16	A	Quasar Science.	
17	Q	And you manufacture tubes for Quasar Science?	
18	A	(In English) Uh-huh.	
19	Q	Do you do so now?	
20	A	(In English) No.	09:34:13
21	Q	Have you done so in the past?	
22	A	(In English) Yes.	
23	Q	What range of time did you make lighting tubes	
24		for Quasar Science?	
25	A	(In English) 2013 to 2017.	09:34:28

1	MR. CUNNINGHAM: Okay.	09:34:59
2	THE REPORTER: Excuse me, Counsel, can I	
3	request that she interprets everything that he says,	
4	only because it's going to get really messy in the	
5	transcript. Every time he answers in English, then I	09:34:59
6	have to designate that he spoke in English at that time,	
7	and then it's going back and forth too much. Can we	
8	keep it all by interpretation?	
9	THE INTERPRETER: Or I can interpret everything	
10	he says, so --	09:34:59
11	MR. CUNNINGHAM: There is some trouble and that	
12	he speak English to a great degree.	
13	THE REPORTER: Right.	
14	MR. CUNNINGHAM: It's just that the interpreter	
15	is here for those instances in which he needs to have	09:34:59
16	that assistance.	
17	THE REPORTER: I understand that, I just want	
18	to let you know that I have to insert other things into	
19	the transcript to designate whether she is interpreting	
20	or not interpreting.	09:34:59
21	MR. CUNNINGHAM: That would be more often than	
22	not, so maybe we should go that way. I'll try and	
23	instruct her to interpret everything.	
24	MR. GROSS: May I have that last question and	
25	answer read back, please.	09:34:59

1	(Whereupon, the record was read back	09:35:49
2	by the Court Reporter as follows:	
3	"Q Have you done so in the past?	
4	"A (In English) Yes."	
5	BY MR. CUNNINGHAM:	09:35:50
6	Q And are these accurate copies of the tube that	
7	you were given and that you opened up partially?	
8	A No. What is shown in this picture, these --	
9	the lighting tube shown in this picture shows a variable	
10	type of lighting. The first one is the tube of the	09:36:39
11	first generation, second one is the second generation,	
12	the third one is the third generation.	
13	Q Very good. So the first one -- is the first	
14	one a accurate copy of what you looked at and took apart	
15	after Andy Lau had given to you?	09:37:05
16	A Not quite the same. Actually, this is not	
17	really the first batch of tubes. This is only the	
18	sample that was left after the first batch of tubes had	
19	been produced. Because in the beginning, we were	
20	producing T8, and this one is T12.	09:37:57
21	Q And the difference between a T8 and a T12 is	
22	what?	
23	A The size.	
24	Q Size of the length? Or size of the diameter --	
25	A Both. Lens-wise the lens of the light emission	09:38:20

1 part is the same. The input is not the same. The size 09:38:33
2 of the input is not the same.

3 Q Did the copies you make from the Andy Lau
4 sample have a plurality of LED lights inside?

5 A I do not really understand what you mean. 09:39:13

6 Q They were LED lights; is that correct?

7 A Yes.

8 Q And, by the way, was there any marking on there
9 as to what company the light had come from, the one that
10 Andy Lau had given you? 09:39:30

11 A No. No, there was only input.

12 Q Okay. What was the input?

13 A The power source.

14 Q The power source. And the connector?

15 A Initially there was no connector. 09:40:01

16 Q Power source. What was their name on the power
17 source?

18 A Just input.

19 Q Oh, I see. The name -- the word "input" was on
20 there? 09:40:19

21 A (In English) Correct.

22 (Through Interpreter) Yes.

23 MR. GROSS: Again, I was going to suggest that
24 nodding the head, even though court reporters are
25 possessed of sheer genius, they can't write down nodding 09:40:33

1 of the head. 09:40:34

2 BY MR. CUNNINGHAM:

3 Q Yes. And to the extent possible, remember to

4 answer in Mandarin. That will assist the court reporter

5 a little bit. 09:40:43

6 A Understand.

7 Q All right. So you produced lights for Quasar

8 Science from 2013 to 2015; is that correct?

9 A (In English) '17.

10 Q 2017. Thank you. 09:41:02

11 At the insistence of Andy Lau; is that correct?

12 A Yes. Initially, since the request for quantity

13 was not there, and so we weren't really making money to

14 do this. Additionally, the cost for R&D was very high,

15 so in the beginning we were telling him that we were not 09:42:11

16 willing to do it.

17 Q Okay. Ultimately you did do it?

18 A Correct. We would like to challenge us with

19 some difficult technical things.

20 Q Let me hand you what we call Exhibit 3. 09:42:36

21 (Exhibit 3 was marked for

22 identification by the Court Reporter

23 and is attached hereto.)

24 MR. CUNNINGHAM: And 4.

25 (Exhibit 4 was marked for 09:43:10

1	identification by the Court Reporter	09:43:10
2	and is attached hereto.)	
3	THE WITNESS: This is the chatting record	
4	between our company's general manager and Alex -- Alex	
5	Su, S-U.	09:43:34
6	BY MR. CUNNINGHAM:	
7	Q And I see that --	
8	A This is the input right here. This is the	
9	sample we got at the time.	
10	Q Very good.	09:43:57
11	A However, it did not show any other company's	
12	logo.	
13	Q And I see the word "Colt LED" in the chat	
14	message immediately below the photos on Exhibit 3.	
15	A Do you mean this here?	09:44:37
16	(In English) You mean this one, "Colt LED"?	
17	Q Yes. Can you read what that chat message says	
18	right there?	
19	A "Is this Colt LED product"?	
20	THE INTERPRETER: The interpreter have the	09:45:37
21	witness read it again because witness was summarizing,	
22	and interpreter is asking witness to read what is here.	
23	THE WITNESS: "I forwarded to memo to inquire	
24	this should be it. I'm waiting for his response	
25	tomorrow. Thank you."	09:46:05

1 BY MR. CUNNINGHAM: 09:46:14

2 Q And you're referring to Exhibit 3; correct?

3 A Yes.

4 Q And the memo refers to?

5 A Should be this per- -- Mr. -- here. 09:46:39

6 Q Yeah. He points to the person next to him;

7 correct?

8 A Correct.

9 MR. BARANOV: And could you state the record

10 the name of the person next to you? 09:46:50

11 THE WITNESS: Memo.

12 MR. BARANOV: Thank you.

13 BY MR. CUNNINGHAM:

14 Q So the photo immediately above the chat message

15 that says "Colt LED" in English is the sample that you 09:47:05

16 received from Andy Lau; is that correct?

17 A Yes. This is the product that we get from him,

18 but that's what at the time -- our general manager at

19 the time wanted to verify whether or not this product

20 was -- whether or not this product was indeed Colt's LED 09:47:48

21 product.

22 Q So he was asking that question of who? Was he

23 asking that question of Alex?

24 A Alex.

25 Q And on Exhibit 4, there are three more photos 09:48:22

1	of a partially disassembled light bulb; correct?	09:48:30
2	A Yes.	
3	Q From your understanding, is that all of the	
4	same disassembled light bulb?	
5	A Their should be two types.	09:49:06
6	Q What are the two types?	
7	A Or one type. Because partial images like this	
8	cannot -- I cannot tell very clearly.	
9	Q So if there were two types, what are the -- why	
10	would you think there might be two types? And what are	09:49:27
11	the differences between the two types?	
12	A This here. This here. (Indicating.)	
13	Q The witness is pointing to the second photo on	
14	Exhibit 4.	
15	What is it about that photo that makes you	09:49:47
16	think it might be a second light bulb?	
17	A I cannot tell from this image. I cannot see	
18	clearly whether the switch go horizontally or it is kind	
19	of push type of switch.	
20	Okay. Now, I -- okay. Now I can tell that	09:50:18
21	they are two type: one is that you turn back and	
22	forth, another type is that you push. Down here you can	
23	tell.	
24	Q And in the message that has "Colt LED" in	
25	English, does it refer to one or two light bulbs?	09:50:48

A Since I did not personally sent this text message, my personal understanding is that it refers to the whole series of the pictures.

THE INTERPRETER: But, if I may, Counsel,
because there is no difference between singular and
plural in Chinese language.

MR. CUNNINGHAM: Very good. Thank you.

BY MR. CUNNINGHAM:

Q Did Andy Lau provide you or your company with more than one light bulb to take apart and copy?

A Are you referring to light bulbs? Are you referring to tubes?

Q Light tubes?

A Yes, tubes, but not bulbs.

Q Yes, light tubes. We will refer to light tubes as being elongated; light bulbs are apparently more round, more spherical?

A Okay.

Q I'm asking.

A Yes.

Q Okay. Did Andy Lau provide you and your company more than one tube to take apart and copy?

A Yes.

MR. BARANOV: Kelly, I would like to interpose an objection at this point as to the relevance of this

1 line of questioning. The manufacturing of the tubes is 09:53:17
2 not at issue in this lawsuit. This is a lawsuit
3 pertaining to the harness. So you've laid out the
4 credentials and the background of this witness. To the
5 extent that you're going to go forward asking him 09:53:38
6 questions about the manufacturing process of the tubes,
7 these questions pertain to the second lawsuit pertaining
8 to the patents, which are now under re-examination by
9 the USPTO in which have been stayed by the Court.
10 So to the extent you will continue this line of 09:53:58
11 questioning, you are violating the stayed order, and the
12 questions are irrelevant to the issues at hand.
13 BY MR. CUNNINGHAM:
14 Q Also, when an objection is raised to a question
15 or series of questions, the witness is asked to answer 09:54:22
16 the question after the objection has been stated for the
17 record.
18 A Okay.
19 MR. BARANOV: So you intend to proceed with
20 this line questioning? 09:54:43
21 MR. CUNNINGHAM: Yeah.
22 BY MR. CUNNINGHAM:
23 Q We can hop to the harnesses.
24 Were you also handed by Mr. -- did Mr. Andy Lau
25 ever provide your company with any power harnesses? 09:54:59

1	A	Are you referring to the -- with a series of	09:55:12
2		lines of tubes, and then you can insert it into	
3		something to hold them?	
4	Q	Did Andy Lau ever provide your company with any	
5		power strips and cloth harnesses for --	09:55:29
6	A	With power?	
7	Q	Power cables.	
8	A	Are you talking about the harness that -- that	
9		look like bandages?	
10	Q	Yes, cloth straps.	09:56:00
11	A	You mean two strips of cloths and then the	
12		tubes will be placed in between the two strips?	
13	Q	Yes. Did Andy Lau ever provide your company	
14		with any pairs of cloth straps or strips?	
15	A	Well, he communicated that issue with our	09:56:45
16		general manager.	
17	Q	Did he provide any photographs of such cloth	
18		straps or strips?	
19	A	I think we have seen them. And there were also	
20		drawings as well. It was very simple.	09:57:09
21	Q	And did you ever -- did your company ever	
22		manufacture any cloth straps or strips for use with	
23		these light bulbs?	
24	A	I think so.	
25	Q	Yes. And do you understand where -- scratch	09:57:34

1 that. 09:57:36

2 Do you understand what company made the cloth

3 straps or strips that were photographed by Andy Lau?

4 MR. BARANOV: Objection. Vague and ambiguous.

5 THE WITNESS: I don't know. 09:58:06

6 BY MR. CUNNINGHAM:

7 Q Roughly at what time did your company receive

8 those photographs of cloth straps?

9 A I don't remember the specific time very well;

10 however, I know for sure that this matter was 09:58:49

11 communicated with him by our general manager, Luo,

12 L-U-O.

13 Q And what is Mr. Luo's full name?

14 A Yizhi Luo, Y-I-Z-H-I, last name L-U-O.

15 Q And his title is general manager? 09:59:15

16 A Yes.

17 Q Is he a general manager of both of the

18 companies that you wrote down in Exhibit 1?

19 A Yes.

20 Q Do you recall if the cloth straps had elastic 09:59:42

21 loops for holding the light tubes?

22 A Yes.

23 Q And did you include also -- I'm sorry. Scratch

24 that.

25 Along with the cloth straps, did you ever 10:00:20

1 receive any photos of the power cords and the connectors 10:00:24
2 for the light tubes?

3 A Which part are you referring to? Are you
4 referring to those with the tube or those with the strip
5 of cloth? 10:01:01

6 Q I'm asking about the power cable itself. Did
7 you ever receive a power cable from Andy Lau?

8 A Yes.

9 MR. CUNNINGHAM: Let me enter this as
10 Exhibit 5. 10:01:30

11 (Exhibit 5 was marked for
12 identification by the Court Reporter
13 and is attached hereto.)

14 BY MR. CUNNINGHAM:

15 Q Can you tell me what the two photos at the 10:01:52
16 bottom of Exhibit 5 are?

17 A The power source -- connect -- connection for
18 T12. However, for those two things we did not get the
19 parts themselves. We only got pictures. But I'm not
20 sure if Mr. Luo got that or not, but I personally never 10:02:33
21 saw it.

22 Q Okay. You never saw an actual power connector?

23 A I did not, but I have seen the picture of it
24 because I'm not in the factory every day.

25 Q Let me establish a little bit about Exhibit 5. 10:03:06

1	Who do you understand the sender to be that is	10:03:09
2	represented on the left-hand side of Exhibit 5?	
3	A I.	
4	Q Okay. And who --	
5	MR. GROSS: Wait. Can I have the answer read	10:03:32
6	back? I'm sorry. The air conditioner is on top of me	
7	here.	
8	(Whereupon, the record was read back	
9	by the Court Reporter as follows:	
10	"A I.")	10:03:41
11	MR. BARANOV: "I"?	
12	BY MR. CUNNINGHAM:	
13	Q By "I," you mean yourself?	
14	A Yes.	
15	Q And who do you understand to be the sender on	10:03:48
16	right-hand side of Exhibit 5?	
17	A Alex Su.	
18	Q Can you spell Su?	
19	A S-U.	
20	Q And so this is you sending a photo of a	10:04:08
21	connector to Alex Su; is that correct?	
22	A Because at the time that he was asking me	
23	whether I have seen Colt LED light parts like this, then	
24	our general manager, Luo, sent that request to me so	
25	I -- and then here Mr. Luo asked -- sent these two	10:04:56

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1	pictures to me asking me to verify if those were their	10:05:08
2	product, like what we were looking at earlier.	
3	Q So is it your recollection that this photo is	
4	Mr. Luo holding a connector, or is this you holding a	
5	connector?	10:05:31
6	A I think neither.	
7	Q Is this photo from Mr. Luo?	
8	A This picture must have been sent from Andy Lau	
9	to Mr. Luo.	
10	Q Okay. And then Mr. Luo sent it to you, and you	10:05:57
11	sent it to Alex Su?	
12	A Mr. Luo asked me to help him verify whether or	
13	not these products are those of the Colt LED product.	
14	Q And roughly what year was this exchange of chat	
15	communications?	10:06:32
16	A This one here?	
17	Q Yes.	
18	A This year.	
19	Q And what month?	
20	A I cannot remember.	10:06:47
21	MR. CUNNINGHAM: Let me provide this as	
22	Exhibit 6.	
23	(Exhibit 6 was marked for	
24	identification by the Court Reporter	
25	and is attached hereto.)	10:07:43

1	BY MR. CUNNINGHAM:	10:07:43
2	Q Can you tell me what is in Exhibit 6?	
3	A This is a picture of Quasar Science at the time	
4	when they were participating in a show.	
5	Q And is this a photo from your factory?	10:08:11
6	A (In English) Yes.	
7	Q In China?	
8	A (In English) Yes.	
9	Q Which one of the companies?	
10	A (In English) Laysion, the second one. Yeah,	10:08:24
11	the second one.	
12	Q The second one listed in Exhibit 1.	
13	Do you recognize any of the individuals in this	
14	photograph?	
15	A Andy Lau.	10:08:41
16	Q Any of the others?	
17	A I know this person here is Steven Strong; but,	
18	however, I have never met this person.	
19	Q And which one -- so you communicated with Andy	
20	Lau; correct?	10:09:08
21	A Yes.	
22	Q Have you ever communicated with Steven Strong?	
23	A No.	
24	Q Have you ever communicated with a gentleman by	
25	the name of Ray Gonzalez?	10:09:20

1 A No. 10:09:26

2 Q But this photograph is poster size; correct?

3 A Like this.

4 Q You're describing about 3 feet by 4 feet?

5 A I think so. 10:09:48

6 Q And it is in your factory; correct?

7 A Yes.

8 Q Is it fair to say there is a large display in

9 your factory of Quasar Science signs and products?

10 A Yes. Because at the time, I do not know 10:10:06

11 whether we were authorized by Andy Lau or by Quasar

12 Science, that we were authorized to use Quasar Science

13 logo and trademark.

14 In the meantime, Andy Lau would also lead

15 clients to our factory to look around, and also he would 10:11:17

16 take pictures of our products and -- and also took

17 pictures, or our production line, and indicating that --

18 indicating that that was his factory.

19 Q Very good.

20 MR. CUNNINGHAM: Let's take a break. We've 10:11:51

21 been going for a while.

22 Is that all right with everybody?

23 THE VIDEOGRAPHER: The time is 10:12 a.m.

24 We're now off the record.

25 (A recess was taken.) 10:20:42

1 THE VIDEOGRAPHER: Back on the record. Here 10:25:52
2 marks the beginning of Disk 2. The time is 10:26 a.m.
3 BY MR. CUNNINGHAM:
4 Q Good morning still, Mr. Jun. Let me hand to
5 you what we have labeled 6. 10:26:12
6 THE REPORTER: Exhibit 7.
7 (Exhibit 7 was marked for
8 identification by the Court Reporter
9 and is attached hereto.)
10 BY MR. CUNNINGHAM: 10:26:13
11 Q Exhibit 7.
12 Do you recognize this as a LED tube?
13 A Of course.
14 Q Do you recognize this as similar to what
15 Mr. Lau provided you? 10:26:36
16 A That should be the case, yes. Yes. Input
17 here.
18 Q Okay. And --
19 A May I check the other end?
20 Q Yes. 10:26:59
21 A Without a logo, the one I have. Okay. Really,
22 this is the one; but at the time I think that this part
23 must had been taken off. And it came without that,
24 either.
25 Q Came without the rubber end? 10:27:32

1 A Correct. I believe that was because there was 10:27:40
2 a logo on the cap.

3 MR. BARANOV: I'll object to Exhibit 7 on the
4 grounds of relevance. It has nothing do with the
5 instant lawsuit. 10:28:12

6 MR. CUNNINGHAM: Willfulness, by the way.

7 MR. BARANOV: Okay. We'll see about that.

8 BY MR. CUNNINGHAM:

9 Q So apart from the rubber end cap and the label,
10 is this the same as what you received from Andy Lau? 10:28:37

11 A Yes, it was provided to our company. However,
12 this only stayed at our company for only one or two
13 days.

14 Q And during those one or two days, did you have
15 your employees take the bulb apart? 10:29:16

16 A Yes. I think that there was another type with
17 a push knob.

18 Q So you were provided two tubes?

19 THE INTERPRETER: Interpreter need to clarify.

20 THE WITNESS: The two tubes were not provided 10:30:02
21 to us at one time. They were provided at different
22 times, maybe in two or three different times.

23 BY MR. CUNNINGHAM:

24 Q Okay. Within what time range?

25 A I think two or three months, because after we 10:30:18

1 first produced our products, he was not very satisfied. 10:30:31

2 Q Mr. Lau was not very satisfied with the copies

3 that you had made?

4 A Correct.

5 Q And he asked you to make additional changes? 10:30:48

6 A Yes.

7 Q And did you make those additional changes?

8 A Yes, but I was not the person who was in charge

9 of this, and all of our projects were taken care by

10 Mr. Luo, L-U-O, but I am aware of that matter. 10:31:18

11 Q You're personally aware of the matter of

12 receiving the tubes and copying the tubes?

13 A Yes.

14 MR. CUNNINGHAM: Can you mark this next exhibit

15 as Exhibit 8, please. 10:31:43

16 (Exhibit 8 was marked for

17 identification by the Court Reporter

18 and is attached hereto.)

19 MR. CUNNINGHAM: I'd like to hand Exhibit 8 to

20 the witness. 10:32:04

21 BY MR. CUNNINGHAM:

22 Q Do you recognize this item?

23 A Of course.

24 Q What is it?

25 A The connector. 10:32:20

1 Q Was it provided to your company the same time 10:32:22
2 as one of these lighting tubes?
3 A You mean something that was identical to this
4 one?
5 Q Yes. 10:32:46
6 A No.
7 Q What was different?
8 A I don't know if this was provided to our
9 company or not. I personally did not see this. All I
10 saw was this tube. 10:33:02
11 Q Did you receive photographs of an image of this
12 connector?
13 A Mr. Luo has sent it to me, and I've seen it.
14 Q And did you receive any drawings from
15 Mr. Andy Lau regarding how he would like his connectors 10:33:27
16 to look?
17 A Yes. However, the outlook of that was
18 completely different from this one. I think his was a
19 octagon shape, and I think it had six or how many sides?
20 I think six or eight sides. It was different. 10:34:18
21 Q So instead of this one, which I'll suggest is
22 oval in shape --
23 A (In English) Like circle.
24 Q -- Andy Lau asked so you make the connector for
25 his lighting tube in the shape of an octagon or a 10:34:43

1	hexagon?	10:34:47
2	A Correct.	
3	MR. CUNNINGHAM: Can I mark Exhibit 9.	
4	(Exhibit 9 was marked for	
5	identification by the Court Reporter	10:35:19
6	and is attached hereto.)	
7	BY MR. CUNNINGHAM:	
8	Q I'd like to hand the witness Exhibit 9.	
9	Do you recognize this item?	
10	A Yes.	10:35:28
11	Q And is this item called a webbing?	
12	A We call it as a B-A-N-G-D-A-R, meaning tying	
13	strip.	
14	Q Tying strip or tying strap?	
15	A Correct. Strip. However, the ones we produce	10:36:02
16	are much heavier. And this is much better. It's	
17	lighter.	
18	Q Did you ever receive from Andy Lau photographs	
19	of a strap like this?	
20	A I did not; however, Mr. Luo has. This is very	10:36:43
21	simple. You don't need any specific item to do anything	
22	with it. You just take one look and you understand.	
23	Q How do you personally know that Mr. Luo	
24	received a photograph of this from Andy Lau?	
25	A Because he placed order with us, because on	10:37:28

1 the -- under the order their was always pictures. 10:37:33

2 Q And your company produced straps or strips like

3 this for Andy Lau?

4 A Actually, we did not engage in the production

5 of it since this kind of things would be produced by a 10:38:23

6 company that engaged in the textile. So we were looking

7 for people to produce this for Mr. Lau, then we would

8 describe this to those textile company to produce it.

9 Q And is this -- other than it's light weight, is

10 this identical to what you had produced for Andy Lau? 10:39:01

11 A I think that there are two strips in one

12 combination. This is only for one side.

13 Q I understand. Very good.

14 A I'm not sure.

15 Q Okay. Oh, what are you not sure about? 10:39:43

16 A I do not know this bundle contains one strips

17 or two once you open it.

18 Q You can open it, please.

19 A (Witness complies.) Okay. The same.

20 Q So it is your understanding that there would be 10:40:26

21 two of these made to go to together with the lighting

22 tubes; is that correct?

23 A Yes.

24 Q And your company didn't make it -- make them,

25 the strips, itself, it found a textile company to make 10:40:41

1	them for Andy Lau; is that correct?	10:40:47
2	A Yes.	
3	MR. CUNNINGHAM: Want to take one more break?	
4	THE VIDEOGRAPHER: The time is 10:41 a.m.	
5	We're now off the record.	10:41:16
6	(A recess was taken.)	
7	THE VIDEOGRAPHER: We're back on the record.	
8	The time is 10:53 a.m.	
9	BY MR. CUNNINGHAM:	
10	Q I would like to just summarize what I	10:53:30
11	understand you were testifying before, and you just let	
12	me know if I'm correct or not.	
13	A Okay.	
14	Q So Andy Lau sent your company photographs of a	
15	strap like this; is this correct?	10:53:55
16	A Yes.	
17	Q So you -- your company then took those	
18	photographs and instructed a textiles company to make	
19	straps like this?	
20	A Yes.	10:54:22
21	Q A first strap and a second strap?	
22	A Yes.	
23	Q And the textile company, in fact, did make the	
24	straps for your company, and then they were sent to Andy	
25	Lau?	10:54:45

1	A	Yes.	10:54:45
2	Q	They had the elastic loops here; is that	
3		correct?	
4	A	Yes.	
5	Q	They are oriented in this fashion on one side	10:55:13
6		of the strap; is that correct?	
7	A	Yes.	
8	Q	So that the lighting tubes could fit into one	
9		of these elastic loops; is that true?	
10	A	Yes.	10:55:46
11	Q	And the other end of the lighting tube could	
12		fit in a similar elastic loop on a similar strip?	
13	A	Yes.	
14	Q	And like this example, Exhibit 9, had connector	
15		pieces on the back of the strap -- is that correct? --	10:56:34
16		for the power cable?	
17	A	I can't specifically verify this. That should	
18		be the case.	
19	Q	That's okay. I don't ask him to answer what	
20		should or shouldn't be the case; it's just what he	10:57:07
21		recalls or what he knows.	
22	A	I think so.	
23	Q	Do you recall whether there were any rubber	
24		bands that were sold with the strap?	
25		Let me scrap that. That was the wrong	10:57:35

1 question. 10:57:37

2 Do you recall whether the textile company that

3 you used to make these straps provided any rubber bands

4 with the strap?

5 A Rubber band? 10:58:04

6 Q He can just answer yes or no.

7 A What type of rubber band? For what?

8 Q A rubber band to connect the power cable to the

9 strap or strip?

10 A I'm not sure. 10:58:33

11 Q Okay. That's fine.

12 MR. CUNNINGHAM: Let me enter as Exhibit 10

13 this item.

14 (Exhibit 10 was marked for

15 identification by the Court Reporter 10:58:46

16 and is attached hereto.)

17 BY MR. CUNNINGHAM:

18 Q I'd like to hand Exhibit 10 to the witness.

19 A This is our product. Yes.

20 Q So you recognize this item? 10:59:13

21 A Yes. Yes, we produced this.

22 Q Okay. At the instruction of Andy Lau?

23 A Yes.

24 Q And do you recall Andy Lau providing you any

25 example from which you could make this item? 10:59:40

1 A There were drawings with regard to samples. I 11:00:03
2 don't know because I'm not at company every day. I have
3 not seen it.

4 Q Do you know whether Andy Lau provided you with
5 any photographs of an example? 11:00:21

6 A I have seen the photograph when I -- at
7 Mr. Luo's place.

8 Oh, okay. This item is produced -- is
9 manufactured by us; and, however, we added things to it.

10 Q So it is manufactured by you or is not 11:01:00
11 manufactured by you?

12 A Some part are manufactured by us, however,
13 there are some changes.

14 Q What changes do you recognize?

15 A I think this head here has been changed. It is 11:01:40
16 different from the original.

17 Q And by "this head here," he was pointing at the
18 end of the cable that has the male prongs; correct?

19 A That is; but, however, there must have been
20 another reason for this because originally Andy saw that 11:02:16
21 every product we have made was making a lot of money.
22 And in 2014, he himself formed factory -- I think -- I
23 think it should be -- actually, I think it should be
24 2015 or 2016 when he established his own factory. It is
25 possible that his own factory did this. And that 11:03:08

1	factory is Taishan, T-A-I-S-H-A-N.	11:03:15
2	Q And your company made power cables like this	
3	for Andy Lau in what years?	
4	A You mean making the identical item?	
5	Q Yes, the identical item. Yes.	11:03:41
6	A Should be in 2015. It should be.	
7	Q Okay. Is that from your personal knowledge?	
8	A I'm not very sure of the specific time.	
9	However, I will be able to check and find it in the	
10	order.	11:04:19
11	Q Okay. But as of today, that's your best	
12	estimate?	
13	A More or less.	
14	Q Okay. Yes, please provide us, if you could,	
15	the information that you said you would provide us.	11:04:35
16	A Because right this moment in China, people are	
17	sleeping already, but I can do it tomorrow.	
18	Q Of course, yes. Not today. That's fine.	
19	Additionally, if you could in the next coming	
20	days, could you provide any photographs or drawings of	11:05:06
21	this connector? I understand this connector, this	
22	octagonally-shaped connector, is something you were	
23	describing before the break.	
24	A No problem. However, those were Quasar's logo,	
25	I don't think they are in existence anymore.	11:05:43

1	Q	Okay. Thank you. Just provide us with which	11:05:48
2		drawings you have; it would be nice to have.	
3		Did you make any other power cables for	
4		Andy Lau that are different from these?	
5	A	Singular ones, double ones, and quadruple ones.	11:06:18
6	Q	And what do you mean by "single ones, double	
7		ones and quadruple ones"?	
8	A	Single ones like this. And then double ones,	
9		they are two.	
10	Q	Okay. And quadruple one, what does that look	11:06:38
11		like?	
12	A	They are connected like that, just more.	
13	Q	Okay. Have you made any power cables for	
14		Andy Lau that have shorter branches than this?	
15	A	Shorter than this?	11:07:16
16	Q	Say, 2 centimeters instead?	
17	A	Like this?	
18	Q	Yes.	
19	A	I don't remember.	
20	Q	Okay. So --	11:07:30
21	A	You can look for that information on the	
22		Quasar's official website.	
23	Q	Yes. But you yourself don't have any personal	
24		knowledge of making a product like that for Andy Lau?	
25	A	The short, the 2 centimeter ones?	11:07:53

1 Q Yes. 11:07:56

2 A Because for a lot of the business transactions,
3 I am not personally communicating the matter with
4 anyone, and so I have not been in charge of everything;
5 but most of the time it was Mr. Luo who would be in 11:08:31
6 communications for the business. However, I will be
7 able to check and find out.

8 Q Thank you.

9 And do you know whether the power cable and the
10 strip are designed to be connected together? 11:08:53

11 A Yes.

12 Q How were they connected together?

13 A They will be stringed together.

14 Q And in what way?

15 A There are two ways to do it. There are two 11:09:24
16 ways: one is to thread it through in the strip here;
17 another way is you directly produce them together.

18 Q Okay.

19 A Oh, yes. For that type, then the branch will
20 be very short. 11:09:57

21 Q Yeah. Okay. Did your company make both of
22 those types, to your understanding?

23 A We will sub it out. Yeah, we sub both of them
24 out.

25 Q Okay. In the design where the strip and the 11:10:20

1	power cable are connected, but not made together, but	11:10:28
2	are connected, how are they connected?	
3	A You can just thread it through directly, but	
4	there were less of that type.	
5	Q So thread it through what? As I hand him	11:10:58
6	Exhibit 9.	
7	A In the back. From the back.	
8	Q And you're pointing to those Velcro loops	
9	there?	
10	A Correct. There was such type of product, but	11:11:14
11	there were much less of that type. The ones that were	
12	produced together, most of them were produced that way.	
13	Q "That way" being that the cable was produced	
14	inside the strip?	
15	A Correct.	11:11:59
16	Q And you and I talked briefly yesterday; is that	
17	correct?	
18	A Yeah.	
19	Q We talked about how the deposition was likely	
20	to go today, that there would be a court reporter and	11:12:12
21	videographer; and then we decided we would want a	
22	translator yesterday; is that correct?	
23	A Correct.	
24	Q All right. Let me take one more break, and	
25	just make sure that we have all the questions we would	11:12:35

1 like and hand him over to you, if you'd like. 11:12:38

2 MR. BARANOV: Thank you.

3 THE VIDEOGRAPHER: The time is 11:12 a.m.

4 We're now off the record.

5 (A recess was taken.) 11:12:45

6 THE VIDEOGRAPHER: We're back on the record.

7 The time is 11:21 a.m.

8 MR. CUNNINGHAM: All right. We're back on the

9 record. I just wanted to say that I don't have any more

10 questions for Mr. Jun. I will, though, reserve my right 11:21:19

11 to ask a few more questions after I heard what is being

12 asked by the other attorney in the room.

13 THE INTERPRETER: Mr. Cunningham, would you

14 please just clarify something for me. I'm sure I know

15 the answer, but I just want to clarify. Because my job 11:21:56

16 order says I'm working for you today, so I'm going

17 continue interpreting for this deposition; right?

18 MR. CUNNINGHAM: Yes. Thank you for clarifying

19 that.

20 EXAMINATION 11:22:09

21 BY MR. BARANOV:

22 Q Mr. Jun, good morning.

23 A Good morning.

24 Q I am Michael Baranov, and I am a attorney for

25 Quasar Science and also for Cinelease and some other 11:22:20

1 companies in another suit that is not part of this 11:22:26
2 proceeding. Let me clarify a few things here.
3 Now, in looking at Exhibit 9, and that is
4 the -- that's the --
5 A (In English) This one? 11:22:45
6 BY MR. BARANOV:
7 Q Yes. Now, your company did not manufacture
8 this specific item; correct?
9 A Correct. Correct. We sub this -- the
10 production of this outside to somebody else, because -- 11:23:29
11 but the orders were placed with us, and then we found
12 somebody else, a textile company to do this.
13 Q And I appreciate the answer, but what I'm
14 trying to get at, this particular model of the device
15 that is here, did your subcontractors make it or did 11:23:51
16 somebody else?
17 A It's like this. Andy would place order to us,
18 and then we would place order to a supplier of ours.
19 Q But my question is, have you ever seen this
20 particular item before today? 11:24:40
21 A This one here?
22 (In English) This one?
23 Q Yes.
24 A (In English) No.
25 (Through Interpreter) However, I have seen the 11:25:02

1	picture of it. Not this thing.	11:25:04
2	Q And we'll get there.	
3	And you know what? You're not represented here	
4	by an attorney, are you?	
5	A No.	11:25:20
6	Q But you did meet with Mr. Cunningham; correct?	
7	A Yes.	
8	Q When?	
9	A Yesterday.	
10	Q For how long?	11:25:33
11	A 20 or 30 minutes.	
12	Q What was discussed during that 20 or 30	
13	minutes?	
14	A He told me that I would be getting an	
15	interpreter and that the deposition would take place in	11:25:55
16	this room. And then there would be a court reporter and	
17	videographer. And the seat I would be sitting would be	
18	around right here.	
19	Q Anything else?	
20	A That's it.	11:26:21
21	Q And the meeting took place here?	
22	A Correct.	
23	Q Did you discuss what this lawsuit is all about?	
24	A No.	
25	Q Did you discuss any of your testimony today?	11:26:42

1 A No. 11:26:47

2 Q Were you shown any of the exhibits that are

3 here today?

4 A No.

5 Q Did you come to this meeting alone or with 11:27:03

6 somebody else?

7 A With Alex Su.

8 Q So one thing Mr. Cunningham did not explain to

9 you, and that is just the basic rules of the deposition

10 process. And the first rule is because everything is 11:27:28

11 being carefully taken by the court reporter and the

12 videographer to carefully listen to the question and

13 just answer the question.

14 And another important point is because you are

15 under oath and you are testifying under penalty of 11:28:07

16 perjury, it is very important to provide accurate

17 answers and not to guess.

18 So what I'm trying to get at is this particular

19 exhibit, was it manufactured by any of your

20 subcontractors or by somebody else? 11:28:53

21 THE INTERPRETER: Counsel, do you mean any the

22 items here or just one?

23 MR. BARANOV: No, just Exhibit 9.

24 THE WITNESS: Our subcontractor.

25 ///

1 BY MR. BARANOV: 11:29:19

2 Q Made this particular item?

3 A Not this particular one, a different one from

4 this one. Ours is heavier.

5 Q Okay. So then the answer to my question is no; 11:29:36

6 is that correct?

7 MR. CUNNINGHAM: Objection. Asked and

8 answered.

9 THE WITNESS: I can't render an answer with

10 that. I'm not -- I don't know what I'm saying "yes" to 11:30:00

11 him.

12 BY MR. BARANOV:

13 Q Okay. Do you know who manufactured this

14 particular device?

15 A Are you referring to this item here in 11:30:21

16 particular, or are you referring to this item that is

17 manufactured by us?

18 Q I'm talking about this particular object that

19 is sitting on the table?

20 A I don't know. 11:30:37

21 Q And you don't know who manufactured it?

22 A This one, I don't know.

23 Q Okay. Now, you've testified that this

24 particular item that you don't know who manufactured it

25 is lighter than what you were making for Quasar; 11:30:55

1 correct? 11:31:00

2 A This one is lighter.

3 Q Okay. How else is it different from what your
4 subcontractors manufactured? Besides the weight what
5 are the other differences? 11:31:36

6 A Well, this does not have much elasticity to it,
7 but ours has very good and superior elasticity. And
8 also, this one, the Velcro strip is not done very well;
9 ours you can -- the entire strip for the one we make is
10 Velcro. You can just completely wrap it around. 11:32:28

11 Q Fair enough.

12 If you unwind --

13 A May I?

14 Q Go ahead.

15 A No. This loop is too loose. 11:32:44

16 Q Okay. Now if you unwind --

17 MR. CUNNINGHAM: For the record, he put the
18 lighting tube exhibit -- the T12 lighting tube that we
19 have through one of the elastic loops.

20 BY MR. BARANOV: 11:33:04

21 Q Now, if you unwind this, there are other little
22 Velcro loops on the backside.

23 A There should be.

24 Q And did the device you manufacture contain
25 these loops on the base of the device? 11:33:31

1 A I believe so; however, we make so many products 11:33:54
2 so I do not personally know in details of every single
3 product. I think it does.
4 Q Okay. Fair enough.
5 Now, you said that you received a photograph of 11:34:11
6 a similar product from Mr. Lau; correct?
7 A He sent the photograph to Luo, our general
8 manager.
9 Q Do you know when that happened?
10 A I don't remember very clearly; however, I can 11:34:47
11 inquire.
12 Q And do you know who took the photograph of this
13 device that was sent to your company?
14 A I don't know.
15 Q And you don't know when was taken, either; 11:35:07
16 right?
17 A I don't know.
18 MR. CUNNINGHAM: Objection. Vague and
19 ambiguous.
20 BY MR. BARANOV: 11:35:17
21 Q So you used just the object in the photograph
22 to make some sort of engineering drawings to put the
23 product into production; is that correct?
24 A Yes.
25 Q Okay. 11:35:48

1 MR. CUNNINGHAM: Stop just for a second. I'm 11:35:51
2 going to reach for a microphone so that when I make
3 objections, they're legible.
4 THE VIDEOGRAPHER: Excuse me. The microphone
5 is over there. 11:36:01
6 MR. CUNNINGHAM: I thought there was an extra
7 one.
8 THE VIDEOGRAPHER: I took it off because he
9 said he wasn't using it.
10 MR. CUNNINGHAM: I see. 11:36:06
11 THE VIDEOGRAPHER: So that one is a table mic.
12 MR. CUNNINGHAM: Sure. Let me go ahead and --
13 MR. BARANOV: Can you hear him?
14 THE VIDEOGRAPHER: Yeah.
15 MR. CUNNINGHAM: There you go. 11:36:10
16 BY MR. BARANOV:
17 Q And you do not know who created the object in
18 the photograph; correct?
19 A I do not know; however, at the time Andy told
20 me that that object was -- that object's drawing was 11:36:38
21 created by their team.
22 Q Okay. The team at Quasar?
23 A That should be the case. That he only referred
24 to it as "his team."
25 Q Okay. 11:37:02

1 A And he later he send a picture of an installed 11:37:12
2 products with all the lighting tubes on.
3 Q Do you recall when that happened?
4 A I'm not sure about the specific time.
5 Q Do you know who took that picture of all the 11:37:37
6 installed tubes?
7 A I don't know.
8 Q Do you know where it was taken?
9 A Should be in United States.
10 Q But you're not sure because you were not there? 11:37:54
11 A Correct.
12 Q You're just relying on --
13 A (In English) I just guess.
14 Q You're guessing?
15 A Yeah. In this question. Because there were 11:38:04
16 white people standing next to it.
17 Q Okay.
18 A And also because at the time Quasar was not the
19 selling to Europe, yet Quasar's products were only sold
20 to in the United States. Based on these factors, I 11:38:43
21 deduced that conclusion.
22 Q And this picture was shown to you early on in
23 the manufacturing process of this particular harness;
24 correct?
25 THE INTERPRETER: I'm sorry, Counsel. May 11:39:03

1 interpreter have read back the question. 11:39:03
2 BY MR. BARANOV:
3 Q So this photograph was shown to you in the
4 beginning of the manufacturing process of the harness;
5 correct? 11:39:13
6 A Before the production.
7 Q Okay. So this was just a prototype that was
8 sent to you by Quasar; correct?
9 A "Photo type"?
10 Q Was it a picture of a prototype of the product, 11:39:47
11 or was it something which was already in use?
12 A The picture shown that it was already assembled
13 and hung. I do not know whether it was in use or not.
14 Q Okay. But it was a final product which was
15 shown to you; is that correct? 11:40:26
16 A Yes.
17 Q And that would have happened sometime in 2013?
18 A No, no. Back in 2013 when it just started, at
19 the time what was produced was T8. This one is T12.
20 Q Okay. And what about the harness? This 11:41:11
21 particular harness, which is Exhibit 9, when did you
22 start manufacturing a device like it?
23 A I'm not sure; however, I can check as I
24 promised the attorney earlier, that I can check order --
25 the order for the date. 11:41:48

1 Q Okay. And would be it fair to say that prior 11:41:51
2 to your starting the manufacturing process off a device
3 similar to Exhibit 9, you were shown a photograph of it
4 in use; correct?

5 A Yes. 11:42:10

6 Q Now, moving on to Exhibit 10, which is this
7 cable. Now, I'm not questioning you about the cable
8 that your company manufactured for Quasar. I'm talking
9 about this particular sample right here.

10 Have you seen this particular unit before 11:42:54
11 today?

12 MR. CUNNINGHAM: Objection. Vague and
13 ambiguous.

14 THE WITNESS: Our company has a similar product
15 like this manufactured by us. 11:43:19

16 BY MR. BARANOV:

17 Q Okay. But you do not know who manufactured
18 this specific exhibit, do you?

19 MR. CUNNINGHAM: Same objection.

20 THE WITNESS: I'm not clear about this. It 11:43:56
21 could be that we manufactured this one and, however, we
22 manufactured it differently. Or another possibility is
23 that this is manufactured by one of our suppliers. A
24 third possibility is that this is manufactured by Andy's
25 own factory in Taishan. 11:44:24

1 Okay. So, then, just to recap, you're not sure 11:44:28
2 who made this particular unit?
3 MR. CUNNINGHAM: Same objection.
4 BY MR. BARANOV:
5 Q There are three possibilities of where it came 11:44:44
6 from?
7 A Actually, just two. One is -- one possibility
8 is that this is manufactured by our company and,
9 however, we switch off this part with a different
10 product from the supplier. Another possibility is that 11:45:24
11 Andy manufactured it.
12 However, this part -- however, this part is
13 manufactured by us.
14 MR. BARANOV: And, for the record, we are --
15 the witness is pointing to the actual connector to the 11:45:48
16 tube, the octagonal connector with the Quasar logo on
17 top.
18 BY MR. BARANOV:
19 Q So now let's talk about Exhibit 7. And that's
20 the LED tube. 11:46:19
21 A This one?
22 Q Correct.
23 Now, I just want to again make clear, have you
24 ever seen this particular tube before?
25 MR. CUNNINGHAM: Objection. Vague and 11:46:39

1 ambiguous. 11:46:39

2 THE WITNESS: If you remove this cap here, then

3 I say I have seen it; however, once you add this label

4 here and the cap here, I would say I have not seen it.

5 BY MR. BARANOV: 11:47:09

6 Q Okay.

7 A And this is not the first product, either.

8 Q I see. So, but, again, what I'm asking for is

9 not whether or not you have seen a tube similar to this

10 one, I'm asking whether you have seen the tube that you 11:47:26

11 are currently holding in your hand before. This

12 particular one.

13 MR. CUNNINGHAM: Objection. Vague and

14 ambiguous.

15 THE WITNESS: I can tell you very specifically 11:47:58

16 that if you take apart like this, I have seen it.

17 BY MR. BARANOV:

18 Q You've seen this tube, this very tube you're

19 holding in your hand, taken apart before; correct?

20 Is that what you're testifying? 11:48:19

21 MR. CUNNINGHAM: Same objection.

22 THE WITNESS: You can make the comparison here

23 yourself.

24 BY MR. BARANOV:

25 Q I don't want you to make a comparison, and I'm 11:48:34

1	not asking whether you've seen a T12 tube or a T8 tube	11:48:37
2	before.	
3	A (In English) T12.	
4	Q That is not my question, okay.	
5	You're holding in your hand a tube; correct?	11:48:48
6	A Yes.	
7	Q This tube, have you seen this particular tube	
8	you're holding in your two hands right now before today?	
9	A I have not seen the ones I am holding in my	
10	hand before; however, I have seen an identical ones	11:49:23
11	manufactured by this company. I'm not sure if I have	
12	seen this particular one before.	
13	Q Okay. Thank you.	
14	And the tube that you've seen before, did they	
15	have this Colt label on them?	11:49:42
16	A No. Only the input here.	
17	Q Okay. The input being the cap on top of the	
18	tube with the plug on it?	
19	A Without the cap, either.	
20	Q Okay. Do you have any technical background?	11:50:04
21	A No. However, I understand and think like this	
22	very well.	
23	Q I appreciate that.	
24	Why did you stop doing business with Quasar?	
25	THE INTERPRETER: "Stop" or "start"?	11:50:39

1	MR. BARANOV: Stop.	11:50:40
2	THE WITNESS: Because -- because it -- no, I'm	
3	not saying "it." I said Andy started his own factory.	
4	Additionally, toward the end of our cooperation, Andy	
5	provided a lot of his own drivers to be used in the	11:51:16
6	products that we were making for him without using our	
7	driver, and because of that, there were a lot of issues	
8	arose from that once the products had been shipped into	
9	United States. And then she [sic] claimed that those	
10	issues were because of -- were caused by us. And then	11:51:47
11	because of that, he would not make payments to us.	
12	Additionally, Andy also provided us with a lot	
13	of the inferior chips to be used in the products and the	
14	same issue occurred and he also blamed us for that, and	
15	for that reason, he would reduce payment to us. We feel	11:52:27
16	that Andy wanted to make money from all front so we	
17	decided to terminate our relationship with him.	
18	And the key problem is that currently Andy has	
19	a product with the name Rainbow RGBX2. For that product	
20	we spent a lot of money for our research and	11:53:31
21	development, and Andy would not pay us anything for	
22	that. He wouldn't even pay us a designing fee.	
23	And another one -- and then also another	
24	product of this, his current product, battery light.	
25	The same thing, we spent a lot of money to manufacture	11:54:12

1 that product and -- on that product. And, however, 11:54:18
2 after we produced that product and Andy turned around
3 and sought out our supplier to manufacture it directly.
4 So we terminated our cooperation.
5 BY MR. BARANOV: 11:54:41
6 Q So subsequent to the termination of your
7 cooperation with Quasar, did you continue to represent
8 your company as Quasar to Quasar's customers?
9 A No.
10 Q You never communicated with any third party 11:55:11
11 utilizing the name Quasar?
12 A Because we also registered the Quasar logo in
13 China ourselves.
14 Q Did you have Quasar's permission to do that?
15 A We were authorized by Quasar. Quasar also 11:56:15
16 authorized us for the period from either 2013 or 2014 to
17 2017, during which period we were authorized to use
18 Quasar's logo as well as the name.
19 Q But you also registered the Quasar trademark in
20 the People's Republic of China; is that correct? 11:56:43
21 A Yes.
22 Q You didn't have any authorization from Quasar,
23 the trademark owner, to do that, did you?
24 A I don't understand. Are you -- do you mean
25 that Quasar authorized us? 11:57:13

1	Q	Yeah. Did Quasar authorize you to register a	11:57:18
2		trademark, a Quasar trademark in the PRC?	
3	A	I don't know because Luo registered the	
4		trademark. Luo.	
5		However, we have our own trademark and name,	11:58:07
6		and all of the products that we sell we use our own	
7		name, Laysion, and we do not use Quasar's name for	
8		sales.	
9	Q	Okay. Did you register the Colt trademark in	
10		the PRC, as well?	11:58:34
11	A	Seriously speaking, I only learned of the name	
12		Colt last year. I did not know of this name early on.	
13	Q	Now, have you permanently stopped using the	
14		Quasar trademark in commerce? Trademark.	
15	A	We legally own Quasar trademark in People's	11:59:20
16		Republic of China, but we can choose to use it or not	
17		use it.	
18	Q	Are you using it?	
19	A	We're not using it; however, theoretically we	
20		can use it.	11:59:48
21	Q	Do you have any plans to use it?	
22	A	Currently we don't have any plan to use it.	
23	Q	Now, when did you start working with Colt?	
24	A	This year.	
25	Q	How did that happen?	12:00:16

1	A	I think they found me on Facebook. I think	12:00:28
2		they found my personal contact on Facebook.	
3		Let me add something. The triangular trademark	
4		of Quasar's, it is not only registered by our company,	
5		many other company --	12:01:00
6		(In English) Not many, not many.	
7		(Through Interpreter) Not many. Other	
8		companies also have registered the triangular trademark.	
9	Q	Fair enough.	
10		But let's go back to these guys. So what was	12:01:11
11		that first contact on Facebook?	
12	A	It was Alex' friend by name of Jimmy who called	
13		me.	
14	Q	When did that occur?	
15	A	It was around National Day of China of last	12:01:54
16		year.	
17	Q	What happened after that call?	
18	A	And after that phone call a few months passed,	
19		and then I was contacted again.	
20	Q	By whom?	12:02:18
21	A	Jimmy.	
22	Q	Who is Jimmy? What is his last name?	
23	A	I don't know.	
24	Q	Okay.	
25	A	I know his Chinese name. Xue Feng Chen.	12:02:33

1	X-U-E, F-E-N-G, C-H-E-N.	12:02:37
2	Q How were you contacted by Jimmy?	
3	A It seems that he found my personal contact	
4	information on Facebook, and he called me and asked if	
5	our company was engaging in LED light manufacturing.	12:03:09
6	Q And what was your response?	
7	A Yes.	
8	Q And what happened after that contact?	
9	A Nothing. Nothing happened after that, either.	
10	Until a few months later Alex contact me again, and Alex	12:04:01
11	came to our factory and met with me and this -- look	
12	around our factory.	
13	Q Okay. Did he place an order at that time?	
14	A Not at that time. Not at that time.	
15	Q So when was first order placed?	12:04:22
16	A This year, but I don't remember specific date	
17	because I am not often at factory. It's very hard to	
18	remember specifically everything -- every date.	
19	Do you guys remember the specific date?	
20	Q No.	12:05:02
21	MR. CUNNINGHAM: Just leave it for the witness	
22	to answer. That's a good answer. Good answer.	
23	BY MR. BARANOV:	
24	Q I'm not asking you to guess, I'm not asking you	
25	to speculate.	12:05:11

1 A (In English) Yeah, yeah, yeah. 12:05:12

2 Q If you don't remember, you don't remember.

3 A (In English) Yeah, I can't remember that.

4 Q Okay. That's all we can do. We are human,
5 we're not computers. 12:05:20

6 So what products are your companies
7 manufacturing for Colt right now?

8 THE INTERPRETER: The interpreter needs to
9 inquire, the product.

10 Easy. The name witness give is Easy Rack for 12:05:46
11 the lighting.

12 BY MR. BARANOV:

13 Q What is this device?

14 A I don't know the English name.

15 Q Okay. Are you manufacturing LED tubes for 12:06:19
16 Colt?

17 A No.

18 Q Any harnesses?

19 A No.

20 Q What about cables? 12:06:47

21 A No.

22 Q And when was the first time you met Mr. Macias,
23 who is sitting to your left?

24 A Alex brought him to meet with me. I think it
25 was this year. 12:07:14

1 Q And the meeting took place in China? 12:07:16
2 A Yes.
3 Q Now, at some point you were served with a
4 subpoena in this lawsuit. Do you know?
5 A What? 12:07:37
6 MR. CUNNINGHAM: Information of the deposition.
7 BY MR. BARANOV:
8 Q Were you ever served with a subpoena requiring
9 you to attend today's deposition?
10 A Subpoena? 12:08:05
11 Q Let me -- okay. Let me rephrase it.
12 How did you find out that you have be here
13 today?
14 A I was -- originally, I personally would like to
15 come to the United States for visit to begin with, and 12:08:46
16 also I have other clients I need to meet, other tube
17 clients I need to meet here. So I arrange with Alex to
18 come here together to have some fun here, and I also
19 like to visit U.S. studios to find out the how the U.S.
20 studio works. 12:09:16
21 Q Okay. So how did you find out about this
22 deposition?
23 A Because yesterday, well, we went to visit the
24 studio. At that time a memo notified me of this matter.
25 Q So that was the first time you learned that 12:09:43

1	you're being deposed in this lawsuit today?	12:09:45
2	A Yes.	
3	Q So why did you agree to come?	
4	A I just want to tell the truth of what happened.	
5	Since Quasar no longer has any business -- business	12:10:14
6	dealings anymore.	
7	Q So this is your way to get back to them, or at	
8	them; is that right?	
9	A No, not at all. You cannot say this is a	
10	payback. Since I personally have never met Mr. Steven	12:10:39
11	Strong, I also would like to take the opportunity to let	
12	everyone know the entire progression of the matter, not	
13	just listen to Andy's one-sided story.	
14	Q Are you being compensated for your attendance	
15	by anyone?	12:11:17
16	A I hope someone would do that, but who will do	
17	that? Are you saying that the U.S. laws allow the	
18	people to be compensated for this?	
19	Q I'm just asking the questions, that's all I'm	
20	doing.	12:11:48
21	A Okay. I'm just asking, too.	
22	Q Okay. Who paid for your air ticket to the	
23	States?	
24	A Myself.	
25	Q Who is paying for your hotel accommodations?	12:12:03

1	A	Myself.	12:12:07
2	Q	Is Colt paying for any of your expenses in	
3		connection with your trip here?	
4	A	Food.	
5	Q	Fair enough.	12:12:28
6		Do you know who Dennis Kelly is?	
7	A	Dennis Kelly?	
8	Q	Correct.	
9	A	I don't know. No.	
10	Q	Do you know who Richard Maas, M-A-A-S, is?	12:12:58
11	A	I don't know.	
12	Q	Do you know when what Mac Tech LED is?	
13	A	Oh, yes, I have impression of that company.	
14		Isn't this company manufacturing this -- I can't	
15		describe, but I have impression of this company.	12:13:35
16	Q	Okay. What's the impression?	
17	A	The dial under the -- like this camera, the	
18		little dial under the bottom.	
19	Q	Okay. Do you do any dealings with Mac Tech?	
20	A	No.	12:13:55
21		MR. BARANOV: All right. Let's take a	
22		five-minute break.	
23		THE VIDEOGRAPHER: The time is 12:14 p.m.	
24		We're now off the record.	
25		(A recess was taken.)	12:14:18

1 THE VIDEOGRAPHER: We're back on the record. 12:22:07
2 The time is 12:22 p.m.
3 BY MR. BARANOV:
4 Q Mr. Jun, you previously stated that Quasar at
5 at some point gave you permission to use their 12:22:16
6 trademark?
7 A Yes.
8 Q Who at Quasar gave you this permission?
9 A Andy Lau.
10 Q Was permission given to you in writing or 12:22:42
11 orally?
12 A E-mail.
13 Q Do you recall when that was?
14 A I think it was either in 2014 or 2015.
15 Q And do you recall what that e-mail stated? 12:23:06
16 A It stated that all of Quasar's R&D would be
17 done by our company, Laysion, and also production.
18 Q But what about the license to use the mark?
19 A Actually, we did not really use it.
20 Q So were you ever provided the license to use 12:24:00
21 the Quasar mark?
22 MR. CUNNINGHAM: Objection. Asked and
23 answered.
24 THE WITNESS: Yes, I feel that I answered the
25 question, also, but I can answer it again. 12:24:26

1	First of all, we registered the trademark in	12:24:38
2	China, within the scope of the Chinese law, and it is	
3	legal for us to use that trademark. Within the scope of	
4	Chinese law that governs the lighting products, within	
5	the area of lighting products, it is legal for us to use	12:25:07
6	it.	
7	On the cultural end of publication aspect of	
8	this, they are owned by another company.	
9	Q But you're not currently using the mark;	
10	correct?	12:25:46
11	A But we're not; however, we can choose to use it	
12	anytime.	
13	Q Do you have any plans to use it at this time?	
14	A I already answered that question earlier.	
15	Q Did you have permission from Quasar Science to	12:26:09
16	sell products marked Quasar?	
17	A Pursuant to Chinese law, even if we do sell	
18	products with this logo, it is still legal. However,	
19	we're not doing that. We use the logo of Laysion,	
20	L-A-Y-S-I-O-N.	12:26:51
21	Q And I appreciate that, but my question was more	
22	specific than that.	
23	A I also answered you very specifically. Well,	
24	our company did receive that e-mail.	
25	Q Okay. But my question is, aside from the	12:27:17

1 Chinese law, did you receive permission from Quasar to 12:27:23
2 sell products marked Quasar?

3 MR. CUNNINGHAM: Objection. Asked and
4 answered. Also Vague and ambiguous.

5 THE WITNESS: First of all, it has given us the 12:27:53
6 authorized right to use the trademark. And actually we
7 have already obtained the authority by registering the
8 trademark in China. Even if we do choose to use it, it
9 is legal, or it doesn't matter if we choose not to use
10 it. 12:28:34

11 Q So then the answer to my question is, no, you
12 did not have Quasar's permission?

13 MR. CUNNINGHAM: Objection. Misrepresents the
14 testimony.

15 THE WITNESS: We did. 12:28:59

16 BY MR. BARANOV:

17 Q Who gave it to you?

18 A Andy.

19 Q He gave you permission to register the mark?

20 A Yes. Not to register the trademark. We had 12:29:13
21 already registered the trademark. No, he authorized us
22 to use it.

23 Can I check in my cell phone for the date of --
24 for the specific day when we registered the trademark?

25 Q No, that's okay. We have that date. 12:29:43

1 But Andy gave you permission to use the mark in 12:29:48
2 connection with the products you're manufacturing for
3 Quasar; correct?

4 A It was like this. Because we only learned of
5 the company Quasar much later. Early on we only knew of 12:30:24
6 a company by the name of -- the name is Huanqiu,
7 H-U-A-N-Q-I-U.

8 At the time when we encountered this triangular
9 trademark, we looked at it; we thought it looked really
10 good. And so we ask around to see who ever had 12:31:08
11 registered the trademark or not, and we found no one so
12 we went to the Chinese commerce and industry authority
13 to register this trademark. That's it.

14 Q Do you know whether or not that particular
15 triangle -- that particular logo was owned by Quasar? 12:31:40

16 THE INTERPRETER: "Do you know" or "did you
17 know," Counsel?

18 BY MR. BARANOV:

19 Q Did you know whether or not this logo was a
20 trademark of Quasar? 12:31:55

21 A At the time we did not know there was such a
22 company by the name of Quasar.

23 Q So when did you first find out that there was a
24 company called Quasar Science?

25 A The specific time when I became aware of this 12:32:30

1 company is much later. I think our general manager knew 12:32:43
2 of this company earlier.

3 Q When?

4 A You mean in my case or our general manager's?

5 Q Good point. Let's start with your case first. 12:33:02

6 A When I learned of it, that should be in 2015.

7 Q And what about your general manager?

8 A Earlier, but I do not know specifically how
9 much earlier.

10 Q Can you give us an estimate? Would it be a 12:33:25
11 year earlier? Or two years earlier?

12 A I cannot estimate.

13 Q Thank you.

14 A But, however, I can inquire this for you. If
15 you need. 12:33:46

16 Q That would be helpful.

17 A Okay.

18 Q And also if you could give us a copy of the
19 e-mail, that would be helpful, too. The e-mail from
20 Andy. 12:33:59

21 A Okay. Later I will.

22 Q Okay. So why don't we do the following: Why
23 don't we mark as Exhibit 11, what is going to be the
24 copy of an e-mail from Andy. We'll insert it when it
25 becomes available. 12:34:32

1 (Exhibit 11 was marked for 12:34:34
2 identification by the Court Reporter
3 and is attached hereto.)
4 MR. BARANOV: And why don't we also, in the
5 transcript, leave two blank spaces for the witness to 12:34:40
6 fill in the dates as to when his manager and he became
7 aware of the name Quasar Science.
8 (Information to be supplied:
9
10 _.) 12:34:53
11 THE WITNESS: Okay.
12 BY MR. BARANOV:
13 Q Now, you stated that Colt is now ordering this
14 particular product from you. Can you tell us, what's
15 the dollar amount of the sales? 12:35:15
16 A Should be around 50,000 U.S. dollars.
17 Q Is it that \$50,000 per month?
18 A Just once.
19 Q That's it?
20 A That's it. 12:35:43
21 Q All right. Do you have any expectation of
22 getting additional orders from Colt?
23 A I don't know. I think we have to wait to see
24 the market reaction.
25 MR. BARANOV: I don't have any other questions 12:36:13

1 at this time. 12:36:15

2 Kelly?

3 MR. CUNNINGHAM: No.

4 MR. BARANOV: Do we stip?

5 MR. CUNNINGHAM: Yeah, I'm going to stipulate. 12:36:21

6 We'll stipulate that the transcript can be sent

7 to me, the original transcript sent to me. And we'll

8 try to get a copy to him for him to review and give us

9 any corrections that he sees that he needs over the next

10 30 days, or 30 days from the date we get -- or that he 12:36:45

11 gets it.

12 We can treat it as the official transcript in

13 the meantime.

14 MR. BARANOV: I found out the witness is also

15 going to provide us with the information requested in 12:37:10

16 the document request, that's within the 30 days as well.

17 THE WITNESS: No problem.

18 MR. BARANOV: So stipulated.

19 MR. CUNNINGHAM: All right. So stipulated.

20 THE VIDEOGRAPHER: This concludes today's 12:37:36

21 proceeding in the deposition of Ya Jun Zhang. Two DVDs

22 were used. The time is 12:37 p.m. We're now off the

23 record.

24 (The proceedings were concluded

25 at 12:37 p.m.) 12:37:47

STATE OF CALIFORNIA)
) ss.
COUNTY OF _____)

I, ZHANG YA JUN, say I have read the
foregoing deposition and declare under penalty of perjury
that my answers as indicated are true and correct.

(Date)

(Signature)

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Sandra Mitchell, Certified Shorthand Reporter,
License No. 12553, for the State of California, do hereby
certify:

That, prior to being examined, the witness
named in the foregoing deposition, to wit, ZHANG YA JUN, was
by me duly sworn to testify the truth, the whole truth and
nothing but the truth;

That said deposition was taken down by me
in shorthand at the time and place therein named and
thereafter reduced to computer-aided transcription
under my direction.

That the foregoing transcript, as typed, is a
true record of the said proceedings.

I further certify that I am not interested
in the event of the action.

Witness my hand this 24th day of October, 2018.

SANDRA MITCHELL, C.S.R. No. 12553

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张亚军





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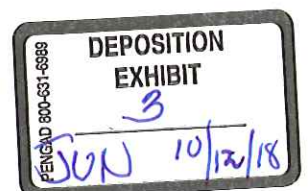
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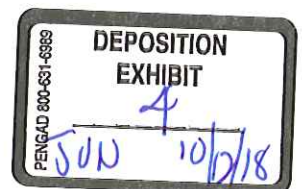
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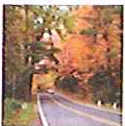
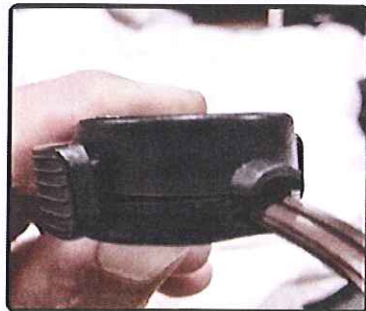


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类行星科技有限公司

授权书

类行星科技有限公司（美国）：专业生产类星体激光二极管
作为我司LED电影灯中国唯一的研究、生产战略合作伙伴，并理
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附商标图



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授权人：（签署）

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日期：06-10-15

