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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of,)
CERTAIN COMPACT WALLETES AND) INVESTIGATION
COMPONENTS THEREOF) NO.:
) 337-TA-1355
)
_____)

DEPOSITION OF CHUNMEI PENG
VOLUME I
LOS ANGELES, CALIFORNIA
TUESDAY, AUGUST 15, 2023

REPORTED BY: NATALIE PARVIZI-AZAD, CSR, RPR, RSR
CSR NO. 14125
JOB NO.: 603774

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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

)
IN THE MATTER OF,) INVESTIGATION
) NO.:
Certain Compact Wallets and)
Components Thereof) 337-TA-1355
)
-----)

DEPOSITION OF CHUNMEI PENG, VOLUME I
TAKEN ON BEHALF OF THE COMPLAINANT
IN LOS ANGELES, CALIFORNIA, BEGINNING AT
9:11 A.M. AND ENDING AT 11:38 A.M., ON
TUESDAY, AUGUST 15, 2023, BEFORE
NATALIE PARVIZI-AZAD, CERTIFIED SHORTHAND
REPORTER NUMBER 14125.

A P P E A R A N C E S

FOR THE CLAIMANT, IN THE MATTER OF:

K&L GATES LLP

BY: BENJAMIN W. WEED, ESQ.

BY: CAROLINE VERMILLION, ESQ.

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CHICAGO, ILLINOIS 60602

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BENJAMIN.WEED@KLGATES.COM

FOR THE RESPONDENT, ARW:

GLACIER LAW, LLP

BY: MICKEY YAO, ESQ.

BY: IRIS JU, ESQ. (REMOTELY)

BY: QUEENA ZHANG, ESQ. (REMOTELY)

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FOR THE UNITED STATES GOVERNMENT, OFFICE OF UNFAIR
IMPORT INVESTIGATIONS:

OFFICE OF UNFAIR IMPORT INVESTIGATIONS

BY: LINDA CHANG, ESQ.

500 E. STREET, S.W.

ROOM 317

WASHINGTON, DC 20436

(202) 205-2576

LINDA.CHANG@USITC.GOV

ALSO PRESENT:

STEVEN TOGAMI, VIDEOGRAPHER;

MINTAO HUANG, CERT NO. 301783, INTERPRETER

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I N D E X

WITNESS	PAGE
CHUNMEI PENG	
EXAMINATION BY MR. WEED	7

E X H I B I T S

EXHIBIT NO.	DESCRIPTION	PAGE
EXHIBIT 1	RESPONDENT SHENZHEN PINCAN TECHNOLOGY CO., LTD D/B/A ARW'S SUPPLEMENTAL RESPONSE TO COMPLAINANT THE RIDGE WALLET LLC'S FIRST AMENDED SET OF INTERROGATORIES TO RESPONDENTS (NOS. 1-72)	36

1	LOS ANGELES, CALIFORNIA	
2	TUESDAY, AUGUST 15, 2023, 9:11 A.M.	09:11:00
3		09:11:00
4	THE VIDEOGRAPHER: We are on the record at	09:11:00
5	9:11 a.m. on August 15th, 2023. Please note that	09:11:36
6	the microphones are sensitive and may pick up	09:11:44
7	whispers, private conversations, and cellular	09:11:47
8	interference. Audio and video recording will	09:11:49
9	continue to take place unless all parties agree to	09:11:52
10	go off the record.	09:11:55
11	This is media unit number 1 of the	09:11:57
12	video-recorded 30(b)(6) deposition of respondent	09:12:00
13	Shenzhen PinCan Technology Co., Ltd., doing business	09:12:07
14	as ARW, regarding certain topics through Chunmei	09:12:10
15	Peng, taken by counsel for the complainant in the	09:12:18
16	matter of "Certain Compact Wallets and Components	09:12:20
17	Thereof," filed before the United States	09:12:25
18	International Trade Commission, investigation number	09:12:30
19	337-TA-1355.	09:12:31
20	This deposition is being held at K&L	09:12:36
21	Gates, located at 10100 Santa Monica Boulevard,	09:12:39
22	Los Angeles, California 90067.	09:12:48
23	My name is Steven Togami from the firm	09:12:49
24	Veritext Legal Solutions, and I am the videographer.	09:12:52
25	The court reporter is Natalie Parvizi from the firm	09:12:55

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1	Veritext Legal Solutions.	09:12:59
2	I am not related to any party in this	09:13:01
3	action, nor am I financially interested in the	09:13:03
4	outcome.	09:13:06
5	If there are any objections to proceeding,	09:13:08
6	please state them at the time of your appearance.	09:13:10
7	At this time, will counsel and all present please	09:13:14
8	state their appearances and affiliations for the	09:13:16
9	record starting with the noticing party.	09:13:20
10	MR. WEED: This is Ben Weed from K&L Gates	09:13:22
11	on behalf of the complainant, and with me from K&L	09:13:24
12	Gates is Caroline Vermillion.	09:13:27
13	MR. YAO: This is Mickey Yao from	09:13:30
14	Glacier Law, LLP, on behalf of respondent ARW. With	09:13:34
15	me on Zoom is my colleague, Ms. Iris Ju.	09:13:36
16	MS. CHANG: Good morning. This is Linda	09:13:46
17	Chang from the Office of Unfair Import	09:13:46
18	Investigations at the International Trade	09:13:48
19	Commission.	09:13:48
20	THE VIDEOGRAPHER: Mr. Interpreter, please	09:13:48
21	state your name.	09:13:55
22	THE INTERPRETER: Today, assisting the	09:13:55
23	witness will be California and Federal	09:13:57
24	Court-certified Mandarin language interpreter Mintao	09:14:00
25	Nathan Huang. Badge number is 301783.	09:14:05

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1 THE VIDEOGRAPHER: Thank you. 09:14:10
2 Could we please have the witness and 09:14:10
3 interpreter oaths. 09:14:12
4 09:14:12
5 MINTAO NATHAN HUANG, Cert.# 301783, 09:14:05
6 was duly sworn as the interpreter to translate
7 English into Mandarin and Mandarin into English in
8 the following proceedings:
9
10 THE CERTIFIED STENOGRAPHER: Please raise
11 your right hand to be sworn.
12
13 CHUNMEI PENG,
14 having declared under penalty of perjury to tell
15 the truth, was examined and testified as follows:
16
17 THE CERTIFIED STENOGRAPHER: Thank you.
18 You may proceed.
19 EXAMINATION
20 BY MR. WEED:
21 Q. Good morning. 09:14:47
22 A. Morning. 09:14:48
23 Q. Would you please state your full name for 09:14:49
24 the record. 09:14:52
25 A. My full name is Chunmei Peng. 09:14:52

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1	Q. And what is your current residential	09:15:03
2	address?	09:15:05
3	A. Shenzhen, China.	09:15:06
4	Q. Can you give me a street address.	09:15:12
5	A. So my current residential address in its	09:15:14
6	entirety will be Shenzhen city, Guangdong	09:15:42
7	province -- spelling is G-U-A-N-G-D-O-N-G --	09:15:42
8	Longgang District, L-O-N-G-G-A-N-G, Buji, B-U-J-I,	09:15:53
9	Junhao, J-U-N-H-A-O, Unit 2B -- number 2, B is the	09:16:00
10	alphabet "B" -- number 1006, ZIP code 51A000.	09:16:10
11	But I'm not sure about my ZIP code, but	09:16:16
12	you are likely be able to find me with that ZIP	09:16:18
13	code.	09:16:21
14	Q. Have you ever been deposed before?	09:16:21
15	A. I have not.	09:16:25
16	Q. Okay. Let's go over a few ground rules if	09:16:26
17	that's all right.	09:16:30
18	A. Sounds good.	09:16:32
19	Q. You understand that I will be asking you	09:16:33
20	questions, and you'll be giving answers to those	09:16:36
21	questions; right?	09:16:38
22	A. Sounds good.	09:16:39
23	Q. And you understand that you're giving	09:16:45
24	answers to those questions under oath; right?	09:16:47
25	A. I understand that.	09:16:49

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1 Q. You understand that it's the same oath you 09:16:56
2 would take if you were sitting in the ITC in 09:16:58
3 Washington; correct? 09:17:00
4 A. I understand that. 09:17:01
5 Q. Is there any reason today why you can't 09:17:11
6 give truthful testimony? 09:17:14
7 A. No. 09:17:15
8 Q. You're not taking any medications, for 09:17:21
9 example? 09:17:24
10 A. No. 09:17:24
11 Q. You understand that you're here today as 09:17:26
12 the corporate representative for a company; right? 09:17:30
13 A. Yes, that's correct. 09:17:32
14 Q. And that company is called Shenzhen PinCan 09:17:38
15 Technology Co., Ltd.; right? 09:17:43
16 A. That's correct. 09:17:43
17 Q. My understanding is that that company does 09:17:47
18 business as something called ARW. 09:17:51
19 Is that true? 09:17:54
20 A. That's correct. 09:17:55
21 Q. Is it okay if we refer to that company as 09:17:57
22 ARW today? 09:18:02
23 A. Yes. 09:18:03
24 Q. Are you employed by ARW? 09:18:07
25 A. That's correct. 09:18:11

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1	Q. Are there more employees of ARW besides	09:18:14
2	you?	09:18:20
3	A. Yes.	09:18:21
4	Q. How many?	09:18:24
5	A. Another employee other than me.	09:18:25
6	Q. So there are two total employees of ARW;	09:18:31
7	is that right?	09:18:35
8	A. That's correct.	09:18:35
9	Q. Is there a division of responsibilities	09:18:38
10	between those two employees at ARW?	09:18:44
11	A. So in terms of division of responsibility	09:18:47
12	within ARW, I am personally in charge of the	09:19:27
13	business option with Amazon in terms of its	09:19:30
14	supervision, purchasing, shipment. And the other	09:19:34
15	colleague of mine is in charge of the internal	09:19:39
16	operation of the Amazon stores, such as sales and	09:19:42
17	promotion events.	09:19:45
18	Q. Is Amazon the only place that ARW sells	09:19:46
19	products?	09:19:53
20	A. That's correct.	09:19:53
21	Q. And is that true worldwide, or is that	09:19:54
22	true just in the United States?	09:19:57
23	THE INTERPRETER: Interpreter's	09:20:16
24	clarification.	09:20:18
25	A. So that applies to -- not only within the	09:20:22

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1	United States, that we do business through Amazon	09:20:24
2	only. It applies to the world as well, that we do	09:20:26
3	business through Amazon only.	09:20:30
4	Q. So every -- every product that ARW sells	09:20:31
5	worldwide is sold through Amazon; is that right?	09:20:35
6	A. That's correct.	09:20:38
7	Q. And my understanding is that ARW does not	09:20:43
8	manufacture any of its products.	09:20:46
9	Is that true?	09:20:51
10	A. That's correct.	09:20:52
11	Q. Is somebody at the company responsible for	09:20:52
12	working with the manufacturer of the products?	09:20:56
13	A. No, but I do the purchasing.	09:20:58
14	Q. Now, you understand this case is about	09:21:08
15	wallets; right?	09:21:17
16	A. That's correct.	09:21:18
17	Q. Does ARW sell any products other than	09:21:22
18	wallets?	09:21:25
19	A. Yes, we do.	09:21:25
20	Q. What kinds of things, at a high level?	09:21:31
21	THE INTERPRETER: Okay.	09:21:33
22	A. UV lights.	09:21:33
23	Q. Okay. Anything else?	09:21:41
24	A. Currently, nothing else.	09:21:42
25	Q. And is it true that currently ARW is not	09:21:45

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1	selling wallets in the US?	09:21:50
2	A. And you're talking about only currently;	09:21:52
3	is that correct?	09:22:03
4	Q. Currently, yes.	09:22:03
5	A. Then, yes, we're not.	09:22:05
6	Q. Why is that?	09:22:06
7	A. So our link has been replaced by Amazon.	09:22:07
8	It's been barred by Amazon.	09:22:16
9	THE VIDEOGRAPHER: I'm sorry, Counsel. I	09:22:22
10	just -- I should announce that we were joined by a	09:22:23
11	Queenena --	09:22:23
12	MR. YAO: Zhang.	09:22:23
13	THE VIDEOGRAPHER: -- Zhang.	09:22:28
14	MR. YAO: She's with -- she is with us on	09:22:28
15	behalf of Glacier as well.	09:22:33
16	THE VIDEOGRAPHER: On Zoom.	09:22:35
17	MR. YAO: Yeah.	09:22:36
18	THE VIDEOGRAPHER: Thank you.	09:22:37
19	BY MR. WEED:	09:22:38
20	Q. You talked about being responsible for	09:22:39
21	purchasing; right?	09:22:42
22	A. Yes.	09:22:44
23	Q. Do you work with a factory when you	09:22:48
24	purchase wallets, or do you work with somebody else?	09:22:52
25	A. Yes, that's correct.	09:22:55

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1	Q.	What is the name of that factory?	09:23:06
2	A.	So it's -- the factory's name is --	09:23:08
3		THE INTERPRETER: Interpreter's spelling.	09:23:35
4	A.	R-U-I, Rui, Ding, D-I-N-G, Sheng,	09:23:35
5		S-H-E-N-G; Intricate Metallurgy Company in -- of	09:23:48
6		Shenzhen City.	09:23:50
7	Q.	And has that always been the factory that	09:23:50
8		ARW has worked with to buy wallets?	09:23:53
9	A.	Yes, that's correct.	09:23:55
10	Q.	Do you remember when ARW first purchased	09:24:02
11		wallets from that factory?	09:24:05
12	A.	July of 2017.	09:24:18
13	Q.	Did the wallets that ARW purchased in July	09:24:20
14		of 2017 look the same as the ones it was purchasing	09:24:23
15		at the end of 2022?	09:24:27
16	A.	I didn't make any purchase back in 2017.	09:24:41
17	Q.	I thought you said ARW first purchased	09:24:46
18		wallets from that factory in July of 2017; is that	09:24:50
19		not true?	09:24:53
20	A.	Correction, 2021, July of 2021.	09:24:54
21	Q.	I see. So if I have it right, the first	09:25:01
22		purchase that ARW made of wallets was in July of	09:25:05
23		2021?	09:25:08
24	A.	Yes, that's correct.	09:25:14
25	Q.	Okay. And has ARW always purchased	09:25:14

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1 wallets that look the same between July of 2021 and 09:25:17
2 whenever it made its last purchase? 09:25:21
3 A. The same -- the same style, yes. 09:25:24
4 Q. How did you find the factory that ARW 09:25:34
5 purchases wallets from? 09:25:37
6 A. The owner of that factory is a friend of 09:25:38
7 mine. 09:25:50
8 Q. Was ARW selling UV lights before it 09:25:50
9 started selling wallets? 09:25:56
10 A. That's correct. 09:25:57
11 Q. Why did ARW decide to get into the 09:26:01
12 business of selling wallets? 09:26:04
13 A. At the time, the factory recommended the 09:26:06
14 wallet as a new type of product that we can sell. 09:26:28
15 After the recommendation, I did some accounting or 09:26:30
16 math in terms of market share and profitability, and 09:26:33
17 it fits the kind of product that we would like to 09:26:36
18 market on Amazon. 09:26:39
19 Q. Is the friend of yours who runs the 09:26:41
20 factory also the other employee of ARW? 09:26:46
21 A. No, that's not right. 09:26:51
22 Q. Okay. Do you buy UV lights from the same 09:26:59
23 factory where you buy wallets? 09:27:02
24 A. No, they're not. 09:27:04
25 Q. Do you know if that factory sells products 09:27:11

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1	other than wallets?	09:27:14
2	A. And we are talking about Ruidingsheng,	09:27:15
3	that factory?	09:27:25
4	Q. Yes.	09:27:26
5	A. As far as I know, yes, they do sell other	09:27:27
6	products.	09:27:31
7	Q. But I -- strike that.	09:27:32
8	Is it true that ARW only buys wallets from	09:27:34
9	that factory?	09:27:39
10	A. Yes, that's correct.	09:27:47
11	Q. Okay. Can you explain for me how a wallet	09:27:48
12	gets from the factory to a customer who buys it on	09:27:52
13	Amazon?	09:27:56
14	A. So first, we place a purchase order with	09:27:58
15	the factory. So once the product is manufactured,	09:28:15
16	we ask --	09:28:28
17	THE INTERPRETER: And interpreter's	09:28:29
18	clarification.	09:28:31
19	A. -- we ask the logistic company to pick up	09:28:32
20	the product from the factory, and then, it will be	09:28:34
21	exported to the US into the warehouse of Amazon FBA,	09:28:48
22	at which point we can initiate the sales process.	09:29:01
23	At this point, the Amazon store is eligible to sell	09:29:05
24	those products.	09:29:08
25	Q. Okay.	09:29:08

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1	A. And once a product is sold, Amazon will be	09:29:19
2	in charge of delivering the product to the	09:29:21
3	customers' hands or homes.	09:29:24
4	Q. Okay. Let's break that down. The first	09:29:25
5	thing you said is that a purchase order is placed;	09:29:27
6	correct?	09:29:30
7	A. Yes, we would place an inventory-oriented	09:29:30
8	purchase order with the factory, informing how much	09:29:45
9	of -- inventory we would like to have with them --	09:29:50
10	from them.	09:29:52
11	Q. And I think you said that that is your	09:29:52
12	responsibility; right?	09:29:54
13	A. Yes, that's correct.	09:29:55
14	Q. How do you determine how much inventory to	09:29:56
15	request in a purchase order?	09:30:02
16	A. So we determine the future month inventory	09:30:03
17	based on the previous month's monthly sales numbers	09:30:23
18	from Amazon.	09:30:26
19	Q. Before Amazon took the products down, were	09:30:29
20	you seeing a growth in sales month over month?	09:30:34
21	A. That's correct.	09:30:37
22	Q. Do you have any idea how much growth you	09:30:45
23	were seeing?	09:30:48
24	A. So the rate of growth is calculated based	09:30:49
25	on the sales rules established by Amazon or applied	09:31:06

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1 within Amazon, where the latter part of the year, we 09:31:12
2 will see a 50 percent increase of sales. 09:31:16
3 Q. When you place a purchase order, do you 09:31:19
4 also specify what colors of wallets to purchase? 09:31:24
5 A. Yes. 09:31:32
6 Q. Do you specify anything else about the 09:31:34
7 wallets that you want to purchase besides the color 09:31:38
8 and the quantity? 09:31:41
9 A. No, nothing other than color and quantity. 09:31:50
10 Q. How does the factory tell you what wallets 09:31:53
11 are available to purchase? 09:31:59
12 A. Usually, I inform them as to what kind of 09:32:00
13 wallet that I would like to purchase, and they will, 09:32:21
14 in turn, inform me how long would it take in order 09:32:24
15 to manufacture certain kind of product. 09:32:27
16 Q. And when you, in the past, have informed 09:32:29
17 them what kind of wallet you want to purchase, is 09:32:33
18 that limited to telling them what color you would 09:32:36
19 like the wallet to be? 09:32:39
20 A. Nothing other than color and quantity. 09:32:49
21 Q. Have you ever asked the factory for a 09:32:52
22 color that they said they couldn't give you? 09:32:56
23 A. Nothing like that happened. 09:32:58
24 Q. Have you ever asked the factory to make a 09:33:06
25 leather wallet? 09:33:09

Page 17

1	A. No. Not so far, no.	09:33:11
2	Q. Have you ever personally taken apart an	09:33:17
3	ARW wallet?	09:33:22
4	A. Yes.	09:33:30
5	Q. And so, you're familiar with what the	09:33:30
6	inside parts of the ARW wallet look like?	09:33:34
7	A. Yes.	09:33:36
8	Q. Have you ever had discussions with the	09:33:40
9	factory about what the inside of the ARW wallet	09:33:43
10	looks like?	09:33:48
11	A. A discussion about what? What do you	09:33:50
12	mean?	09:34:00
13	Q. About, for example, the shape of the money	09:34:00
14	clip.	09:34:03
15	A. No, we have not engaged in any discussion	09:34:06
16	regarding its shapes because these products are	09:34:16
17	existing products in the factory.	09:34:18
18	Q. Have you ever asked the factory to change	09:34:20
19	the shape of the money clip on the ARW wallets?	09:34:24
20	A. No.	09:34:28
21	Q. Is it your understanding that the ARW	09:34:36
22	wallets also have a logo on them that says ARW?	09:34:40
23	A. Yes.	09:34:45
24	Q. Who puts the logo on the wallets?	09:34:52
25	A. The factory did.	09:34:55

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1 Q. And did you have to give the factory an 09:35:00
2 image that you wanted to have them put on the 09:35:05
3 wallets for the logo? 09:35:09
4 A. Yes, that's correct. 09:35:10
5 Q. Okay. All right. I think what you said 09:35:12
6 happens next is that a logistics company picks the 09:35:19
7 wallets up from the factory; correct? 09:35:22
8 A. That's correct. 09:35:24
9 Q. Do you know who that logistics company is? 09:35:29
10 A. Shenzhen Beitai -- 09:35:31
11 THE INTERPRETER: Interpreter's spelling 09:35:31
12 is B-E-I-T-A-I. 09:35:31
13 A. -- International Logistics Company. 09:35:48
14 Q. And how did you come to know about that 09:35:48
15 company? 09:35:52
16 A. It's a -- we knew each other through an 09:35:52
17 exhibition of logistics companies. 09:36:07
18 Q. Did the -- strike that. 09:36:09
19 Did your friend at the factory introduce 09:36:10
20 you to the logistics company? 09:36:13
21 A. No. No, that's not the case. 09:36:15
22 Q. When was that exhibition of logistics 09:36:21
23 companies that you mentioned? 09:36:28
24 A. So it happened sometime in the early part 09:36:29
25 of 2021 where we had a logistics exhibition. 09:36:45

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1	Q. Why were you at that -- well, strike that.	09:36:50
2	Were you at that logistics exhibition	09:36:52
3	before you first purchased wallets?	09:36:57
4	A. That's correct, yes.	09:36:59
5	Q. Why were you at that exhibition?	09:37:04
6	A. Because I've always been in the Amazon	09:37:05
7	business industry, so oftentimes, I attend logistics	09:37:16
8	exhibitions.	09:37:21
9	Q. All right. When the logistics company	09:37:22
10	picks up the wallets from the factory, who has title	09:37:35
11	to the wallets at that point?	09:37:39
12	A. Can you define "title" for me. I don't	09:37:41
13	quite understand what you mean by that.	09:37:55
14	Q. Who owns the wallets after the logistics	09:37:56
15	company picks them up from the factory?	09:37:59
16	A. Only at that point after the pick up;	09:38:04
17	correct?	09:38:13
18	Q. Yes.	09:38:13
19	A. Our company, PinCan.	09:38:14
20	Q. So PinCan owns the wallets at the point	09:38:22
21	when the logistics company picks them up from the	09:38:26
22	factory; is that right?	09:38:32
23	A. Yes.	09:38:33
24	Q. So for example, if the wallets are lost in	09:38:34
25	the overseas transportation, the loss is an ARW	09:38:41

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1 loss; right? 09:38:45

2 A. That's correct. 09:38:46

3 Q. Okay. And do you know where wallets from 09:38:51

4 the factory actually enter the US? 09:38:57

5 A. I'm not sure about that. 09:39:00

6 Q. Is it different? 09:39:08

7 THE INTERPRETER: Counsel, can you clarify 09:39:12

8 that -- 09:39:13

9 MR. WEED: Sure. 09:39:13

10 THE INTERPRETER: -- phrasing? 09:39:13

11 BY MR. WEED: 09:39:14

12 Q. Is it different depending on which 09:39:14

13 shipment we're talking about? 09:39:17

14 A. Likely. We don't place a limitation on 09:39:24

15 the kind of shipment with the logistics company. 09:39:29

16 Q. Okay. You said, then, that they are 09:39:32

17 exported to the US for Amazon FBA; right? 09:39:35

18 A. Yes. 09:39:39

19 Q. Does Amazon ever own the products as part 09:39:44

20 of the Amazon FBA process? 09:39:49

21 A. I don't believe there's a point that 09:39:52

22 Amazon owns such products. Such inventory has 09:40:06

23 always been ours. 09:40:11

24 Q. But is it true that the inventory in the 09:40:12

25 US for ARW wallets is always in an Amazon warehouse? 09:40:14

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1 the shelf? 09:42:12

2 A. January of 2023. 09:42:14

3 Q. Okay. And when Amazon took that product 09:42:22

4 off the shelf, do you have any idea how many wallets 09:42:24

5 Amazon shipped back? 09:42:28

6 A. Around 26,000. 09:42:31

7 Q. And where are those 26,000 wallets 09:42:40

8 currently? 09:42:42

9 A. In Texas. 09:42:42

10 Q. Are they in an Amazon facility in Texas? 09:42:51

11 A. No. 09:42:54

12 Q. Are they in an -- strike that. 09:42:57

13 Are they at a building that ARW owns in 09:43:01

14 Texas? 09:43:05

15 A. It's an international warehouse that we 09:43:05

16 had a business relationship with. 09:43:14

17 THE INTERPRETER: Not -- interpreter's 09:43:19

18 clarification. 09:43:19

19 A. No. And it is an international warehouse 09:43:20

20 that we had a business relationship with. 09:43:22

21 Q. Is it your understanding that, right now, 09:43:25

22 ARW owns those 26,000 or so wallets? 09:43:30

23 A. That's correct. 09:43:34

24 Q. And what is ARW's view of the value of 09:43:42

25 those 26,000 wallets at this point? 09:43:47

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1	A. Well, in terms of the specific	09:43:50
2	calculation, I have to do the math in terms of its	09:44:09
3	actual production cost, its shipment cost, return	09:44:14
4	shipment cost. Then I'll have a number.	09:44:19
5	Q. Are you saying that you could tell me	09:44:21
6	right now what the number is for the actual	09:44:26
7	production cost, shipment cost, return cost?	09:44:29
8	A. I may be able to give you a unit price.	09:44:34
9	But the other numbers, I have to do calculations on.	09:44:51
10	I don't have a number readily available today.	09:44:55
11	Q. Could you give me an estimate of what the	09:44:58
12	unit price is per wallet?	09:45:00
13	A. Sure.	09:45:02
14	Q. What is that?	09:45:05
15	A. So in terms of the two products, the	09:45:07
16	carbon fiber one is 23.8 renminbi, RMB, cost for	09:45:27
17	unit price. And the forged one, which is slightly	09:45:37
18	pricier, at 33.8 RMB.	09:45:38
19	Q. Sorry, just to clarify, did she say 23.8	09:45:41
20	or 25.8?	09:45:43
21	A. 23.8. 23.8.	09:45:44
22	Q. And do you have any sense of the breakdown	09:45:47
23	between the carbon fiber product and the forged	09:45:55
24	product in that 26,000 wallet lot?	09:45:58
25	A. I don't have a specific number in mind,	09:46:01

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1 but my estimation for the carbon fiber lot is around 09:46:20
2 60 to 70 percent of the total. 09:46:25
3 Q. Have you seen with your eyes that 26,000 09:46:27
4 wallet lot? 09:46:36
5 A. No, I have not. 09:46:38
6 Q. You mentioned that that warehouse in Texas 09:46:46
7 is one that you had a prior relationship with; 09:46:49
8 correct? 09:46:52
9 A. Not a prior relationship, a relationship. 09:46:52
10 Q. Did you find that warehouse for the 09:47:02
11 purpose of holding the 26,000 wallets? 09:47:05
12 A. Yes. 09:47:08
13 Q. And how did you find them? 09:47:12
14 A. If you engage in a Baidu search -- 09:47:14
15 THE INTERPRETER: The spelling is 09:47:14
16 B-A-I-D-U. 09:47:14
17 A. -- for the term "overseas storage 09:47:38
18 warehouse," then multiple entries will pop up. And 09:47:41
19 it just so happens that this Texas company has an 09:47:45
20 office in Shenzhen. I paid them a visit, negotiated 09:47:48
21 the arrangement for the wallets. 09:47:51
22 Q. So does ARW have a written agreement with 09:47:53
23 that Texas warehouse? 09:47:56
24 A. No, we don't. 09:48:00
25 Q. Is ARW paying that warehouse to hold its 09:48:05

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1	wallets?	09:48:08
2	A. Yes.	09:48:09
3	Q. Is that a per month fee?	09:48:15
4	A. So not quite like that. It started with a	09:48:17
5	60-day rent fee waiver, after which we engaged in a	09:48:37
6	half-year model where the fees are calculated every	09:48:41
7	six months.	09:48:45
8	Q. I see.	09:48:45
9	A. Thank you.	09:48:48
10	Q. Do you know what city in Texas that	09:48:48
11	warehouse is in?	09:48:50
12	A. I don't have an idea.	09:48:51
13	Q. Do you know the name of the warehouse?	09:48:56
14	A. Yisong, Y-I-S-O-N-G, in its Chinese name.	09:48:58
15	That's the one that I go by.	09:49:11
16	Q. Does ARW have any plans for those wallets	09:49:13
17	at this point?	09:49:18
18	A. No.	09:49:18
19	Q. Has ARW's business grown since those	09:49:25
20	wallets were taken down from Amazon?	09:49:34
21	A. ARW wallet has ceased its sales.	09:49:36
22	(Reporter clarification.)	09:49:36
23	A. Ceased. Ceased its sales.	09:49:55
24	Q. Right, but I thought you said that ARW	09:49:55
25	sold other products too; correct?	09:49:58

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1	A.	Then yes.	09:51:56
2	Q.	And how big is that office space?	09:51:57
3	A.	About 60 square meters.	09:51:59
4	Q.	Do you and your colleague go into the	09:52:06
5		office every day?	09:52:09
6	A.	Yes, we do.	09:52:10
7	Q.	Do you or your colleague have other jobs	09:52:15
8		beyond ARW?	09:52:18
9	A.	No.	09:52:19
10	Q.	How did you come up with the name ARW?	09:52:25
11	A.	So ARW, the trade name, is something that	09:52:30
12		I came up with. The principle that I followed was	09:52:47
13		something that's short and memorable.	09:52:50
14	Q.	Does ARW stand for anything?	09:52:52
15	A.	No.	09:52:55
16	Q.	Did you draw the logo for ARW?	09:52:59
17	A.	No, we hired a designer.	09:53:02
18	Q.	Are you familiar with the Ridge Wallet?	09:53:12
19	A.	To some extent, yes.	09:53:20
20	Q.	When did you first hear about the Ridge	09:53:25
21		Wallet?	09:53:27
22	A.	Around June of 2021, I believe.	09:53:27
23	Q.	Is that before you first purchased an	09:53:41
24		order for wallets?	09:53:45
25	A.	That's correct.	09:53:46

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1 Q. And how did you hear about Ridge in June 09:53:52
2 of 2021? 09:53:55
3 A. At the time when I was about to purchase a 09:53:57
4 wallet, I was selecting wallets for ARW to sell, 09:54:21
5 there was a meeting with the factory, and they 09:54:25
6 showed us a series of wallets, which included the 09:54:30
7 Ridge Wallet. 09:54:33
8 Q. So do I have it right that you first heard 09:54:37
9 about the Ridge Wallet from the factory you purchase 09:54:40
10 ARW wallets from? 09:54:43
11 A. Yes, that's correct. 09:54:51
12 Q. And did the factory present the Ridge 09:54:52
13 Wallet to you as an option of something you could 09:54:54
14 buy? 09:54:56
15 A. I don't quite understand. Can you 09:55:06
16 rephrase? 09:55:07
17 Q. Well, you said that they showed you a 09:55:08
18 series of wallets; correct? 09:55:10
19 A. Yes. 09:55:11
20 Q. Can you remember any of the other wallets 09:55:14
21 besides Ridge that were in that series? 09:55:17
22 A. Yes, a variety of different wallets from 09:55:26
23 this factory. 09:55:34
24 Q. And what did they tell you about that 09:55:34
25 series of wallets as they were showing it to you? 09:55:36

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1	A.	So by way of introduction, they told us	09:55:39
2		that this is a popular type of wallet, that it's a	09:55:58
3		mature product. It's good for sales. It's ready	09:56:03
4		for sales.	09:56:06
5	Q.	Did they say that about all the wallets in	09:56:06
6		the series or just the Ridge Wallet?	09:56:13
7	A.	All the samples that they showed, they	09:56:26
8		have similar introductions.	09:56:28
9	Q.	Was it your understanding that that	09:56:29
10		factory was manufacturing Ridge Wallets?	09:56:31
11	A.	That, I'm not sure about.	09:56:42
12	Q.	Did the factory suggest that by copying	09:56:44
13		the Ridge Wallet you could make money on Amazon?	09:57:11
14	A.	No.	09:57:27
15	Q.	Did you -- strike that.	09:57:27
16		When you were at the factory looking at	09:57:34
17		the Ridge Wallet, did anybody take the Ridge Wallet	09:57:36
18		apart?	09:57:39
19	THE INTERPRETER:	Interpreter needs to	09:58:07
20		clarify.	09:58:08
21	A.	Point of clarification about my previous	09:58:11
22		testimony is that during the introduction phase with	09:58:23
23		the factory, what they showed me in regards to the	09:58:26
24		Ridge Wallets, it was a link on Amazon, but what	09:58:30
25		they actually showed me physically is what they	09:58:33

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1	have.	09:58:36
2	Q. I see. So when you -- were you at a	09:58:37
3	meeting in person at the factory at that time?	09:58:42
4	A. Yes, I did.	09:58:44
5	Q. And the only product that you saw in	09:58:51
6	person was the product that you ultimately bought;	09:58:53
7	right?	09:58:56
8	A. Correct.	09:58:56
9	Q. But is it fair to assume that by the time	09:58:58
10	you showed up at the factory for that meeting you	09:59:02
11	were already interested in purchasing wallets?	09:59:05
12	A. So yes, I was previously familiar with	09:59:07
13	this category of products on Amazon, things like	09:59:37
14	wallets and watches, but I was -- yes, you can say	09:59:41
15	that I was interested in purchasing wallets prior to	09:59:45
16	going to the factory.	09:59:47
17	Q. But before going to the factory, you	09:59:48
18	weren't aware of Ridge; correct?	09:59:51
19	A. Correct.	09:59:52
20	Q. Did you become interested in this category	09:59:59
21	of products because your friend at the factory	10:00:03
22	suggested it to you, or were you interested prior to	10:00:07
23	talking to your friend at the factory?	10:00:09
24	A. I became interested in it after the	10:00:22
25	recommendation from the factory.	10:00:25

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1	Q. Do you have any understanding why the	10:00:27
2	factory recommended this product line to you?	10:00:29
3	A. Because they have been selling this kind	10:00:32
4	of product for many years.	10:00:40
5	Q. And did your friend know that you were	10:00:42
6	already selling products on Amazon when he	10:00:45
7	recommended wallets to you?	10:00:47
8	MR. YAO: Objection. Calls for	10:00:56
9	speculation.	10:01:02
10	You can answer if you know.	10:01:02
11	A. Counsel, can you kindly repeat the	10:01:16
12	question?	10:01:18
13	Q. Did your friend know that you were already	10:01:18
14	selling products on Amazon when he recommended	10:01:21
15	wallets to you?	10:01:23
16	A. Aware, yes.	10:01:24
17	Q. And was this a friend you had from prior	10:01:32
18	business relationships or from personal	10:01:35
19	relationships?	10:01:37
20	A. A personal friend of mine.	10:01:38
21	Q. Do you know when Shenzhen PinCan	10:01:45
22	Technology was created?	10:01:53
23	A. 2013.	10:01:58
24	Q. And prior to starting to sell wallets in	10:01:59
25	2021, had Shenzhen PinCan sold anything but UV	10:02:06

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1	lights between 2013 and 2021?	10:02:11
2	A. Yes.	10:02:11
3	Q. It had sold other products before?	10:02:25
4	A. Yes.	10:02:27
5	Q. At a high level, what kinds of products	10:02:27
6	were those?	10:02:29
7	A. TV box, CD player. CD player. And	10:02:37
8	kitchen rack for seasonings, things like that.	10:02:53
9	Q. Is it fair to say that Shenzhen PinCan has	10:02:57
10	always been in the business of selling products on	10:03:03
11	Amazon?	10:03:05
12	A. So I may not have the most accurate	10:03:17
13	information with regard to the dates because I	10:03:30
14	joined in 2021, but likely I heard that they started	10:03:32
15	the Amazon store back in 2016 or 2017.	10:03:36
16	Q. Okay. So you joined ARW in 2021.	10:03:39
17	Is that true?	10:03:45
18	A. Yes, correct.	10:03:46
19	Q. And how did you find ARW as a possible	10:03:49
20	employer?	10:03:53
21	A. It's through a friend's referral. It's a	10:03:55
22	group of friend who have been doing Amazon stores.	10:04:07
23	Q. And what's your current title at ARW?	10:04:10
24	A. CEO.	10:04:12
25	Q. Do you know what month you joined ARW in	10:04:17

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1	2021?	10:04:22
2	A. June.	10:04:23
3	Q. Did you join ARW after you first visited	10:04:27
4	the factory?	10:04:32
5	A. No.	10:04:33
6	Q. When you joined ARW, do you know if they	10:04:40
7	were already discussing potentially selling wallets?	10:04:48
8	A. No.	10:04:51
9	Q. No, they weren't, or no, you don't know?	10:04:59
10	A. I don't know either way.	10:05:07
11	Q. Okay. So before, I asked you when ARW	10:05:11
12	first became aware of Ridge, and you told me it was	10:05:19
13	June of 2021. Were you answering that question as	10:05:23
14	ARW or as yourself?	10:05:27
15	A. As the company.	10:05:29
16	Q. Okay. I believe I've seen in some of the	10:05:37
17	discovery responses that ARW has made approximately	10:05:43
18	\$650,000 of profit selling wallets.	10:05:47
19	Does that sound right?	10:05:50
20	A. Give or take, yeah. And you're talking	10:05:51
21	about the total; correct?	10:06:07
22	Q. Total.	10:06:09
23	A. Give or take that amount.	10:06:10
24	Q. And is it fair to assume that that started	10:06:11
25	sometime in June of 2021?	10:06:14

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1	A. Should be August.	10:06:16
2	Q. Okay. So between August of 2021 and	10:06:25
3	January of 2023, ARW made about \$650,000 of profit	10:06:29
4	selling wallets; is that right?	10:06:32
5	A. Correct.	10:06:46
6	Q. Do you have any idea how many units were	10:06:46
7	sold in that time period?	10:06:48
8	A. So you mean quantity; correct?	10:06:50
9	Q. Correct.	10:07:03
10	A. 180,000, around that number.	10:07:09
11	Q. And do you have any understanding of the	10:07:13
12	percentage of ARW's profits over that same time	10:07:15
13	period that were made up of wallet sales as compared	10:07:19
14	to other things?	10:07:23
15	A. So we have not done a detailed analysis,	10:07:24
16	but based on the reading of statistics, likely the	10:07:52
17	profit for ARW by selling wallets was around 95	10:07:56
18	percent.	10:07:56
19	Q. Okay. And is it ARW's understanding that	10:08:01
20	the same factory has manufactured every wallet that	10:08:02
21	ARW has ever sold?	10:08:07
22	A. Yes.	10:08:09
23	Q. Okay.	10:08:12
24	MR. WEED: Why don't we take a quick	10:08:13
25	break. It's been about an hour.	10:08:15

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1	THE VIDEOGRAPHER: This marks the end of	10:08:17
2	media number 1. Going off the record at 10:07 a.m.	10:08:19
3	(Recess.)	10:19:51
4	THE VIDEOGRAPHER: This marks the	10:19:51
5	beginning of media number 2. Going back on the	10:20:21
6	record at 10:20 a.m.	10:20:24
7	(Exhibit 1 marked.)	10:20:29
8	BY MR. WEED:	10:20:29
9	Q. All right. Welcome back.	10:20:29
10	I've handed you a document that I've	10:20:33
11	marked as Exhibit 1. Do you have that?	10:20:34
12	A. Yes, I see it.	10:20:36
13	Q. And before we proceed, are you able to	10:20:43
14	read the English language?	10:20:46
15	A. I can read general English, not the	10:20:56
16	professional terminology, if that's what you mean.	10:20:59
17	Q. Okay. If you would look at the third to	10:21:02
18	the last page of that document, please.	10:21:07
19	A. I should take the opportunity to read it	10:21:23
20	beforehand. Is it page 41?	10:21:25
21	Q. Should be 54.	10:21:28
22	A. (In English): 54.	10:21:30
23	(Through the interpreter:) 54; right?	10:21:36
24	Q. Yes. On page 54, is that your signature?	10:21:37
25	A. Yes.	10:21:41

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1	Q. And did you sign this document on May	10:21:41
2	19th, 2023?	10:21:44
3	A. Correct.	10:21:50
4	Q. Can you understand by reading all of the	10:21:50
5	words that are on page 54?	10:21:52
6	A. Yes, I have read it.	10:22:01
7	Q. And you can understand the English	10:22:02
8	language words on this page; correct?	10:22:05
9	A. In the sense that I understood it after	10:22:18
10	using a phone app to translate it.	10:22:20
11	Q. I see. Did you read the remainder of this	10:22:22
12	document prior to signing page 54?	10:22:25
13	A. And please allow me some time to actually	10:22:35
14	look at them now.	10:22:38
15	Q. Of course.	10:22:39
16	A. I'm done reviewing them.	10:27:49
17	Q. Okay. Did you read this document prior to	10:27:50
18	signing page 54?	10:27:53
19	A. Yes.	10:27:53
20	Q. And did you need to use the phone app to	10:28:03
21	translate the document as you read it prior to	10:28:05
22	signing?	10:28:07
23	A. Yes.	10:28:08
24	Q. Do you remember the name of the phone app	10:28:17
25	you were using?	10:28:18

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1	THE INTERPRETER: One second. Let me do a	10:28:30
2	localization search. English spelling is Youdao,	10:28:32
3	Y-O-U-D-A-O, dictionary.	10:28:39
4	Q. All right. Would you turn to page 8,	10:28:44
5	please. Are you there?	10:28:55
6	A. Yes.	10:29:08
7	Q. Do you see in the second line where the	10:29:09
8	document says, "Respondent sells the Accused	10:29:13
9	Products through Amazon in the United States, and	10:29:19
10	its business address is Room 312-320, 3rd Building,	10:29:21
11	XingHui Technology Park, HuaLing West Road, DaLang,	10:29:21
12	LongHua, Shenzhen, Guangdong, 518109"?	10:29:34
13	A. Yes, I can see that.	10:29:59
14	Q. Is that your business address?	10:30:00
15	A. Yes, as it is on the business	10:30:04
16	registration.	10:30:08
17	Q. And does the next sentence list out the	10:30:09
18	same manufacturer you told me about earlier today?	10:30:12
19	A. Correct.	10:30:16
20	Q. Is the shipping forwarder in the last	10:30:21
21	sentence the one we talked about before as the	10:30:26
22	logistics company?	10:30:28
23	A. Correct.	10:30:30
24	Q. If you would go to page 18, please. Are	10:30:38
25	you there?	10:30:56

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1	A. Yes.	10:30:57
2	Q. In the third line up from the bottom	10:30:57
3	there's a -- there's a clause that starts	10:31:01
4	"Respondent first learned."	10:31:04
5	Do you see that?	10:31:04
6	A. Yes, I can see that.	10:31:05
7	Q. And it says, "Respondent first learned of	10:31:11
8	the Patent-in-Suit on or about October, 2020."	10:31:15
9	Do you see that?	10:31:17
10	A. Yes, I can see that.	10:31:23
11	Q. And the next sentence says, "The	10:31:24
12	individual with knowledge of said circumstance is	10:31:26
13	Chunmei Peng"; right?	10:31:30
14	A. Yes.	10:31:32
15	Q. You weren't working for ARW in October of	10:31:34
16	2020; is that right?	10:31:38
17	A. Correct.	10:31:38
18	Q. How did ARW learn of the patent-in-suit in	10:31:46
19	October of 2020?	10:31:49
20	A. I heard it from the factory.	10:31:58
21	Q. I thought you testified this morning that	10:32:00
22	you first met the factory in June of 2021?	10:32:02
23	A. Well, that factory visit was 2021, but we	10:32:05
24	have been friends prior.	10:32:17
25	Q. I see. So your friend who worked at the	10:32:18

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1	factory told you about Ridge's patent in	10:32:25
2	October 2020?	10:32:31
3	THE INTERPRETER: Interpreter needs to	10:33:06
4	clarify a particular word with the witness.	10:33:08
5	A. Okay. So what I learned back then from	10:33:11
6	the friend of mine in the factory was probably back	10:33:23
7	in October 2020. What I learned was that the patent	10:33:26
8	was published at that time.	10:33:30
9	Q. Why were you talking to your friend about	10:33:33
10	Ridge's patent in October of 2020?	10:33:36
11	A. So we were on a topic of international	10:33:39
12	e-commerce and the difficulties and hardship they're	10:33:57
13	in, and this problem just kind of came up.	10:34:01
14	Q. Prior to that discussion, were you aware	10:34:03
15	that your friend was making wallets?	10:34:11
16	A. Yes.	10:34:15
17	Q. And when you talked to your friend in	10:34:24
18	October of 2020 about Ridge's pending patent, was	10:34:28
19	that the first time that you had heard about Ridge?	10:34:32
20	A. Probably yes. I believe so.	10:34:36
21	Q. And in October of 2020, did you know that	10:34:49
22	Ridge was selling wallets?	10:34:54
23	A. Actually, I did not. At the time, I	10:35:07
24	wasn't paying attention to this kind of product.	10:35:08
25	Q. Can you tell me everything you can	10:35:11

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1	remember about the conversation with your friend in	10:35:14
2	October of 2020 about Ridge's patent?	10:35:16
3	A. So at the time, we were in this discussion	10:35:51
4	about a particular product that a lot of sellers had	10:35:53
5	been selling, but one of the companies obtained a	10:35:57
6	patent, and they start filing claims against the	10:36:00
7	various sellers.	10:36:02
8	Q. But at that time, you were not in the	10:36:04
9	wallet business; correct?	10:36:10
10	A. That's correct.	10:36:15
11	Q. And then, you met with your friend at his	10:36:15
12	factory to talk about selling wallets in June of	10:36:18
13	2021; right?	10:36:21
14	A. After June, yes, correct.	10:36:29
15	Q. And at that point, you were aware that	10:36:31
16	Ridge had a patent that had issued; right?	10:36:33
17	A. At the time, the factory's representation	10:36:43
18	to me was that this particular product that I	10:36:59
19	intended to purchase were not infringing because a	10:37:02
20	lot of sellers are still selling this product.	10:37:06
21	Q. So the -- strike that.	10:37:08
22	So you discussed Ridge's patent with the	10:37:12
23	factory when you visited around June of 2021; right?	10:37:15
24	A. Well, I didn't specifically ask about	10:37:38
25	Ridge per se, but I asked about this product that I	10:37:40

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1 intended to purchase and asked them to clarify if 10:37:44
2 there's any pending patent infringement risks, and I 10:37:47
3 want to clear out those risks before I make the 10:37:51
4 purchase. 10:37:54

5 Q. If you go over to page 19 of Exhibit 1, 10:37:57
6 please. 10:38:00

7 A. All right. I'm on that page. 10:38:01

8 Q. Do you see in the big paragraph on that 10:38:05
9 page, there's a sentence that starts out "At that 10:38:12
10 time"? 10:38:20

11 A. Right here in the middle portion? 10:38:20

12 Q. Yes. It says, "At that time, Respondent 10:38:22
13 was not selling any of the Accused Products but 10:38:26
14 found it intriguing why a product that had been on 10:38:30
15 the market since 2012 could still apply for a 10:38:35
16 patent"; right? 10:38:38

17 A. I can see that. 10:38:48

18 Q. What product was respondent aware of that 10:38:49
19 had been on the market since 2012? 10:38:57

20 A. So I did research back in -- sometime in 10:39:05
21 the past realizing that -- through Google, that 10:39:31
22 Ridge had started a Kickstarter campaign, and also 10:39:34
23 on YouTube and Google and various channels that the 10:39:37
24 product has been -- had been sold since 2012. 10:39:40

25 Q. So when this document talks about products 10:39:46

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1 on the market since 2012, you're referring to Ridge 10:39:51
2 wallets being on the market since 2012; right? 10:39:54
3 A. That particular product being campaigned 10:40:06
4 on Kickstarter. 10:40:09
5 Q. Okay. I want to make sure that you're not 10:40:10
6 talking about somebody else's product. You're 10:40:13
7 talking here about Ridge's product; right? 10:40:16
8 A. I believe it was Ridge's. I believe. 10:40:17
9 Q. Okay. That sentence goes on, and it says, 10:40:23
10 "So Respondent signed a dissent contract with a 10:40:29
11 patent agent in June 2021." 10:40:31
12 Do you see that? 10:40:33
13 A. Yes, I can see that. 10:40:45
14 Q. What is a dissent contract? 10:40:46
15 A. Okay. So back in June 2021, after 10:41:31
16 learning about the patent -- of the potential patent 10:41:33
17 related to the product that I am interested in 10:41:38
18 buying, I started an inquiry regarding to the 10:41:41
19 patent. And later on -- and it's my judgment that I 10:41:44
20 believe the patent should be invalid in this case. 10:41:48
21 And I started an application with the 10:41:52
22 department of intellectual property to nullify the 10:41:55
23 patent in this case. That's what it refers to in 10:41:59
24 this paragraph. 10:42:02
25 Q. And when you say "the department of 10:42:03

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1	intellectual property," are you talking about the US	10:42:07
2	Patent Office?	10:42:28
3	A. I believe -- well, I know that at the	10:42:28
4	time, there's an -- maybe an intellectual property	10:42:31
5	agent that works in Shenzhen. I asked him to file	10:42:33
6	an application for invalid -- invalidity with the	10:42:37
7	USPTO at the time --	10:42:41
8	Q. And --	10:42:43
9	A. -- on my behalf.	10:42:44
10	Q. Sorry. Is it your understanding that that	10:42:45
11	application for invalidity was actually filed?	10:42:47
12	A. Yes.	10:42:53
13	Q. Do you know anything about the status of	10:42:54
14	that?	10:42:58
15	A. So around December of 2021, the agent, the	10:42:59
16	IP company informed me that, yeah, the patent at the	10:43:17
17	current time is invalid.	10:43:22
18	Q. Have you spoken with that agent since	10:43:24
19	December of 2021?	10:43:26
20	A. Yes.	10:43:26
21	Q. And do you have any understanding about	10:43:34
22	whether the patent is currently invalid?	10:43:36
23	A. I'm not sure if it's valid or not.	10:43:39
24	Q. Did the agent tell you that the patent is	10:43:53
25	currently valid?	10:43:57

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1	A.	According to the agent, there is a	10:43:58
2		case -- a pending case surrounding this patent, so	10:44:10
3		until the case is concluded, there's no information	10:44:15
4		as to its status.	10:44:17
5	Q.	Do you know the name of that agent?	10:44:18
6	A.	You want the name of the company or the	10:44:30
7		person?	10:44:32
8	Q.	Either one.	10:44:32
9	A.	Okay. The name of the company is Shenzhen	10:44:33
10		Chuanfu --	10:44:33
11		THE INTERPRETER: Interpreter's spelling	10:44:33
12		is C-H-U-A-N-F-U.	10:44:47
13	A.	-- Intellectual Property Company.	10:44:51
14	Q.	Okay. So just so that I'm clear, when	10:44:54
15		page 19 refers to a dissent contract with a patent	10:45:10
16		agent, that's referring to something that happened	10:45:14
17		between ARW and the Chinese patent attorney; right?	10:45:17
18	A.	I personally am not too familiar with this	10:45:46
19		process. I don't recall retaining an attorney per	10:45:49
20		se. We hired an agent to -- maybe they have instead	10:45:53
21		hired an attorney to do the application for us, as	10:45:57
22		far as I know.	10:45:59
23	Q.	Okay. Is that reference to a patent agent	10:46:00
24		on page 19 a reference to your counsel here today?	10:46:03
25	A.	What do you mean by that?	10:46:16

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1	Q. It --	10:46:16
2	A. Which sentence are you referring to?	10:46:18
3	Q. It says, "Respondent signed a dissent	10:46:19
4	contract with a patent agent in June 2021"; right?	10:46:22
5	A. You're talking about the current counsel	10:46:31
6	of mine?	10:46:33
7	Q. Correct.	10:46:34
8	A. Then, no. No.	10:46:34
9	Q. When did you first meet your current	10:46:37
10	counsel?	10:46:39
11	A. It was after January of 2023, after Amazon	10:46:47
12	has de-shelved our products.	10:46:51
13	Q. Are you paying your counsel to represent	10:46:54
14	you?	10:46:57
15	THE INTERPRETER: Sorry, Counsel, I	
16	couldn't hear you right --	
17	MR. WEED: It's okay.	
18	THE INTERPRETER: -- there.	
19	BY MR. WEED:	
20	Q. Are you paying your current counsel to	10:47:01
21	represent you?	10:47:02
22	A. Of course I paid.	10:47:02
23	Q. All right. If you would turn to page 22,	10:47:10
24	please.	10:47:25
25	Are you there?	10:47:31

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1	10:48 a.m.	10:49:04
2	(Recess.)	10:51:26
3	THE VIDEOGRAPHER: Going back on the	10:51:26
4	record at 10:51 a.m.	10:51:42
5	BY MR. WEED:	10:51:44
6	Q. All right. Are you still on page 22?	10:51:44
7	A. Yes.	10:51:51
8	Q. Do you know when the manufacturer provided	10:51:52
9	you with sample and drawings, as this response talks	10:51:56
10	about?	10:52:00
11	A. January 8th, 2023, around that period of	10:52:03
12	time.	10:52:17
13	Q. And since January 8th of 2023, have you	10:52:17
14	had further discussions with the wallet	10:52:20
15	manufacturer?	10:52:23
16	A. Yes.	10:52:25
17	Q. What have you talked with them about since	10:52:32
18	January 8th, 2023?	10:52:35
19	A. We would like for them to provide more	10:52:38
20	proof in terms of proving that they were the	10:52:54
21	designer of this product.	10:52:57
22	Q. Have they provided any additional proof?	10:52:58
23	A. Just the 2D and 3D drawings.	10:53:01
24	Q. Why do you want the manufacturer to prove	10:53:09
25	that they were the designer of this product?	10:53:12

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1 A. Because the patent -- whoever is the 10:53:19
2 designer of the patent shall have the right to the 10:53:32
3 patent. 10:53:35
4 Q. Have you ever heard the phrase "indemnity" 10:53:35
5 before? 10:53:40
6 A. And what is that? What's the -- what's 10:53:40
7 this concept? 10:53:46
8 Q. Have you ever heard of the concept of one 10:53:47
9 company paying another company for its legal bills? 10:53:49
10 A. So one company -- one company paying for 10:53:58
11 the other company's legal bills? I have not heard 10:54:11
12 of it. 10:54:13
13 Q. Have you ever asked your manufacturer to 10:54:14
14 cover your legal bills in this case? 10:54:16
15 A. No. 10:54:18
16 Q. And so, you said the only additional proof 10:54:24
17 the manufacturer gave you were 2D and 3D drawings; 10:54:30
18 right? 10:54:35
19 A. That's correct. 10:54:35
20 Q. And were those drawings dated? 10:54:37
21 A. No, it was not. 10:54:41
22 Q. Have they ever provided you with evidence 10:54:44
23 that they came up with this product before Ridge's 10:54:46
24 patent was filed? 10:54:51
25 A. So they proved [sic] a sales record that 10:54:52

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1 their products being sold around or prior to July of 10:55:21
2 2017, the early part of 2017, on some e-commerce 10:55:24
3 platforms in mainland China. 10:55:29
4 Q. Okay. Do you know if your manufacturer 10:55:31
5 partner makes wallets for other companies as well? 10:55:39
6 A. Yes, they do. 10:55:48
7 Q. Do you know the names of any of the other 10:55:49
8 companies they make wallets for? 10:55:51
9 A. ROSSM -- 10:55:51
10 THE INTERPRETER: R-O-S-S-M? 10:56:00
11 A. -- R-O-S-S-M. Mountain, M-O-U-N-T-A-I-N. 10:56:00
12 THE INTERPRETER: Okay. 10:56:00
13 A. And another one by name of Gongniu, 10:56:18
14 G-O-N-G-N-I-U. It's a phonetic spelling meaning a 10:56:36
15 bull, B-U-L-L. And there are a couple of more, but 10:56:36
16 I don't recall at the moment. 10:56:39
17 Q. So one of them you said was "ROSSM"; 10:56:44
18 correct? 10:56:44
19 A. Yes. 10:56:44
20 Q. And then you said "Mountain." Were you 10:56:44
21 referring to "Mountain Voyage"? 10:56:47
22 A. Yes. 10:56:51
23 Q. Has the manufacturer told you that they 10:56:51
24 manufactured products for those other companies? 10:57:07
25 A. Yes. 10:57:09

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1	Q. Has the manufacturer ever told you whether	10:57:13
2	they manufactured products for Ridge also?	10:57:17
3	A. No.	10:57:24
4	Q. Do you know if the manufacturer has a	10:57:24
5	website?	10:57:43
6	A. Yes, on 1688, they do.	10:57:48
7	Q. 1 --	10:57:52
8	A. 1688.com is a platform powered by Alibaba	10:57:57
9	where the purchaser can go on to shop for different	10:58:14
10	manufacturers. The manufacturers can register an	10:58:17
11	account and showcase there.	10:58:19
12	Q. And is it your understanding that 1688.com	10:58:21
13	is a website maintained by your wallet manufacturer?	10:58:26
14	A. No, the -- well, the manufacturer is a	10:58:35
15	registered seller account, user of that website,	10:58:50
16	that platform.	10:58:53
17	Q. I see. And do you know how I would find	10:58:54
18	your manufacturer's seller account on that platform?	10:58:57
19	A. Yes, I am able to, yes.	10:59:03
20	Q. How would I find that?	10:59:12
21	A. Just input the company's name on that	10:59:18
22	platform. You will find it.	10:59:20
23	Q. Okay. Have you ever heard of a company	10:59:21
24	called SWZA?	10:59:25
25	A. Yes, I have.	10:59:31

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1	Q. How have you heard of them?	10:59:31
2	A. So we are codefendants.	10:59:39
3	Q. I see. Apart from this lawsuit, have you	10:59:41
4	heard of SWZA before?	10:59:45
5	A. We knew each other, yes.	10:59:47
6	Q. Do you know personally the people who	10:59:54
7	worked for SWZA?	10:59:56
8	A. Yes, I do.	11:00:03
9	Q. How do you know those people?	11:00:03
10	A. It's the same group of Amazon sellers in	11:00:10
11	the industry.	11:00:14
12	Q. Do you know if your factory also makes	11:00:14
13	wallets for SWZA?	11:00:16
14	A. Yes, they do.	11:00:25
15	Q. Okay. Are there any other companies you	11:00:25
16	can think of as you sit here now that you know --	11:00:27
17	THE INTERPRETER: One second, Counsel, my	11:00:32
18	realtime is off now.	11:00:34
19	MR. WEED: Want to go off the record?	11:00:36
20	THE INTERPRETER: Yeah, please.	11:00:38
21	THE VIDEOGRAPHER: Going off the record at	11:00:38
22	11:00 a.m.	11:00:40
23	(Discussion held off the record.)	11:02:17
24	THE VIDEOGRAPHER: Going back on the	11:02:17
25	record at 11:02 a.m.	11:02:35

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1 BY MR. WEED: 11:02:37

2 Q. Okay. We were just talking about how your 11:02:38

3 factory also makes wallets for SWZA. 11:02:40

4 Do you remember that? 11:02:43

5 A. Yes. Yes, I remember. 11:02:44

6 Q. Are there any other companies you can 11:02:50

7 think of where you know that your factory makes 11:02:52

8 wallets for those companies? 11:02:55

9 A. So you mean the clients to that factory; 11:02:56

10 right? 11:03:10

11 Q. Yes. 11:03:10

12 A. I believe -- so in terms of the company 11:03:21

13 brands, they were the ones that I mentioned to you 11:03:22

14 earlier. There may be some other smaller sellers, 11:03:24

15 but I do not recall. 11:03:26

16 Q. Yeah, I just asked because you -- we added 11:03:27

17 SWZA to that list. And I was wondering if there are 11:03:29

18 others that you could add to the list as well. 11:03:35

19 A. So, yeah, SWZA was added later on after I 11:03:40

20 mentioned to you the three companies. And there are 11:03:58

21 maybe other ones, but I do not -- I do not recall 11:03:59

22 their names at the moment. Maybe you show me their 11:04:10

23 logo, I can recognize them, such as a skull. But 11:04:13

24 maybe they have been taken off the shelf as well. 11:04:19

25 Q. Are you ever heard of a company called 11:04:21

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1	Storus, S-T-O-R-U-S?	11:04:27
2	A. Yes, I have.	11:04:27
3	Q. Does Storus use the same factory as you to	11:04:27
4	make their wallets?	11:04:35
5	MR. YAO: Objection. Calls for	11:04:35
6	speculation.	11:04:36
7	A. I'm not sure. I'm not sure.	11:04:37
8	Q. Could you go to page 30, please, of	11:04:47
9	Exhibit 1.	11:05:02
10	A. I'm on it.	11:05:03
11	Q. The third line from the bottom of the	11:05:04
12	page, there are three names listed.	11:05:07
13	Do you see that?	11:05:09
14	A. Yes, I can see them.	11:05:10
15	Q. Who is the second name?	11:05:14
16	A. Fan, Cui.	11:05:16
17	Q. Who is Fan, Cui?	11:05:20
18	A. My operator -- operation -- person in	11:05:22
19	charge of operations.	11:05:26
20	Q. That's the other employee of ARW?	11:05:27
21	A. That's correct, yes.	11:05:29
22	Q. Okay. And who is Zhouwen Liu?	11:05:33
23	A. The owner of that factory.	11:05:38
24	Q. I see. That's the person who you were	11:05:42
25	discussing Ridge's patent with in October of 2020?	11:05:46

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1	A.	That's correct.	11:05:49
2	Q.	Do you know where Zhouwen Liu lives?	11:05:58
3	A.	Shenzhen.	11:06:01
4	Q.	Have you ever heard the name Joe Reeves?	11:06:02
5		THE INTERPRETER: Counsel, could you	11:06:18
6		kindly spell it out.	11:06:20
7		MR. WEED: J-O-E, R-E-E-V-E-S.	11:06:21
8	A.	No, I have not.	11:06:24
9		BY MR. WEED:	11:06:25
10	Q.	Do you know the name Mia Kaminski?	11:06:25
11		Kaminski, K-A-M-I-N-S-K-I.	11:06:35
12	A.	Yes, I've heard of that name, yes.	11:06:35
13	Q.	And how do you know Mia Kaminski?	11:06:36
14	A.	I don't really know this person, but I	11:06:42
15		heard that this person has a patent.	11:06:46
16	Q.	Have you ever met Mia Kaminski?	11:06:48
17	A.	No, I have not.	11:06:53
18	Q.	Can we go to page 34, please.	11:06:58
19	A.	All right. I'm on it.	11:07:33
20	Q.	Do you see the picture on that page?	11:07:35
21	A.	Yes, I can see that.	11:07:38
22	Q.	Is that a picture from Amazon?	11:07:38
23	A.	Yes, it is.	11:07:40
24	Q.	And it looks like that's a picture of the	11:07:43
25		ARW wallet; is that right?	11:07:45

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1	A. That's correct.	11:07:46
2	Q. In the text above the picture, there is a	11:07:49
3	sentence that says, "Respondent is one of the best	11:08:00
4	sellers in Amazon."	11:08:02
5	Do you see that?	11:08:04
6	A. Where does it say that?	11:08:04
7	Q. Four lines above the picture.	11:08:16
8	A. Yes. Yes, I can see that.	11:08:23
9	Q. Why is respondent one of the best sellers	11:08:24
10	in Amazon?	11:08:27
11	A. Because it says "#1" here next to -- if	11:08:28
12	you look at the circle portion next to the green	11:08:45
13	color, it says "#1" there.	11:08:48
14	Under this category of "Men's Money	11:08:56
15	Clips," it says rank "#1."	11:08:59
16	Q. I see. And under the category of "Men's	11:09:00
17	Wallets," it says rank "#3"; right?	11:09:05
18	A. I believe so, but the number is kind of	11:09:08
19	small for me to see.	11:09:15
20	Q. Do you know when this image from Amazon's	11:09:16
21	website was captured?	11:09:21
22	A. So it was sometime back in 2022, but it	11:09:23
23	was taken by the person in charge of operations. I	11:09:40
24	need to ask her to verify. Him or her.	11:09:42
25	Q. Is it fair to say that this picture was	11:09:44

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1	not taken because of the lawsuit?	11:09:50
2	A. No.	11:09:58
3	THE INTERPRETER: Let the interpreter	11:10:01
4	clarify.	11:10:02
5	A. It's not related to this lawsuit.	11:10:05
6	Q. The next sentence says, "Respondent has	11:10:07
7	incurred numerous advertisement expenses to promote	11:10:15
8	the Accused Products."	11:10:18
9	Do you see that?	11:10:19
10	A. Yes, I can see that.	11:10:20
11	Q. What kinds of advertising expenses has ARW	11:10:28
12	incurred?	11:10:31
13	A. A lot of advertisement within Amazon.	11:10:32
14	Q. We talked in the first session about a	11:10:44
15	profit number of about 650,000 US dollars.	11:10:47
16	Do you remember that?	11:10:50
17	A. Yes.	11:10:51
18	Q. Is that profit number determined after	11:10:55
19	removing the advertisement expenses referred to in	11:10:59
20	this answer?	11:11:03
21	A. Yes.	11:11:11
22	Q. Okay. Why does ARW believe that its	11:11:11
23	products do so well on Amazon?	11:11:14
24	A. Our understanding of ARW's performance is	11:11:38
25	not just ARW, the products, being sold so well on	11:11:40

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1 Amazon. It's that our operation as a company has 11:11:44
2 done so well so that its sales are so good on 11:11:47
3 Amazon. 11:11:51
4 Q. What parts of ARW's operations have led to 11:11:51
5 ARW being number one in men's money clips? 11:11:55
6 A. So, first, we do the optimization of the 11:12:11
7 links to our products and placement of 11:12:16
8 advertisements. 11:12:25
9 Q. Anything else? 11:12:26
10 A. Promotions, deals. That's about it. 11:12:30
11 Q. Okay. Is there anything different between 11:12:38
12 ARW's products and the other wallets manufactured by 11:12:42
13 your manufacturer, to your knowledge? 11:12:46
14 A. I don't think there is much of a 11:13:04
15 difference. 11:13:07
16 Q. So is it fair to say that ARW's success is 11:13:07
17 not because its products are superior to the other 11:13:09
18 wallets made by the factory? 11:13:11
19 A. So the product is the basis, but the 11:13:31
20 success lies in our operation. 11:13:33
21 Q. If you would go to page 36, please. 11:13:44
22 A. 36, yes. 11:13:49
23 Q. In the last paragraph on page 36, it says, 11:13:50
24 "Respondent responds as follows:" -- it says, 11:13:54
25 "Respondent does not develop any of the accused 11:14:02

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1 products, and it did not consult any Ridge Products 11:14:04
2 when discussing the Accused Products with its 11:14:07
3 manufacturer." 11:14:11

4 Do you see that? 11:14:11

5 A. Yes, I can see that. 11:14:26

6 Q. I thought we said before that the factory 11:14:27
7 did show you a Ridge Wallet link on the web when you 11:14:31
8 met with them in June of 2021; right? 11:14:36

9 A. Yes, they did. The link, yes. 11:14:48

10 Q. So what does it mean that ARW did not 11:14:49
11 consult any Ridge products when discussing the 11:14:52
12 accused products with its manufacturer? 11:14:54

13 A. Essentially says that we did not develop 11:15:23
14 or design this product. It has been an existing 11:15:25
15 model with the manufacturer that we were only 11:15:28
16 recommended about this product. And the reason why 11:15:31
17 the manufacturer brought up Ridge was because at the 11:15:35
18 time, Ridge was suing people or making complaints 11:15:39
19 due to a patent. 11:15:41

20 Q. Do you remember if, when you talked with 11:15:49
21 the manufacturer in June of 2021, there were other 11:15:51
22 wallet designs available that you could have 11:15:55
23 purchased and sold? 11:15:58

24 A. No. 11:16:11

25 Q. So the one that ARW decided to purchase 11:16:11

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1	was the only wallet that the manufacturer was	11:16:15
2	selling at the time?	11:16:19
3	A. That's correct, yes.	11:16:20
4	Q. Do you know if the manufacturer today	11:16:22
5	offers different wallet designs for purchase?	11:16:25
6	A. Yes, after products being taken off the	11:16:28
7	shelf, they have to design new ones.	11:16:41
8	Q. Is ARW currently buying any of those new	11:16:44
9	designs?	11:16:48
10	A. No, we don't.	11:16:51
11	Q. Why not?	11:16:52
12	A. We are waiting for the conclusion of this	11:16:55
13	case.	11:16:57
14	Q. Are you aware of any companies that are	11:17:01
15	buying any of the new designs from your factory?	11:17:05
16	A. That information was not relayed to me by	11:17:19
17	the factory.	11:17:21
18	Q. Are you aware of any ways in which the new	11:17:22
19	designs are different from ARW's wallets?	11:17:25
20	A. Changes have been made to its structure,	11:17:28
21	appearances, and functionality.	11:17:50
22	Q. Have you seen any of those new designs on	11:17:52
23	Amazon being sold by any other wallet companies?	11:18:09
24	A. I believe so. At least some similar	11:18:12
25	products are being sold.	11:18:23

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1	Q. Can you think of who those sellers are?	11:18:25
2	A. Extremus. It's spelled as	11:18:41
3	E-X-T-R-U-M-U-S [sic].	11:18:51
4	Q. I think it's E-X-T-R-E-M-U-S?	11:18:54
5	A. Likely that too. I'm not sure.	11:19:00
6	Q. Okay.	11:19:02
7	A. I don't recall exactly.	11:19:03
8	Q. But your only familiarity with Extremus is	11:19:04
9	by seeing their products on Amazon; right?	11:19:08
10	A. That's correct.	11:19:11
11	Q. Okay.	11:19:15
12	MR. WEED: It's been about another hour.	11:19:17
13	Why don't we take another break?	11:19:18
14	THE WITNESS: Sounds good.	11:19:20
15	THE VIDEOGRAPHER: This marks the end of	11:19:23
16	media number 2. Going off the record at 11:19 a.m.	11:19:25
17	(Recess.)	11:30:33
18	THE VIDEOGRAPHER: This marks the	11:30:33
19	beginning of media number 3. Going back on the	11:30:37
20	record at 11:30 a.m.	11:30:40
21	BY MR. WEED:	11:30:43
22	Q. All right. Just a few more questions for	11:30:43
23	you.	11:30:45
24	At this point, is ARW considering any new	11:30:45
25	product lines to replace the wallet product?	11:30:50

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1 A. Yes, that's correct. 11:32:36

2 Q. Okay. But are you saying that there are 11:32:36

3 competitors of ARW's who sell on Amazon and also 11:32:38

4 competitors who sell other places? 11:32:43

5 A. That's why I was asking earlier if you are 11:33:07

6 limiting my answer to competitors on Amazon because 11:33:09

7 I wasn't paying attention to other platforms other 11:33:12

8 than Amazon. 11:33:15

9 Q. Understood. Who do you consider to be 11:33:16

10 ARW's biggest competitor on Amazon? 11:33:19

11 A. Okay. They are basically the ones that I 11:33:57

12 have mentioned to you earlier like Mountain Voyage, 11:33:59

13 Extremus, Bull or Gongniu. 11:34:03

14 THE INTERPRETER: Interpreter spelling, 11:34:06

15 G-O-N-G-N-I-U. 11:34:06

16 A. But this one company has been taken off 11:34:09

17 the shelf already. 11:34:11

18 Q. So is it fair to say that ARW's biggest 11:34:12

19 competitors on Amazon get their wallets from the 11:34:18

20 same manufacturer as ARW? 11:34:22

21 A. Incorrect. That apply only to Mountain 11:34:24

22 Voyage. It doesn't apply to Extremus. 11:34:42

23 Q. Did you say before that the bull company 11:34:45

24 also got its wallets from the same manufacturer? 11:34:49

25 A. Yes, that's the case. 11:34:53

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1	Q. Understood. Do you consider Ridge to be a	11:34:54
2	competitor of ARW?	11:35:01
3	A. No.	11:35:07
4	Q. Why not?	11:35:09
5	A. Different market, different kind of	11:35:12
6	market.	11:35:19
7	Q. How are the markets different for Ridge	11:35:19
8	versus ARW?	11:35:22
9	A. First, in terms of the pricing placement,	11:35:41
10	Ridge's placement is somewhere above \$100 per unit,	11:35:44
11	and our price, ARW's, is somewhere between 20 to 30	11:35:49
12	and that also -- that price range also applies to	11:35:52
13	the competitors that I mentioned earlier.	11:35:57
14	Q. I see. Do you have any beliefs -- well,	11:35:59
15	strike that.	11:35:59
16	Who are your biggest competitors on	11:36:03
17	platforms that aren't Amazon?	11:36:05
18	A. None that can I speak of. I never pay	11:36:07
19	attention to other platforms.	11:36:15
20	Q. Have you ever heard of a brand called	11:36:17
21	Hayvenhurst?	11:36:20
22	A. Yes, I have.	11:36:26
23	Q. How have you heard of Hayvenhurst?	11:36:27
24	A. So after our product's been taken off the	11:36:40
25	shelf, and if you go back to trending products, you	11:36:42

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1	can see this brand running.	11:36:45
2	Q. Have you heard of Hayvenhurst other than	11:36:47
3	seeing their products on Amazon?	11:36:50
4	A. No.	11:36:59
5	Q. Do you know if your factory makes	11:37:00
6	Hayvenhurst's wallets?	11:37:01
7	A. No.	11:37:11
8	Q. No, you don't know?	11:37:11
9	A. I don't know if they did or not.	11:37:12
10	Q. I see. Is ARW considering selling wallets	11:37:19
11	on any other platforms besides Amazon?	11:37:22
12	A. No.	11:37:31
13	Q. Is there any reason why ARW's only	11:37:33
14	interested in selling on Amazon?	11:37:35
15	A. Because my experience was with Amazon, the	11:37:49
16	platform. I had no prior experience with other	11:37:52
17	platforms.	11:37:54
18	MR. WEED: Okay. I don't have any further	11:38:00
19	questions. Thank you.	11:38:02
20	THE WITNESS: Thank you.	11:38:06
21	MS. JU: I don't have any questions	11:38:09
22	either. Thank you, Ms. Peng.	11:38:11
23	THE WITNESS: Thank you.	11:38:15
24	MR. WEED: Go off the record.	11:38:16
25	THE VIDEOGRAPHER: Counsel, is that okay?	11:38:18

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1 MR. YAO: Yeah. No questions from 11:38:19
2 respondent as well. 11:38:20
3 THE WITNESS: All right. 11:38:23
4 THE VIDEOGRAPHER: Counsel, Natalie, is it 11:38:23
5 okay to conclude? 11:38:26
6 MR. WEED: Yes. 11:38:28
7 THE VIDEOGRAPHER: All right. Thanks. We 11:38:28
8 are off the record at 11:38 a.m. And this concludes 11:38:30
9 today's 30(b)(6) deposition of respondent Shenzhen 11:38:34
10 PinCan Technology Co., Ltd., doing business as ARW, 11:38:42
11 regarding certain topics through Chunmei Peng. The 11:38:44
12 total number of media used was three and will be 11:38:51
13 retained by Veritext Legal Solutions. Thank you. 11:38:54

14 (Deposition concluded at 11:38 A.M.)

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1 CERTIFIED STENOGRAPHER'S CERTIFICATE
2 STATE OF CALIFORNIA)
) SS.

3 COUNTY OF LOS ANGELES)
4

5 I, NATALIE PARVIZI-AZAD, HERBY CERTIFY:

6 I AM A DULY QUALIFIED CERTIFIED SHORTHAND
7 REPORTER IN THE STATE OF CALIFORNIA, HOLDER OF
8 CERTIFICATE NUMBER CSR 14125 ISSUED BY THE COURT
9 REPORTERS BOARD OF CALIFORNIA AND WHICH IS IN FULL
10 FORCE AND EFFECT. (BUS. & PROF. § 8016)

11 I AM NOT FINANCIALLY INTERESTED IN THIS
12 ACTION AND NOT A RELATIVE OR EMPLOYEE OF ANY
13 ATTORNEY OF THE PARTIES, OR OF ANY OF THE PARTIES.
14 (CIV. PROC. § 2025.320(A))

15 I AM AUTHORIZED TO ADMINISTER OATHS OR
16 AFFIRMATIONS PURSUANT TO CALIFORNIA CODE OF CIVIL
17 PROCEDURE, SECTION 2093 (B) AND PRIOR TO BEING
18 EXAMINED, THE DEPONENT WAS FIRST PLACED UNDER OATH
19 OR AFFIRMATION BY ME. (CIV. PROC. §§ 2025.320,
20 2025.540(A))

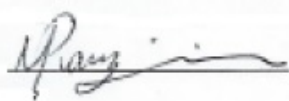
21 I AM THE CERTIFIED OFFICER THAT
22 STENOGRAPHICALLY RECORDED THE TESTIMONY IN THE
23 FOREGOING PROCEEDING AND THE FOREGOING TRANSCRIPT
24 IS A TRUE RECORD OF THE TESTIMONY GIVEN. (CIV.
25 PROC. § 2025.540(A))

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1 I HAVE NOT, AND SHALL NOT, OFFER OR PROVIDE
2 ANY SERVICES OR PRODUCTS TO ANY PARTY'S ATTORNEY
3 OR THIRD PARTY WHO IS FINANCING ALL OR PART OF THE
4 ACTION WITHOUT FIRST OFFERING SAME TO ALL PARTIES
5 OR THEIR ATTORNEYS ATTENDING THE PROCEEDING AND
6 MAKING SAME AVAILABLE AT THE SAME TIME TO ALL
7 PARTIES OR THEIR ATTORNEYS. (CIV. PROC §
8 2025.320(B))

9 I SHALL NOT PROVIDE ANY SERVICE OR PRODUCT
10 CONSISTING OF THE CERTIFIED STENOGRAPHER'S
11 NOTATIONS OR COMMENTS REGARDING THE DEMEANOR OF
12 ANY WITNESS, ATTORNEY, OR PARTY PRESENT AT THE
13 PROCEEDING TO ANY PARTY OR ANY PARTY'S ATTORNEY OR
14 THIRD PARTY WHO IS FINANCING ALL OR PART OF THE
15 ACTION, NOR SHALL I COLLECT ANY PERSONAL
16 IDENTIFYING INFORMATION ABOUT THE WITNESS AS A
17 SERVICE OR PRODUCT TO BE PROVIDED TO ANY PARTY OR
18 THIRD PARTY WHO IS FINANCING ALL OR PART OF THE
19 ACTION. (CIV. PROC. § 2025.320(C))
20

21 DATED: August 18, 2023.
22

23 
24

NATALIE PARVIZI-AZAD, CSR NO.14125
25

1 BENJAMIN W. WEED, ESQ.

2 BENJAMIN.WEED@KLGATES.COM

3 AUGUST 18, 2023

4 RE: CERTAIN COMPACT WALLETES AND COMPONENTS THEREOF

5 AUGUST 15, 2023, CHUNMEI PENG, VOLUME I, JOB NO. 6037740

6

7 The above-referenced transcript has been completed by
8 Veritext Legal Solutions and review of the transcript is being
9 handled as follows:

10

11 — Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
12 to schedule a time to review the original transcript at
13 a Veritext office.

14

15 — Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
16 Transcript - The witness should review the transcript and
17 make any necessary corrections on the errata pages included
18 below, notating the page and line number of the corrections.
19 The witness should then sign and date the errata and penalty
20 of perjury pages and return the completed pages to all
21 appearing counsel within the period of time determined at
22 the deposition or provided by the Code of Civil Procedure.

23

24

25

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1 ___ Waiving the CA Code of Civil Procedure per Stipulation of
2 Counsel - Original transcript to be released for signature
3 as determined at the deposition.

4
5 ___ Signature Waived - Reading & Signature was waived at the
6 time of the deposition.

7
8 ___ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF
9 Transcript - The witness should review the transcript and
10 make any necessary corrections on the errata pages included
11 below, notating the page and line number of the corrections.
12 The witness should then sign and date the errata and penalty
13 of perjury pages and return the completed pages to all
14 appearing counsel within the period of time determined at
15 the deposition or provided by the Federal Rules.

16
17 XX Federal R&S Not Requested - Reading & Signature was not
18 requested before the completion of the deposition.

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[business - communications]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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