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1 UNITED STATES INTERNATIONAL TRADE COMMISSION
2 Washington, D.C.
3 x
4 In the Matter of :
5 CERTAIN DERMATOLOGICAL : Inv. No. 337 TA 1356
6 TREATMENT DEVICES AND :
7 COMPONENTS THEREOF :
8 x
9
10
11
12 Volume 2
13
14 Videotaped Deposition of DR. JONGJU NA
15 Washington, D.C.
16 Tuesday, July 25, 2023
17 9:24 a.m.
18
19
20 Job No. 501141
21 Pages: 161 300
22 Reported by: Janet A. Hamilton, RDR

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1 Videotaped Deposition of DR. JONGJU NA,
2 held at the offices of:
3
4
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6 Latham & Watkins LLP
7 555 Eleventh Street, NW
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9 Washington, DC 20004 1304
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15 Pursuant to Notice, before Janet A.
16 Hamilton, Registered Diplomate Reporter and Notary
17 Public in and for the District of Columbia.
18
19
20
21
22

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16 ILOODA CO., LTD.:
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10 ON BEHALF OF RESPONDENTS SHEnB CO., LTD.,
11 CARTESSA AESTHETICS, LLC and AESTHETICS
12 BIOMEDICAL, INC.:
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Serendia, LLC
Exhibit 2128
EndyMed v. Serendia
IPR2024-00844
Ex. 2128-001

20

MR SANDERS: What are you referr ng to as
2 "th s"?
3 MS CHOI: Exh b t 26 and 28
4 MR SANDERS: I'm not sure we had -- you
5 know, you have the most know edgeab e w tness
6 here So I don't know that we're go ng to be ab e
7 to prov de any greater c ar ty than conta ned
8 dur ng th s depos t on But I'm happy to take
9 your request under adv sement
0 MS CHOI: Thank you That sa d, we're
go ng to take a f ve-m nute break
2 MR SANDERS: You're tak ng a break now?
3 We just came back --
4 MR NESTER: We're just sw tch ng up
5 MR SANDERS: Oh, gett ng new counse
6 Okay
7 THE VIDEOGRAPHER: We are go ng off the
8 record The t me s :24
9 (A d scuss on was he d off the record)
20 THE VIDEOGRAPHER: We are go ng back on
2 the record The t me s :28
22 EXAMINATION BY COUNSEL FOR RESPONDENTS ROHRER

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1 AESTHETICS, INC. AND ROHRER AESTHETICS, LLC
2 BY MR. KEELER:
3 Q Good morning, Dr. Na. My name is Robert
4 Keeler. I will be asking you questions now.
5 **A (In English) Thank you. Good morning.**
6 Q Dr. Na, what is the Sylfirm X?
7 **A (In English) Sylfirm X is last my**
8 **product. I mean last product which I developed.**
9 Q And what is it used for?
10 **A (In English) Sylfirm X has two kinds of**
11 **wave. First one is a continuous wave. Second one**
12 **is pulsed wave.**
13 Q Is Sylfirm X an RF microneedling device?
14 **A (In English) Sylfirm X is one of RF**
15 **microneedling device.**
16 Q The Sylfirm X has a center console;
17 correct?
18 **A (In English) I cannot understand what you**
19 **mean console.**
20 Q What are the different parts of the
21 Sylfirm X?
22 **A (In English) Sylfirm X which I develop**

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1 **consist of the machine body, a machine -- how can**
2 **I say -- the main body of machine, and then**
3 **electric connector to electric outlet, and pull**
4 **switch to operate, and then a handle -- a hand --**
5 **handle and then connected to main body, and then**
6 **the hanger to hold the connector line.**
7 **Yes. I think so, yeah.**
8 Q As part of the main body, is there an RF
9 generator?
10 **A (In English) Yes.**
11 Q How does that RF generator work in the
12 Sylfirm X?
13 **A (In English) Please clear your question.**
14 **How -- what means how?**
15 **What are you -- what I mean --**
16 (Through Interpreter) If you can be more
17 specific with your question -- what you're getting
18 at with your question, I'll be able to better
19 answer your question, please.
20 Q What does the RF generator generate?
21 **A Sylfirm X RF generator generates ACRF**
22 **frequency.**

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1 Q What do you mean by ACRF frequency?
2 MR. SANDERS: Objection. Asked and
3 answered.
4 **A I don't quite catch that. May I have one**
5 **more time?**
6 **May I have the question one more time,**
7 **please?**
8 **What was the question again, please?**
9 Q The question was: What do you mean by
10 ACRF frequency?
11 MR. SANDERS: Objection. Asked and
12 answered.
13 **A (In English) I answered to you. ACRF**
14 **generator in Sylfirm X generate ACRF frequency.**
15 Q Does the ACRF frequency generated by the
16 Sylfirm X have an RF frequency rate?
17 **A (In English) Yes, RF frequency rate --**
18 (Through Interpreter) Yes. It does.
19 Q What is that RF frequency rate?
20 **A Two megahertz.**
21 Q Does the ACRF frequency also have an AC
22 frequency rate?

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1 MR. SANDERS: Objection. Ambiguous.
2 **A (In English) ACRF include that. AC**
3 **frequency alternate at RF frequency, and AC**
4 **frequency can be same with RF frequency, and AC**
5 **frequency can be different from the RF frequency.**
6 **Yeah -- means, yeah -- I means, yes, that --**
7 (Through Interpreter) I may not be right.
8 LEAD INTERPRETER: And the rest was spoken
9 in English by Dr. Na.
10 **A (Through Interpreter) And then again, I'm**
11 **not sure whether I answered your question.**
12 Q In the Sylfirm X, is there a separate AC
13 frequency rate from the RF frequency rate?
14 **A (In English) Sylfirm X, AC frequency --**
15 (Through Interpreter) In Sylfirm X, AC
16 frequency and RF frequency are there together.
17 They are not separated.
18 Q What do you mean by they are there
19 together?
20 **A In Sylfirm X is AC alternate 2 megahertz**
21 **RF that is delivered -- or I mean it's generated.**
22 Q So is it fair to say that there is a

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1 2 megahertz signal generated and applied to
2 needles in the Sylfirm X product?
3 **A To put it more accurately, 2 megahertz,**
4 **that's generated by Sylfirm X RF generator. That**
5 **electric signal is delivered to the needles.**
6 Q And is that electric signal modulated at
7 all?
8 MR. SANDERS: Objection. Ambiguous.
9 **A Well, I don't quite understand what you**
10 **just said, sir.**
11 Q Do you know what it means to modulate a
12 signal?
13 **A Yes, I do.**
14 Q Is the 2 megahertz signal generated by the
15 Sylfirm X modulated?
16 MR. SANDERS: Same objection.
17 **A RF generator -- actually, if I may provide**
18 **a general descriptions -- it's an electric --**
19 **electric signal is received and modulated, and**
20 **then output as 2 megahertz. And that is**
21 **2 megahertz RF generator.**
22 **And for modulation there are many part**

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1 **that are involved and that is, generally speaking.**
2 **So that is why I said I am not clear what you are**
3 **saying.**
4 Q Is the 2 megahertz RF signal generated by
5 the Sylfirm X and applied to the needles, is that
6 a sine wave?
7 **A (In English) Okay. My invention --**
8 (Through Interpreter) RF signals, they
9 could have sine wave or could have different
10 shapes because it all depends on whether RF
11 generator is designed well or not.
12 So depending on the state -- state of
13 design, the shape could differ. And also you
14 could actually pick wave form depending on the
15 purpose of the RF generator.
16 So depending on what kind of output you'd
17 want, RF generator can have the kind of wave form
18 that -- that you want. But -- but it does -- it's
19 not to say that my invention has only sine wave.
20 One of the product Sylfirm X that
21 incorporates my invention is designed to have the
22 sine wave to the extent possible. But then again,

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1 having said that, that is not to say my invention
2 delivers only sine wave.
3 Q What else could your invention deliver?
4 **A I find your question unclear. If you**
5 **could specify as to what -- which of my invention**
6 **you are referring to, please.**
7 Q You said that your -- "it is not to say my
8 invention delivers only sine wave."
9 I'm asking in response to your statement,
10 what else could your invention deliver?
11 **A Of my inventions the one that relates to**
12 **wave forms or wave form --**
13 LEAD INTERPRETER: By the interpreter,
14 plurality is unknown at this point.
15 Q Is it fair to say the only frequency rate
16 in the RF signal generated by the Sylfirm X is the
17 2 megahertz frequency?
18 (Interpreters conferring)
19 **A So I would think that it be -- if I put it**
20 **this way, it be more accurately put. So when RF**
21 **generate -- generator outputs 2 megahertz, for the**
22 **most part, it's 2 million hertz --**

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1 (Check interpreter conferring with
2 witness.)
3 (Interpreters conferring.)
4 A Actually if I may, I would like to ask you
5 to repeat your question. I did not quite
6 understand your question, sir.
7 Q In the Sylfirm X do the needles extend
8 from a surface?
9 A So that is correct. So the word "surface"
10 was not very clear to me. So if you delve more
11 into the word "surface," so in terms of needle, so
12 I was thinking more like in terms of when the
13 needles are retracted, the tips of the needles.
14 So in English, so the surface of all the ends are
15 connected. So that is plane of the needle tip --
16 tips, and so I understood your question to mean
17 that the needles extend from that plane.
18 Q To clarify, do the needles telescope out
19 from that plane?
20 CHECK INTERPRETER: (Conferring with
21 witness.)
22 A Move to penetrate the skin.

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1 Q When the needles penetrate to move the
2 skin, do they become longer?
3 A Huh? I don't understand what you mean by
4 that, sir.
5 Q Does their length increase?
6 A Are you saying the needles themselves,
7 their length increase? I'm not quite sure what is
8 increasing in length.
9 Q The needles themselves.
10 A (In English) I don't know -- I don't
11 know -- (speaking Korean).
12 (Through interpreter) I don't know. I
13 don't know. Needles themselves? Needles?
14 Q I think earlier you testified that there
15 was an LED in the handle; is that correct?
16 I should clarify, in the Sylfirm X.
17 A In the Sylfirm X that I made, there is an
18 LED on the handle. That is correct.
19 Q Where on the handle is the LED?
20 A So if I put it in proximal end, I hope you
21 would understand. So it's at the end, the
22 proximal end of that.

25

1 Q And is it within the handle or on the
2 surface of the handle?
3 A So in Sylfirm X it's toward the end. It's
4 not to say it's inside. If you look at it, I
5 guess it's very hard to put it in words, but I'm
6 not saying it's inside but it's toward the end.
7 Q When does the LED in the handle light up?
8 A In a Sylfirm X the LED in the handle -- I
9 am a bit confused right now. So when the radio
10 frequency of the needles come out, that's when it
11 lights up, but then I am a bit confused right now.
12 Q Why are you confused?
13 A Because without a product, so we looked at
14 Sylfirm, Scarlet -- strike that.
15 We looked at Scarlet S previously. So
16 when the LED lights up refers in Scarlet S. So I
17 am a bit mixed up because, frankly speaking, I'm
18 very tired right now and I'm unusually a bit mixed
19 up.
20 Q So is it your testimony today that the LED
21 in the handle in the Sylfirm X lights up when the
22 radio frequency is applied to the needles and the

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1 needles are extended?
2 A No, sir. What I said was that at this
3 moment right now, sitting here right now, I do not
4 quite remember.
5 Q Did the original Scarlet that we were
6 talking about earlier from the 2010 Korean FDA
7 document have an LED on the handle?
8 A That, too, frankly I do not remember.
9 Q Do you know if there's a document that
10 would help you remember?
11 A So if you show me the document, the
12 machine that you're asking me about and the
13 document of KFDA approval, that will help me
14 remember.
15 Q Dr. Na, could you please take out Exhibit
16 28 from earlier today.
17 A 28. Is this the one? I have it.
18 Q Is this the document you were referring
19 to?
20 A This appears to be different from the KFDA
21 approval document.
22 Q Does this document show that the original

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3 Reporter and Notary Public before whom the
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10 I am neither counsel for, related to, nor employed
11 by any of the parties to this case and have no
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13 IN WITNESS WHEREOF, I have hereunto set my hand
14 this 27th day of July, 2023.
15
16
17
18
19 Janet A. Hamilton
20 Registered Diplomate Reporter
21 My commission expires
22 March 31, 2028