

UNITED STATES INTERNATIONAL TRADE COMMISSION

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In the Matter of

Investigation No.

337-TA-1413

CERTAIN WIRELESS FRONT-END MODULES

AND DEVICES CONTAINING THE SAME

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OPEN SESSIONS

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Skyworks Ex 2002
Kangxi v. Skyworks
IPR2025-00912

1 UNITED STATES INTERNATIONAL TRADE COMMISSION

2 Washington, D.C.

3 Before the Honorable MaryJoan McNamara

4 Administrative Law Judge

5 -----X

6 In the Matter of Investigation No.

7 337-TA-1413

8 CERTAIN WIRELESS FRONT-END MODULES

9 AND DEVICES CONTAINING THE SAME

10 -----X

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12 International Trade Commission

13 500 E Street, SW

14 Washington, D.C.

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16 Evidentiary Hearing

17 Monday, July 14, 2025

18 Volume IV

19

20 The parties met pursuant to notice of the

21 Administrative Law Judge at 9:30 a.m. Eastern.

22

23

24 Reported by: Linda S. Kinkade RDR CRR RMR RPR CSR

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14 Also present:

15 Stephen Kovacic, Esq. (Skyworks)

16 Noel Whitley, Esq. (Skyworks)

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20 *** Index appears at end of transcript ***

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1 MR. DOWD: Thank you, Your Honor.

2 JUDGE MCNAMARA: Okay. Thank you.

3 MR. SHANNON: With that, Your Honor, I think
4 we're ready to proceed.

5 JUDGE MCNAMARA: Okay.

6 MR. SHANNON: Your Honor, on behalf of KCT, we'd
7 call to the stand Mr. Huan Zhao.

8 JUDGE MCNAMARA: Good morning, Mr. Zhao.

9 THE WITNESS: Good morning, Your Honor.

10 JUDGE MCNAMARA: How are you?

11 THE WITNESS: Good, good.

12 JUDGE MCNAMARA: Would you kindly remain standing
13 and raise your right hand?

14 HUAN ZHAO,

15 having been first duly sworn or affirmed on
16 his oath, was thereafter examined and testified as follows:

17 JUDGE MCNAMARA: Please state your full name.

18 THE WITNESS: Huan Zhao.

19 JUDGE MCNAMARA: Thank you very much. You may be
20 seated.

21 DIRECT EXAMINATION

22 BY MR. SHANNON:

23 Q. Good morning, Mr. Zhao.

24 A. Good morning, Mr. Shannon.

25 Q. Mr. Zhao, could you state your name again for the

1 record just so we're all clear?

2 A. My name is Huan Zhao.

3 Q. Where do you work?

4 A. KCT.

5 Q. What is your role at KCT?

6 A. I'm one of the two cofounders and CTO of KCT.

7 Q. What are your current responsibilities at KCT?

8 A. I'm in charge of the whole engineering
9 department, and I direct the technical product development.

10 Q. I'd like to get into your background a little
11 bit, Mr. Zhao. What is your educational background?

12 A. I have both a master degree and a bachelor degree
13 in electrical engineering.

14 Q. Where did you get your undergraduate degree?

15 A. I got my bachelor degree in electrical
16 engineering from Shanghai Jiao Tong University, which is one
17 of the most prestigious universities in China.

18 Q. Where did you get your master's degree?

19 A. I got my master's degree in electrical
20 engineering from Lehigh University in Bethlehem,
21 Pennsylvania, of the United States.

22 Q. How did you happen to land in Bethlehem,
23 Pennsylvania?

24 A. After my college bachelor degree, I got a full
25 scholarship from Lehigh University.

1 Q. What did you do after you graduated from Lehigh?

2 A. I worked for a couple of RF front-end module
3 design companies in the States before I founded KCT.

4 Q. Can you walk us through your career before KCT?

5 A. Sure. I worked for a company called Anadigics
6 from 2006 to 2009 in Warren, New Jersey, and then I worked
7 for a startup company called VT Silicon in Atlanta, Georgia,
8 from 2009 through 2010.

9 And then from 2010 to 2011 I worked for a large
10 RF front-end company called RFMD in Dallas, Texas. And then
11 right before I founded KCT, I worked for a startup company
12 specializing in CMOS, Wi-Fi front-end modules, in Irvine,
13 California, called RFaxis.

14 Q. What did you do next?

15 A. I then decided to found KCT.

16 Q. Why did you decide to found KCT?

17 A. I and one of the other cofounder, Dr. Ping Peng,
18 we saw some good opportunities in Chinese domestic Wi-Fi
19 front-end module business market, and personally, you know,
20 I also -- I was very interested in trying out my new ideas
21 of integrating things on CMOS dies. So I really wanted to
22 try it out, and we were very enthusiastic about it. And
23 there was no -- I'm sorry.

24 Q. And go ahead, finish.

25 A. There was no Chinese domestic player back then in

1 Wi-Fi front-end market, so we really thought, you know, we
2 could do a good job. That's why we started KCT.

3 (Whereupon, the hearing proceeded in confidential
4 session.)

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1 O P E N S E S S I O N

2 JUDGE MCNAMARA: Please just be sure to let us
3 know when you move.

4 MS. FRAZIER: Absolutely.

5 JUDGE MCNAMARA: Thank you.

6 BY MS. FRAZIER:

7 Q. Mr. Zhao, have you found your declaration from
8 May 16th, 2025 at tab 3 of volume 2?

9 A. I now have that paper form in front of me.

10 Q. And we'll turn to page 6, paragraph 16 of your
11 declaration.

12 A. 16?

13 Q. Paragraph 16.

14 A. Okay, I have that.

15 Q. And you wrote here, second sentence from the
16 last, in your declaration to Her Honor, "the two accounts
17 function as if they are owned by two different people."

18 That was what you said, correct?

19 A. That's what I wrote there.

20 Q. That's what you wrote in the declaration you
21 provided to Her Honor, correct?

22 A. That's right, but it's under the context of the
23 sentence leading to that.

24 Q. Now, by the time you founded KCT, Skyworks was
25 already a leader in the market for FEMs, correct?

1 A. That is correct.

2 Q. And since its founding, KCT has made Skyworks and
3 Skyworks' products a focus of KCT's business, correct?

4 A. Would you repeat that question? It was a little
5 bit longer.

6 Q. Since its founding, KCT has made Skyworks and
7 Skyworks' products a focus of KCT's business, correct?

8 A. Correct. It was a competitive market, so we
9 aimed at, you know, different competitors, along with
10 Skyworks.

11 MS. FRAZIER: Your Honor, with apologies for the
12 quick whiplash, we now will need to go on the KCT
13 confidential record.

14 (Whereupon, the hearing proceeded in confidential
15 session.)

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1 O P E N S E S S I O N

2 BY MS. FRAZIER:

3 Q. Just a few final questions.

4 In your opinion, KCT is an innovator and has no
5 reason to use Skyworks' patents, correct?

6 A. Of course that's right.

7 Q. And during your examination with Mr. Shannon this
8 morning, you spoke about KCT's R&D investment, correct?

9 A. That's right.

10 Q. We can agree, though, that Skyworks is a world
11 leader in RF FEMs, correct?

12 A. I do think so and do respect Skyworks.

13 Q. They are one of two world leaders in the space,
14 Skyworks and Qorvo, correct?

15 A. You are -- yeah, two of the largest companies in
16 this field.

17 Q. Two of the world leaders? The two world leaders,
18 correct?

19 A. Leader -- it's okay if you want to use that word.

20 Q. And KCT was a late joiner into the Wi-Fi market,
21 correct?

22 A. That was correct.

23 Q. And compared to Skyworks, KCT's R&D strength is
24 relatively weak, correct?

25 A. I won't comment on that. I cannot answer that.

1 Because of the size. But weaker is a more subjective word.

2 Q. At least as of the end of 2023, KCT believed that
3 its R&D was relatively weak compared to Skyworks, correct?

4 A. As I say, counsel, relatively smaller investment
5 due to the product lines, size of the company, et cetera,
6 but I wouldn't necessarily say weaker, because if you take
7 into account the percentage of people, of revenue, I don't
8 think our R&D investment was weak.

9 Q. Well --

10 A. Not at all.

11 Q. Let's see what KCT told the world about that.
12 KCT officially listed on the Shanghai Stock Exchange on
13 November 17th, 2023, correct?

14 A. That was correct.

15 Q. And as part of its Initial Public Offering, KCT
16 had to provide a prospectus to the China securities
17 regulation commission, correct?

18 A. That sounds right, but, you know, that was like a
19 CFO kind of scope of understanding, which I -- might help
20 answer but might not get the accurate answer.

21 Q. Fair enough. But you would agree it was
22 important for KCT to be truthful and honest in its filing
23 with the China securities and regulations commission,
24 correct?

25 A. Of course.

1 Q. And if we could bring up that prospectus, it's at
2 CX-726, and we'll go to page 21.

3 A. I've never seen this document before, counsel.
4 This is really the first time I see this document.

5 Q. And in this prospectus, the second paragraph, it
6 starts referring to well-known overseas RF chip
7 manufacturers such as Skyworks, correct?

8 A. Okay. That's what it reads here.

9 Q. And then a few lines down it says, "compared with
10 well-known overseas RF chip manufacturers, the company's
11 capital scale is small and its R&D strength is relatively
12 weak."

13 Do you see that?

14 A. I think that's an English translation issue.
15 Would you please show me the Chinese original?

16 Q. Your counsel is free to show that to you.

17 Sir, you're the cofounder of KCT as we discussed,
18 it is now a public company, correct, since this prospectus?

19 A. It is a public company right now.

20 Q. And this litigation could have -- be of great
21 consequence to KCT's investors, correct?

22 A. That, I'm not sure.

23 Q. And litigation could impact you personally,
24 correct?

25 A. Of course. I was insulted by lots of these

1 accusations of copying.

2 Q. And you own share of KCT?

3 A. Yes, I do.

4 Q. Thank you.

5 MS. FRAZIER: No further questions, Your Honor.

6 JUDGE MCNAMARA: Okay. Thank you, Ms. Frazier.

7 Before we continue on -- Ms. Chang, thank you --
8 let me be very clear about the lines I'm drawing around any
9 testimony that attempted to get at attorney-client
10 privilege, waiver, process. It's not going to be allowed.

11 So if there was anything on the record with which
12 you rightfully disagree, Mr. Shannon, you will have an
13 opportunity to move to strike it.

14 MR. SHANNON: Thank you.

15 JUDGE MCNAMARA: Okay?

16 MR. SHANNON: Thank you.

17 JUDGE MCNAMARA: You're welcome. Just so it's
18 clear. I don't go down that road.

19 MR. SHANNON: Thank you.

20 MS. FRAZIER: Understood. Thank you, Your Honor.

21 JUDGE MCNAMARA: Thank you.

22 MS. CHANG: Good afternoon, Your Honor.

23 JUDGE MCNAMARA: Good afternoon, Ms. Chang.

24 MS. CHANG: May we go on the KCT confidential
25 record, please.

1 (Whereupon, the hearing proceeded in confidential
2 session.)
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