

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION AT SANTA ANA
HONORABLE JAMES V. SELNA, JUDGE PRESIDING

CERTIFIED TRANSCRIPT

MR TECHNOLOGIES, GMBH,	)	
	)	
Plaintiff and	)	
Counterclaim Defendant,	)	
	)	
vs.	)	SACV NO.
	)	8:22-cv-01599-JVS-DVM
WESTERN DIGITAL TECHNOLOGIES,	)	
INC.,	)	
	)	
Defendant and	)	
Counterclaim Plaintiff.	)	DAY 5, VOLUME II
_____	)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS

JURY TRIAL

SANTA ANA, CALIFORNIA

TUESDAY, JULY 23, 2024

1:02 P.M.

DEBORAH D. PARKER, CSR 10342
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UNITED STATES DISTRICT COURT
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Deborah D. Parker, U.S. Court Reporter

02:17:58 1 raise your right hand.

2 CHANTHEE SALAYPHONH, DEFENDANT'S WITNESS, SWORN

3 THE WITNESS: Yes.

4 THE CLERK: Thank you. You may step up on the
02:18:09 5 witness stand, please.

6 If you could please state your full name, spelling
7 your first and last name for the record.

8 DEFENDANT: Chanthee Salayphonh, C-H-A-N-T-H-E-E,
9 Salayphonh, S-A-L-A-Y-P-H-O-N-H.

02:18:30 10 THE CLERK: Thank you.

11 MS. YOUNG: May I proceed?

12 THE COURT: You may.

13 DIRECT EXAMINATION

14 BY MS. YOUNG:

02:18:34 15 Q Good afternoon.

16 Ms. Salayphonh, can you please introduce yourself
17 to the jury?

18 A Sure.

19 Hi. My name is Chanthee Salayphonh. I live in
02:18:41 20 Northern California, and I work at Western Digital.

21 Q You might want to move the mic.

22 A Oh.

23 Q How long have you been at Western Digital?

24 A For about 15 and a half years.

02:18:52 25 Q And what is your current role at Western Digital?

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02:29:24 1 Q Why does Western Digital keep track of the costs of the
2 different components?

3 A We keep track to monitor our gross margin and to make
4 sure we also have analysis on how to keep our costs as low
02:29:37 5 as possible. The goal is to make sure we minimize our
6 costs, but keep the price to our customers constant.

7 Q Now, you mentioned that Western Digital sometimes
8 purchases its components. Has Western Digital ever
9 purchased media?

02:29:51 10 A Yes.

11 Q And who has Western Digital purchased media from?
12 *(Court Reporter requests clarification for the*
13 *record.)*

14 THE WITNESS: Showa Denko.

02:29:59 15 BY MS. YOUNG:

16 Q And just to be clear, when you say "media," what
17 exactly are they purchasing?

18 A We're purchasing the media platters.

19 Q Do you know what products the Showa Denko media is used
02:30:09 20 in?

21 A Yes. It's used in various hard disk drives.

22 Q What are -- are the Showa Denko medias used in the
23 accused products?

24 A Yes.

02:30:20 25 Q And do you know if those products that use the

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02:30:22 1 Showa Denko media are sold in the U.S.?

2 A Yes.

3 Q So just bringing all this together, when we talk about
4 the accused products, is an entire hard drive the smallest
02:30:33 5 unit that can be sold?

6 A No, it's not. Components can also be sold.

7 MS. YOUNG: Mr. Schmoller, you can take that down.

8 BY MS. YOUNG:

9 Q How about when we talk about the issues in the case
02:30:44 10 relating to storing in Western Digital's accused hard
11 drivers, is the entire hard drive the smallest unit that can
12 be sold in that context?

13 A No.

14 Q And what would be sold in that context?

02:30:55 15 A We can sell media platters.

16 Q So just to be clear, are the media platters ever
17 actually sold separately by Western Digital?

18 A No, it's not.

19 Q Could Western Digital sell just the media platters, if
02:31:09 20 it chose to?

21 MR. LEDAHL: Speculation, Your Honor.

22 THE COURT: Do the foundation.

23 (Pause.)

24 THE COURT: Lay the foundation, please.

02:31:18 25 MS. YOUNG: I know.

Deborah D. Parker, U.S. Court Reporter