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. WESTERN DIGITAL TECHNOLOGIES, INC., Defendant and Counterclaim Plaintiff.	SACV NO. 8:22-cv-01599-JVS-DVM **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
OFFICIAL COURT REPORTER
UNITED STATES DISTRICT COURT
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raise your right hand.

CHANTHEE SALAYPHONH, DEFENDANT'S WITNESS, SWORN

THE WITNESS: Yes.

THE CLERK: Thank you. You may step up on the witness stand, please.

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

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

THE CLERK: Thank you.

MS. YOUNG: May I proceed?

THE COURT: You may.

DIRECT EXAMINATION

BY MS. YOUNG:

Q Good afternoon.

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

A Sure.

Hi. My name is Chanthee Salayphonh. I live in Northern California, and I work at Western Digital.

Q You might want to move the mic.

A Oh.

Q How long have you been at Western Digital?

A For about 15 and a half years.

Q And what is your current role at Western Digital?

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Q Why does Western Digital keep track of the costs of the different components?
A We keep track to monitor our gross margin and to make sure we also have analysis on how to keep our costs as low as possible. The goal is to make sure we minimize our costs, but keep the price to our customers constant.
Q Now, you mentioned that Western Digital sometimes purchases its components. Has Western Digital ever purchased media?
A Yes.
Q And who has Western Digital purchased media from?
(Court Reporter requests clarification for the record.)
THE WITNESS: Showa Denko.
BY MS. YOUNG:
Q And just to be clear, when you say "media," what exactly are they purchasing?
A We're purchasing the media platters.
Q Do you know what products the Showa Denko media is used in?
A Yes. It's used in various hard disk drives.
Q What are -- are the Showa Denko medias used in the accused products?
A Yes.
Q And do you know if those products that use the

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Showa Denko media are sold in the U.S.?
A Yes.
Q So just bringing all this together, when we talk about the accused products, is an entire hard drive the smallest unit that can be sold?
A No, it's not. Components can also be sold.
MS. YOUNG: Mr. Schmoller, you can take that down.
BY MS. YOUNG:
Q How about when we talk about the issues in the case relating to storing in Western Digital's accused hard drivers, is the entire hard drive the smallest unit that can be sold in that context?
A No.
Q And what would be sold in that context?
A We can sell media platters.
Q So just to be clear, are the media platters ever actually sold separately by Western Digital?
A No, it's not.
Q Could Western Digital sell just the media platters, if it chose to?
MR. LEDAHL: Speculation, Your Honor.
THE COURT: Do the foundation.
(Pause.)
THE COURT: Lay the foundation, please.
MS. YOUNG: I know.

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