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14 *Attorneys for Class Plaintiffs*

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17
 18 IN RE TRANSPACIFIC PASSENGER
 AIR TRANSPORTATION ANTITRUST
 LITIGATION

Case No.: C 07-5634 CRB
 MDL No. 1913

19
 20 This Document Relates to:
 21 ALL ACTIONS

**REQUEST FOR INTERNATIONAL
 JUDICIAL ASSISTANCE REGARDING
 TAKING DEPOSITION OF CHAN
 SECK FUN
 (LETTER ROGATORY)**

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REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE REGARDING TAKING DEPOSITION OF CHAN SECK
 FUN (LETTER ROGATORY)
 CASE NO. C07-5634 CRB

1 TO THE REGISTRAR OF THE SUPREME COURT OF SINGAPORE:

2 WHEREAS, the above-captioned coordinated proceedings are pending before this
3 Court;

4 WHEREAS, the Plaintiffs allege that Defendants engaged in anticompetitive conduct
5 concerning the pricing of passenger fares and fuel surcharges on routes between the U.S. and
6 Asia/Oceania;

7 WHEREAS, discovery in the above-captioned coordinated proceedings is currently
8 ongoing and has a deadline of completion of January 31, 2014;

9 WHEREAS, it is necessary for the purposes of justice and for the due determination of
10 the matters in dispute between the parties that the following person should be examined as a
11 witness upon oath touching such matters, namely Chan Seck Fun, Blk 5000J #23-44 Marine
12 Parade Road, Singapore (449291), and it appears that such witness is resident within your
13 jurisdiction:

14 **I. REQUEST**

15 The United States District Court Northern District of California presents its compliments
16 to the Supreme Court of Singapore, and requests international assistance to compel testimony to
17 be used in a civil proceeding before this Court in the above-captioned matter.

18 This Court requests, for the reasons previously stated, that the Supreme Court of
19 Singapore summon Chan Seck Fun, Blk 5000J #23-44 Marine Parade Road, Singapore
20 (449291), to attend at such time and place as you shall appoint, if possible, prior to January 31,
21 2014, before you or such other person as according to your procedure is competent to take the
22 examination of witnesses, and that you will cause such witness to be examined orally on the
23 interrogatories and topics which are attached to this letter of request as Attachment A, in the
24 presence of the agents of the plaintiffs and defendants on due notice given.

25 In addition, this Courts requests that you will permit the agents of both the plaintiffs and
26 defendants to examine upon interrogatories and oral examination on the interrogatories and
27 topics which are attached to this letter of request as Attachment A or arising out of the answers

1 thereto, such witness, and permit the cross-examination of the said witness upon cross-
2 interrogatories and oral examination, and permit the party producing the witness for
3 examination to examine him orally, or permit the agents of both the plaintiffs and defendants to
4 attend the deposition and taken evidence by video-link.

5 In addition, this Courts requests that you will be pleased to cause the evidence of the
6 said witnesses (and the answers of the said witnesses and all additional oral questions, whether
7 on examination, cross-examination or re-examination) to be reduced into writing and all books,
8 letters, papers and documents produced on such examination to be duly marked for
9 identification, and that you will be further pleased to authenticate such examination by the seal
10 of your tribunal or in such other way as is in accordance with your procedure and to return it
11 together with the interrogatories and cross-interrogatories and a note of the charges and
12 expenses payable in respect of the execution of this request through the counsel from whom the
13 same was received for transmission to the United States District Court of the Northern District
14 of California.

15 In addition, this Court requests that you will cause the agents of the parties appointed to
16 be informed of the date and place where the examination is to take place. Their contact
17 information is as follows:

18 Allan Steyer
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7 Facsimile: 202-637-2201

8 *Attorneys for Defendant Singapore Airlines*

9 **II. FACTS OF THE CASE**

10 Plaintiffs Micah Abrams, Meor Adlin, Franklyn Ajaye, Andrew Barton, Brenden G.
11 Maloof, Rachel Diller, Scott Frederick, David Kuo, Dickson Leung, Donald Wortman, Harley
12 Oda, Roy Onomura, Shinsuke Kobayashi, Patricia Lee, Nancy Kajiyama, on her own behalf and
13 on behalf of Noboru Kajiyama [deceased], Della Ewing Chow, James Kawaguchi, individually
14 and on behalf of all others similarly situated, filed the complaint in this action under Section 16
15 of the Clayton Act, (15 U.S.C. §26). The Second Amended Class Action Complaint in this
16 matter seeks to obtain injunctive relief for violations of Section 1 of the Sherman Antitrust Act
17 (15 U.S.C. §1) and to recover damages and/or restitution based on claims that Defendants Air
18 France, Air New Zealand, All Nippon Airways, Cathay Pacific Airways, China Airlines, Eva
19 Airways, Japan Airlines International, KLM Royal Dutch Airline, Malaysia Airlines, Malaysian
20 Airline System Berhad, Philippine Airlines, Inc., Qantas Airways, Ltd., Singapore Airlines,
21 Thai Airways, United Airlines, and Vietnam Airlines engaged in anticompetitive conduct
22 concerning the pricing of passenger fares and fuel surcharges on routes between the U.S. and
23 Asia/Oceania from approximately January 2000 through at least July 2011 that caused plaintiffs
24 and individuals similarly situated to pay artificially high and non-competitive prices for tickets
25 for air passenger travel in the United States.

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1 **III. RECIPROCITY**

2 The United States District Court for the Northern District of California would be willing
3 to provide similar assistance to the Supreme Court of Singapore.

4 **IV. REIMBURSEMENT FOR COSTS**

5 Counsel for the Plaintiffs have represented that they are willing to reimburse the
6 Supreme Court of Singapore for costs incurred in executing this Letter Rogatory in an amount
7 not to exceed Two Thousand dollars (\$2000.00) in United States Dollars. If the costs for
8 executing this Letter Rogatory will exceed USD \$2000, please contact counsel for the Plaintiffs
9 before exceeding this amount. Their contact information is as follows:

10 Allan Steyer
11 Jayne A. Peeters
12 Dana M. Andreoli
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18 Jennie Lee Anderson
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21 San Francisco, CA 94104
22 Telephone: 415.986.1400
23 Facsimile: 415.986.1474

24 The Court extends to the Registrar of the Supreme Court of Singapore assurances of its
25 highest consideration.

26 Dated: 12/23/2013

27 By: 
28 Hon. Judge Donna M. Ryu
United States Magistrate Judge

1 **Attachment A: Questions for Chan Seck Fun**

- 2 1. What is your full name?
- 3 2. When were you employed with Singapore Airlines?
- 4 a. What positions did you hold at Singapore Airlines?
- 5 b. What were the dates that you held each of those positions?
- 6 c. What were your responsibilities and duties for each of those positions?
- 7 d. Were you involved in setting Singapore Airlines' fuel surcharges?
- 8 i. If yes, how did Singapore Airlines decide to initially impose a fuel
- 9 surcharge and in what amount?
- 10 ii. If yes, what were the criteria used to determine the fuel surcharges
- 11 imposed?
- 12 iii. If yes, how did Singapore Airlines decide how much to change the fuel
- 13 surcharge for Singapore Airlines?
- 14 iv. If yes, did Singapore Airlines ever change the fuel surcharge for
- 15 Singapore Airlines flights flying to and from the United States?
- 16 v. If yes, when did Singapore Airlines make those changes to fuel
- 17 surcharges for Singapore Airlines flights flying to and from the United States?
- 18 vi. If yes, who at Singapore Airlines had authority to change or control the
- 19 Singapore Airlines fuel surcharge?
- 20 What was their title?
- 21 When were they employed with Singapore Airlines?
- 22 Who did they report to?
- 23 Who were their direct reports?
- 24 vii. If no, who did have authority?
- 25 What was their title?
- 26 When were they employed with Singapore Airlines?
- 27 Who did they report to?

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Who were their direct reports?

Did you ever communicate with these people about changing fuel surcharges for Singapore Airline flights to or from the United States?

If yes, when?

If yes, what was said?

e. Were you involved in setting Singapore Airlines' fares?

i. If yes, what were the criteria used to determine Singapore Airlines' fares?

ii. If yes, how did Singapore Airlines decide how much to change the fares for Singapore Airlines?

iii. If yes, did Singapore Airlines ever change the fares for Singapore Airlines flights flying to and from the United States?

iv. If yes, when did Singapore Airlines make those changes to fares for Singapore Airlines flights flying to and from the United States?

v. If yes, who else at Singapore Airlines had authority to change or control the Singapore Airlines fares?

What was their title?

When were they employed with Singapore Airlines?

Who did they report to?

Who were their direct reports?

vi. If no, who did have authority to change or control the Singapore Airlines fares?

What was their title?

When were they employed with Singapore Airlines?

Who did they report to?

Who were their direct reports?

Did you ever communicate with these people about changing fuel surcharges for Singapore Airline flights to or from the United States?

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If yes, when?

If yes, what was said?

3. Were you employed with other airlines?
 - a. If yes, with what other airlines were you employed?
 - b. If yes, what dates were you employed at each of the other airlines?
 - c. If yes, what positions did you hold at each of the other airlines?
 - d. If yes, what were your responsibilities/duties at each of the other airlines?
4. When you were employed at Singapore Airlines, did you directly communicate with other airlines regarding fuel surcharges?
 - a. What airlines?
 - b. With whom did you communicate?
 - c. When did you communicate with them?
 - d. What was communicated?
 - e. Why?
5. When you were employed at Singapore Airlines, did you directly communicate with other airlines regarding fares?
 - a. What airlines?
 - b. With whom did you communicate?
 - c. When did you communicate with them?
 - d. What was communicated?
 - e. Why?
6. Were you aware of anyone else at Singapore Airlines who directly communicates with other airlines regarding fuel surcharges?
 - a. Who? What were their names and titles?
 - b. What airlines and with whom did they communicate with?
 - c. When did they communicate with the other airlines?
 - d. What was communicated?

- 1 e. Why?
- 2 7. Were you aware of anyone else at Singapore Airlines who directly communicates with
3 other airlines regarding fares?
- 4 a. Who? What were their names and titles?
- 5 b. What airlines and with whom did they communicate with?
- 6 c. When did they communicate with the other airlines?
- 7 d. What was communicated?
- 8 e. Why?
- 9 8. Did Singapore Airlines coordinate with other airlines regarding whether to impose fuel
10 surcharges?
- 11 a. If yes, did these fuel surcharges affect flights to or from the United States?
- 12 9. Did Singapore Airlines coordinate with other airlines regarding the amount of fuel
13 surcharges to be imposed on any given flight?
- 14 a. If yes, did these fuel surcharges affect flights to or from the United States?
- 15 10. Did Singapore Airlines coordinate with other airlines regarding the amount of fares to be
16 charged for any given flight?
- 17 a. If yes, did these fares affect flights to or from the United States?
- 18 11. Did Singapore Airlines agree with other airlines to raise fuel surcharges if another
19 airline raised their fuel surcharge?
- 20 a. If yes, did these fuel surcharges affect flights to or from the United States?
- 21 12. Did Singapore Airlines agree with other airlines to raise fares if another airline raised
22 their fares?
- 23 a. If yes, did these fares affect flights to or from the United States?
- 24 13. When you were employed at Singapore Airlines, did you or anyone who reported to you
25 communicate with Cathay Pacific Airways regarding fuel surcharges?
- 26 a. If yes, who at Singapore Airlines participated in these communications? What
27 were their names and titles?

- 1 e. What was communicated?
- 2 f. Did Singapore Airlines agree with Cathay Pacific Airways to coordinate the
3 amount of fares to be imposed on any given flight?
- 4 (1) If yes, did these fares affect/concern flights to or from the United States?
- 5 h. Did Singapore Airlines agree with Cathay Pacific Airways to raise fares if
6 Cathay Pacific Airways raised their fares?
- 7 (1) If yes, did these fares affect/concern flights to or from the United States?
- 8 15. When you were employed at Singapore Airlines, did you or anyone who reported to you
9 communicate with All Nippon Airways regarding fuel surcharges?
- 10 a. If yes, who at Singapore Airlines participated in these communications? What
11 were their names and titles?
- 12 b. If yes, who All Nippon Airways participated in these communications? What
13 were their names and titles?
- 14 c. How did these communications take place? I.E. by telephone, over email, in
15 person, facsimile?
- 16 d. When did these communications take place?
- 17 e. What was communicated?
- 18 f. Did Singapore Airlines agree with All Nippon Airways to impose fuel
19 surcharges if All Nippon Airways raised their fuel surcharge?
- 20 (1) If yes, did these fuel surcharges affect/concern flights to or from the
21 United States?
- 22 g. Did Singapore Airlines agree with All Nippon Airways to coordinate the amount
23 of fuel surcharges to be imposed on any given flight?
- 24 (1) If yes, did these fuel surcharges affect/concern flights to or from the
25 United States?
- 26 h. Did Singapore Airlines agree with All Nippon Airways to raise fuel surcharges if
27 All Nippon Airways raised their fuel surcharge?

1 (1) If yes, did these fuel surcharges affect/concern flights to or from the
2 United States?

3 16. When you were employed at Singapore Airlines, did you or anyone who reported to you
4 communicate with All Nippon Airways regarding fares?

5 a. If yes, who at Singapore Airlines participated in these communications? What
6 were their names and titles?

7 b. If yes, who at All Nippon Airways participated in these communications? What
8 were their names and titles?

9 c. How did these communications take place? I.E. by telephone, over email, in
10 person, facsimile?

11 d. When did these communications take place?

12 e. What was communicated?

13 f. Did Singapore Airlines agree with All Nippon Airways to coordinate the amount
14 of fares to be imposed on any given flight?

15 (1) If yes, did these fares affect/concern flights to or from the United States?

16 g. Did Singapore Airlines agree with All Nippon Airways to raise fares if All
17 Nippon Airways raised their fares?

18 (1) If yes, did these fares affect/concern flights to or from the United States?

19 17. When you were employed at Singapore Airlines, did you or anyone who reported to you
20 communicate with China Airlines regarding fuel surcharges?

21 a. If yes, who at Singapore Airlines participated in these communications? What
22 were their names and titles?

23 b. If yes, who China Airlines participated in these communications? What were
24 their names and titles?

25 c. How did these communications take place? I.E. by telephone, over email, in
26 person, facsimile?

27 d. When did these communications take place?

- 1 e. What was communicated?
- 2 f. Did Singapore Airlines agree with China Airlines to impose fuel surcharges if
- 3 China Airlines raised their fuel surcharge?
- 4 (1) If yes, did these fuel surcharges affect/concern flights to or from the
- 5 United States?
- 6 g. Did Singapore Airlines agree with China Airlines to coordinate the amount of
- 7 fuel surcharges to be imposed on any given flight?
- 8 (1) If yes, did these fuel surcharges affect/concern flights to or from the
- 9 United States?
- 10 h. Did Singapore Airlines agree with China Airlines to raise fuel surcharges if
- 11 China Airlines raised their fuel surcharge?
- 12 (1) If yes, did these fuel surcharges affect/concern flights to or from the
- 13 United States?
- 14 18. When you were employed at Singapore Airlines, did you or anyone who reported to you
- 15 communicate with China Airlines regarding fares?
- 16 a. If yes, who at Singapore Airlines participated in these communications? What
- 17 were their names and titles?
- 18 b. If yes, who at China Airlines participated in these communications? What were
- 19 their names and titles?
- 20 c. How did these communications take place? I.E. by telephone, over email, in
- 21 person, facsimile?
- 22 d. When did these communications take place?
- 23 e. What was communicated?
- 24 f. Did Singapore Airlines agree with China Airlines to coordinate the amount of
- 25 fares to be imposed on any given flight?
- 26 (1) If yes, did these fares affect/concern flights to or from the United States?
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1 g. Did Singapore Airlines agree with China Airlines to raise fares if China Airlines
2 raised their fares?

3 (1) If yes, did these fares affect/concern flights to or from the United States?

4 19. When you were employed at Singapore Airlines, did you or anyone who reported to you
5 communicate with Malaysia Airlines regarding fuel surcharges?

6 a. If yes, who at Singapore Airlines participated in these communications? What
7 were their names and titles?

8 b. If yes, who Malaysia Airlines participated in these communications? What were
9 their names and titles?

10 c. How did these communications take place? I.E. by telephone, over email, in
11 person, facsimile?

12 d. When did these communications take place?

13 e. What was communicated?

14 f. Did Singapore Airlines agree with Malaysia Airlines to impose fuel surcharges if
15 China Airlines raised their fuel surcharge?

16 (1) If yes, did these fuel surcharges affect/concern flights to or from the
17 United States?

18 g. Did Singapore Airlines agree with Malaysia Airlines to coordinate the amount of
19 fuel surcharges to be imposed on any given flight?

20 (1) If yes, did these fuel surcharges affect/concern flights to or from the
21 United States?

22 h. Did Singapore Airlines agree with Malaysia Airlines to raise fuel surcharges if
23 Malaysia Airlines raised their fuel surcharge?

24 (1) If yes, did these fuel surcharges affect/concern flights to or from the
25 United States?

26 20. When you were employed at Singapore Airlines, did you or anyone who reported to you
27 communicate with Malaysia Airlines regarding fares?

- 1 a. If yes, who at Singapore Airlines participated in these communications? What
2 were their names and titles?
- 3 b. If yes, who at Malaysia Airlines participated in these communications? What
4 were their names and titles?
- 5 c. How did these communications take place? I.E. by telephone, over email, in
6 person, facsimile?
- 7 d. When did these communications take place?
- 8 e. What was communicated?
- 9 f. Did Singapore Airlines agree with Malaysia Airlines to coordinate the amount of
10 fares to be imposed on any given flight?
- 11 (1) If yes, did these fares affect/concern flights to or from the United States?
- 12 g. Did Singapore Airlines agree with Malaysia Airlines to raise fares if Malaysia
13 Airlines raised their fares?
- 14 (1) If yes, did these fares affect/concern flights to or from the United States?
- 15 21. When you were employed at Singapore Airlines, did you or anyone who reported to you
16 communicate with Philippine Airlines regarding fuel surcharges?
- 17 a. If yes, who at Singapore Airlines participated in these communications? What
18 were their names and titles?
- 19 b. If yes, who Philippine Airlines participated in these communications? What were
20 their names and titles?
- 21 c. How did these communications take place? I.E. by telephone, over email, in
22 person, facsimile?
- 23 d. When did these communications take place?
- 24 e. What was communicated?
- 25 f. Did Singapore Airlines agree with Philippine Airlines to impose fuel surcharges
26 if Philippine Airlines raised their fuel surcharge?
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- 1 (1) If yes, did these fuel surcharges affect/concern flights to or from the
2 United States?
- 3 g. Did Singapore Airlines agree with Philippine Airlines to coordinate the amount
4 of fuel surcharges to be imposed on any given flight?
- 5 (1) If yes, did these fuel surcharges affect/concern flights to or from the
6 United States?
- 7 h. Did Singapore Airlines agree with Philippine Airlines to raise fuel surcharges if
8 Philippine Airlines raised their fuel surcharge?
- 9 (1) If yes, did these fuel surcharges affect/concern flights to or from the
10 United States?
- 11 22. When you were employed at Singapore Airlines, did you or anyone who reported to you
12 communicate with Philippine Airlines regarding fares?
- 13 a. If yes, who at Singapore Airlines participated in these communications? What
14 were their names and titles?
- 15 b. If yes, who at Philippine Airlines participated in these communications? What
16 were their names and titles?
- 17 c. How did these communications take place? I.E. by telephone, over email, in
18 person, facsimile?
- 19 d. When did these communications take place?
- 20 e. What was communicated?
- 21 g. Did Singapore Airlines agree with Philippine Airlines to coordinate the amount
22 of fares to be imposed on any given flight?
- 23 (1) If yes, did these fares affect/concern flights to or from the United States?
- 24 h. Did Singapore Airlines agree with Philippine Airlines to raise fares if Philippine
25 Airlines raised their fares?
- 26 (1) If yes, did these fares affect/concern flights to or from the United States?
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1 23. When you were employed at Singapore Airlines, did you or anyone who reported to you
2 communicate with Thai Airways regarding fuel surcharges?

3 a. If yes, who at Singapore Airlines participated in these communications? What
4 were their names and titles?

5 b. If yes, who Thai Airways participated in these communications? What were their
6 names and titles?

7 c. How did these communications take place? I.E. by telephone, over email, in
8 person, facsimile?

9 d. When did these communications take place?

10 e. What was communicated?

11 f. Did Singapore Airlines agree with Thai Airways to impose fuel surcharges if
12 Thai Airways raised their fuel surcharge?

13 (1) If yes, did these fuel surcharges affect/concern flights to or from the
14 United States?

15 g. Did Singapore Airlines agree with Thai Airways to coordinate the amount of fuel
16 surcharges to be imposed on any given flight?

17 (1) If yes, did these fuel surcharges affect/concern flights to or from the
18 United States?

19 h. Did Singapore Airlines agree with Thai Airways to raise fuel surcharges if Thai
20 Airways raised their fuel surcharge?

21 (1) If yes, did these fuel surcharges affect/concern flights to or from the
22 United States?

23 24. When you were employed at Singapore Airlines, did you or anyone who reported to you
24 communicate with Thai Airways regarding fares?

25 a. If yes, who at Singapore Airlines participated in these communications? What
26 were their names and titles?

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- 1 b. If yes, who at Thai Airways participated in these communications? What were
2 their names and titles?
- 3 c. How did these communications take place? I.E. by telephone, over email, in
4 person, facsimile?
- 5 d. When did these communications take place?
- 6 e. What was communicated?
- 7 f. Did Singapore Airlines agree with Thai Airways to coordinate the amount of
8 fares to be imposed on any given flight?
- 9 (1) If yes, did these fares affect/concern flights to or from the United States?
- 10 g. Did Singapore Airlines agree with Thai Airways to raise fares if Thai Airways
11 raised their fares?
- 12 (1) If yes, did these fares affect/concern flights to or from the United States?
- 13 25. When you were employed at Singapore Airlines, did you or anyone who reported to you
14 communicate with Vietnam Airlines regarding fuel surcharges?
- 15 a. If yes, who at Singapore Airlines participated in these communications? What
16 were their names and titles?
- 17 b. If yes, who Vietnam Airlines participated in these communications? What were
18 their names and titles?
- 19 c. How did these communications take place? I.E. by telephone, over email, in
20 person, facsimile?
- 21 d. When did these communications take place?
- 22 e. What was communicated?
- 23 f. Did Singapore Airlines agree with Vietnam Airlines to impose fuel surcharges if
24 Vietnam Airways raised their fuel surcharge?
- 25 (1) If yes, did these fuel surcharges affect/concern flights to or from the
26 United States?
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1 g. Did Singapore Airlines agree with Vietnam Airlines to coordinate the amount of
2 fuel surcharges to be imposed on any given flight?

3 (1) If yes, did these fuel surcharges affect/concern flights to or from the
4 United States?

5 h. Did Singapore Airlines agree with Vietnam Airlines to raise fuel surcharges if
6 Vietnam Airlines raised their fuel surcharge?

7 (1) If yes, did these fuel surcharges affect/concern flights to or from the
8 United States?

9 26. When you were employed at Singapore Airlines, did you or anyone who reported to you
10 communicate with Vietnam Airlines regarding fares?

11 a. If yes, who at Singapore Airlines participated in these communications? What
12 were their names and titles?

13 b. If yes, who at Vietnam Airlines participated in these communications? What
14 were their names and titles?

15 c. How did these communications take place? I.E. by telephone, over email, in
16 person, facsimile?

17 d. When did these communications take place?

18 e. What was communicated?

19 f. Did Singapore Airlines agree with Vietnam Airlines to coordinate the amount of
20 fares to be imposed on any given flight?

21 (1) If yes, did these fares affect/concern flights to or from the United States?

22 g. Did Singapore Airlines agree with Vietnam Airlines to raise fares if Vietnam
23 Airlines raised their fares?

24 (1) If yes, did these fares affect/concern flights to or from the United States?

25 27. When you were employed at Singapore Airlines, did you or anyone who reported to you
26 communicate with Japan Airlines regarding fuel surcharges?

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1 a. If yes, who at Singapore Airlines participated in these communications? What
2 were their names and titles?

3 b. If yes, who Japan Airlines participated in these communications? What were
4 their names and titles?

5 c. How did these communications take place? I.E. by telephone, over email, in
6 person, facsimile?

7 d. When did these communications take place?

8 e. What was communicated?

9 f. Did Singapore Airlines agree with Japan Airlines to impose fuel surcharges if
10 Japan Airlines raised their fuel surcharge?

11 (1) If yes, did these fuel surcharges affect/concern flights to or from the
12 United States?

13 g. Did Singapore Airlines agree with Japan Airlines to coordinate the amount of
14 fuel surcharges to be imposed on any given flight?

15 (1) If yes, did these fuel surcharges affect/concern flights to or from the
16 United States?

17 h. Did Singapore Airlines agree with Japan Airlines to raise fuel surcharges if Japan
18 Airlines raised their fuel surcharge?

19 (1) If yes, did these fuel surcharges affect/concern flights to or from the
20 United States?

21 28. When you were employed at Singapore Airlines, did you or anyone who reported to you
22 communicate with Japan Airlines regarding fares?

23 a. If yes, who at Singapore Airlines participated in these communications? What
24 were their names and titles?

25 b. If yes, who at Japan Airlines participated in these communications? What were
26 their names and titles?

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- 1 c. How did these communications take place? I.E. by telephone, over email, in
2 person, facsimile?
- 3 d. When did these communications take place?
- 4 e. What was communicated?
- 5 f. Did Singapore Airlines agree with Japan Airlines to coordinate the amount of
6 fares to be imposed on any given flight?
- 7 (1) If yes, did these fares affect/concern flights to or from the United States?
- 8 g. Did Singapore Airlines agree with Japan Airlines to raise fares if Japan Airlines
9 raised their fares?
- 10 (1) If yes, did these fares affect/concern flights to or from the United States?
- 11 29. With respect to each document identified in ATTACHMENT B, a copy of which will be
12 provided to you, answer the following:
- 13 a. Are you familiar with this document?
- 14 b. Have you seen this document before?
- 15 c. Please explain what this document is.
- 16 d. When did you first see this document?
- 17 (1) Was this in connection with your employment at SIA?
- 18 (2) If yes, what was your position and responsibilities at the time?
- 19 e. Are you the author of this document?
- 20 (1) Were you in any way involved in the preparation of this document?
- 21 (2) Explain your involvement.
- 22 (3) If applicable, what does it mean to be “sponsored” or “approved” by you?
- 23 (4) Did you send this document to anyone?
- 24 i. If yes, who?
- 25 ii. If yes, why?
- 26 f. What was the purpose of this document?
- 27 g. Did you receive this document?

- 1 (1) If yes, why was it sent to you?
- 2 (2) If yes, how did you respond?
- 3 h. Please explain the roles of the other individuals named in this document at the
- 4 time this document originated.
- 5 (1) What company did each such individual work for?
- 6 (2) Was the company a competitor of SIA?
- 7 (3) What position did each such individual hold and what were his or her
- 8 responsibilities?
- 9 (4) What was your relationship with each such individual?
- 10 (5) How frequently did you communicate with each such individual?
- 11 (6) How did you communicate with him or her, e.g., letter, email, telephone,
- 12 in person, etc.
- 13 i. Were there any follow-up communications, e.g., letter, email, telephone, in
- 14 person, etc., to this document?
- 15 j. Did you discuss this document with anyone at SIA?
- 16 (1) If yes, with whom (name, position, responsibilities)?
- 17 (2) If yes, when?
- 18 (3) If yes, please describe your discussions.
- 19 (4) If yes, did you or anyone at SIA come to any conclusions?
- 20 k. Did you discuss this document with anyone outside of SIA?
- 21 (1) If yes, with whom (name, company, position, responsibilities)?
- 22 (2) If yes, when?
- 23 (3) If yes, please describe your discussions.
- 24 (4) If yes, did you come to any agreement regarding the matters described in
- 25 the document?
- 26 (5) Did you come to any agreement regarding future conduct of SIA and/or
- 27 any competitor?

ATTACHMENT B

1
2 Exhibit 1 is a copy of an email dated March 5, 2003 from Chan Seck Fun to Ee Kim Lye,
3 among others, (and related emails and attachments) regarding imposing fuel surcharges,
4 produced by SIA and identified as SIA_11_000123186 – SIA_11_000123190.

5 Exhibit 2 is a copy of minutes from the August 5, 2003 Board of Airline Representatives Hong
6 Kong meeting, produced by Cathay Pacific and identified as CXACMDL000004180 –
CXACMDL000004186.

7 Exhibit 3 is a copy of an email dated May 19, 2004 from Kaori Noma to Ee Kim Lye, among
8 others, (and related emails) regarding fuel prices and surcharges, produced by SIA and identified
as SIA_11_000114045 – SIA_11_000114048.

9 Exhibit 4 is a copy of minutes from the November 19, 2003 Board of Airline Representatives
10 Hong Kong meeting, produced by Cathay Pacific and identified as CXTPAC-000664227 –
CXTPAC-000664233.

11 Exhibit 5 is a copy of minutes from the May 21, 2004 Board of Airline Representatives Hong
12 Kong meeting, produced by Cathay Pacific and identified as CXTPAC-000664258 – CXTPAC-
000664265.

13 Exhibit 6 is a copy of an email dated June 7, 2004 from Ee Kim Lye to Paakkeat Ong (and
14 related emails) regarding fuel surcharges, produced by SIA and identified as SIA_11_000206784
15 – SIA_11_000206785.

16 Exhibit 7 is a copy of an email dated May 12, 2004 from Ee Kim Lye to Chan Seck Fun
regarding fare increases and fuel prices, produced by SIA and identified as SIA_11_000209349.

17 Exhibit 8 is a copy of an email dated March 10, 2000 from Julie Yang to Ee Kim Lye, among
18 others, (and related emails) regarding fuel surcharges, produced by SIA and identified as
SIA_11_000229584 – SIA_11_000229586.

19 Exhibit 9 is a copy of an email dated May 31, 2004 from Chan Seck Fun to Ivan Wong, among
20 others, (and related emails) regarding imposing fuel surcharges, produced by SIA and identified
21 as SIA_11_000113253.

22 Exhibit 10 is a copy of an email dated April 11, 2003 from Ee Kim Lye to Chan Seck Fun (and
23 related emails) regarding fare increases and fuel prices, produced by SIA and identified as
SIA_11_000125898.

24 Exhibit 11 is a copy of an email dated December 30, 2003 from Chan Seck Fun to Edmond Chiu,
25 among others, (and related emails) regarding insurance surcharges, produced by SIA and
identified as SIA_11_000182728 - SIA_11_000182729.

1 Exhibit 12 is a copy of an email dated October 13, 2005 from Ee Kim Lye to Chan Seck Fun,
2 among others, (and related emails) regarding fares, produced by SIA and identified as
3 SIA_11_000018558 – SIA_11_000018560.

4 Exhibit 13 is a copy of an email dated December 23, 2003 from Chan Seck Fun to Rocky Kwok,
5 among others, (and related emails) regarding insurance surcharges, produced by SIA and
6 identified as SIA_11_000062520.

7 Exhibit 14 is a copy of an email dated February 6, 2004 from Victoria Wong to Constance
8 Wong, among others, (and related emails) regarding insurance surcharges, produced by SIA and
9 identified as SIA_11_000063986 - SIA_11_000063995.

10 Exhibit 15 is a copy of an email dated January 7, 2004 from Ee Kim Lye to Phillip Goh among
11 others, (and related emails) regarding insurance surcharges, produced by SIA and identified as
12 SIA_11_000127121 - SIA_11_000127124.

13 Exhibit 16 is a copy of an email dated January 12, 2004 from Ee Kim Lye to Philip Goh, among
14 others, (and related emails) regarding insurance surcharges, produced by SIA and identified as
15 SIA_11_000207456 – SIA_11_000207460.

16 Exhibit 17 is a copy of an email dated June 9, 2004 from Chan Seck Fun to Ee Kim Lye (and
17 related emails) regarding fuel surcharges, produced by SIA and identified as
18 SIA_11_000199085.

19 Exhibit 18 is a copy of an email dated June 2, 2004 from Chan Seck Fun to Ee Kim Lye (and
20 related emails and attachments) regarding fuel surcharges, produced by SIA and identified as
21 SIA_11_000199091 – SIA_11_000199092.

22 Exhibit 19 is a copy of an email dated March 10, 2000 from Julie Yang to Ee Kim Lye, among
23 others, (and related emails) regarding fares, produced by SIA and identified as
24 SIA_11_000229584 – SIA_11_000229586.

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2013, I electronically filed the foregoing REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE REGARDING TAKING DEPOSITION OF CHAN SECK FUN (LETTER ROGATORY) with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record registered for electronic filing.

/s/ Dana M. Andreoli
Dana M. Andreoli