

Exhibit 14  
(Submitted Under Seal)

1 UNITED STATES INTERNATIONAL TRADE COMMISSION

2 WASHINGTON, D.C.

3 \_\_\_\_\_  
4 In the Matter of:

5 CERTAIN ELECTRONIC DIGITAL

Case No.:

6 MEDIA DEVICES AND COMPONENTS

337-TA-796

7 THEREOF  
8 \_\_\_\_\_

9  
10  
11  
12 \*\*\* CONFIDENTIAL BUSINESS INFORMATION \*\*\*

13  
14 VIDEOTAPED PERSONAL DEPOSITION OF:

15 GI-YOUNG LEE, VOLUME 2

16  
17  
18 February 17, 2012

19 Kim & Chang

20 Daewoo, South Korea

21 9:38 a.m. to 1:43 p.m.  
22  
23  
24  
25

1 to stipulation of counsel, was examined and testified  
2 through the interpreter as follows:

3 EXAMINATION

4 BY MR. ZHANG:

5 Q. Good morning, Miss Lee.

6 A. Good morning.

7 Q. Do you recall that before we started our  
8 deposition yesterday, you took an oath to tell the  
9 truth?

10 A. Yes.

11 Q. And do you understand that you are still  
12 under that oath here today?

13 A. Yes.

14 MR. ZHANG: I'd like to mark as the next  
15 exhibit a set of CAD drawings Bates labeled  
16 SAMNDCA-CAD000030.

17 (Exhibit 12 was marked for identification.)

18 VIDEOGRAPHER: Can we go off the record for  
19 one second? I've just got to change something. Stand  
20 by. I'm going off the record. The time is 9:40.

21 (Recess taken from 9:40 a.m. to 9:41 a.m.)

22 VIDEOGRAPHER: The time is 9:41. We're back  
23 on the record.

24 Q. (By MR. ZHANG) Miss Lee, if you could  
25 please review the CAD drawings quickly.

1 [REDACTED]  
2 MR. ZHANG: I'll mark as the next exhibit a  
3 Samsung phone model produced under number 45 [REDACTED]

5 (Exhibit 14 was marked for identification.)

6 Q. (By MR. ZHANG) Miss Lee, if you could  
7 please review the model and tell me if you recognize  
8 it.

9 A. Yes, I do.  
[REDACTED]

13 Q. Did you personally make this model?

14 MS. NEILL: Objection, vague.

15 A. I did not personally make this.

16 Q. (By MR. ZHANG) Do you know who made this  
17 model?

18 A. I don't exactly recall.

19 Q. Does the model's physical appearance appear  
20 altered to you in any way?

21 MS. NEILL: Objection, vague.

22 A. I'm not sure.

23 Q. (By MR. ZHANG) Do you see any changes in  
24 the model here today that you don't recall seeing the  
25 last time that you saw the model?

1 Do you recognize the design that's depicted  
2 in these drawings?

3 A. I can recognize what this design is of.

4 COURT REPORTER: I'm sorry, "I can" or "I  
5 can't"?

6 LEAD INTERPRETER A. KIM: "I can."  
7 [REDACTED]

15 MR. ZHANG: I'd like to mark as the next  
16 exhibit a Samsung phone model produced under number 48,  
17 [REDACTED]

18 (Exhibit 13 was marked for identification.)

19 Q. (By MR. ZHANG) Miss Lee, if you could  
20 review the model and tell me if you recognize what it  
21 is.

22 A. I don't quite recognize it.  
23 [REDACTED]

1 MS. NEILL: Objection, vague.

2 A. I'm not quite sure, because it has been  
3 quite some time since I last saw it.

4 MR. ZHANG: Okay. I'll mark as the next  
5 exhibit a Samsung phone model produced under number 58.  
6 (Exhibit 15 was marked for identification.)

7 Q. (By MR. ZHANG) Miss Lee, if you could  
8 please review the model and tell me if you recognize  
9 it.

10 A. This is a model that I've seen before.  
11 [REDACTED]

14 Q. Did you personally make this model?

15 MS. NEILL: Objection, vague.

16 A. As to that, I'm not sure.

17 Q. (By MR. ZHANG) Do you know who did make the  
18 model?

19 A. I'm not exactly sure.

20 Q. Does the physical appearance of the model  
21 look different than when the last time you saw it?

22 MS. NEILL: Objection, vague.

23 A. Likewise, I don't quite recall as to that,  
24 given that it has been a long time now.

25 MR. ZHANG: I'll mark as the next exhibit a

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1 Q. What do you recognize it to be?  
 2 A. This is an article reflecting in-house  
 3 interview.  
 4 Q. Did you and Mr. Tae Joong Kim work together  
 5 on the Galaxy Nexus?  
 6 MS. NEILL: Objection, vague, lacks  
 7 foundation.  
 8 A. In some area we did together.  
 9 Q. (By MR. ZHANG) What area did you guys -- do  
 10 you and Mr. Kim work together on the Nexus?  
 11 MS. NEILL: Objection, vague.  
 12 A. Designs . . .  
 13 (Interpreters conferring.)  
 14 A. Design specification.  
 15 Q. (By MR. ZHANG) Is it true that you and  
 16 Mr. Kim prepared this blog post together?  
 17 MS. NEILL: Objection, vague, lacks  
 18 foundation.  
 19 A. We did not prepare this article as  
 20 reflected.  
 21 CHECK INTERPRETER P. KIM: "Ourselves."  
 22 Q. (By MR. ZHANG) Do you recall my asking you  
 23 this question yesterday during your Northern District  
 24 of California deposition?  
 25 A. Are you saying that you asked this same

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1 Q. Are there any detriments to having a curved  
 2 front face for a touchscreen cellular phone?  
 3 MS. NEILL: Objection, vague.  
 4 A. I'm not sure about that.  
 5 Q. (By MR. ZHANG) You're not aware of any  
 6 increased cost associated with making the front surface  
 7 of the Galaxy Nexus curved?  
 8 MS. NEILL: Objection, vague, lacks  
 9 foundation.  
 10 A. I would think there would be also an  
 11 increase in cost.  
 12 Q. (By MR. ZHANG) Aside from cost, any other  
 13 detriments that you're aware of for making the front  
 14 surface of a mobile phone curved?  
 15 MS. NEILL: Objection, vague.  
 16 A. Not that I can come up with at this moment.  
 17 MR. ZHANG: I'd like to show the witness  
 18 what was previously marked as Exhibit 19 at the JinSoo  
 19 Kim deposition. And that is a Galaxy Vibrant phone.  
 20 MS. NEILL: Objection, mischaracterizes the  
 21 record.  
 22 MR. ZHANG: Is it not a Vibrant phone?  
 23 MS. NEILL: It's a Vibrant, it's just not  
 24 necessarily called Galaxy Vibrant. It's a Samsung  
 25 Vibrant.

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1 question whether we prepared this article ourselves  
 2 yesterday?  
 3 Q. I'll ask a different question.  
 4 Do you recall testifying yesterday that you  
 5 and Mr. Kim prepared this blog post?  
 6 MS. NEILL: Objection, mischaracterizes  
 7 prior testimony.  
 8 A. We prepared it together, in part.  
 9 Q. (By MR. ZHANG) Is it true that the front  
 10 face of the Galaxy Nexus is curved?  
 11 MS. NEILL: Objection, vague.  
 12 A. Yes.  
 13 Q. (By MR. ZHANG) What are the advantages of  
 14 having a front surface to a touchscreen cellular phone  
 15 that is curved rather than flat?  
 16 MS. NEILL: Objection, vague, lacks  
 17 foundation.  
 18 A. Like I testified earlier on NDCAL case,  
 19 since human face is shaped curved, I remember  
 20 testifying that the advantage, therefore, based on  
 21 that, would be advantageous to have it curved.  
 22 Q. (By MR. ZHANG) Can you think of any other  
 23 advantages here today?  
 24 A. I don't quite recall anything else at the  
 25 moment.

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1 MR. ZHANG: Oh, it's a Samsung Vibrant,  
 2 okay.  
 3 Q. (By MR. ZHANG) Miss Lee, if you could  
 4 please take the phone out of the box and hold it up so  
 5 that the camera can make a record of it.  
 6 A. (Deponent complies.)  
 7 MR. ZHANG: Do you have it? Okay. Good.  
 8 Thank you.  
 9 Q. (By MR. ZHANG) Miss Lee, do you know of a  
 10 reason why the speaker slot on a touchscreen mobile  
 11 phone could not be located at the top of the front  
 12 surface immediately underneath the metal band that  
 13 surrounds the front surface?  
 14 CHECK INTERPRETER P. KIM: (Speaking in  
 15 Korean.)  
 16 MS. NEILL: Objection, vague,  
 17 mischaracterizes the record.  
 18 A. I'm not sure about that.  
 19 Q. (By MR. ZHANG) Does that mean you know of a  
 20 reason or you don't know of a reason?  
 21 MS. NEILL: Same objections.  
 22 A. I'm saying that I don't know about that for  
 23 sure.  
 24 Q. (By MR. ZHANG) Were you involved with the  
 25 design of a phone previously at Samsung that had its

1 reasons, but none that I can come up with at this time.

2 Q. Are you aware of any detriments to having  
3 rounded corners on a touchscreen cellular phone?

4 MS. NEILL: Objection, vague.

5 A. None that I can think of at this time.

6 Q. (By MR. ZHANG) Are you aware of a detriment  
7 associated with rounded corners whereby space is taken  
8 away from the interior of the phone for components?  
9 Maybe I can ask that better.

10 Are you aware that rounded corners on a  
11 cellular phone can take away interior space for  
12 components?

13 MS. NEILL: Objection, vague.

14 A. I think that may vary depending on the shape  
15 of components.

16 Q. (By MR. ZHANG) So turning your attention to  
17 page 2 of Exhibit 2 again, and comparing the Vibrant  
18 phone that's in front of you to the photograph of the  
19 [REDACTED]

22 MS. NEILL: Objection, vague. Also object  
23 to comparing a photograph to an actual object that  
24 she's holding in her hand.

25 A. So just to clarify, did you just ask me one

[REDACTED]

18 Q. (By MR. ZHANG) Miss Lee, do you know of a  
19 reason why the active area on a touchscreen cellular  
20 phone has to be centered on the front face of the  
21 phone?

22 MS. NEILL: Objection, vague.

23 A. I think that varies depending on the phone.

24 Q. (By MR. ZHANG) So in your opinion, it is  
25 possible to have a functioning touchscreen cellular

1 looks different from the other?

2 Q. (By MR. ZHANG) Yes.

3 A. Yes.

[REDACTED]

7 MS. NEILL: Objection, vague.

8 A. I don't know about that.

9 Q. (By MR. ZHANG) So you have no information  
10 either way; is that correct?

11 MS. NEILL: Same objection.

12 A. I don't think I can state as to that solely  
13 by looking at the front surface of a phone, because  
14 that may vary depending on what level of comfort the  
15 user might feel.

16 CHECK INTERPRETER P. KIM: "Front shape."

17 LEAD INTERPRETER A. KIM: "The front surface  
18 shape," that is.

[REDACTED]

1 phone where the active area is not centered on the  
2 front face?

3 MS. NEILL: Objection, vague.

4 A. I think it may not be centered right in the  
5 mid-point of the front surface.

6 Q. [REDACTED]

13 A. I find it hard to make that distinction  
14 solely by looking at this photograph.

15 Q. (By MR. ZHANG) So the photograph . . .

16 A. [REDACTED] because

18 looking at this photograph reflected on this page, I  
19 don't know whether this is a photograph depicting a  
20 mock-up phone or actually a phone that has been  
21 commercially released.

22 Q. So I believe you had two concerns about the  
23 question, one was that the photograph is of poor  
24 quality, so if I were to ask you the same question, but  
25 to just tell you that I'm only asking you to look at

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1 (Counsel representing this witness should arrange for  
 2 reading and signing and thereafter distribute copies of  
 3 the signed Errata sheet to opposing counsel without  
 4 involvement of the court reporter.)

5 STYLE OF CASE: Certain Electronic Digital Media  
 6 Devices and Components Thereof

7 DEPOSITION OF: GI-YOUNG LEE

8 DATE TAKEN: February 17, 2012

9 E R R A T A S H E E T

10 Page	11 Line Change	12 Reason
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I hereby certify that I have read my deposition and  
 that it is true and correct subject to any changes in  
 form or substance entered here.

Date \_\_\_\_\_ GI-YOUNG LEE

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C E R T I F I C A T E

2 DAEWOO )  
 3 SOUTH KOREA )

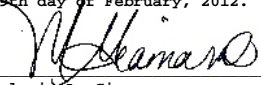
4 I, Melanie L. Giamarco, Registered  
 5 Professional Reporter and Certified Realtime Reporter,  
 6 do hereby certify that the aforementioned witness was  
 7 first duly sworn by me pursuant to stipulation of  
 8 counsel to testify to the truth; that I was authorized  
 9 to and did report said deposition in stenotype; and  
 10 that the foregoing pages are a true and correct  
 11 transcription of my shorthand notes of said deposition.

12 I further certify that said deposition was  
 13 taken at the time and place hereinabove set forth and  
 14 that the taking of said deposition was commenced and  
 15 completed as hereinabove set out.

16 I further certify that I am not attorney or  
 17 counsel of any of the parties, nor am I a relative or  
 18 employee of any attorney or counsel of any party  
 19 connected with the action, nor am I financially  
 20 interested in the action.

21 The foregoing certification of this  
 22 transcript does not apply to any reproduction of the  
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 24 and/or direction of the certifying reporter.

25 IN WITNESS WHEREOF, I have hereunto set my  
 hand this 19th day of February, 2012.



Melanie L. Giamarco  
 Certified Realtime Reporter  
 Registered Professional Reporter  
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