

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  
6 MEDIA DEVICES AND COMPONENTS  
7 THEREOF

Case No.:  
337-TA-796

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

Page 75

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.

Page 77

1 A. No.  
 2 MR. ZHANG: I'll mark as the next exhibit a  
 3 Samsung phone model produced under number 45 that  
 4 appears to relate to an S1 project.  
 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.  
 10 Q. Do you recognize it to be one of the models  
 11 produced during the S1 project?  
 12 A. Yes.  
 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?

Page 76

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 Q. (By MR. ZHANG) Is this the Volga phone  
 8 design that you worked on at Samsung?  
 9 MS. NEILL: Objection, lacks foundation.  
 10 A. Yes.  
 11 Q. (By MR. ZHANG) And do you know if the Volga  
 12 phone was released into a commercial product?  
 13 MS. NEILL: Objection, vague.  
 14 A. I don't know.  
 15 MR. ZHANG: I'd like to mark as the next  
 16 exhibit a Samsung phone model produced under number 48,  
 17 and that appears to relate to the S4 project.  
 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 Q. Did you work on the S4 project?  
 24 A. No.  
 25 Q. Do you know what the S4 project is?

Page 78

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 Q. Was this model produced during the S1  
 12 project?  
 13 A. Probably so, I think.  
 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

Page 99

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

Page 101

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.

Page 100

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.

Page 102

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

Page 111

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 Vegas phone depicted on the page, would you agree with  
 20 me that the corner design on the Vegas phone is  
 21 different than the corner design on the Vibrant phone?  
 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

Page 113

1 feedback from anyone at Samsung that a particular phone  
 2 design was not comfortable to use?  
 3 MS. NEILL: Objection, vague.  
 4 A. I may have, but I cannot come up with any at  
 5 this moment.  
 6 Q. (By MR. ZHANG) When you design a phone, is  
 7 user comfort one of the factors that you take into  
 8 account?  
 9 MS. NEILL: Objection, vague.  
 10 A. It may be one of the factors.  
 11 Q. (By MR. ZHANG) Has it ever been one of the  
 12 factors? And by that, I mean user comfort. Actually,  
 13 let me start over.  
 14 Has user comfort ever been one of the factors  
 15 that you considered when designing a phone at Samsung?  
 16 MS. NEILL: Objection, vague.  
 17 A. Not that I can think of at this moment.  
 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

Page 112

1 looks different from the other?  
 2 Q. (By MR. ZHANG) Yes.  
 3 A. Yes.  
 4 Q. Do you think that the Vegas phone would be  
 5 just as comfortable for the user to use as the  
 6 Galaxy -- or, I'm sorry, the Samsung Vibrant phone?  
 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.  
 19 Q. (By MR. ZHANG) Is there a department at  
 20 Samsung that performs testing on cell phone designs to  
 21 determine whether customers would find them to be  
 22 comfortable to use?  
 23 MS. NEILL: Objection, vague.  
 24 A. I am not exactly sure about that.  
 25 Q. (By MR. ZHANG) Have you ever received

Page 114

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. (By MR. ZHANG) And referring to page 2 of  
 7 Exhibit 2, once again, would you agree with me that on  
 8 the Victory phone depicted there, the active area of --  
 9 the active area is not centered on the front surface?  
 10 MS. NEILL: Objection, vague; object, the  
 11 quality of the photograph and the witness being asked  
 12 to determine what the active area is.  
 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. And I also believe by determining on the  
 17 active area, this phone will be ambiguous, 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

Page 131

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

Page 132

C E R T I F I C A T E

2 DAEWOO )  
 3 SOUTH KOREA )

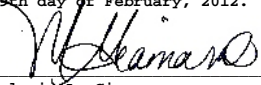
4 I, Melanie L. Giamarco, Registered  
 5 Professional Reporter and Certified Realtime Reporter,  
 6 do hereby certify that the aforementioned witness was  
 7 first duly sworn by me pursuant to stipulation of  
 8 counsel to testify to the truth; that I was authorized  
 9 to and did report said deposition 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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