

1 raise your right hand, please?

2 DON-JOO LEE,

3 after having been duly sworn by the reporter, pursuant
4 to stipulation of counsel, was examined and testified
5 through the interpreter as follows:

6 THE WITNESS: I do.

7 MR. KIM: I've been asked to read the
8 following statement. We understand the court
9 reporter is not authorized to administer oaths
10 in this venue; nevertheless, we request that she
11 administer the oath and we stipulate that we
12 waive any objection to the validity of the
13 deposition based on the oaths.

14 MS. MAROULIS: Stipulated.

15 DIRECT EXAMINATION

16 BY MR. KIM:

17 Q. Good morning, Mr. Lee.

18 Have you had your deposition taken before,
19 Mr. Lee?

20 A. No.

21 Q. So I will briefly review the basics. I
22 imagine your counsel has also mentioned it. First, do
23 you understand that you have taken an oath to testify
24 truthfully today?

25 A. Yes, I do.

1 1977?

2 A. No, not 1977, but 1979.

3 Q. Okay. And what is your current position?

4 A. I'm the head of the sales and marketing at
5 mobile business unit of Samsung Electronics.

6 Q. And how long have you held that position?

7 A. This year marks the fourth year into this
8 position.

9 Q. So since 1998?

10 I'm sorry.

11 A. From 2009.

12 Q. I see. So you're entering your fourth year.

13 A. Yes.

14 Q. And what position did you hold before that?

15 A. You mean immediately before?

16 Q. Yes.

17 A. I was responsible for CIS region for Samsung
18 Electronics.

19 Q. And what is the CIS region?

20 A. President of Samsung Electronics CIS. And
21 CIS covers countries of the Soviet federations,
22 including Russia.

23 Q. So in that position was that mobile devices
24 only, or was that all Samsung products?

25 MS. MAROULIS: Objection, vague.

1 don't have the data to support it.

2 BY MR. KIM:

3 Q. Do you have any data at all on that subject?

4 MS. MAROULIS: Objection, vague.

5 THE WITNESS: I don't have precise
6 recollection.

7 BY MR. KIM:

8 Q. Who would be the best person -- or who would
9 know about such data at Samsung Electronics?

10 MS. MAROULIS: Objection, vague, calls for
11 speculation.

12 BY MR. KIM:

13 Q. Or who would be responsible for collecting
14 that kind of data?

15 A. A team doing market research under marketing
16 division.

17 Q. That's in your division, correct?

18 A. Yes.

19 (Exhibit 1559 Bates SAMNDCA 62702 through
20 711 was marked for identification.)

21 BY MR. KIM:

22 Q. I'm showing you a document that's been
23 marked as Exhibit 1559, which has Bates numbers SAMNDCA
24 62702 through 711. And feel free to review as much as
25 you want, but my question focuses on the second page

1 in, which has Bates number ending at 704.

2 And my first question is: If you look at
3 page Bates number 10462704, is this an e-mail that
4 Brent Yoo of Samsung Telecommunications America sent to
5 several people, including a copy to you?

6 A. This is what is written in the document, and
7 it seems likely.

8 Q. And if you look at the second paragraph, do
9 you see the reference to first-time smartphone user and
10 IOS lock-in?

11 A. I see it.

12 Q. Is it correct that this e-mail notes that
13 it's important to get first-time smartphone users
14 before they're locked into the IOS so that Samsung can
15 lock them into the Android IOS?

16 MS. MAROULIS: Objection, document speaks
17 for itself.

18 THE WITNESS: That is one of our many
19 strategies.

20 MR. KIM: Victoria, I finished this line of
21 questioning. I have some other line of
22 questioning. The question is what you want to
23 do for lunch. I don't know if lunch is actually
24 here yet.

25 MS. MAROULIS: It's 11:50.

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C E R T I F I C A T E

(Seoul)

(South Korea)

I, Tracey S. LoCastro, Registered Professional Reporter, do hereby certify that the aforementioned witness was first duly sworn as noted by stipulation of counsel to testify the whole truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

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

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

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

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



TRACEY S. LOCASTRO,
Registered Professional Reporter