

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

----- X
UNIVERSAL ELECTRONICS INC.,
Plaintiff, Case No. SACV
-against- 12-00329 AG
(JPRx)

UNIVERSAL REMOTE CONTROL, INC.,

Defendant.

----- X
UNIVERSAL REMOTE CONTROL, INC.,

Counter-Claimant,
-against-
UNIVERSAL ELECTRONICS INC.,
Counter-Defendant.

----- X
HELD AT: Judicial Reporting Service
550 Mamaroneck Avenue
Suite 405
Harrison, New York 10528
September 12, 2013
10:15 a.m. [REDACTED]

Examination before Trial of
the the Defendant and Counter-Claimant,
Universal Remote Control INC. by JAK HEE YOUNG [REDACTED]
held pursuant to Subpoena, held at the above
time and place before a Notary Public of the
State of New York.

Jacqueline A. Smith, Reporter

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MR. LEE: I am Christopher [REDACTED]
I represent [REDACTED] [REDACTED]
Electronics [REDACTED] today is
Doctor Shawn Burke, an expert for
Universal Electronics.

MR. EPSTEIN: I [REDACTED] [REDACTED]
Epstein [REDACTED] [REDACTED]
Dr. [REDACTED] [REDACTED] [REDACTED]
Mr. You at the deposition. Mr. You
is a [REDACTED] [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXAMINER [REDACTED]. [REDACTED] [REDACTED]

Q. Please state your full name for the record.

A. Jak Hee You.

Q. Please [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]

A. Ohsung Electronic USA, Inc.,

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 10 [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. So the record is clear, why

[REDACTED] read [REDACTED] in [REDACTED] [REDACTED] [REDACTED]

[REDACTED]? [REDACTED] do you have an extra card?

Thank you.

(Whereupon, You Exhibit 2,
original business card of Mr. Jack
Hee You, was marked for
Identification.)

A. The exact name of that location
would be Ohsung Mexico SAD. Ohsung Mexico,
Ohsung Electronics Mexico SADB.

Q. Mr. You, so the record is
clear, I will hand you one of your business
cards that I marked as Exhibit You 2. Would
you identify the document for me fork the
record?

A. This is [REDACTED] u [REDACTED] e [REDACTED] [REDACTED]

Q. It's double sided, right?

A. Yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Which [redacted] [redacted] [redacted] [redacted] [redacted]

[redacted] r [redacted]

A. Ohsung [redacted] [redacted] [redacted] [redacted] [redacted]

[redacted]

Q. I see. Am I correct that you [redacted]

[redacted] s [redacted] s [redacted] a [redacted] n [redacted] o [redacted] e [redacted] [redacted]

[redacted] E [redacted] [redacted] [redacted] a [redacted] [redacted] t

correct?

A. No. O [redacted] g [redacted] i [redacted] [redacted] [redacted]

[redacted] a [redacted] e [redacted] [redacted] c [redacted] a [redacted] [redacted] u [redacted] [redacted]

[redacted] A [redacted]. [redacted]

Q. And isn't it correct that you,

as the executive director of Ohsung

Electronics USA, report to Ohsung

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

28

Electronics in Korea? Is that correct?

A. Yes, correct.

Q. Who is your boss?

A. It would be CEO of Ohsung Electronics Inc., in Korea.

Q. What's the name of the CEO of Ohsung Electronics?

A. Kyung Jong Yoo. His name is spelled K-y-u-n-g J-o-n-g Y-o-o.

Q. Kyung Jong Yoo. Is that his name?

A. That is correct.

Q. Now, s [redacted] e [redacted] [redacted] e [redacted] [redacted] [redacted] [redacted] [redacted]
[redacted] r [redacted]

A. White I [redacted] [redacted]

Q. What is [redacted] a [redacted] re [redacted] of [redacted] [redacted] [redacted] [redacted]
[redacted]

A. [redacted] [redacted] [redacted] M [redacted] [redacted]
[redacted] Y [redacted] [redacted]

Q. What is your immigration status at this point, sir?

A. I am a green card holder.

Q. When did you retain that status?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

29

A. I believe it was about eight or nine years ago.

Q. Do you live here with your family?

A. Yes.

Q. Where is your office located at this time?

A. 500 Mamaroneck Avenue, Harrison, New York 10528.

Q. That's the location of URC as well, is that correct, sir?

A. Yes. That is correct.

Q. Would you tell the jury how many people work with you at this location?

MR. EPSTEIN: Objection. I don't think there is any jury here.

A. For which company are you referring to?

Q. Let's take one at a time. Ohsung USA Electronics.

A. Three.

Q. Including yourself?

A. Including myself, it would be four.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Now, do you [redacted] C [redacted]
[redacted] a [redacted] n [redacted] R [redacted]

A. Not as [redacted] a [redacted] k [redacted]. [redacted]

Q. Do you know who owns URC, to
your knowledge?

A. Mr. Park.

Q. As far [redacted] y [redacted] u [redacted] r [redacted] d [redacted]
[redacted] P [redacted] w [redacted] C [redacted] r [redacted] c [redacted] R [redacted] C [redacted] s [redacted] [redacted] [redacted]
[redacted]

A. Yes. T [redacted] h [redacted] c [redacted] a [redacted] e [redacted] n [redacted]

Q. When did you first meet
Mr. Park?

A. In 1988 or 1989.

Q. Under what circumstances did
you first meet Mr. Park?

A. Mr. Park was visiting Ohsung
Electronics to purchase remote controls.

Q. Did Mr. Park, in fact, obtain
remote control products from Ohsung at the
time?

A. Yes. He did.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Did you do any preparation for today's testimony?

A. What type of preparation? I am not sure what you are referring to.

Q. It's a yes or no question? Did [redacted]
[redacted] t [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted]
[redacted] o [redacted] ti [redacted]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

84

A. Yes, I did.

Q. Which [redacted] [redacted] p [redacted] [redacted] [redacted]

[redacted]

A. Bob. [redacted]

Q. Mr. Epstein [redacted] [redacted]

A. Yes. [redacted]

Q. And are you or --

MR. LEE: Strike that.

Q. Do you have a retainer agreement with Mr. Epstein?

MR. EPSTEIN: Objection.

Privilege.

Q. You can answer yes or no.

A. What do you mean by retainer?

Q. Do you have an agreement between Mr. Epstein's law firm and you or Ohsung that establishes the attorney client relationship?

A. Yes.

Q. Are you [redacted] [redacted] [redacted] [redacted]

[redacted] E [redacted] a [redacted] s [redacted] [redacted] [redacted]

A. Ohsung [redacted] a [redacted] [redacted] [redacted] [redacted]

[redacted] i [redacted] a [redacted]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Now, is [redacted] correct that [redacted] [redacted] [redacted]

[redacted] or [redacted] in [redacted] Chicago [redacted]

[redacted] A. That [redacted]

A. That is [redacted] [redacted]

Q. And if [redacted] that [redacted] [redacted]

[redacted] or a [redacted] [redacted] [redacted] [redacted]

[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]

[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]

[redacted] [redacted] [redacted]

A. That is [redacted] [redacted]

Q. How often do you get paid?

1 126

2 A. Once a month.

3 Q. Do you get paid electronically
4 or do you receive a check?

5 A. By check.

6 Q. And who is issuing the checks
7 that you receive for your compensation?

8 A. Ohsung Electronics USA Inc.,
9 issues those checks.

10 Q. Who is responsible for issuing
11 those checks at Ohsung Electronics USA?

12 A. Account manager. Accounting
13 manager.

14 Q. Who is the accounting manager
15 for Ohsung Electronics USA?

16 A. Can I look at the names on the
17 list? Young Woo Lee. Y-o-u-n-g W-o-o
18 L-e-e.

19 Q. And he's listed on You
20 Exhibit 4, right?

21 A. That is correct.

22 Q. Do you also receive W-2 forms
23 each year from Ohsung Electronics USA?

24 MR. EPSTEIN: Objection. This
25 line of questioning has nothing to do

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

127

with any of the claims or defenses in
this litigation.

You may answer the question.

A. Yes, I [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

222

(Where [REDACTED], [REDACTED] [REDACTED] [REDACTED])

exar [REDACTED]; [REDACTED] [REDACTED]

con [REDACTED]