

Exhibit D

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: TFT-LCD (FLAT PANEL))
ANTITRUST LITIGATION,)

THIS DOCUMENT RELATES TO:)
Case No. 3:10-cv-01064-SI)
DELL INC., and DELL PRODUCTS)
L.P.,)

Master Case No.
M-07-1827-SI
Individual Case
No.
3:10-cv-01064-
SI

Plaintiffs,)

Vs.)

SHARP CORPORATION; SHARP)
ELECTRONICS CORPORATION;)
HITACHI DISPLAYS, LTD.; HITACHI)
ELECTRONIC DEVICES (USA), INC.;)
HITACHI, LTD.; EPSON IMAGING)
DEVICES CORPORATION; EPSON)
ELECTRONICS AMERICA, INC.;)
HANNSTAR DISPLAY CORPORATION;)
TOSHIBA AMERICA ELECTRONIC)
COMPONENTS, INC.; TOSHIBA)
AMERICA INFORMATION SYSTEMS,)
INC.; TOSHIBA CORPORATION; and)
TOSHIBA MOBILE DISPLAY CO.,)
LTD.,)

Defendants.)

HIGHLY CONFIDENTIAL TRANSCRIPT ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF MOHAN RAO, Ph.D.

TUESDAY, JUNE 12, 2012

REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 Quarter 4 2001 through 2004, but do not
2 statistically pick up any overcharges for 2005 and
3 '6.

4 Q. BY MR. FARZAN: But you did model the
02:59 5 potential overcharges for 2005 and 2006 and didn't
6 find any, correct, and then stopped at 2004 for
7 your damages period?

8 MS. BERNSTEIN: Object to form.

9 THE WITNESS: No, that is exactly what I
02:59 10 did. That's the model I am just describing to you.
11 So in other words, I have a model -- see, when you
12 have a backcasting model, you can't test that for
13 2005 and '6. But I also have a model, a dummy
14 variable model, where I explicitly test for it. I
02:59 15 have a dummy that is from Quarter 1 -- Quarter 4
16 2001 through end of 2004. I have a separate dummy
17 that's turned on for 2005 and '6. I find it to be
18 statistically significant for what I call the
19 damages period until 2004, and I find it to be not
02:59 20 statistically significant for 2005 and '6.

21 Therefore, I know there is something about
22 2005 and '6 for which I should not be calculating
23 damages.

24 Now, the backcasting model works
03:00 25 differently than that in that you can't test it for

1 those two periods, because each period is different
2 and independent by itself. And but -- but in
3 conjunction with my statistical model and all of
4 the qualitative information with respect to what's
03:00 5 happening at Samsung and so on that I discuss, I
6 stop calculating overcharges in 2005 and '6; not
7 that there aren't overcharges in certain periods,
8 but as I said, there aren't systematic positive
9 overcharges, and therefore I stop.

03:00 10 Q. BY MR. FARZAN: It is probably a bad
11 question on my part. And what I was just trying to
12 get at is maybe what you just said, but just to be
13 clear on the record, you did model 2005 and 2006 to
14 see if there were overcharges? One of your models
03:00 15 did look at whether there were overcharges during
16 that two-year period? That's what I'm trying to
17 figure out.

18 A. Correct.

19 Q. Okay. That's all I was trying to get at.
03:01 20 So it was a bad question on my part.

21 And then based on your modeling and the
22 results that you got for 2005 and 2006, you then
23 made your damages period Q4 2001 until the end of
24 2004?

03:01 25 A. That is correct.