

Page 523 1 UNITED STATES OF AMERICA 2 CONSUMER PRODUCT SAFETY COMMISSION 3 : Vol. IV 4 In the Matter of CPSC Docket No. 12-2 5 ZEN MAGNETS, LLC 6 STAR NETWORKS, USA, LLC CPSC Docket No. 12-3 7 Respondents. 8 Wednesday, July 16, 2014 10 Bethesda, Maryland 11 12 CONTINUED DEPOSITION OF SHIHAN QU: called for examination by Counsel for Complainant, 13 14 pursuant to Notice, taken at the Consumer Product 15 Safety Commission, 3440 East-West Highway, 16 Bethesda, Maryland, 20814, commencing at 2:08 17 p.m., before Kim Brantley, a Court Reporter and 18 Notary Public in and for Maryland, when were 19 present on behalf of the respective parties: 20 21 22 Reported by Kim M. Brantley, CSR

Page 540

- A. No, no, just magnetssd.pdf. I think
- 2 it's still up on the CPSC website.
- 3 (Public Policy Polling report was
- 4 marked Deposition Qu Exhibit 33, for
- 5 identification.)
- 6 BY MR. ARAGON:
- 7 Q. I'm going to refer you, Mr. Qu, to a
- 8 document that's been marked as Exhibit 33 and show
- 9 to your counsel. It's a document that says at the
- top Public Policy Polling.
- A. Mm-hmm.
- Q. We had talked about a poll that you had
- 13 contracted for today?
- 14 A. Yes.
- 15 Q. And I want to ask if this is the
- document that reflects the results of that poll?
- 17 A. Yes.
- Q. And if it accurately reflects the
- questions that were asked as part of the poll?
- 20 A. Yes.
- Q. When we talked about it I think you
- 22 said you had help drafting these questions. Is

Page 541

- I that correct?
- 2 A. Yes.
- Q. With whom did you have help drafting
- 4 these questions?
- 5 A. So generally I would draft it, or I
- 6 would kind of write the questions, and then one of
- 7 the editors would need to approve the questions or
- 8 make modifications.
- 9 So I'm not sure if you consider that
- 10 assistance in drafting, because they didn't
- II contribute to the content directly. But I'm sure
- 12 they had specific preferences as far as form,
- 13 syntax and things like that.
- Q. Well, I'm asking, is it correct to say
- 15 you drafted questions and sent it to them and they
- worked on it?
- 17 A. "Worked on it" seems a bit vague.
- Q. Mm-hmm.
- A. But I sent them to them.
- Q. I'm actually focused on the first half.
- Is it correct that you drafted questions and sent
- 22 them to them?