

Christopher T. Micheletti  
**ZELLE LLP**  
 44 Montgomery St., Suite 3400  
 San Francisco, CA 94104  
 Telephone: (415) 693-0700  
 Facsimile: (415) 693-0770  
 cmicheletti@zelle.com

Aaron M. Sheanin  
**ROBINS KAPLAN LLP**  
 2440 West El Camino Real, Suite 100  
 Mountain View, CA 94040  
 Telephone: (650) 784-4040  
 Facsimile: (650) 784-4041  
 asheanin@robinskaplan.com

*Interim Co-Lead Class Counsel for the  
 End-User Plaintiffs*

Victoria Sims  
**CUNEO GILBERT & LADUCA, LLP**  
 4725 Wisconsin Avenue, NW, Suite 200  
 Washington, DC 20016  
 Telephone: (202) 789-3960  
 Facsimile: (202) 789-1813  
 vicky@cuneolaw.com

Shawn M. Raiter  
**LARSON • KING, LLP**  
 30 East Seventh Street, Suite 2800  
 Saint Paul, MN 55101  
 Telephone: (651) 312-6518  
 Facsimile: (651) 789-4818  
 sraiter@larsonking.com

*Interim Co-Lead Class Counsel for the  
 Reseller Plaintiffs*

Kenneth R. O'Rourke  
**WILSON SONSINI GOODRICH & ROSATI  
 Professional Corporation**  
 One Market Plaza  
 Spear Tower, Suite 3300  
 San Francisco, CA 94105  
 Telephone: (415) 947-2000  
 Facsimile: (415) 947-2099  
 korourke@wsgr.com

*Counsel for Seagate Plaintiffs*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

IN RE: HARD DISK DRIVE SUSPENSION  
 ASSEMBLIES ANTITRUST LITIGATION

Case Nos. 3:19-md-02918-MMC  
 3:20-cv-01217-MMC

MDL No. 2918

THIS DOCUMENT RELATES TO:  
 ALL ACTIONS

**DECLARATION OF AARON M.  
 SHEANIN IN OPPOSITION TO  
 DEFENDANT SAE MAGNETICS  
 (H.K.) LTD.'S MOTION TO DISMISS  
 COMPLAINTS FOR LACK OF  
 PERSONAL JURISDICTION**

Judge: Hon. Maxine M. Chesney  
 Date: July 17, 2020  
 Time: 9:00 a.m.  
 Courtroom: 7, 19<sup>th</sup> Floor

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

DECL. OF AARON M. SHEANIN IN OPP'N TO DEF. SAE MAGNETICS (H.K.) LTD.'S MOT. TO DISMISS  
 COMPLAINTS FOR LACK OF PERSONAL JURISDICTION  
 CASE NOS. 3:19-md-02918-MMC, 3:20-cv-01217-MMC

1 I, Aaron M. Sheanin, declare as follows:

2 1. I am partner of the firm Robins Kaplan LLP and serve as Interim Co-Lead Class  
3 Counsel for End-User Plaintiffs. I make this declaration in opposition to Defendant SAE  
4 Magnetics (H.K.) Ltd.'s Motion to Dismiss Complaints for Lack of Personal Jurisdiction. I have  
5 personal knowledge of the facts stated herein and, if called upon to do so, I could and would testify  
6 competently thereto.

7 **JFTC's Investigation of the Suspension Assembly Conspiracy**

8 2. Attached hereto as Exhibit A is a true and correct copy of the Cease and Desist Order  
9 issued by the Japan Fair Trade Commission ("JFTC") against NHK Spring Co., Ltd. and Nat  
10 Peripheral (HK) Co., Ltd. on February 9, 2018, and a certified English translation thereof.

11 **Document Produced by the TDK Defendants in this Litigation**

12 3. Attached hereto as Exhibit B is a true and correct copy of [REDACTED]  
13 [REDACTED] produced by TDK in  
14 this litigation as TDKHDD000041479. [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

17 **LinkedIn Profiles of SAE Employees in California**

18 4. Attached hereto as Exhibit C is a true and correct copy of the LinkedIn profile of Yun  
19 Teng, a Sr. Account Manager at SAE Magnetics in Milpitas, California from February 1999 to the  
20 present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

21 5. Attached hereto as Exhibit D is a true and correct copy of the LinkedIn profile of  
22 Phong Vu, a Senior Product Engineer at SAE Magnetics in Milpitas, California from June 2019 to  
23 the present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

24 6. Attached hereto as Exhibit E is a true and correct copy of the LinkedIn profile of Ellis  
25 Cha, a Vice President of SAE Magnetics in the San Francisco Bay Area from August 1995 to the  
26 present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

27 7. Attached hereto as Exhibit F is a true and correct copy of the LinkedIn profile of  
28

Quinghua Zeng, a Director, HDI Dynamics at SAE Magnetics in the San Francisco Bay Area from July 2005 to the present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

8. Attached hereto as Exhibit G is a true and correct copy of the LinkedIn profile of Chao-Hui Yang, a Senior Staff Engineer at SAE Magnetics in the San Francisco Bay Area from February 1997 to the present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

9. Attached hereto as Exhibit H is a true and correct copy of the LinkedIn profile of Jeff Li, an Engineering Manager, HDD System Integration at SAE Magnetics in the San Francisco Bay Area from July 2008 to the present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

10. Attached hereto as Exhibit I is a true and correct copy of the LinkedIn profile of Darwin San Juan, a Program Manager for SAE Magnetics (H.K.) Ltd. in Milpitas, California from September 2013 to the present. This document was downloaded from LinkedIn at my direction on May 24, 2020.

**Documents Produced by the TDK Defendants in this Litigation**

11. Attached hereto as Exhibit J is a true and correct copy of [REDACTED]  
[REDACTED]  
[REDACTED] produced by TDK in this litigation as TDKHDD000021458.

12. Attached hereto as Exhibit K is a true and correct copy of [REDACTED]  
[REDACTED]  
[REDACTED] produced by TDK in this litigation as TDKHDD000023896.

**CADE's Investigation of the Suspension Assembly Conspiracy**

13. Attached hereto as Exhibit L is a true and correct copy of Technical Report No. 4/2018 (SEI No. 0459666), and attachment thereto, issued by the General Superintendent's Office of

Brazil's Administrative Council for Economic Defense ("CADE") for Administrative Proceedings No. 08700.006006/2017-61, and a certified English translation thereof.

**Correspondence Exchanged in this Litigation**

14. Attached hereto as Exhibit M is a true and correct copy of a letter dated March 18, 2020 from J. Clayton Everett, Jr., counsel for the TDK Corporation, Hutchinson Technology Inc., Headway Technologies, Inc., Magnecomp Precision Technology Public Co., Ltd., and SAE Magnetics (H.K.) Ltd. to Christopher T. Micheletti, Aaron M. Sheanin, Victoria Sims, and Shawn Raiter.

**Documents Produced by the TDK Defendants in this Litigation**

15. Attached hereto as Exhibit N is a true and correct copy of [REDACTED]  
[REDACTED]  
[REDACTED] produced by TDK in this litigation as an unofficial English translation as TDKHDD000003971. [REDACTED]  
[REDACTED]

16. Attached hereto as Exhibit O is a true and correct copy of [REDACTED]  
[REDACTED] produced by TDK in this litigation as TDKHDD000024412.

17. Attached hereto as Exhibit P is a true and correct copy of [REDACTED]  
[REDACTED]  
[REDACTED] produced by TDK in this litigation as TDKHDD000041291.

18. Attached hereto as Exhibit Q is true and correct copy of [REDACTED]  
[REDACTED] produced by TDK in this litigation as an unofficial English translation as TDKHDD000003883. [REDACTED]  
[REDACTED]  
[REDACTED]

19. Attached hereto as Exhibit R is a true and correct copy of [REDACTED]  
[REDACTED]

1 [REDACTED] [REDACTED] produced by TDK in this litigation as an unofficial English  
2 translation as TDKHDD000002159. [REDACTED]

3 [REDACTED]  
4 20. Attached hereto as Exhibit S is a true and correct copy of [REDACTED]  
5 [REDACTED]  
6 produced by TDK in this litigation as TDKHDD000000798.

7 21. Attached hereto as Exhibit T is a true and correct copy of [REDACTED]  
8 [REDACTED] produced by TDK in this litigation  
9 as TDKHDD000004775. [REDACTED]

10 [REDACTED]  
11 [REDACTED]  
12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///


25 ///

26 ///

27 ///

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3  
4 Executed this 1st day of June, 2020 at Oakland, California.

5  
6 By:   
7 Aaron M. Sheanin  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28