

UNITED STATES INTERNATIONAL TRADE COMMISSION  
Washington, D.C.

Before The Honorable Doris Johnson Hines  
Administrative Law Judge

In the Matter of

CERTAIN VAPORIZER DEVICES,  
CARTRIDGES USED THEREWITH, AND  
COMPONENTS THEREOF

Investigation No. 337-TA-1372

**JOINT MOTION TO TAKE FACT DEPOSITION OF NON-PARTY WILLIAM  
STEIGER OUT OF TIME AND REQUEST FOR EXPEDITED TREATMENT**

Pursuant to 19 C.F.R. § 210.15 and the Ground Rules in this Investigation, Complainant NJOY, LLC (“Complainant”) and Respondent JUUL Labs, Inc. (“Respondent”) (collectively “the Private Parties”) hereby jointly request leave to conduct the deposition of non-party fact witness, Mr. William Steiger, taking place on March 29, 2024, after the close of fact discovery, and respectfully request expedited treatment.

**Ground Rule 5.1 Certification**

Pursuant to Ground Rule 5.1, counsel for Complainant and counsel for Respondent certify that they have conferred with each other and the Staff prior to filing this motion. The Staff does not oppose this motion.

**Motion for Leave and Request for Expedited Treatment**

Pursuant to Order No. 22, the date for the close of fact discovery is March 12, 2024. Mr. William Steiger is a non-party who received a subpoena from Respondent JLI in connection with his role as former employee and general counsel of non-party Fuma International LLC. Mr. Steiger’s original deposition took place on March 5, 2024, which included objections and instructions on the basis of privilege during the course of Mr. Steiger’s original deposition. The

Private Parties have conferred regarding the objections and instructions on the basis of privilege. After conferring, the Private Parties have agreed to continue the deposition of non-party Mr. Steiger solely for continuing of questions to address the issue relating to Mr. Steiger's recollection regarding WES\_00040 without delving into any privileged attorney-client communications. Due to the parties' prior dispute over objections, meet and confers, and subsequent conferring with counsel for Mr. Steiger on scheduling and availability, the parties were not able to schedule Mr. Steiger's follow-on deposition for March 29<sup>th</sup> until yesterday, March 27<sup>th</sup>.

Yesterday, on March 27, 2024, counsel for Mr. Steiger informed the Private Parties that Mr. Steiger is available to continue his deposition on Friday March 29, 2024, in a video conference for a short duration.

The Private Parties have agreed to split the three-hour deposition time equally, with each side having approximately one-and-a-half hours of deposition time, if needed.

For the foregoing reasons, Complainant and Respondent respectfully request that the ALJ grant this motion to take the fact deposition of Mr. William Steiger out of time, and respectfully request expedited treatment.

Dated: March 28, 2024

Respectfully submitted,

<u>/s/ Michael T. Renaud</u> Michael T. Renaud Adam S. Rizk William Meunier Marguerite McConihe Samuel Davenport Matthew A. Karambelas Catherine Xu James Thomson Courtney Herndon Paul Weinand Meena Seralathan	<u>/s/ Sutton Ansley</u> Anish R. Desai Elizabeth S. Weiswasser Adam B. Banks Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 anish.desai@weil.com elizabeth.weiswasser@weil.com adam.banks@weil.com
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Tianyi Tan  
Hannah M. Edge  
Mintz Levin Cohn Ferris  
Glovsky and Popeo PC  
One Financial Center  
Boston, MA 02111  
Tel: (617) 542-6000  
Fax: (617) 542-2241  
David Hollander  
Mintz Levin Cohn Ferris  
Glovsky and Popeo PC  
555 12th Street NW, Suite 1100  
Washington, DC 20004  
Tel: (202) 434-7300  
Fax: (202) 434-7400

Reza Dokhanchy  
MINTZ LEVIN COHN FERRIS  
GLOVSKY AND POPEO PC  
3580 Carmel Mountain Road, Suite 300  
San Diego, CA 92130  
Tel: (858) 314-1596  
Fax: (858) 314-1501  
Mintz-JUUL-ITC-2@mintz.com  
*Counsel to Respondent  
JUUL Labs, Inc.*

Christopher Pepe  
W. Sutton Ansley  
Amanda K. Branch  
Matthew Sieger  
Weil, Gotshal & Manges LLP  
2001 M Street, N.W., Suite 600  
Washington, D.C. 20036  
Telephone: (202) 682-7000  
Facsimile: (202) 857-0940  
christopher.pepe@weil.com  
sutton.ansley@weil.com  
amanda.branch@weil.com  
matthew.sieger@weil.com

Adrian Percer  
Weil, Gotshal & Manges LLP  
201 Redwood Shores Parkway  
Redwood Shores, CA 94065  
Telephone: (650) 802-3000  
Facsimile: (650) 802-3100  
adrian.percer@weil.com

Beth Wilkinson  
Brian L. Stekloff  
James Rosenthal  
Alysha Bohanon  
Wilkinson Stekloff LLP  
2001 M Street N.W., 10th Floor  
Washington, DC 20036  
Telephone: (202) 847-4000

*Counsel for Complainant NJOY, LLC*

## CERTIFICATE OF SERVICE

I, Megan A. De Renzis, hereby certify that on March 28, 2024, true and correct copies of the forgoing document were served on the parties as indicated below:

<p>The Honorable Lisa R. Barton                  Secretary to the Commission                  United States International Trade Commission                  500 E Street SW, Room 112                  Washington, DC 20436</p>	<p><input checked="" type="checkbox"/> Via EDIS  <input type="checkbox"/> Via Hand Delivery  <input type="checkbox"/> Via Federal Express (Overnight)  <input type="checkbox"/> Via Electronic Mail</p>
<p>The Honorable Doris Johnson Hines                  Administrative Law Judge                  United States International Trade Commission                  500 E Street SW, Room 317                  Washington, DC 20436  <a href="mailto:JohnsonHines1372@usitc.gov">JohnsonHines1372@usitc.gov</a></p>	<p><input type="checkbox"/> Via EDIS  <input type="checkbox"/> Via Hand Delivery  <input type="checkbox"/> Via Federal Express (Overnight)  <input checked="" type="checkbox"/> Via Electronic Mail  <input checked="" type="checkbox"/> Via Box</p>
<p>Vu Bui, Esq.                  The Office of Unfair Import Investigations                  United States International Trade Commission                  500 E Street SW, Room 317                  Washington, DC 20436  <a href="mailto:Vu.Bui@usitc.gov">Vu.Bui@usitc.gov</a></p>	<p><input type="checkbox"/> Via EDIS  <input type="checkbox"/> Via Hand Delivery  <input type="checkbox"/> Via Federal Express (Overnight)  <input checked="" type="checkbox"/> Via Electronic Mail</p>
<p><i>Counsel for Complainant NJOY, LLC</i></p> <p>Elizabeth S. Weiswasser                  Anish R. Desai                  WEIL GOTSHAL &amp; MANGES LLP                  767 5th Avenue                  New York, NY 10153                  Telephone: (212) 310-8000                  W. Sutton Ansley                  Christopher M. Pepe                  Matthew D. Sieger                  WEIL GOTSHAL &amp; MANGES LLP                  2001 M Street NW, Suite 600                  Washington, DC 20036                  Telephone: (202) 682-7000</p> <p>Adrian C. Percer                  WEIL GOTSHAL &amp; MANGES LLP                  201 Redwood Shores Parkway                  Redwood Shores, CA 94065                  Telephone: (650) 802-3000</p> <p>Beth Wilkinson                  Brian L. Stekloff</p>	<p><input type="checkbox"/> Via EDIS  <input type="checkbox"/> Via Hand Delivery  <input type="checkbox"/> Via Federal Express  <input checked="" type="checkbox"/> Via Electronic Mail</p>

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<p>James Rosenthal  Alysha Bohanon  Wilkinson Stekloff LLP  2001 M Street N.W., 10th Floor  Washington, DC 20036  Telephone: (202) 847-4000</p> <p><a href="mailto:NJOY.JUUL.ITC.1372@weil.com">NJOY.JUUL.ITC.1372@weil.com</a>  <a href="mailto:NJOY-JUUL-ITC@wilkinsonstekloff.com">NJOY-JUUL-ITC@wilkinsonstekloff.com</a>.</p>	

*/s/Megan A. De Renzis*  
Megan A. De Renzis  
Legal Specialist  
Mintz, Levin, Cohn, Ferris  
Glovsky and Popeo, P.C.  
555 12th Street NW, Suite 1100,  
Washington, DC 20004  
+1.202.434.7406  
[MADeRenzis@mintz.com](mailto:MADeRenzis@mintz.com)