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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity for Charleston County

Appellate Case No. 2020-00029

Trial Court Case No. 2017-CP-10-3705

HO DONG LEE,

Appellant,

v.

YONG WOOK PARK and
SUNNY KIM PARK,

Respondents.

SUPPLEMENT TO RECORD ON APPEAL

Dated: December 13, 2020

s/Karen M. DeJong

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1 IN THE COURT OF COMMON PLEAS
2 FOR THE STATE OF SOUTH CAROLINA
3 CHARLESTON COUNTY

4 DEPOSITION OF HO DONG LEE

5 HO DONG LEE,
6 Plaintiff,
7 vs. CASE NO. 2017-CP-10-3705
8 YONG WOOK PARK and SUNNY KIM PARK,
9 Defendants.

10 DEPONENT: HO DONG LEE
11
12 DATE: APRIL 10, 2019
13
14 TIME: 12:08 P.M.
15 LOCATION: LESEMAN & ASSOCIATES
16 CHARLESTON, SOUTH CAROLINA
17 REPORTED BY: RONDA K. BLANTON, RPR
18 NCRA REGISTERED PROFESSIONAL
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9 ALSO

PRESENT: Tina Tang (VIA PHONE)

10 Certified Korean Interpreter (Law)
Languages Unlimited

11 Orlando, FL

12 Hyon Kim

- - -

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I N D E X

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1 TINA KANG,
2 Interpreter, having been first duly sworn to
3 translate Korean to English and English to
4 Korean, responded as follows:

5 HO DONG LEE,
6 having been first duly sworn, was examined and
7 testified as follows:

8 THE WITNESS: Yes, I do.

9 THE INTERPRETER: Yes.

10 EXAMINATION

11 BY MR. LESEMANN:

12 Q. Mr. Lee, my name is Ellis Lesemann.

13 A. Yes. I got it.

14 Q. As you know, I am the attorney for Yong
15 Wook Park and Sunny Park.

16 A. Yes.

17 Q. We are here today to take your
18 deposition.

19 A. Yes.

20 Q. Do you understand that you are under
21 oath?

22 A. Yes.

23 Q. Do you understand that the transcript of
24 this deposition can be used in the lawsuit that
25 you have filed against Mr. and Mrs. Park?

1 THE INTERPRETER: I'm sorry. Can you
2 repeat the name after that?

3 MR. LESEMAN: Yes.

4 Q. Do you understand that this transcript
5 from this deposition will be used in the lawsuit
6 that you have filed against Mr. Park and
7 Mrs. Park?

8 THE INTERPRETER: Thank you.

9 A. Yes.

10 Q. I will ask you a series of questions and
11 will ask that you provide complete responses.

12 A. Yes.

13 Q. If you do not understand a question that
14 I ask, you should direct your question to the
15 interpreter rather than to your own attorney.

16 Do you understand?

17 A. Yes.

18 Q. Okay. We are able to take breaks
19 whenever you need a break.

20 A. Yes.

21 Q. However, if we take a break during the
22 deposition, you may not speak with your attorney
23 about the content of this deposition or about the
24 case.

25 A. Yes.

1 Q. Are you ready to proceed?

2 A. Yes.

3 Q. Have you ever had your deposition taken
4 before?

5 A. No.

6 Q. When did you immigrate to the United
7 States?

8 A. May of '91.

9 Q. How old are you currently?

10 THE WITNESS: I am 60. 1958. 60.

11 Yeah. 60 or 61 --

12 A. So 1958 so either 60 or 61. Maybe it's
13 60 years old. 60.

14 Q. What is your educational background?

15 THE WITNESS: College. Finished.

16 A. I finish college.

17 Q. Where did you go college?

18 A. So Konkuk University just for the
19 evening extension classes. Like I work during
20 daytime. I go to college in the evening.

21 Q. Could you spell the university -- the
22 name of the university that you just mentioned?

23 THE WITNESS: K-U -- K-U-N -- K-U --

24 A. It's been a long time. So I don't know
25 how to spell Konkuk.

1 THE INTERPRETER: Are you using a
2 computer? Are you using a computer? Sir, so I
3 happen to know the legal spelling of that
4 university. Is it okay to give you?

5 MR. LESEMAN: Yes. Yes, please.

6 THE INTERPRETER: Okay. Spelling of
7 Konkuk is K as in kilo, O as in ocean, N as in
8 Nancy, K as in kilo, U as in university, K as in
9 kilo, Konkuk University.

10 Q. Okay. So is Konkuk University in South
11 Korea?

12 A. Yes.

13 Q. Okay. Did you complete a degree at
14 Konkuk University?

15 A. Yes.

16 Q. What was your area of study?

17 A. Electric engineering.

18 Q. Have you attended any schools in the
19 United States?

20 A. No.

21 Q. Have you been in the United States,
22 other than for possible vacations, for the last
23 27 years?

24 THE INTERPRETER: That is not
25 specifically clear. Can you repeat the question?

1 MR. LESEMANN: Yes.

2 Q. Have you lived in the United States
3 continuously since May of 1991?

4 THE INTERPRETER: Thank you.

5 A. Yes.

6 Q. What is your citizenship status in the
7 United States?

8 A. I have a Green Card.

9 Q. To obtain a Green Card, do you have to
10 take a citizenship test?

11 A. I tried once, but I did not pass. So I
12 have not done.

13 Q. When did you try to pass the citizenship
14 test?

15 A. Around 2008 or 2009, but I do not recall
16 the exact date.

17 Q. Please list your employment beginning in
18 1991 and continuing through the present.

19 A. I came to the States '91. In year '92 I
20 started having a dry cleaner business, and I
21 think I continued until '99.

22 THE WITNESS: In 2000 we starting to --

23 A. Year 2000 I started a restaurant with
24 Yong Park and Sunny Kim.

25 So all of us, like the Yong Park and

1 Sunny Park will begin living in the States 40
2 years except one year they got married and moved
3 out. Other than this, we have lived together
4 almost 20 years.

5 So my wife made me -- took care of my --
6 our children and then the house -- homemaking.

7 THE INTERPRETER: He's describing his
8 duties and what he was doing. So I had to stop
9 him. Hold on, please.

10 MR. LESEMAN: Okay.

11 A. My wife taking care of children and
12 being off homemaking, and she also took care of
13 Sunny Kim and Yong Park children and then
14 in-laws -- father-in-law, mother-in-law. And
15 almost like working full-time at home during the
16 time I ran the dry cleaners and I did the -- ran
17 the restaurant, including order and small jobs.

18 Q. Okay. Did -- you please go ahead.

19 THE WITNESS: Okay.

20 A. So the main -- the important duties
21 since I haven't learn English, like the
22 management duties was not allowed.

23 Q. Okay. When you came to the United
24 States in May 1991, did you move to South
25 Carolina at that time?

1 A. Yes. I came to the -- came to South
2 Carolina because my wife was living here, but I
3 do not have any other people -- I do not have any
4 other, you know, addresses or any other -- I did
5 not have any other people.

6 Q. From 1991 to the present, have you had
7 any other jobs or businesses other than the dry
8 cleaning business and the restaurant businesses?

9 A. In the middle of that, I was a used car
10 dealer.

11 Q. What was the name of the used car
12 dealership?

13 A. Auto P-I-S-I something LLC.

14 Q. Okay. Where was the auto dealership
15 located?

16 A. Ladson, L-A-D-S-O-N, Road, in North
17 Charleston.

18 Q. Did you own the property where the car
19 dealership was located, or were you a tenant?

20 A. In the beginning I leased. Then later
21 on I purchased 10 acres over there.

22 Q. Was the lease in English?

23 THE INTERPRETER: You also -- sir, may I
24 repeat the question to --

25 MR. LESEMANN: Yes, you may. Maybe I

1 could ask another question.

2 Q. Was there a written lease agreement?

3 A. Yes. I think it was in written form;
4 and at the time there was a person helping me.
5 American. Together he was helping me. His name
6 was Clark Hyman.

7 Q. Did you sign the lease?

8 A. I think so. It's been a long time so I
9 do not recall, but I think so.

10 Q. Did you review it before you signed it?

11 A. I think Clark Hyman reviewed it, and I
12 think I then did it.

13 Q. Did you have a conversation with Clark
14 about what the lease stated before you signed it?

15 THE INTERPRETER: Thank you.

16 A. Yes.

17 Q. Does Clark speak Korean?

18 A. No.

19 Q. When Clark explained the lease agreement
20 to you, was your conversation with Clark in
21 English?

22 A. Yes. In English, yes. So the thing is,
23 that kind of a lease agreement, it was a simple
24 one, like how much lease per month. Then as long
25 as you pay, then it's not like selling and

1 purchasing. It was a simple one. So understood
2 it.

3 Q. Were you able to read and understand the
4 lease in English that was signed for the used car
5 dealership?

6 A. So, no. Usually Clark Hyman, the
7 American person, did it; and usually I trusted
8 him, and I let him take care of everything. So
9 this way about a year or one year-and-a-half, the
10 business was closed. It was sold. I sold it.

11 So I sold. And the 10 acres -- out of
12 the 10 acres, 4 acres is like a front where those
13 businesses are. Then in the back there are,
14 like, 6 acres is on the back. The regular land.

15 So, therefore, there was a problem
16 operating. I saw this. At that time I don't
17 know what you call it, but it's a buy here and
18 pay. It's like a used car dealer.

19 So then all the documents/papers, it was
20 a 55 cents per dollar. So there was something
21 like that, kind of, financing place. So I sold
22 to them. So I received \$450,000 in check. Cash.
23 Then I gave that money to young Park and Sunny
24 Park because there was some loan. I gave them
25 \$265,000 maybe to them to pay off their loan.

1 The money was Sunny's father's money.

2 So the -- I have a -- I had a dealer,
3 but I was no longer doing that dealership. So I
4 pay stuff so the -- in front of that, the land in
5 front of that building, the 4 acres. I got
6 \$450,000, and then I gave to Yong Park. I don't
7 know if they paid on their loans or something. I
8 don't know; but I start a business, but
9 eventually I own -- I didn't get to spend any
10 money. It was all spent. The dealer, I sold it
11 at \$70,000; but I did not get to spend any money.

12 Q. Did you ever interact with the customers
13 at the used car dealership?

14 THE INTERPRETER: Can you repeat the
15 question?

16 Q. Did you ever interact with the customers
17 at the used car dealership?

18 THE INTERPRETER: Thank you.

19 A. Mainly Clark Hyman did it. I only,
20 like, follow him.

21 Q. Did you ever sign any agreements or
22 other documents in English relating to the sale
23 of any vehicles to any customers?

24 A. I do not understand.

25 THE INTERPRETER: Sir, can I repeat the

1 question to your client?

2 Q. Yeah. Did you ever sign any agreements
3 for the dealership to sell vehicles?

4 A. Maybe I could have done it. Maybe Clark
5 did it. I do not recall right now.

6 Q. Did you sign a lease agreement on behalf
7 of the dry cleaning business?

8 A. Dry cleaner lease agreement?

9 Q. Yes.

10 A. Are you reporting to the '91 when I just
11 started, or when are you referring to?

12 Q. Did you operate more than one dry
13 cleaning business?

14 A. No. Only one.

15 Q. Okay. I am referring to the dry
16 cleaning business, the one dry cleaning business.

17 A. Yes. So at the time I was not -- I only
18 sign to the page a short time. So the pastor at
19 the church is the one I was going. The pastor
20 helped me.

21 Q. Did you sign the lease agreement for the
22 dry cleaning business?

23 A. Yes. I think so. That's why I start
24 the business.

25 Q. Did you sign contracts with vendors of

1 the dry cleaning business?

2 A. So the thing is, all the suppliers/
3 companies for the dry cleaners, there was no
4 contract. Whenever I needed something, I tell
5 them; and they deliver to me. So then I would
6 give them check. That's how I recall.

7 Q. Would you review purchase orders for the
8 business?

9 A. When you say a "purchase order" for the
10 dry cleaners, what do you mean by that?

11 Q. Invoices for goods or equipment that was
12 purchased.

13 A. So it come in wise, I took over the
14 existing business. So all the equipment was
15 already there. So in the middle of it, if the
16 machine breaks down, we had that fixed. Then
17 changed the shirt machine and then repair. Then
18 this was not a new business. I took over all
19 the, you know, existing customer business.

20 Q. Who was the prior owner of the business?

21 A. I do not recall, but the name was one
22 one-hour cleaner.

23 Q. Did the prior owner of the business
24 speak Korean?

25 A. No.

1 Q. Did you enter into a written agreement
2 with the prior owner to purchase the dry cleaning
3 business?

4 A. Yes, you know, documents. Usually in
5 documents. I think so. In documents.

6 Q. Did you use an attorney when you
7 purchased the dry cleaning business?

8 A. I think so. Because usually when you
9 do, like, a sale of business, you do that. Now I
10 recall, it was some -- it was a business broker.
11 They are, you know, I think like a sale of
12 businesses. So I think so.

13 Q. Were all of the discussions with the
14 business broker and the prior owner in English?

15 A. Yes. And it was in English. And as I
16 mentioned earlier, my pastor helped me. So I
17 think so. The pastor helped me.

18 Q. Did you translate the document for the
19 purchase of the business into Korean?

20 A. No.

21 Q. Do you believe that you understood the
22 contracts enough to sign them?

23 A. Yes. So. Yes. At that time still the
24 same; but like the dry cleaners, like the small
25 businesses, it's not a big business. As long as

1 the price is right, and then you check the
2 customer. It was not a complicated agreement.
3 It was a simple one because, even though there's
4 a little inconveniences, since we need a job,
5 generally, you know, you have to make a living.
6 So we, kind of, just purchased it.

7 Q. Did you complete documents with a bank
8 in order to open a bank account for the dry
9 cleaning business?

10 A. Yes. In order to get the credit card,
11 then -- then, yes, to do so, yes.

12 Q. Okay. Were those documents in English?

13 A. Yes.

14 Q. Did anyone at the bank speak Korean?

15 A. No. But usually we go to a bank and
16 pay -- you tell them I purchased a business, and
17 I came here to open account. Then the bank, they
18 took care of everything.

19 Q. Did you obtain insurance policies for
20 the dry cleaning business?

21 A. Yes.

22 Q. Did you complete and submit documents in
23 English in order to obtain the insurance
24 policies?

25 A. At the time the insurance was, kind of,

1 a simple one. I think I only got the work
2 compensation policy case of an accident. So it
3 was a simple one. You know, for the insurance
4 policy wise, the -- those kind of sign and just
5 pay the premium, like an immigrant, very little
6 English.

7 They usually do not go into detail
8 because if people went into details in English,
9 you cannot really run a business. So usually
10 like a Korean or like an immigrant, they, kind
11 of, you know, ask the people around you.

12 Then if they say okay to sign, you go
13 sign. So it's not a matter of, like a, you know,
14 your business is going to be closed or nothing
15 like -- no critical matter. As long as it's not
16 a critical matter, you, kind of, go by people --
17 people and just do the business. Otherwise, you
18 cannot really run any business.

19 Q. Did your insurance agent speak Korean
20 while you were operating the dry cleaning
21 business?

22 A. No. No. As I mentioned earlier, no.

23 Q. Do you have a driver's license in South
24 Carolina?

25 A. Yes.

1 Q. Did you take the driver's test in
2 English?

3 A. So long time ago, I think maybe in
4 Korean; but I do not recall because, actually --
5 so right now, I'm using this existing driver's
6 license. It's simple like a vision has the basic
7 test, just extending the driver's license. So I
8 do not know.

9 MR. LESEMANN: Could you mark that as
10 Exhibit No. 01, please.

11 (Exhibit No. 01 was marked for
12 identification.)

13 A. Yes.

14 Q. Before I ask you about Exhibit No. 01, I
15 wanted to ask did you interact with the customers
16 of the dry cleaning business in English?

17 A. Yes. In, like, a simple English. Like
18 a hi, how are you doing? Like a regular, you
19 know, immigrant, kind of a short English
20 conversation. Like how are you doing? It's like
21 a basic English.

22 Q. When did Yong Wook Park immigrate to the
23 United States, if you know?

24 A. I recall a person came into my life so
25 '84 or '85. I think '84.

1 So that time I and my wife, we were
2 dating in South Korea. Then I heard that this
3 person was going to immigrate to the States.

4 Q. To your knowledge, is English Yong Wook
5 Park's second language?

6 A. I think so, yes.

7 Q. Okay. Is English your second language?

8 A. Yes. Once I came to the States, that's
9 how you have them, yes.

10 Q. Do you watch television in English?

11 A. Yes.

12 Q. Do you listen to the radio in English?

13 A. Yes. TV and radio. I just watch it. I
14 do not understand, but I just watch that in order
15 to learn English; and I watch movies. I do not
16 understand them during my watching them but just
17 to, you know, listen.

18 Q. Do you read magazines in English?

19 A. The easy ones, like a party and
20 document, just, kind of, I am able to read. But
21 like a -- just language we using -- using that
22 position like this kind and the professional
23 commonalities and more like upper class English,
24 I cannot do that.

25 Q. Do you read newspapers in English?

1 A. Yes. Same thing. Just to read it but
2 not in detail, and I cannot understand
3 everything; and there are more things I do not
4 understand I can understand.

5 Q. Have you been reading magazines and
6 newspapers in English since you immigrated to the
7 United States in 1991?

8 A. So I did not subscribe any newspapers
9 for the English. And when I go to my doctor, if
10 there's a medicine, I just, kind of, read through
11 to pass time. Actually I do not understand. So
12 I'm just looking through. I don't know how to
13 explain.

14 Q. Do you have a translator with you at all
15 times?

16 A. No. No. Sometimes I ask someone over
17 the phone.

18 Q. Have you ever had a contract translated
19 into Korean before signing it?

20 A. You mean translate into Korean?

21 Q. Yes.

22 A. You mean the -- on the contract? Do you
23 mean the kind of things on there?

24 Q. Yes. Have you ever had any type of
25 contract or agreement translated from English

1 into Korean before you signed it?

2 A. Well, I do not recall. I don't think
3 so.

4 Q. As a practice, do you want to be sure
5 that you understand a contract before you sign
6 it?

7 A. Not really.

8 Q. What happened to the dry cleaning
9 business?

10 A. So then as I -- yes. I -- as I
11 mentioned earlier, at the -- in the same house,
12 there are -- 12 people were living together.
13 Like the Sunny Park, Yong Park's family, by two
14 son, my wife. Several of us was living in the
15 same house. And so I heard that the restaurant
16 make more money. It was a better business. So I
17 sold it year '99; and then in the meantime in
18 year '96, I purchased the land to do a
19 restaurant. Then I did until '99. Then I
20 started maybe 2000 the restaurant.

21 Q. When you purchased land, were the
22 documents for the purchase of the land in
23 English?

24 A. Yes.

25 Q. Did you have those documents translated

1 before you signed them?

2 A. So, no. At that time the -- among my
3 customers, one of the customers, that person was
4 a regular customer and was a -- was a realtor.
5 So I trusted the realtor. Then whenever that
6 realtor told me to sign, I signed it. Then the
7 price was proper to us. So I trusted them. Then
8 signed it. You know, in the States, in America,
9 without trusting and doing like this, I cannot
10 really make a living.

11 Q. When you sold the dry cleaning business
12 in 1999, were the documents that sold the dry
13 cleaning business also in English?

14 A. I think so, yes.

15 Q. Did you review the documents to sell the
16 dry cleaning business before you signed them?

17 A. So, yes. At that time the -- Sunny
18 Kim's older brother purchased the business. Then
19 Sunny Kim's older brother speaks both -- is
20 fluent both Korean and English. Also went to the
21 Army here in the -- here. So there was a no
22 special problem. I think I signed everything
23 without any problem.

24 Q. Did you review the documents before you
25 signed them?

1 A. I don't think so. I think I just signed
2 them.

3 Q. So I'll turn your attention now to
4 Exhibit No. 01.

5 A. Yes.

6 Q. Did you open a business called Hana
7 Enterprises, LLC?

8 A. Yes.

9 Q. Did you sign documents in English in
10 order to open the business Hana Enterprises, LLC?

11 A. Yes.

12 Q. Did you use an attorney to assist you in
13 the opening of Hana Enterprises?

14 A. So the LLC, it was done by a lawyer.
15 The rest of it, there was a person helping in the
16 middle of it, a Korean person and also American
17 person. They helped me.

18 Then for the business, it was either
19 went to rent or lease. But anyway, it was like,
20 you know, basic thing like as a -- as I mentioned
21 earlier, like running a dry cleaner, as long as
22 you pay the rent per month, how much it is, and
23 then so was kind of a -- so I could not pay much
24 attention. Then this -- that time I did not have
25 money; and then in order to make a living, even

1 though something was unreasonable, I had no
2 choice. I just signed it.

3 Q. Who was the lawyer that you used?

4 A. You mean Hana Enterprises?

5 Q. Yes.

6 A. Hold on, please. Wait, please.

7 Q. I can ask a follow-up question.

8 Was it the same attorney, Mr. Graves
9 Wilson, that you used in the 2013 transaction?

10 A. No.

11 Q. Okay. You were going to check your
12 phone?

13 A. Yes. The -- the lawyer for -- made up
14 the Hana restaurant, that's a lawyer is on Google
15 Maps. So I can check right away.

16 Q. Okay.

17 A. Do you want me to find it right now?

18 Q. Yes.

19 A. (Complies with request.)

20 MS. DEJONG: Are you sure?

21 THE WITNESS: Yeah. (Indicating.)

22 Q. Weeks -- Weeks & Irvin or Wigger Law
23 Firm?

24 THE WITNESS: I think, sir, this one.
25 (Indicating.)

1 Q. Okay. So did you sign a lease equipment
2 for the location of Hana Enterprises in English?

3 A. I think I did in front -- in the
4 presence of a building owner.

5 Q. Okay. Was the building owner Korean?

6 A. No. American. So the signing the
7 papers, I got -- once I got the papers, I ask
8 someone if it okay to sign the papers. So they
9 said okay. So I signed them and a took a -- I
10 gave them.

11 Q. Who did you ask if it was okay to sign
12 the papers?

13 A. So at that time there was someone -- you
14 were, like, working together with Kim; and then I
15 asked her.

16 Q. Did you review the documents yourself
17 before you signed them?

18 A. Yes.

19 So the thing is, as I mentioned earlier,
20 you know, like, when you are really in need of a
21 business, like to make a living, you need to do
22 something, then even though something was not
23 complete, usually like a -- like building lease,
24 basically kind of a safe moment. So the kinds of
25 a, you know, as long as you pay the lease, then

1 there's no big problem. So signed it.

2 Q. Did you fully read and understand the
3 lease for Hana Enterprises before you signed it?

4 A. So not completely. But as long as you
5 pay well and you give the owner -- you get the
6 insurance and then personal guaranty, I thought
7 that three things were in important. So I only
8 did those things. That both the lease, the
9 tentative lease agreement kind of in the same
10 format, so I just -- so I signed it.

11 Q. Was Hana Enterprises a restaurant?

12 A. Yes.

13 Q. Was it an existing restaurant?

14 A. Yes.

15 Q. Did you enter into an agreement in
16 English to purchase the equipment from the
17 existing business?

18 A. So over there, there were not many
19 equipment. And we were just leasing the place.
20 Then the equipment, like we used for that, we got
21 that a lot. Then also they have a restaurant
22 supply, they do lease to you. So we lease many
23 from them.

24 Q. Okay. Were the leases for equipment
25 that you signed in English?

1 A. Yes.

2 Q. What happened to the Hana Enterprises
3 business?

4 A. I don't know what kind of a question
5 that is.

6 Q. Did the business close, or is it still
7 operating?

8 A. So I rent the business until end of
9 February last year, 2018.

10 THE INTERPRETER: Sir, can I ask him if
11 he meant February or June?

12 THE WITNESS: June, June.

13 A. June. I'm sorry. It was June 2018.

14 So the reason we had the business closed
15 was we did not have the money. There was no
16 operating money. We needed more personnel,
17 employees; but we could not pay them. So we
18 could not hire any more employees.

19 So thing is, like, I just did not have
20 this money to -- the funds to operate basically.
21 So we were using credit cards, but there was no
22 funds. No more money. Could not hire any more
23 employees. So eventually no more money. So it
24 was closed.

25 Q. Was the name of the restaurant Hana,

1 H-A-N-A?

2 A. Yes.

3 Q. Where was it located?

4 A. Dorchester Road, North Charleston.

5 Q. Is there another restaurant that is
6 operating currently in the same place?

7 A. Yes.

8 Q. What is the name?

9 A. I'm not sure.

10 Q. What is the street address on Dorchester
11 Road for the location?

12 A. I need to check my phone. Is it okay to
13 check my phone?

14 Q. Yes.

15 A. (Complies with request.) (Indicating.)

16 THE WITNESS: I think Unit 1.

17 Q. Okay. 8440. Okay.

18 THE WITNESS: I think No. 1. You
19 need --

20 A. Unit 1, Unit No. 1.

21 Q. What is the name of the landlord?

22 THE WITNESS: This. (Indicating.)

23 MS. DEJONG: What is that?

24 THE WITNESS: This company.

25 (Indicating.)

1 MS. DEJONG: Can you read it?

2 THE WITNESS: Coldwell --

3 MS. DEJONG: Here. Show it to him.

4 MR. LESEMAN: Okay. Okay. Thank you.

5 Q. So it was Coldwell Banker Commercial
6 Atlantic?

7 A. Yes. I think that's the company.

8 Q. Okay. Referring back to Exhibit No. 01,
9 tell me about Katsu LLC, please.

10 A. So thing is Katsu, LLC, we -- like me
11 and Yong Wook Park, Sunny Kim, or what you call
12 it? There was some kind of dispute in assets,
13 and business was not doing well. So previously
14 it was called Yokoso, Inc.; but March 2013 I was
15 supposed to run it. But while I was doing it, my
16 customers got confused. So I had the name
17 changed.

18 Q. Were you the only owner of Katsu, LLC?

19 A. Yes.

20 Q. Did you sign the documents in English in
21 order to establish Katsu, LLC?

22 A. Yes. I think so.

23 Q. What is Unison Builders Maintenance,
24 LLC?

25 A. So we want to do a cleaning business.

1 We want to do a cleaning business so we
2 established that.

3 But didn't do that -- didn't do
4 anything. It's just a name. Then tried. Then
5 didn't do anything.

6 May I say something and -- and explain
7 in detail?

8 Q. Yes.

9 A. So earlier I mentioned that about
10 dealers, used car dealers. The reason I started
11 this business was that -- no. We were living in
12 the same house. We were living in the same
13 house.

14 Then at a certain moment -- I don't know
15 what he called it. I said, like, there's these
16 people are more -- had more power than me. So
17 there's people with the power. There are people
18 without power. Then they were starting -- the
19 Sunny Park and Yong Park, they was able to speak
20 English. They were running restaurant business.

21 After they started business, I said I'm
22 a person without power. I don't know if you can
23 understand; but anyway, a certain moment I said I
24 do not have any more power. So I said if I do
25 any -- I probably not do anything. If I do

1 something, I might, you know, die without much
2 power.

3 So I tried to do business. That's why I
4 tried used car dealer and then the maintenance
5 business, but it did not work out. I don't know.
6 If you talk to psychologist, you might
7 understand; but I think just regular people
8 cannot understand. I don't know.

9 Q. What are you currently doing for income?

10 A. Right now I'm looking for a job.

11 MR. LESEMAN: Would you mark this as
12 Exhibit No. 02.

13 (Exhibit No. 02 was marked for
14 identification.)

15 Q. I am showing you what has been marked as
16 Exhibit No. 02 to your deposition.

17 A. Yes.

18 Q. Can you identify this document?

19 A. I do not understand. Can you explain to
20 me?

21 Q. Can you tell me what this document is?

22 A. Is this interpreter have this document?

23 Q. No.

24 A. Then here's a Korean person. May I ask
25 this Korean person regarding this?

1 Q. No.

2 Does your signature appear on page 2 of
3 the document?

4 A. Yes. I think that's mine.

5 Q. Did you read and understand this
6 document before you signed it?

7 A. So this one is a Power of Attorney
8 Richard Rodriguez since his name's there. I
9 think because of my limited English, I asked this
10 neighbor, this person. So we went together and
11 request to, you know, do this Power of Attorney.

12 Q. Did -- I'm just going to reask the prior
13 question.

14 Did you read and understand this
15 document before you signed it?

16 A. Yes. Not all of it, but most of this.
17 Not for sure, but Richard explained to me, so,
18 yes.

19 Q. What is your understanding of the
20 purpose of this document?

21 A. This one regarding food and then the
22 working on behalf of me. Power of something.
23 Working for me. Personal --

24 Q. Do you understand that you have
25 authorized Mr. Rodriguez to make decisions on

1 your behalf?

2 A. I'm not sure; but I think so, yes.

3 Q. Is this document still in effect?

4 A. Yes.

5 Q. Did you translate this document into
6 Korean before you signed it?

7 A. No.

8 Q. Did you review this document with a
9 translator before you signed it?

10 A. Yes. We charge -- I think we read it.

11 Q. Does Richard speak Korean?

12 A. A little bit.

13 Q. Is Richard paying the expenses of the
14 lawsuit that you have brought against Yong Wook
15 Park and Sunny Park?

16 A. Yes. I asked him to lend money.

17 Q. Is there a written document relating to
18 the loan of money?

19 A. No.

20 Q. How much money has he loaned you for the
21 litigation?

22 A. So about \$2700 plus -- I did not add it
23 up in total because I've paid this much and that
24 much. I have not added up.

25 Q. Do you have an agreement with

1 Mr. Rodriguez to pay him a percentage of the
2 amounts you might recover in this case?

3 A. No. Not those things. That he is the
4 person like, you know, for the righteous purpose,
5 not when he hears this kind of a story, he was
6 not for money but more for like a justice.

7 So Richard is a military man and 20
8 years, 25 years, and retired.

9 Q. Are you obligated to pay Mr. Rodriguez
10 back for the moneys that he has loaned to you?

11 A. So, yes. I promise. But thing is right
12 now, I help him. So I work a lot. So I need to
13 pay him certain money. Then also for now, I pay
14 him a lot; but we did not talk about in details.

15 Q. What work are you helping Mr. Rodriguez
16 with?

17 A. So right now, not to guess, he's still
18 constructing three houses in east beach. So the
19 previous house needs to be cleaned and then put
20 away things and gardening. Also for the new
21 house, there are many things to do, including
22 gardening and moving.

23 Q. Are you being paid for the work that you
24 are performing?

25 A. No. We charge help. And sometimes he

1 knows we do not have money, then he pays.

2 Q. Did you rely upon Mr. Rodriguez to
3 explain this specific Power of Attorney to you?

4 A. Yes.

5 (Exhibit No. 03 was marked for
6 identification.)

7 Q. I will show you what's been marked as
8 Exhibit No. 03 to your deposition. It is a
9 continuing and unconditional guaranty with Bank
10 of America.

11 Does your signature appear on page 7 of
12 the document?

13 A. Yes. But what kind of a document is
14 this?

15 Q. It is a continuing and unconditional
16 guaranty.

17 A. What kind of a condition?

18 Q. I'm just reading the title to you. The
19 title is "Continuing and Unconditional Guaranty."

20 Did you read this document before you
21 signed it?

22 A. So as I mentioned earlier, we were
23 living in same house for last 20 years; and then
24 Sunny came and Yong Park. They speak better
25 English. And just this is signed, and I just

1 signed then. Then actually I do not know what
2 the contents of this document are. I just signed
3 it.

4 So right now I'm looking at this, it
5 says Tsunami of Columbia, LLC. What's the --
6 what's your question?

7 Q. I asked him if he read and understood
8 the document before he signed it.

9 A. So as I -- as I mentioned earlier, you
10 know, usually, if I tell a story. I just signed
11 this as a cosigner. I got called to cosign.
12 That's why I signed it. I end up having to sign.
13 So seeing as though I do not the details of it;
14 but for the business, they say I need to sign.
15 Then I signed it.

16 Q. Okay. Do you often sign legal documents
17 without reading them?

18 A. Sometimes I do. Sometimes I ask someone
19 who knows about it. The thing is, like I said,
20 we known each other for 20 years and trusted him,
21 better English. And if I do not trust them, who
22 should I trust?

23 Q. Do you sign legal documents without
24 understanding them?

25 A. Sometimes I do not understand.

1 Sometimes I understand. Yes.

2 Q. Which legal documents have you signed
3 that you feel like you do understand?

4 A. So then whatever we did on this
5 document, there are fine print that I do not
6 know. But it is for the loan, \$100,000. I do
7 not check the -- all the details on the middle of
8 this document, but I only go to the end of it.
9 It's like guaranty that I try to sign, and that's
10 the important one.

11 So then if there's a problem with the
12 money, there's a problem. If you do not pay,
13 that's the problem. If you pay, there's no
14 problem. So I just signed them.

15 Let me explain to you one more thing.

16 Do you know what -- why they say
17 "American dream"? The American dream is, you
18 know, people like us come to the States? People
19 like us.

20 Q. In 2012 before the transaction with Yong
21 Wook Park, how many hours per week did you work
22 in the various restaurants?

23 A. In 2012?

24 Q. Yes.

25 A. So at that time I was living in North

1 Charleston. So I do not know exact hours.

2 Q. Did you go to the restaurant every day?

3 A. Yes. Went there to clean every day.

4 Q. You cleaned. Are you saying that you
5 were cleaning the restaurant every day?

6 A. Yes. Every day for cleaning. Monday
7 through Saturday. Maybe one day off. I think I
8 also worked on Sunday. My wife was staying at
9 home and then taking care of the children and my
10 parents. I said 12 people were living in that
11 house. So it was year 2012 that I can't be --
12 moved out and cleaning.

13 Q. Did you do anything in addition to
14 cleaning -- are we speaking -- sorry. I'll start
15 over again.

16 Are we speaking of the Yokoso location
17 in North Charleston?

18 A. No. This time three of them or some of
19 them.

20 Q. How many of the different restaurants
21 would you clean?

22 A. So in the beginning three. Later on
23 two. Went down to two because we were moving.

24 Q. So which were the three restaurants that
25 you would clean?

1 A. So Mount Pleasant Tsunami and
2 enter/move. Then North Charleston Yokoso and
3 then the Summerville.

4 Q. Did you ever visit or work in the
5 restaurants in Columbia?

6 A. So thing is when we were, like,
7 friendly, we used to work together and go
8 together. But in year 2009 we had some
9 differences in opinion regarding church matter.
10 I said, you know, for the church of county, the
11 finances was wrong. And then Yong Park was on
12 pastor's side. So there's a conflict of
13 opinions.

14 After that he told me do nothing
15 about -- do nothing. So -- so that's how people,
16 we were doing something together. But that kind
17 of a difference of opinion. This started the
18 year of 2009. After that we didn't do much
19 together.

20 Q. Prior to 2009 did you do tasks other
21 than cleaning the restaurants?

22 A. So -- so in the beginning when the
23 restaurant opened, we did the busboy and wait --
24 waiting the tables and everything.

25 So then they opened the Tsunami. Then

1 we went over there and worked.

2 THE INTERPRETER: Sir, he said in
3 English; and I did not quite understand what he
4 was saying. Is it okay if I ask him to repeat?

5 MR. LESEMANN: Yes.

6 THE INTERPRETER: Yes, sir.

7 A. I forgot -- I forgot the question. Can
8 you repeat the question? Thank you.

9 Q. Oh, I think we were talking about
10 whether he did tasks other than cleaning in the
11 various restaurants.

12 And then you mentioned that you were
13 doing something, but then the accountant said
14 that maybe you needed more employees rather than
15 doing the work yourself as owners or something
16 like that.

17 A. Yes. That is correct. After that, we
18 start the used car dealer. Then I was running
19 the used car dealer. Then building cleaning and
20 restaurant cleaning.

21 So for the building cleaning, I had pre-
22 care but it did not work out so I ended up not
23 doing it.

24 MR. LESEMANN: Okay. We're just going
25 to take about a five-minute break. We've been

1 going for about an hour and 40 minutes or so. So
2 we'll just take a short break and Tina, we'll
3 just leave you on the line; but we'll keep the
4 line open, but we'll let you know when you're
5 coming back? Okay?

6 THE INTERPRETER: Okay. Thank you.

7 (Recess taken 2:00 p.m. to 2:11 p.m.)

8 BY MR. LESEMANN:

9 Q. Did you have an attorney for the
10 transaction in 2013?

11 A. 2013 transaction?

12 Q. Yes.

13 A. Yes.

14 Q. Was it Mr. Graves Wilson?

15 A. Yes.

16 MR. LESEMANN: Would you mark this as
17 Exhibit No. 04.

18 (Exhibit No. 04 was marked for
19 identification.)

20 Q. When did you first meet Mr. Wilson?

21 A. So thing is, a year before, two -- so
22 2004, maybe 2004. I do not recall exactly.

23 Maybe 2011 because we lost a long time.

24 Q. How did you find Mr. Wilson?

25 A. Well, I think I found him from telephone

1 directory.

2 THE WITNESS: I don't -- I'm not sure.

3 A. I'm not sure. Right now I do not have
4 a -- I do not have a clear mind so --

5 Q. Was the idea to divide up the restaurant
6 assets a mutual idea between you and Yong Wook
7 Park?

8 A. So thing is, I don't know it was about.
9 I don't know about assets. At this time, as I
10 mentioned, we had lived together 20 year before
11 moving out. He was saying no money. No money.
12 So thing is, I lived -- we lived everything 20
13 years. So I trusted him. Then I don't know
14 about, you know, dividing the assets. Since my
15 wife is Yong's older sister, we are family. So I
16 did not want to fight, dispute about this matter
17 and continue to leave among family members.

18 So I didn't want to fight. So since we
19 have our parents still alive, our father and our
20 mother, you know. So I wanted to heal. So
21 actually the beginning, I did not know about
22 dividing the assets. So since I did not -- did
23 not want to fight with them, I said I'm going to
24 take over this one thing. Business. So this
25 works out well. I think everything will be okay,

1 but it did not work out.

2 But we did not knowing that dividing the
3 asset, I signed it. That's what I want to say.

4 THE INTERPRETER: I'm sorry. I had to
5 stop him because it was getting long and
6 continuing. Thank you.

7 A. Now, so I -- let me continue the story.

8 At this time the list of, you know, the
9 dividing list. At that time I had letter, you
10 know. It was questionable at that time because
11 there were many things were not on that list. So
12 then as far as I know, there's an initial three,
13 you know, restaurants, one in Greenville Tsunami
14 and Greenville, Virginia, and then another one
15 here. They was not on the lease at the time.

16 But I was, you know. I thought about --
17 we were -- we could have fought against them; but
18 as I mentioned earlier, we are, kind of a family
19 members; and my parents -- our parents are still
20 alive. And then I have two son and they have
21 four daughter. So since we were living together,
22 we were like more a weird family than anything --
23 like a -- we are more like brothers and sisters.

24 So then I thought about, even though,
25 you know, all this problem later on, then we meet

1 together. You know, we meet together the time.
2 So that's why I didn't want to fight that time.

3 Q. What is the name of the three
4 restaurants that you say you are not on the list?

5 A. Okay. So Tsunami over Greenville and
6 Virginia Tsunami. The name I understand was a
7 Tsunami over Virginia and then another one Three
8 Guys Wing.

9 Q. Is it your belief that those three other
10 businesses were in operation at the time of the
11 transaction in February of 2013?

12 A. Yes. I lived -- and also the Tsunami of
13 Greenville was in operation that I know. Also I
14 know how much money was put into that business.
15 I do recall. Is it okay to tell you?

16 Q. Yes.

17 A. The Tsunami in Greenville, I purchased
18 at \$120,000. So I put down \$60,000. 6-0. And
19 then I got a note for \$60,000.

20 So the construction, I did not know
21 exactly; but the construction, the telephone, the
22 money owed men together to -- was my company.

23 THE INTERPRETER: I'm sorry. He meant
24 to say Yokoso.

25 THE WITNESS: Corporation.

1 A. Corporation. So I paid that remodeling
2 fee for Yokoso, Inc., corporation.

3 THE WITNESS: From Yokoso, yes.

4 Q. Were you a part owner of Tsunami of
5 Greenville?

6 THE WITNESS: And our money over there,
7 invest the money.

8 A. So my common sense is, you know, I was a
9 partner. That I invested my money into the
10 company. So if I invested my money to their as a
11 partner, the company -- who does the company
12 belong to? I need to ask you that question.

13 Q. Do you have documentation of making an
14 investment in Tsunami of Greenville?

15 A. So the -- so there's no documents; but
16 being that Sunny Park and Yong Park, we had other
17 documents which was insurance documents. They
18 used Yokoso corporation on that paper.

19 Q. So when you reviewed the agreement for
20 the 2013 transaction, did you see that Tsunami of
21 Greenville was not listed?

22 A. Correct. I didn't -- it was not there.

23 Q. Okay. And did you discuss this with
24 anyone?

25 A. So only to my wife. As I mentioned

1 earlier, we are -- we are family members, you
2 know. Don't make a problem, trouble. So we
3 ending up here.

4 So right now I -- thought that came up
5 to me. So accounting, since we did an income tax
6 so accounting people might now. They have it.

7 Q. Is Tsunami of Greenville still open?

8 A. I think so.

9 Q. Have you ever been to the Tsunami of
10 Greenville location?

11 A. Yes. Many times.

12 Q. Did you have any discussion with Yong
13 Wook Park about how the Tsunami of Greenville
14 entity would be divided?

15 A. No such thing. My understanding is Yong
16 Park and I get 50 percent. 5-0. And Sunny Park,
17 sister, 50 percent.

18 Q. Are you still an owner of Tsunami of
19 Greenville?

20 A. I'm not sure. I don't know how the
21 documents are.

22 Q. In 2013 -- in February of 2013 when you
23 signed the agreement, were you aware that Tsunami
24 of Greenville was not included in the agreement?

25 A. So at this time, I did not think of that

1 because I was stressed out. But after everything
2 was finished, my wife said later on after
3 everything was finished, how come that's not on
4 the list? Then for the Virginia we lended --
5 lent 160 -- \$160,000. So then she mentioned. So
6 that's why we talked.

7 So then talk two days ago or while ago,
8 I was cleaning my home. Then I found a copy of
9 an insurance policy that it shows that Yokoso
10 corporation paid for the payments. I need to
11 find out more information about this.

12 Q. Is it your testimony that you personally
13 loaned \$160,000 for the Tsunami of Greenville
14 location?

15 THE INTERPRETER: Sir, can you repeat?
16 Did you say 150 or 160?

17 MR. LESEMAN: 160.

18 THE INTERPRETER: Thank you.

19 A. He was not on Greenville Tsunami. It
20 was green -- Tsunami for --

21 It was not a Tsunami of Greenville. It
22 was Tsunami of Virginia. I only know the
23 Virginia one.

24 THE WITNESS: 160,000.

25 A. I lent it. \$160,000.

1 So I need to -- I want to know how they
2 buy the income taxes, under what kind of an
3 entity. I need to request both Virginia Tsunami.

4 Q. Where in Virginia is the Virginia
5 Tsunami location?

6 A. May I check my phone?

7 Q. Yes.

8 A. (Complies with request.) I cannot find
9 it. I need to look it up later.

10 Q. Are you alleging that you made a
11 \$160,000 loan to Virginia -- Tsunami of Virginia
12 and that you were a 50 percent owner?

13 A. So, no, I'm not alleging that. I just
14 want to make sure it was \$160,000. After that,
15 they opened the business. I have not -- they
16 have not paid back to me.

17 So for the income tax, for the Virginia
18 Tsunami, I want to know how that was reported on
19 the tax. If the tax was 500 from Sunny and Yong
20 Wook Park, that means that, no, that's part of my
21 business.

22 Q. From where was the \$160,000? In which
23 account was the \$160,000 that you allege that you
24 paid into this business?

25 A. I do not know. My wife, I, and Sunny

1 and Yong Wook Park agree to -- to lent the money.
2 I don't know how it was paid. By check or cash.
3 I don't know how it was paid.

4 What I'm testing is if I -- if you look
5 at the income tax returns for the Virginia
6 Tsunami, then you will find out.

7 Q. Respectfully, I won't.

8 But are you saying that you and your
9 wife put \$160,000 of your own money into the
10 Tsunami of Virginia business?

11 A. The thing is, I don't know how the money
12 was given to them; but it was not in the -- it
13 was money we lent them. Then later on I did
14 not -- I didn't get paid back. So if you look at
15 the business income tax, if it was under Sunny
16 and Yong Wook Park, then I think that should be
17 under investment.

18 Q. Do you have a copy of a check or a wire
19 transfer indicating that you or your wife paid
20 \$160,000 as a loan to Tsunami of Virginia?

21 A. So, no. We, four of us, sat down
22 together; and then both of us, we agreed on that.
23 So after that, I think maybe Sunny came to the --
24 came with the sister or Sunny Kim was doing it.
25 So I don't know. We do not know how it was --

1 the money went. Then that's all, you know.
2 That's how I am -- that's my understanding.

3 Q. Was the money -- was the \$160,000 from
4 another business, or was it from your own
5 personal bank account?

6 A. So that, I do not have that. Seeing as,
7 you know, we were living in the same house and
8 that, you know, when the starting of the business
9 and still living in the same house. So we -- we
10 were always -- all live like family members. So
11 we just, you know, we kind of trust each other.
12 So we lent the money, and you just lend the
13 money; and it was okay to do so. We were doing
14 everything like that way. So I do not know.

15 So about Virginia, I do not know if this
16 helps or needs to be checked.

17 Q. Okay. For the first time today, I have
18 heard about an allegation whereby you said that
19 you had loaned \$160,000 of your own money to
20 Tsunami of Virginia; and I just want to know if
21 there's any emails, documents, evidence at all
22 that support this allegation that you personally
23 loaned \$160,000 to Tsunami of Virginia.

24 A. That I think it was not -- it was not my
25 own money. It was a corporation money. At that

1 time Sunny Kim that it was going to give so we
2 okayed it. So, therefore, I need to have that
3 check. I do not have any document -- records or
4 evidence proof that I gave that money.

5 Q. Okay. Which corporation did the money
6 come from?

7 A. I think just the money is here right
8 now. The -- from the same -- the seven
9 restaurants from the -- money is from seven
10 restaurants.

11 Q. Do you believe that you were an owner or
12 a part owner of Tsunami of Greenville?

13 A. Yes. I have proof.

14 Yes. So this proof. (Indicating.)
15 This is an insurance, a copy, I recall. One of
16 this. I don't know which one. But it was
17 Greenville, they used it, my corporation policy
18 so we came down. They paid to Greenville. So I
19 don't know.

20 MS. DEJONG: I have seen that. Do you
21 want a copy? Do you want to question him on it?

22 MR. LESEMAN: Yeah. I guess so.

23 (Pause in proceedings.)

24 BY MR. LESEMAN:

25 Q. Okay. So first we were talking about

1 some information about insurance.

2 MR. LESEMANN: Could you mark that as
3 the next exhibit, please.

4 (Exhibit No. 05 was marked for
5 identification.)

6 Q. I believe you raised this issue when I
7 asked you why you thought that you might be a
8 coowner of Tsunami of Greenville. So let me ask
9 this question:

10 Are you alleging that you -- go ahead.

11 A. Yes.

12 Q. Okay. All right. Are you alleging that
13 you should be a part owner of Tsunami of
14 Greenville if certain insurance claims for
15 Tsunami of Greenville employees were turned in on
16 the Yokoso insurance policy?

17 A. Oh, no. As I mentioned earlier, we
18 purchased that \$120,000. We put down 60. 6-0.
19 \$60,000. That was from corporation as an
20 investment. So people this insurance matter, we
21 were full partners. So later on I found this.
22 Then I need to question my insurance agent about
23 this one because people with the insurance matter
24 or my family members. They went on the first --
25 it was an investment. All my family members knew

1 about it. So that's what I believe.

2 So then most of the insurance payments,
3 the premium payment, was very high. Then I have
4 the insurance payment. The payments for this
5 insurance is very, very high compared to other
6 insurance premium. I saw this, and I remember
7 because that each that says she was recommending
8 for the saving kind of the insurance. So I paid
9 a lots of money.

10 Then one year, year 2010, I paid
11 \$100,000. So then I remembered what she was --
12 what she said. It was a, like, a saving kind of
13 an insurance. So I need to check with them about
14 this insurance.

15 Q. What is it about the insurance that you
16 need to check?

17 A. So then -- okay. So other than, you
18 know, Yokoso corporation, there's other
19 restaurants. Then this insurance premium is for,
20 you know, it's just common sense. It's too high.
21 So what I call the subpoena. So I think I'll
22 use -- the sales lady should be subpoenaed for
23 sure.

24 Q. Are you trying to determine whether any
25 of the employees listed on the exhibit that's

1 been marked as Exhibit No. 05 were employed by
2 other entities other than Yokoso?

3 A. I do not understand the question.

4 Q. The document is seeking to find out the
5 company who is associated with the claim numbers
6 on the document. Why do you want to know that?

7 A. So the thing is, Yokoso, Incorporation,
8 has seven restaurants. One or two of them are
9 not applicable. So if they used my company --
10 our company money for that, that's -- that's
11 something to leave out.

12 Q. Can you confirm that the issues that
13 you're talking about occurred in 2010?

14 A. So, yes, sir. Right now I have this
15 copy for year 2010, and I also have a question
16 about this insurance. Insurance premium is very
17 high.

18 So after I found this copy, I did some
19 work about three weeks ago because that third
20 lady mentioned about the savings kind of an
21 insurance; and she mentioned that \$500,000. So I
22 want to find out the background of this insurance
23 and then why this amount is so high on here, and
24 I want to know how much was saved; and I want to
25 know who the beneficiary is. I want to find out

1 the details of the insurance coverage.

2 So then also, you know, I -- the reason
3 I found this copy of this insurance copy is I was
4 trying to get the insurance or traction that they
5 say there was -- it was very high. The reason --
6 you are mentioning about change the names. When
7 I try to get the insurance, they was -- the
8 insurance premium was very high because there was
9 an accident. So I said I had not had any
10 accidents.

11 Then for the insurance at the
12 Charleston -- you got the copy of this one. So
13 that's why -- that's one of the reasons changing
14 the name.

15 MR. LESEMANN: Could you mark that,
16 please.

17 (Exhibit No. 06 was marked for
18 identification.)

19 Q. I'm showing you what's been marked as
20 Exhibit No. 06.

21 A. Yes.

22 Q. You have said that you believe the
23 insurance premium was too high. For the year
24 2013, was the insurance premium \$34,535 as
25 reflected on Exhibit No. 06?

1 A. Yes.

2 Q. Okay. What are you alleging that the
3 insurance premium should have been instead?

4 A. So usually for us, for building and
5 internet together, year 2013 at this time, it was
6 around \$4500. \$4500 or about \$4,000. I have a
7 copy of this document at my home. At home. So
8 building and business together, \$2900 or \$3,000.
9 If there's no building, if it was a lease, it was
10 about \$1700 or \$1900. So when I calculated is
11 this -- this is really too high.

12 Q. Okay. And so the numbers you're just
13 speaking of just now, are those for a hibachi
14 restaurant?

15 A. So I do not know. So that's why I want
16 to get hold of this insurance agent because of
17 what kinds of coverage this one has. So I do not
18 know.

19 (Exhibit No. 07 was marked for
20 identification.)

21 Q. I'm showing you the document that's been
22 marked as Exhibit No. 07.

23 A. Yes.

24 Q. And why have you brought this document
25 to the deposition today?

1 A. Hopefully it helps.

2 Q. Excuse me?

3 A. Hopefully it helps this case.

4 Q. What does this document represent
5 according to you?

6 A. So is it okay if I explain to you?

7 Q. Yes.

8 A. So the thing is, yes, I was doing
9 business all together. Then I had -- I have,
10 like, four or five different banks, personal
11 banking, checking accounts. I don't know why I
12 put it, but personal checking account.

13 Then even though I deposited into my
14 check. So someone took money. So I trying to
15 show Sunny took the money because there's a -- a
16 bank up by my home. So I was able to get this
17 copy. I was trying to get the copy of the
18 checking statements, but it was seven years ago
19 so I could not get it; but I got this much.
20 Hopefully it helps with this case. Then it was
21 40,000 deposit. 44,000. 40,000 was the -- went
22 out of this account. So then Sunny can use this
23 money.

24 So I think it was -- I did not sign. It
25 was not my initial, but I could not get hold of

1 the copy of the check. So I brought this.

2 Q. So your allegation is that Sunny Kim
3 signed Check No. 1030 for \$40,000 and took this
4 money?

5 A. Yes. I -- so I recall all checks for
6 all the checking accounts I deposited and the --
7 the money wise, spending money, Sunny Kim used
8 all the money. Took all the money. I don't know
9 if it was spent for the restaurant business or
10 personally. That I do not know.

11 Q. Do you know whether you talked to Sunny
12 Kim about this \$40,000?

13 A. So, oh, yes. So when cash comes deposit
14 after that, and then at the time I think they
15 needed money. It was not just one bank account.
16 It was deposit into four, five different bank
17 accounts after that. There's an office at home,
18 the second floor upstairs. So we don't know how
19 that money was spent.

20 Q. Have you ever seen Check No. 1030?

21 A. So there was a home office. Once we
22 open or checking account at our bank, we leave
23 the checkbook upstairs at home office. So that
24 we used that living there. So I do not recall.
25 We just -- just use it whenever needed. So I do

1 not recall about that.

2 Q. Did everyone use everyone else's
3 checkbooks in these accounts?

4 A. So, no. My personal checking and my
5 wife's personal bank account, I recall these were
6 deposited. That's why I brought these copies for
7 my -- mine and my wife.

8 Q. Are you alleging that -- why is it that
9 you think that Sunny Kim -- Sunny Park took this
10 money?

11 A. At this time they said they were in need
12 of money.

13 Q. So did Mrs. Park tell you that she was
14 going to write a check for \$40,000 from this
15 account?

16 A. Wait a moment.

17 Yes. Probably, yes. Said that.

18 Q. And did you have this conversation with
19 Mrs. Park in 2007 when the check was written?

20 A. Yes. After the deposit, I'm in need of
21 money. It's deposit, and then spend it.

22 Q. Okay. So to confirm, if Miss Park wrote
23 this check for \$40,000, she consulted with you
24 and had your permission to do that?

25 A. Yes. But the thing was, she used that

1 money for the restaurant because of a, you know,
2 the -- they were short for the money for the
3 restaurant, but that's what I believe. But if
4 she spent personally, then, no.

5 Q. Okay. So did you authorize her to write
6 this check for \$40,000 provided that the money
7 was going to be used for the businesses that you
8 owned together with Mr. Park?

9 A. Yes.

10 Q. But if the money was used personally by
11 Mr. or Mrs. Park rather than for the businesses,
12 you did not give them permission to use the money
13 for their own personal purposes.

14 A. Correct.

15 Q. The last page of the exhibit shows a
16 series of deposits.

17 A. Yes.

18 Q. It appears that this is the -- the first
19 page appears to be a September 2007 statement.

20 A. Yes.

21 Q. The middle page is an October 2007
22 statement, and the last page is an August 2007
23 statement.

24 Does all of that appear correct to you?

25 A. Yes. At that time. We did not show the

1 period of time on all of them, a lot of money,
2 yes.

3 Q. Okay. Do each of the three pages of
4 Exhibit No. 07, do each of the three pages appear
5 to all relate to the account that ends in the
6 number 699?

7 A. Are you asking me the account number?

8 Q. I'm just asking do all three pages and
9 statements relate to the same account?

10 A. Yes.

11 Q. Okay. So on the third page where there
12 was -- there's a series of deposits that are
13 identified. What was the source of the money for
14 those deposits?

15 THE WITNESS: Restaurant. Yokoso, Inc.

16 A. Restaurant. Yokoso, Inc.

17 Q. So were those revenues from Yokoso?

18 A. So, well, Yokoso and Tsunami. I do not
19 recall all exactly, but Yokoso for sure from
20 restaurant.

21 Q. So, for example, on July 10, there's a
22 \$5,000 deposit.

23 A. Yes, that is correct.

24 Q. Would these funds be from the Yokoso
25 operating account?

1 THE WITNESS: They coming home in two
2 weeks and together. Sometimes three months, six
3 months, they coming together.

4 A. So, yes. The restaurant, once every two
5 weeks, the manager brings that, like a printout
6 summary of that sale, like everyday sales
7 including credit card sales and cash sales.

8 Then the manager puts all that
9 information in an envelope. Then once every two
10 weeks, we pick them up. Then after that, we make
11 sure and everything's okay, then we collect all
12 the cashes.

13 Then manager supposed to deposit every
14 day, but I don't know. Sometimes once every two
15 weeks and then sometimes three or six months,
16 then collect all together and count and deposit.

17 Q. So the same \$5,000 deposit on July 10
18 that we spoke of before --

19 A. Yes.

20 Q. -- since you and Mr. Park are both
21 owners of the business, does that \$5,000 belong
22 to both you and to Mr. Park?

23 A. Yes.

24 Q. Did all of the money that was deposited
25 into this Sun Trust Bank account come from the

1 revenues of Yokoso?

2 A. Yokoso, Inc., and Tsunami at the time
3 the, you know, the restaurants you are running.
4 It's from there.

5 Q. So all of the moneys that are going into
6 this account, essentially, belong to the various
7 businesses that you own together with Mr. Park.

8 A. Yes.

9 (Exhibit No. 08 was marked for
10 identification.)

11 MR. LESEMAN: So Tina?

12 THE INTERPRETER: Yes.

13 MR. LESEMAN: We've got one-page
14 document that's an affidavit. It is partially in
15 Korean. So I think what I would propose, it's
16 been marked as Exhibit No. 08. I think I
17 would -- it's just about 30 -- 25 to 30 words,
18 but I'd like to propose that -- that Mr. Lee read
19 it in Korean; and then you could translate it for
20 the record into English, please.

21 THE INTERPRETER: Yes.

22 A. Let me read, yes. (Complies with
23 request.)

24 I Ho Dong Lee and Sunny Park, 1786
25 Cherokee Rose Circle, Mount Pleasant, SC 29466.

1 This land and buildings, I see for all the
2 possessions. And then the fee of \$100,000 and
3 Yong Wook Park \$100,000 and Sunny Kim \$260,000,
4 not responsible for that.

5 Q. Thank you for translating the document
6 and for reading it.

7 Could you please explain to me, in your
8 own words, the transaction that this states.

9 A. At that time in 2013, I think we were
10 separating around that time. Sunny Kim made this
11 document.

12 So at that time I was not in clear head.
13 As I mentioned earlier, I did not fight with the
14 family members.

15 So I signed this.

16 So \$260,000, the one I mentioned earlier
17 from a car dealer, I had a \$400,000 from that
18 man.

19 THE WITNESS: 450.

20 A. \$450,000.

21 So I now remember that I settled to pay
22 that. And Teal has \$100,000. I called him
23 directly and asked him. In the -- in the
24 beginning, no money was lent. The SOB final was
25 just sued. He said that he lent the money.

1 So I did not believe about this Teal has
2 \$100,000, and my understanding is Geong Hong
3 (phonetic) had invested \$150,000 to Three Guys
4 Wing.

5 So Sunny Kim is -- who that person
6 is Sunny Kim's older sister. At Greenville
7 Tsunami. So I think of Kim Sunny -- Sunny Kim
8 and Yong See Kim (phonetic), we are business
9 partners. I don't think this is long. I think
10 this is Sunny Kim's business income. I do not
11 believe this is plain.

12 Q. When the affidavit states that you are
13 surrendering any right to the furnishings or
14 possessions, I believe you mentioned, if that is
15 correct -- go ahead.

16 THE INTERPRETER: Thank you.

17 A. So -- okay. That means that the address
18 on that statement, 1786 Cherokee Rose Circle, I
19 meant to -- I'm keeping all that possessions in
20 that house, like including pianos --

21 Q. Yes.

22 A. Like \$20,000 and Sunny took everything.
23 I don't know what that is.

24 Q. And so does the affidavit indicate that
25 you and your wife are relinquishing any right to

1 the possessions in the Cherokee Rose house?

2 A. Yes.

3 Q. And did you receive something in
4 exchange for that, or what -- how does that
5 relate to the amounts of money that you also
6 mentioned?

7 A. So then, no, it's not related. As I
8 mentioned earlier, since I did not want to fight
9 among family members, I just signed it.

10 Actually, regarding this house, they
11 lied to me because on the house that -- house
12 title, my name should be on it together with
13 them; but my name was never recorded.

14 I found out later, like the last year, I
15 talked to one of the realtors. And that realtor
16 told me from the very beginning, your name was
17 not on the title. So that means they lied to me.

18 So since they are taking care of my
19 parents, then all -- their parents also, I just
20 said, I just leave the house and -- and I did not
21 get anything in exchange for that. I have a copy
22 of a title. If you need, I can show that to you.

23 Q. Would the copy of the title show that
24 you are not listed on the title?

25 A. Yes.

1 Q. When was the house purchased?

2 A. So I purchased the land year 2003 and
3 did a construction year 2004. Then move in May
4 of 2005. All of us moved from West Ashley --
5 West Ashley to Mount Pleasant, about 30 minutes
6 away.

7 Q. Okay. Did you just tell me that you
8 purchased the property at 1786 Cherokee Rose
9 Circle?

10 A. Yes. No. No. First of all, I
11 purchased the land. Then we constructed a home
12 there, house there.

13 Q. Did you purchase the property in your
14 own name?

15 A. So I thought so because it was mentioned
16 only -- as I mentioned earlier, as we were living
17 the same house, Sunny came in and lived with us
18 for 20 year. So I trust them since we are living
19 together. So I trust them. We are living in the
20 same house. I trusted them. How can you live
21 with them? You know, so until now, I thought my
22 name was on it. That's what I thought.

23 Q. Okay. Did you sign any documents
24 relating to the purchase or to the construction
25 of the home?

1 A. I think I signed when we got the loan.

2 Q. Do you remember which bank the loan was
3 with?

4 A. I do not recall. I think it was a
5 mortgaging company, and then I just -- then we
6 end up sign so --

7 Q. Okay. Does the house at 1786 Cherokee
8 Rose Circle have any relationship to the
9 agreement that you signed with Yong Wook Park to
10 divide the restaurant assets?

11 A. So how soon, I did not talk about it.
12 Later on we were separating. Then about the
13 house, they do not -- for the family members
14 side, we were, like, the four of us. But they
15 had eight of them. So then I just says, leaving
16 the house. So I don't think -- it's not on here,
17 but I just gave that house to them.

18 Q. I'm going to ask you some more questions
19 about Mr. Graves Wilson.

20 A. Yes.

21 Q. Did you meet with him in person relating
22 to the division of the restaurant businesses and
23 the properties?

24 A. Yes.

25 Q. Did you meet with him several times?

1 A. So, well, maybe five to six times. I
2 don't know, and I met this many times; but I did
3 not count them. So I don't know.

4 Q. Did you also speak with him over the
5 phone from time to time?

6 A. So due to my limited English, I could
7 not call, talk over the phone. So usually I went
8 over there and talked, as I mentioned earlier,
9 because of an English problem. And then trying
10 to make it easy for all of us as a family member,
11 I just went there and followed his plan.

12 Q. Did you take a translator with you when
13 you met with Mr. Wilson?

14 A. Yes. Twice.

15 Q. Did you pay Mr. Wilson for the services
16 that he provided to you?

17 A. Yes. I think I made a payment with a
18 check.

19 Q. Are you satisfied with the services that
20 Mr. Wilson provided to you as your attorney for
21 the transaction?

22 A. That I do not know. At this time the
23 lawyer suggest me to file a lawsuit. You cannot
24 just let it go. So then I and my wife talked
25 about it. And then if we filed suit, you know,

1 we are family members; and then the relations
2 going to go bad. It's going to be, you know,
3 broken. So we did not want to do it; but then at
4 the time, the lawyer suggest to me to file a
5 lawsuit. But we opposed.

6 Q. Was this in 2012 when you had this
7 discussion?

8 A. I think so.

9 Q. Would it have been before February 27 of
10 2013 when you signed the agreement?

11 A. I guess -- when I signed it?

12 Q. Yes. When you signed the agreement on
13 February 27, 2013, did the conversation, the
14 discussion that you just mentioned, did that
15 occur prior to when you signed the agreement?

16 A. Only did it once. Once.

17 Q. Only had one -- are you saying that you
18 only had one conversation about a potential
19 lawsuit?

20 A. Yes. Talked about once.

21 Q. And that was before you signed the
22 agreement?

23 A. Yes.

24 Q. And what were you going to file a
25 lawsuit about potentially?

1 A. So at that time this -- I look at the
2 papers, and everything was wrong. So at the
3 time -- and I think the lawyer found out
4 something. Then later on -- later on after I
5 signed the agreement, I was, kind of, curious.
6 So we searched on the computer and entered the
7 Yong Wook Park and Sunny Kim, and there was three
8 properties we were not aware of.

9 Yeah. I recall there was three of them.
10 Wilmington Beach house, and Myrtle Beach Yokoso,
11 and then Greenville house. There are three of
12 them.

13 THE WITNESS: And after, church member,
14 they tell me about how the --

15 A. So that my -- also the church members
16 said when they went to Asheville to get the
17 efforts, the Sunny Kim said that the building
18 over there is also mine so I -- I thought they
19 were hiding too many things. That's why we end
20 up here.

21 Q. What were you going to file a lawsuit
22 about prior to when you signed the agreement
23 instead?

24 A. Could you repeat the question?

25 Q. What were you going to file a lawsuit

1 about prior to when you signed the agreement in
2 February of 2013?

3 A. So people I signed the agreement;
4 correct?

5 Q. Yes.

6 A. At this time my lawyer said that there
7 are too many things unbalanced. Something is
8 wrong. There are too many things wrong. So
9 through the lawyer, there are too many things --
10 too many things were wrong. So I should divide
11 up the --

12 Q. But you decided to sign the agreement
13 instead?

14 A. Yes.

15 (Exhibit No. 09 was marked for
16 identification.)

17 Q. The document that's been marked as
18 Exhibit No. 09, did you review it with a
19 translator, a Korean translator, prior to signing
20 it?

21 A. Are you asking me if I -- we use in
22 Korean?

23 Q. No. Did you review it with a
24 translator?

25 A. Not in details, but I think I did once

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1 or twice.

2 So I -- not in details, but thing is
3 I -- as I mentioned earlier, in our mind, my wife
4 and I, you know, as I said earlier, since we are
5 family members, let's just forget about it. So
6 we, kind of, decide not to go for it.

7 But in the beginning, let me explain to
8 you in detail, the beginning. Yong Park wanted
9 to use just one lawyer.

10 THE INTERPRETER: I don't know what this
11 means. Can I find out?

12 A. He went and told me the need of one
13 lawyer; but later on I thought it was better, you
14 know, suspicious. So I decide to hire my own
15 lawyer. That's how I hired Mr. Wilson.

16 Q. So it was your decision to have your own
17 attorney?

18 A. Yes.

19 Q. And are you satisfied with the job that
20 your attorney did on your behalf?

21 A. So actually I do not know. If you get
22 this paper, if I look at this paper, then I
23 might -- not many things I can understand. I
24 just to sign.

25 You know, usually, like, immigrant, they

1 cannot really understand. They do not
2 understand, like, this kind of a thing. As I
3 mentioned earlier, you know, what is American
4 dream? It is like when you come back -- so -- so
5 they can leave.

6 So that is part of American dream. So
7 maybe, you know, you do not understand; but being
8 as though it's asking this kind of with limited
9 English, you probably understand everything. I
10 think that it's a testament to the wrong.

11 Q. Is Yong Wook Park also an immigrant?

12 A. So, yes. And he came to States '83 or
13 '84, and he went to high school here. Also I
14 heard he went to college in Charleston and so
15 also gave the citizenship. They became citizens,
16 both Sunny Kim and Yong Park, two of them, around
17 '95. And Sunny came also went to high school
18 here and also work here.

19 Q. Okay. Did you read the agreement that's
20 been marked as Exhibit No. 09 before you signed
21 it?

22 A. So rather than reading, I've heard that
23 I hit one read statement or text; and that's the
24 device, and then I don't know about the rest.

25 Q. Did you discuss the transaction over the

1 course of several months with Mr. Wilson?

2 A. Well, it took more than a year. I think
3 you lasted -- I recall -- maybe it was more than
4 one -- it was more than one year because whether
5 Yokoso, the restaurant, supposed to operate.
6 What I need to -- what I need to determine for
7 year 2012, Yokoso in North Charleston generated
8 about \$200,000. Then without any payment and
9 then \$200,000.

10 So as long as they delay to hand that
11 over to me, it's going to be their income. So it
12 was delayed and delayed and delayed. So one day
13 he paid to not hand over. I'm going to hire a
14 forensic accounting. So it's like, you know,
15 court kind of thing. I told them I'm going to
16 hire forensic accountant company. Then finally
17 early March 2013, they handed it -- handed me
18 over.

19 Q. Do you know whether there was any delay
20 relating to a forbearance agreement with Bank of
21 America at the same time frame?

22 A. I do not understand what you are saying.

23 Q. Were you willing to accept the deal that
24 is outlined in the agreement that's marked as
25 Exhibit No. 09?

1 A. So as I mentioned earlier, as family
2 members, you should just upset. She didn't want
3 to have a broken relationship with them. At this
4 time I chose Yong too. So I just accepted.

5 Q. So you did accept the agreement that's
6 marked as Exhibit No. 09?

7 A. So then my thinking is, later on people
8 around me told me that they are hiding many
9 things. So I got suspicious. So I was not sure
10 of what was going on. So I end up consulting a
11 lawyer.

12 Q. Okay. That wasn't the answer to the
13 question that I asked.

14 Did you accept the agreement that is
15 marked as Exhibit No. 09 and indicate your
16 acceptance by adding your signature to the
17 document?

18 A. Well, I'm looking at now and to see that
19 we are dividing the debts of -- rather than
20 dividing the assets at that time, I did not know.
21 But many people -- I was talking to many people
22 that looks like this is -- everything -- many
23 things were wrong at the time. I did not know,
24 but this is a --

25 THE INTERPRETER: This isn't -- I need

1 to ask him again. I was a little confused. Can
2 I ask him to repeat?

3 MR. LESEMAN: Yes.

4 THE INTERPRETER: Thank you.

5 A. So we supposed to be dividing assets,
6 but this is only like dividing the debts. To me.
7 Right now, you know, when I look at now, it's
8 just dividing debts. It was not dividing the
9 assets of -- or at least not purpose.

10 So because there are many things were
11 not included here and also there are many things
12 were hide -- hidden so it is not a reasonable to
13 divide up asset. It's like a front for trying to
14 do it. I don't think in America it's possible.

15 Q. What are you claiming was hidden from
16 this document?

17 A. So as I mentioned earlier, two of the
18 Tsunami and then three ice cream. And then the
19 one I mentioned earlier, three properties and
20 Sunny -- because Sunny came in. Me works at the
21 rest rants. They did not have any other work.
22 But all this -- the possessions just -- assets, I
23 want to know where they are -- where they came
24 from. I want to check their background.

25 So almost -- just need to be

1 investigated. In South Korea, year 2004, I don't
2 know exactly which year it is; but they purchased
3 \$200,000 worth of land in South Korea called Yo
4 Ito (phonetic). Then they sold it with me. I do
5 not have any proof to show that; but, you know,
6 so I cannot really say for sure.

7 But there are many things like the
8 building in Greenville area, but then I heard
9 many other things. And can you believe they have
10 a \$14 million -- can you believe it? I want to
11 ask you.

12 Q. Does this agreement that's been marked
13 as Exhibit No. 09 state anywhere within the
14 document that it relates to every single asset
15 that's owned by Yong Wook Park or by you?

16 THE INTERPRETER: Sir, can you repeat
17 the question one more time?

18 MR. LESEMANN: Yeah. I'm asking him if
19 he believes that the agreement that he signed
20 that's been marked as Exhibit No. 09 states that
21 it covers every single asset owned by him and by
22 Yong Wook Park.

23 THE INTERPRETER: Thank you.

24 A. So I cannot -- Exhibit No. 09 listed all
25 the assets? Are you asking me if the No. 09,

1 Exhibit No. 09 listed all the assets?

2 MR. LESEMANN: It's okay. I think I'm
3 just going to -- we're just going to move on.
4 Thank you, Tina.

5 Could you mark this as the next exhibit.
6 (Exhibit No. 10 was marked for
7 identification.)

8 THE WITNESS: Can we have a break?

9 (Recess taken 4:10 p.m. to 4:16 p.m.)

10 BY MR. LESEMANN:

11 Q. Mr. Lee, I would ask you to point to any
12 section in the agreement that's marked as Exhibit
13 No. 09 that you allege that Yong Wook Park
14 specifically breached.

15 A. So on this list there are many hidden
16 things there, and then things I do not know were
17 not included; but I cannot approve of this
18 agreement. Then I did not know the law; but
19 while I was talking or searching with other
20 people, I found out. So within three years in
21 South Carolina, it could be voided. So then I
22 think something cannot be find in here so then --
23 going to be a breach of our contract. We want to
24 void it.

25 So other than these, there are many

1 other things up here. So there are many other
2 things there. So then it was not -- they hide it
3 or it was not, you know, under common sense or
4 under American law. This is not possible. If
5 they did it, cheated me, so that this is not an
6 agreeable agreement.

7 So this is not just the cheating. More
8 than that. It's put all the family members to
9 death. So this is, like, you know, there are
10 many things. I defined it because they can
11 leave, you know. As a family member, trust each
12 other. So I trust them. That's why I just
13 signed it. I -- it's -- this is not really, you
14 know, bad that they defrauded.

15 Q. You did not answer the question that I
16 asked you.

17 Here is the question which I asked you.

18 THE WITNESS: Okay.

19 Q. Can you point to any specific section of
20 the agreement and identify which of these
21 sections that you allege Yong Wook Park breached
22 as part of your claim for breach of contract?

23 MS. DEJONG: I'm going to object to that
24 because you're asking him -- because you're
25 asking him for a legal conclusion.

1 MR. LESEMANN: There's no speaking
2 objections, Karen. And he is the plaintiff in a
3 breach of contract case, and he has to be able to
4 identify what part of an agreement that he
5 believes got breached.

6 Q. So, again, I'll ask you, Mr. Lee, can
7 you identify any portion of this agreement that
8 you say that Yong Wook Park breached?

9 A. Is this dividing assets?

10 Q. I'll repeat my question.

11 My question to you is to identify which
12 section of the agreement that you allege that
13 Yong Wook Park breached.

14 A. So I don't know, but there are supposed
15 many other properties specifically on here. But
16 it's not on it. That's why I don't know.

17 Q. Does this agreement say that it lists
18 every property that you own or that Yong Wook
19 Park owns?

20 A. So as far as I know, the -- the things
21 we do not know. But like for Greenville --
22 Greenville Tsunami and Three Guys Wing. I thin
23 those should be on the documents. As you know,
24 they used my insurance and then -- the insurance.
25 And if those did not have anything to do with

1 this, then they should not have used me on their
2 insurance. If they used it, that means it has
3 relationship, that it should be on this document.

4 Q. Is there anything else that you can
5 identify that you allege constitutes a breach of
6 contract, other than your statement that other
7 assets are not listed on this document?

8 A. So one more thing. Just when I'm
9 looking at it, supposed to be dividing the
10 assets; but this does not list any kind of a
11 value, price, or any words. So this is very
12 general today. So I do not understand it either.

13 Q. Did you ask for the assets to be
14 appraised before this agreement was signed?

15 A. No, I did not.

16 Q. Okay.

17 A. So we -- we were not professionals, and
18 I'm not a professional. So I thought this is how
19 it's supposed to be. But later on, they say
20 you're not supposed do that.

21 Q. Who is "they"?

22 A. So other, like a lawyer, not here. Not
23 this one; but many other lawyers I talked to,
24 they said that.

25 Q. Who said that? Which lawyers?

1 THE WITNESS: North Charleston have one
2 lawyer.

3 A. So one in North Charleston and one in
4 Atlanta, a Korean lawyer; but it's been a long
5 time. So I do not recall.

6 Q. Are you alleging that the omission of
7 appraised values of each business causes this
8 agreement to be void?

9 A. That -- yes. But also the things that
10 are not listed on here, they did not list it
11 here. They made lots of money. Then they keep
12 the money. Then they claim they only have a few
13 assets, then dividing that. I think that's not
14 fair.

15 Q. Who are the church members that you
16 referenced that told you about other properties
17 that Yong Wook Park and Sunny Park own allegedly?

18 THE WITNESS: I cannot talk to this
19 name.

20 Q. You just don't want to?

21 THE WITNESS: Because I own to --

22 (Interruption.)

23 MR. LESEMAN: Okay. All right. So, I
24 think, Tina, when we were cut off, I had asked
25 Mr. Lee to identify certain church members who he

1 had had some discussions with; and there was
2 going to be a discussion between you and him on
3 that.

4 I believe he doesn't want to disclose
5 those names, but we'll just -- if you recall
6 where we were, that's -- I think that's where we
7 sort of were.

8 THE INTERPRETER: Okay.

9 BY MR. LESEMAN:

10 Q. So could you please identify the church
11 members who approached you to claim that Yong
12 Wook Park and Sunny Park had assets that they
13 were hiding or not disclosing to you?

14 A. So I cannot give out those names because
15 they did not do it intentionally. They were just
16 talking, and it came out easily. So I cannot
17 talk about those names because, you know, then
18 our relationship would go bad. So, please, I
19 cannot tell you.

20 Q. Okay. So because these are witnesses
21 that have given information to you and
22 participated in conversations about -- that
23 Mr. Lee believes are important to this lawsuit,
24 he is not at liberty to refuse to disclose those
25 names to me.

1 A. Well, I need to ask the names then. So
2 when I was at the rest -- they came once to the
3 restaurant. So I do not recall their names
4 exactly. So then I think the best way to
5 approach is this not get those names; but I think
6 it's better to find those properties, not getting
7 those payment from the third parties, if I'm
8 still connection.

9 MR. LESEMANN: All right. Could you
10 explain that if I'm not able to get a disclosure
11 of the names, that I have the right to petition
12 the Court to compel Mr. Lee to provide that
13 information because it's discoverable knowledge
14 that's known to him and to ask the Court to also
15 require him to pay the costs of reconvening his
16 deposition, including the costs to bring you back
17 as our translator.

18 A. I understand.

19 Q. Speaking of church members, members of
20 the church have approached your mother-in-law to
21 tell her that Yong Wook Park has lost this case
22 and will go to jail if he does not pay you.

23 And by your mother-in-law, I'm referring
24 to Yong Wook Park's mother.

25 A. Yes.

1 Q. Please identify each person at the
2 church that you have discussed this lawsuit with.

3 A. So I do not have any specific church
4 member I talk about this lawsuit because all the
5 Park family know about this, and then also all my
6 family members know about this. So usually, you
7 know, when you talk about the case, that's
8 generally speaking, this is something wrong that
9 you may up going to jail. But nothing specific.

10 Q. Are you alleging under oath that you
11 have not spoken with any member of the church
12 relating to this lawsuit?

13 A. Well, I do not recall. I don't know
14 other -- I don't know. I do not -- I cannot
15 recall if had any conversation.

16 Q. Please refer to the document that's been
17 marked as Exhibit No. 10.

18 MR. LESEMAN: Sorry. I know I've
19 underlined on it, but maybe we should move this
20 sticker. Is that okay, Karen?

21 MS. DEJONG: Yes, uh-huh.

22 MR. LESEMAN: Tina, I now have the
23 document that's been marked as Exhibit No. 10,
24 and it's the document that was emailed to you
25 earlier today.

1 THE INTERPRETER: Yes.

2 Q. In paragraph 12 it states, "Due to
3 plaintiff's difficulty understanding English,
4 plaintiff relied upon defendant's verbal
5 representations as to the value of the assets
6 when plaintiff agreed to the division of the
7 properties."

8 What verbal representations,
9 specifically, are you alleging that Yong Wook
10 Park made to you relating to the value of the
11 assets?

12 A. Are you asking because it talks about
13 the value of the assets?

14 Q. I am asking because in the complaint, he
15 says he is relying upon defendant's verbal
16 representations; and I want to know the exact
17 verbal representations that he is referring to in
18 his complaint.

19 A. So there was no conversation regarding
20 the value of the assets. The only -- I only
21 talked about the assets.

22 Q. Okay. So to confirm, neither defendant
23 made any verbal representations to you relating
24 to the value of the assets prior to when you
25 signed the agreement?

1 A. Correct. We did not talk about the
2 value.

3 Q. In paragraph 11, it states that
4 defendant caused this agreement to be breached by
5 failing to provide plaintiff with a full
6 financial disclosure.

7 Can you identify the provision in the
8 agreement that required Yong Wook Park to provide
9 you with a full financial disclosure of the
10 company's assets, liabilities, payoff statements,
11 appraisals and any other documentation?

12 A. So then I think, you know, what is a
13 partner? I think a partner has 50 percent or
14 less rights to the -- the properties possession
15 even though those are not listed on this
16 document. I think it's obvious they need to give
17 those information and under, you know, American
18 law or any other law.

19 Q. Can you identify any provision in the
20 agreement that required defendant to provide you
21 a full financial disclosure relating to assets
22 that you both owned?

23 THE INTERPRETER: Sir, can I repeat the
24 question to him?

25 MR. LESEMAN: Yes, you may repeat my

1 question. Certainly.

2 THE INTERPRETER: Thank you.

3 A. Okay. I do not know. I do not know
4 about that, but it's a common sense. I think you
5 should give all that information to your partner.

6 Q. I understand that. And I just want to
7 confirm. The agreement is 16 pages. You can
8 answer this question by telling me that it's on
9 page 1, page 2, or any other page. Or you can
10 tell me that it is in Section 2 or Section 4 or
11 Section 8.

12 But I just want to ask -- and I
13 understand what you've said about partnership.
14 But I want to ask is there any provision anywhere
15 in this agreement that specifically requires that
16 Yong Wook Park provide you with a full financial
17 disclosure?

18 A. I don't know. I do not know. This
19 needs to be checked by a professional. These are
20 my -- I cannot tell. I need to -- I'm going to
21 ask a professional first.

22 Q. As we sit here today, you cannot name
23 any page or any section of this agreement that
24 requires Yong Wook Park to provide you with a
25 full financial disclosure; is that correct?

1 A. Could you -- can you repeat? Can you
2 repeat?

3 Q. Yes.

4 I understand what you have said about
5 partnership and how you feel partners are
6 obligated to each other; however, for purposes of
7 clarification, is it true that you cannot
8 identify any section of this agreement that
9 requires Yong Wook Park to provide you with a
10 full financial disclosure of these assets?

11 A. Is it okay to -- to talk to my lawyer?

12 Q. No.

13 A. Then I cannot help it.

14 Q. Do you have an answer in terms of a
15 section or page?

16 A. So I cannot talk to my lawyer. Then if
17 I need to answer right now, then I think
18 something is wrong.

19 Q. I'll just move on. It's not worth
20 spending any more time about, and I'll just --
21 yeah. Hasn't identified anything yet so -- what
22 I'd like to do is to move on to paragraph 13. Of
23 the complaint, yes.

24 Did you read this complaint before it
25 was filed?

1 A. So I cannot read these papers. I did
2 not understand, but I think I saw it once.

3 Q. After the transaction did you have the
4 right to sell Yokoso, Inc., if you wanted to do
5 so?

6 A. Which period are you referring to?

7 Q. After February 27, 2013.

8 A. So are you asking me if I'm able to sell
9 it?

10 Q. After the transaction date, did you have
11 the ability to sell Yokoso, Inc., if you wanted
12 to do so?

13 A. I have not thought about it because of
14 the bank of going through foreclosure. So I did
15 not think about it.

16 Q. Were you the sole owner of Yokoso, Inc.,
17 after the transaction on February 27, 2013?

18 A. I think so. I'm not sure.

19 Q. If you are the sole owner of a company,
20 do you have the right to sell the company?

21 A. Yes. At this time -- the forecloser by
22 a bank, so I did not think about that.

23 Q. You have not answered my question in the
24 two times that I have asked it. I understand
25 that you lost Yokoso, Inc., due to foreclosure.

1 A. Yes.

2 Q. However -- and I could ask the question
3 a different way.

4 Did Yong Wook Park have the right to
5 sell the entities that he received as a result of
6 the 2013 transaction?

7 A. Well, under this circumstances, these
8 documents are not in correct order. I think he
9 does not have right to sell.

10 Q. So your testimony is that Yong Wook Park
11 did not have the right to sell the entities of
12 which he was the sole owner?

13 A. So thing is, if these documents are not
14 in, you know, not legal. So I don't know why. I
15 don't know. But so these documents not in
16 correct order, then I don't think he has the
17 right to sell because, you know, the law is
18 common sense. It's out of common sense, then the
19 order is not a proper statement of, you know. So
20 I don't know, but that's what I think.

21 Q. Are you saying that you are trying to
22 have this document declared invalid?

23 A. Yes. For me, yes. Because there are
24 things which are not listed on this document.
25 So, to me, this documents are not in correct

1 order. Not legal.

2 Q. Do you understand that some of the
3 entities of which Yong Wook Park was the sole
4 owner have already been sold?

5 A. So I understand what, but I cannot
6 accept that. They put a Tsunami downtown. They
7 put this in, and they returned it; and they sold
8 it, and they got the payments. And they've paid
9 it under Sunny Kim's name, and they took money.
10 So then I think that that's not on, you know,
11 legitimate transaction. How could that be under
12 the law?

13 Q. I'm not going to mess with it.

14 On paragraph 13 you allege that some of
15 the entities were sold or -- and that moneys were
16 received far in excess of the values that were
17 represented to you at the time you signed the
18 agreement.

19 THE INTERPRETER: So this is confused.
20 Can I repeat to your client?

21 MR. LESEMAN: Sure.

22 THE INTERPRETER: Thank you.

23 A. So I said that we -- I did not hope to
24 say anything about the value of the business. I
25 don't know where this is coming from, but I did

1 not talk about the value of the businesses.

2 Q. Understood.

3 And that's what I wanted to confirm
4 because it appears in more than one place in the
5 complaint.

6 A. Yes.

7 Q. Okay. So no values were represented to
8 you by either defendant relating to any of these
9 assets at the time you signed the agreement; is
10 that correct?

11 A. Correct.

12 Q. And where -- in paragraph 14 it refers
13 to values. Again, this is a mistake; and there
14 were no discussions about the values of the
15 assets between you and the defendants prior to
16 the transaction. Is that correct?

17 A. Correct.

18 Q. In paragraph 15 there is a reference to
19 the debts of the assets.

20 What are the debts related to any assets
21 or companies that you had discussions with either
22 defendant about prior to the transaction?

23 THE WITNESS: Please say that again now.

24 THE INTERPRETER: Are you asking me --
25 he's asking me to repeat the question.

1 MR. LESEMANN: Yes.

2 Q. So paragraph 15 talks about the debts of
3 the assets, which I want to ask him about; and it
4 refers to the assets listed in paragraph 5, which
5 are the restaurants and the properties that are
6 discussed in the agreement.

7 So my question is: Did you have a
8 specific discussion with either defendant about
9 the debts of those entities or related to those
10 properties prior to the transaction?

11 THE INTERPRETER: He said it was No. 09.

12 THE WITNESS: No. 9 and --

13 Q. I was reading from paragraph 15, which
14 refers to paragraph 5 of the complaint.

15 THE WITNESS: What is number --

16 Q. Yeah, yes.

17 THE WITNESS: This one? (Indicating.)

18 Q. Yes.

19 A. Koreans have found things complicated.
20 I don't know what you're saying.

21 Q. Sure.

22 So did you have -- and also paragraph 15
23 refers to debts that you were required to pay
24 off. So did you have any -- did you have any
25 discussions with Yong Wook Park or Sunny Park

1 prior to the transaction about the debts that you
2 assumed under this agreement?

3 A. So we were supposed to divide the debts,
4 take, you know, actually whatever debts.

5 Q. Is the way in which the debts were
6 supposed to be divided the way that is set forth
7 in the agreement itself?

8 A. I think so. Not sure. But I think so.

9 Q. Okay. Did you have an understanding
10 that you would take one restaurant and Yong Wook
11 Park would take four restaurants under this
12 agreement?

13 A. Yes. All the, you know, they're listed
14 on -- listed on this, yes. I do understand.

15 Q. Okay. I'd like to talk to you about
16 paragraph 30 of the complaint, but first let's
17 speak about paragraph 27.

18 It refers to the value of the assets and
19 the amount of debts owed. Again, we've covered
20 this. But there were no representations made to
21 you about the value of the assets; is that
22 correct?

23 A. Correct.

24 Q. And there were no representations made
25 to you separate from the agreement by the

1 defendants prior to the transaction relating to
2 the amount of debts owed; is that correct?

3 A. I only saw what's on this document. I
4 do not know anything -- I do not know about other
5 things. I don't know.

6 Q. Okay. Can you identify any
7 representation made to you by either defendant
8 prior to the transaction relating to the amount
9 of debts that was not correct?

10 A. I don't know. I need to review the
11 document. So time right now, I don't know. Even
12 though I'm looking at it now, I don't know.

13 Q. We're here today for your deposition.
14 So I just want to ask if you can identify any
15 representation that Yong Wook Park or Sunny Park
16 made to you relating to the amounts of debts owed
17 by any entity or relating to either of the
18 properties that are discussed in the agreement.

19 A. I'm not sure. I need to review the
20 document.

21 Q. As you're here today under oath, can you
22 identify any representation about the debts that
23 were made to you by either defendant?

24 A. So right now with my English, I cannot
25 do it. I cannot check. I need to talk to a

1 professional so that was - because I need to see
2 you later after I talk to a professional.

3 Q. You are alleging representations that
4 were made to you by the defendants. I am
5 assuming that when you spoke with Yong Wook Park
6 or with Sunny Park, it would be in Korean.

7 A. Yes. Main in Korean.

8 Q. And each question in this deposition is
9 being translated into Korean.

10 A. Yes.

11 Q. You have filed a complaint in which you
12 have alleged that the defendants made false
13 representations to you relating specifically to
14 the amount of debts owed by the companies or owed
15 on the properties that are encompassed in the
16 agreement. We are here for your deposition, and
17 I am entitled on behalf of my clients to ask you
18 for the support for this allegation.

19 Alternatively, it could be a mistake in
20 the document; and no representations about the
21 amounts of debts were made to you by the
22 defendants.

23 With that said, I'll ask one last time:

24 Can you identify any representation made
25 about the amounts of debts of these entities or

1 these properties that you allege were made to you
2 by the defendants prior to the transaction?

3 A. Are you asking me how much the debt is?

4 Q. No. I am asking you if there is any
5 representation relating to the amount of debts
6 owed by the entities or on the properties listed
7 within the agreement that was made to him by
8 either defendant prior to the transaction.

9 A. So I did not understand the last part of
10 the statement, even though it's in Korean.

11 Q. Okay. Can you identify any
12 representation that was made to you by either
13 defendant relating to the amounts of debt prior
14 to the transaction?

15 MS. DEJONG: I'm going to object. This
16 is, like, the seventh time you've asked this
17 question. He's answered it several times.

18 MR. LESEMAN: Do you know how angry I
19 am that he won't answer it?

20 MS. DEJONG: Because you're using words
21 he doesn't understand.

22 MS. LESEMAN: Why do you think I'm
23 paying --

24 MS. DEJONG: You're using the same
25 words.

1 MR. LESEMANN: Karen -- Karen, just back
2 off.

3 MS. DEJONG: No. It's harassment now.
4 That's what it is.

5 MR. LESEMANN: That's absurd.

6 MS. DEJONG: Ask her to count it.

7 MR. LESEMANN: You know what --

8 MS. DEJONG: Seven times you've asked
9 the same question. He's tried to answer. You're
10 not going to get what you want to hear.

11 MR. LESEMANN: I'm going to ask the
12 question. I'm paying \$250 an hour for a Korean
13 translator to be here to play long with this game
14 because he doesn't -- yeah. To answer it. Okay.
15 So he -- no. This part is a game. Okay. She's
16 using words and language that he's spoken for 50
17 some years.

18 MS. KIM: No. Even in Korean, it's very
19 hard to understand some of the legal parts.

20 MR. LESEMANN: Okay.

21 MS. KIM: So whatever she explains to
22 him is hard to understand.

23 MR. LESEMANN: Understood. Understood.
24 Eventually we can get there where the
25 answer could just be: You know what? No, I

1 can't identify any.

2 MS. DEJONG: That's what you want him to
3 say.

4 MR. LESEMANN: Because that's what the
5 case is.

6 MS. DEJONG: That's coercion. That's --

7 MR. LESEMANN: No, it's not.

8 MS. DEJONG: Yes, it is.

9 MR. LESEMANN: No. If you want to get
10 up and walk out, you can; but otherwise, I'm in
11 control --

12 MS. DEJONG: I'm just saying you keep
13 asking him the same question until he decides
14 he's just going to say anything to get out of
15 this room. That's not good lawyering.

16 MR. LESEMANN: You can -- you can say
17 that --

18 MS. DEJONG: You cannot ask that
19 question again. He's answered it over and over.
20 He does not understand.

21 MR. LESEMANN: I can ask the question
22 until I get an answer.

23 MS. DEJONG: Then that's harassment.

24 MR. LESEMANN: No, it's not.

25 MS. DEJONG: Yes, it is. You're

1 harassing.

2 MR. LESEMANN: He hasn't answered it.

3 MS. KIM: And even in Korean, you
4 would --

5 MR. LESEMANN: Ma'am, ma'am, I
6 understand. Okay. We're going to be a lot
7 longer with this whole exercise. All right?

8 MS. DEJONG: You've already assumed he's
9 playing a game.

10 MR. LESEMANN: This exercise right here
11 where I've asked a question and I've paid a
12 Korean translator to --

13 MS. DEJONG: He answered it.

14 MR. LESEMANN: No. He hasn't answered
15 it.

16 MS. DEJONG: He has answered several
17 times.

18 MR. LESEMANN: He says he can't because
19 of his English.

20 MS. DEJONG: And then he says he doesn't
21 know. That's true. If he's saying it's cause of
22 English, then it's true.

23 MR. LESEMANN: He's being asked a
24 question in Korean, and he's answering in Korean.
25 Karen, your position is pretty silly right now.

1 MS. DEJONG: I don't think it is.

2 MR. LESEMANN: So, Tina, could you ask
3 the -- do we need to go back and ask the question
4 again?

5 THE INTERPRETER: Yes.

6 MR. LESEMANN: Okay.

7 THE INTERPRETER: Do you want to make
8 shorter sentences?

9 MR. LESEMANN: Okay.

10 Q. Can you identify a representation that
11 was made to you about the amount of debts by
12 either defendant prior to the transaction?

13 A. So when you say "representing," you are
14 reporting to those debts for those documents, the
15 one I have right now? Are you referring to that?

16 Q. No. I'm referring to statements that he
17 is alleging that the defendants made or that may
18 not have been made because there are certain
19 aspects of the complaint that were in error.

20 MS. DEJONG: Why don't you just ask him
21 a question.

22 MR. LESEMANN: I have.

23 MS. DEJONG: That wasn't a question.

24 MR. LESEMANN: He just asked -- I'm
25 responding to a question that he asked to the

1 interpreter.

2 A. He said that the people -- the people --
3 so all I mentioned when we were dividing, the
4 things which were not on the list, the company,
5 the -- there was some list. But specific
6 representing something and so they were not on
7 the list. So I cannot accept that.

8 Q. So I understand that. But I'm talking
9 about the companies and the properties that are
10 on the list.

11 A. Yes. Then what's the question? I do
12 not understand the question.

13 Q. Okay. The question is: Separate from
14 what's stated in the agreement on this page, are
15 you alleging that representations were made to
16 you about the amounts of debts of these entities
17 and these properties that aren't in this
18 agreement?

19 A. I do not recall.

20 Q. Prior to the transaction did you review
21 any of the tax returns for any of the entities?

22 A. The tax returns, are you reporting for
23 the restaurants?

24 Q. Yes.

25 A. This one here or --

1 Q. Yes.

2 A. So I know -- and now I know the tax
3 returns. So what's the question about the tax
4 returns?

5 Q. Did you review any of them prior to the
6 transaction as you were preparing to enter the
7 transaction?

8 A. No, I didn't ask them. When we were
9 dividing, as I mentioned earlier, my family
10 members didn't want to fight. So let's be like
11 that. So I did not review them.

12 Q. Did you review any financial statements
13 for any of the businesses before you entered the
14 transaction?

15 A. No. Did not give me.

16 Q. Did you ask for any financial statements
17 prior to entering into the transaction?

18 A. I don't think so, no. So because they
19 say every day "no money, no money," so I believed
20 them.

21 Q. Is the answer, no, I did not ask for
22 any?

23 A. Okay.

24 Q. Is that correct? He did not ask for
25 any?

1 A. Correct.

2 Q. So in the agreement, which has been
3 marked as Exhibit No. 09, did you ever read
4 paragraph 9?

5 A. I don't think so. I don't think I have
6 read them now, right now.

7 Q. Do you know whether your lawyer read it?

8 A. I do not know.

9 Q. Did you read paragraph 17, which appears
10 on page 13 and 14?

11 A. Pages 13 and page 14?

12 Q. Paragraph 17, which is called complete
13 agreement/merger.

14 A. Maybe. I have read it. But due to my
15 English ability, even though I read it, even --
16 maybe I did not understand, but I just say I read
17 it.

18 Q. Can you remember what parts of this
19 agreement that you have ever read?

20 A. So rather than reading these, as I
21 mentioned earlier, we do not want to be bound by
22 this. So we want to just sign it up fast, and
23 hopefully everything works out well.

24 MR. LESEMAN: Tina, you just said that
25 he did not want to be bound by this. I need to

1 clarify. Was -- was --

2 THE INTERPRETER: That the --

3 A. So the family, my wife said just to, you
4 know, do it, like easily, to not to go into
5 details because of younger brother. He's like my
6 wife's younger brother. Also he's living
7 together with my wife's parents. So, you know,
8 family members, position, that fight, that's why.

9 Q. Understood. So it was to keep family
10 peace.

11 A. Yes.

12 (Exhibit No. 11 was marked for
13 identification.)

14 Q. So I'm showing you what's been marked as
15 Exhibit No. 11.

16 A. Okay.

17 Q. Did you work together with your attorney
18 to respond to these discovery requests? To these
19 questions?

20 A. Yes.

21 Q. Are you able to identify anything in
22 this set of answers to interrogatories that is
23 incorrect?

24 A. So right now with my English, I cannot
25 identify them. Can I check later and let you

1 know later?

2 Q. Well, the purpose of the deposition is
3 for today. If he wishes to work with his
4 attorney to amend these at some later time, I
5 guess that's something that they can discuss.

6 But I just want to ask as we're sitting
7 here today, is there anything -- did he -- well,
8 I'll ask it a different way.

9 Did he review these -- did he review
10 these answers to these questions before they were
11 provided to me?

12 A. So are you asking me if I've reviewed
13 this answer to the questions?

14 Q. Yes.

15 A. Not sure, but we talk together. We
16 talked together.

17 Q. Okay. Relating back to the agreement,
18 which was Exhibit No. 09, did you ever sit down
19 with Yong Wook Park and review a copy of this
20 agreement directly with Yong Wook Park?

21 A. So this document, lawyer for the Parks,
22 Yong Park, not great person. The lawyer for
23 Mr. Park made this agreement; and then later on
24 in Myrtle Beach, both worked on together. And
25 Yong Wook Park's lawyer was this man.

1 Q. When you say you worked on it together,
2 do you mean you and Mr. Wilson?

3 A. No. This paper, the Yong's lawyer
4 prepared and brought this. So Yong, again, I
5 said let's do it. I think that's how it said.

6 Q. Okay. Other than agreeing to sign the
7 document, did you have any other discussion with
8 Yong Wook Park about the specific wording of the
9 agreement?

10 A. So, no. First things, like I hating
11 from the very beginning with this stuff. Just
12 sign that, you know, you lawyers and you have to
13 answers to those question. I have a limited
14 English. I'm an immigrant. Then if I -- you
15 have to do those things, you use the words on
16 everything. That stuff is really unnecessary.
17 If I knew how to do it, it would just be
18 unnecessary.

19 Q. Okay. And I'm just going to -- just for
20 clarification, did you ever sit down with Yong
21 Wook Park to discuss the draft document that the
22 attorneys had prepared?

23 A. Yes. At the business of this, I talked
24 once or twice.

25 Q. And that was prior to signing the

1 document?

2 A. Before signing?

3 Q. Yes.

4 A. I think so. Yes. Yes. The day of
5 signing --

6 Q. So are you saying that you had a meeting
7 on the day of signing in which you and Park
8 agreed that you would sign?

9 A. Yeah. I signed it. That is correct.

10 MR. LESEMANN: All right. Well, I don't
11 have any further questions for the witness. And,
12 Karen, I don't know if you wanted to -- since
13 I've asked everything more than once --

14 THE WITNESS: Thank you.

15 MR. LESEMANN: Tina, thank you very
16 much. I think that we're --

17 MS. DEJONG: I just have one question.

18 MR. LESEMANN: So, Tina, we have one
19 question that the plaintiff's attorney, Karen,
20 would like to ask. So we will need you for that.

21 EXAMINATION

22 BY MS. DEJONG:

23 Q. Mr. Lee, at the time that this agreement
24 was signed, did you think it was a fair division
25 of the property, including the debt?

1 THE INTERPRETER: Can you repeat that,
2 please?

3 Q. I said, Mr. Lee, at the time you signed
4 this agreement, did you believe that it was a
5 fair division of the properties, taking into
6 account the debt?

7 THE WITNESS: Not fair. So the --

8 A. I'd say it was not fair.

9 Q. But at the time you signed it, did you
10 think it was fair?

11 A. At the time I did not even think of that
12 kind of a question because I -- I stated many
13 times. My wife was saying that -- let's go
14 smoothly for the peace of the family. So let's
15 just do it, you know, without going through, you
16 know, details. So then read my our, like my
17 English, it's really hard to understand this kind
18 of a document. It's very hard to do it.

19 MS. DEJONG: I have no further
20 questions.

21 MR. LESEMAN: Okay. Tina, now we're
22 done. Thank you.

23 (The deposition concluded at 5:51 p.m.)

24 - - -

25

1 CERTIFICATE OF REPORTER
2 STATE OF SOUTH CAROLINA
3 COUNTY OF HORRY

4 I, Ronda K. Blanton, a Registered
5 Professional Reporter and Notary Public for the
6 State of South Carolina at Large, do hereby
7 certify that the witness in the foregoing
8 deposition was by me duly sworn to testify to the
9 truth, the whole truth, and nothing but the truth
10 in the within-entitled cause; that said
11 deposition was taken at the time and location
12 therein stated; that the testimony of the witness
13 and all objections made at the time of the
14 examination were recorded stenographically by me
15 and were thereafter transcribed by computer-aided
16 transcription; that the foregoing is a full,
17 complete, and true record of the testimony of the
18 witness and of all objections made at the time of
19 the examination; and that the witness was given
20 an opportunity to read and correct said
21 deposition and to subscribe the same.

22 Should the signature of the witness not be
23 affixed to the deposition, the witness shall not
24 have availed himself/herself of the opportunity
25 to sign or the signature has been waived.

I further certify that I am neither related
to nor counsel for any party to the cause pending
or interested in the events thereof.

Witness my hand, I have hereunto affixed my
official seal on April 11, 2019, at Myrtle Beach,
Horry County, South Carolina.

Ronda K. Blanton
NCRA REGISTERED PROFESSIONAL
REPORTER, RPR
Notary Public,
State of South Carolina at Large
My Commission expires:
May 15, 2028.

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Pause (1)	pre (1)	rants (1)	repeat (19)
pay (22)	premium (9)	read (29)	REPORTED (2)
paying (3)	Premiums (1)	reading (7)	REPORTER (5)
payment (5)	prepared (2)	ready (1)	reporting (3)
payments (4)	preparing (1)	really (11)	represent (1)
payoff (1)	presence (1)	realtor (4)	representation (7)
pays (1)	PRESENT (3)	realtors (1)	representations (11)
peace (2)	pretty (1)	reask (1)	represented (2)
pending (1)	previous (1)	reason (4)	representing (2)
people (25)	previously (1)	reasonable (1)	request (6)
percent (4)	price (3)	reasons (1)	requests (1)
percentage (1)	print (1)	recall (26)	require (1)
performing (1)	printout (1)	receive (1)	required (3)
period (2)	prior (25)	received (3)	requires (3)
permission (2)	probably (3)	Recess (2)	Respectfully (1)
person (17)	problem (11)	recommending (1)	respond (1)
personal (8)	proceed (1)	reconvening (1)	responded (1)
personally (5)	proceedings (1)	record (2)	responding (1)
personnel (1)	PROFESSIONAL (9)	recorded (2)	responses (1)
petition (1)	professionals (1)	records (1)	responsible (1)
PHONE (8)	promise (1)	recover (1)	rest (4)
phonetic (3)	proof (4)	refer (1)	restaurant (31)
pianos (1)	proper (2)	reference (1)	restaurants (16)
pick (1)	properties (17)	referenced (1)	result (1)
P-I-S-I (1)	property (5)	referring (8)	retired (1)
place (4)	propose (2)	refers (5)	returned (1)
plain (1)	provide (8)	reflected (1)	returns (5)
Plaintiff (6)	provided (4)	refuse (1)	revenues (2)
plaintiff's (2)	provision (3)		review (17)
plan (1)			reviewed (3)

Richard (5)	set (2)	start (4)	talks (2)
right (36)	settled (1)	started (7)	Tang (1)
righteous (1)	seven (5)	starting (3)	tasks (2)
rights (1)	seventh (1)	STATE (5)	tax (10)
Road (3)	shirt (1)	stated (4)	taxes (1)
Rodriguez (6)	short (4)	statement (8)	Teal (2)
RONDA (3)	shorter (1)	Statements (7)	telephone (2)
room (1)	Show (7)	States (20)	television (1)
Rose (5)	showing (4)	status (1)	tell (13)
RPR (2)	shows (2)	staying (1)	telling (1)
run (3)	side (2)	stenographically (1)	tenant (1)
running (4)	sign (33)	sticker (1)	tentative (1)
< S >	signature (5)	stop (2)	terms (1)
safe (1)	signed (59)	story (3)	test (4)
sale (4)	signing (7)	Street (2)	testament (1)
sales (4)	silly (1)	stressed (1)	testified (1)
sat (1)	simple (7)	study (1)	testify (1)
satisfied (2)	single (2)	stuff (3)	testimony (4)
Saturday (1)	Sir (11)	submit (1)	testing (1)
saved (1)	sister (4)	subpoena (1)	text (1)
saving (2)	sisters (1)	subpoenaed (1)	Thank (19)
savings (1)	sit (3)	subscribe (2)	thereof (1)
saw (4)	sitting (1)	sued (1)	thin (1)
saying (12)	six (3)	suggest (2)	thing (25)
says (6)	small (2)	suit (1)	things (33)
SC (4)	smoothly (1)	Suite (2)	think (95)
school (2)	SOB (1)	summary (1)	thinking (1)
schools (1)	sold (12)	Summerville (1)	third (3)
seal (1)	sole (4)	Sun (1)	thought (12)
searched (1)	son (2)	Sunday (1)	three (23)
searching (1)	soon (1)	SUNNY (50)	TIME (69)
second (3)	sorry (6)	Sunny's (1)	times (10)
section (9)	sort (1)	suppliers (1)	Tina (12)
sections (1)	source (1)	supply (1)	title (7)
see (5)	SOUTH (14)	support (2)	today (10)
seeing (2)	speak (10)	supposed (10)	told (7)
seeking (1)	speaking (6)	sure (20)	total (1)
seen (2)	speaks (1)	surrendering (1)	traction (1)
sell (10)	special (1)	suspicious (2)	transaction (29)
selling (1)	Specific (8)	sworn (3)	transcribed (1)
sense (6)	specifically (6)	< T >	transcript (2)
sentences (1)	spell (2)	tables (1)	transcription (1)
separate (2)	spelling (2)	take (13)	transfer (1)
separating (2)	spend (3)	taken (4)	translate (5)
September (1)	spending (2)	talk (17)	translated (4)
series (3)	spent (4)	talked (10)	translating (1)
services (2)	spoke (2)	talking (7)	translator (9)
	spoken (2)		tried (5)

trouble (1)	void (2)	WWW.CLARK-
true (4)	voided (1)	ASSOCIATES.COM
trust (8)	vs (1)	(1)
trusted (6)	< W >	< Y >
trusting (1)	Wait (3)	Yeah (10)
truth (3)	waiting (1)	Year (27)
try (3)	waived (1)	year-and-a-half (1)
trying (7)	walk (1)	years (12)
Tsunami (41)	want (45)	Yo (1)
turn (1)	wanted (7)	Yokoso (27)
turned (1)	watch (4)	YONG (60)
TV (1)	watching (1)	Yong's (2)
Twice (3)	way (7)	young (1)
two (14)	week (1)	younger (2)
type (1)	Weeks (7)	
< U >	weird (1)	
uh-huh (1)	Well (16)	
unbalanced (1)	went (17)	
Unconditional (4)	We're (7)	
underlined (1)	West (3)	
understand (54)	We've (3)	
understanding (7)	wife (18)	
understood (7)	wife's (3)	
Unison (1)	Wigger (1)	
Unit (3)	willing (1)	
United (8)	Wilmington (1)	
University (8)	Wilson (11)	
Unlimited (1)	Wing (3)	
unnecessary (2)	wire (1)	
unreasonable (1)	wise (3)	
upper (1)	wishes (1)	
upset (1)	within-entitled (1)	
upstairs (2)	WITNESS (42)	
use (10)	witnesses (1)	
Usually (13)	WOOK (44)	
< V >	wording (1)	
vacations (1)	words (7)	
value (11)	work (17)	
values (5)	worked (4)	
various (3)	working (4)	
vehicles (2)	works (3)	
vendors (1)	worth (2)	
verbal (5)	write (2)	
Virginia (18)	written (5)	
vision (1)	wrong (9)	
visit (1)	wrote (1)	