Exhibit B

41

in this case there are alternative potential points at which a conspiracy that was successful in substantially impacting prices may have ended. The first is the beginning of 2005 at which time high level Samsung employees were apparently told not to participate in any price-fixing agreements.[135] The second is around January 2006 when Samsung began to cooperate with the DOJ in its investigation into price-fixing in the TFT-LCD industry.[136] The third and final potential end point is when the conspiracy became public in December 2006.[137]

110. In order to determine the end date of my overcharge calculations, I examine the prices predicted from the post-conspiracy model with actual prices paid by Dell over the period from the fourth quarter of 2001 through the fourth quarter of 2006 for each of the panels purchased by Dell from the conspirators for which I was able to obtain DisplaySearch cost data.[138] As explained above, the model predicts prices quite well during the post-conspiracy period. During 2005 and 2006, the model does not indicate persistent overcharges. For the fourth quarter of 2001 through 2004, however, there is a persistent divergence between the prices predicted by the model and the actual (higher) prices paid by Dell.

111. Because the model does not fit the data well between the first quarter of 2005 and the end of 2006, I do not calculate any overcharges for this period. The relatively poor modeling fit during this period (yet persistent overcharges prior to this) is consistent with the effectiveness of the cartel diminishing after Samsung informed high level employees to stop engaging in price-fixing agreements. I calculate overcharges only through the fourth quarter of 2004. Combined with my choice of starting period, this leads to an

---

[135] Deposition of Heon Seong Kim (Volume I), July 14, 2010, at pages 107-108; Deposition of Hong Bum Suh (Volume I), March 9, 2010, at pages 40-42.

[136] SAML 815331.

[137] "LCD Price-Fixing Probe Widens," *BetaNews*, dated December 12, 2006.

[138] As noted above, the overcharge model is run with prices converted into natural logs. Thus, the predictions from the model must be transformed into levels. Simply taking an exponential of the predicted price in logs is capable of leading to an underestimate of the predicted values in levels. To account for this, I use a transformation described in Wooldridge (2010). See Jeffrey M. Wooldridge, *Introductory Econometrics, a Modern Approach*, 4th Edition, 2010, at page 211 at equation 6.40. This results in an upward adjustment in the calculated "but-for" price and, therefore, a downward adjustment in the calculated overcharges.