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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

RICHARD L. CHANG,

Plaintiff,

v.

BIOSUCCESS BIOTECH CO., LTD., and DOES 1–10,

Defendants.

BIOSUCCESS BIOTECH CO., LTD.,

Counterclaimants,

v.

RICHARD L. CHANG and DOES 1–10,

Counter-Defendants.

Case No. CV13-01340 JAK (ANx)

DECLARATION OF ENOCH H. LIANG IN SUPPORT OF DEFENDANT BIOSUCCESS BIOTECH CO., LTD.'S MOTIONS IN LIMINE **NOS. 1-4**

Judge: Hon. John A. Kronstadt
Place: Courtroom 750
Date: June 2, 2014
Time: 3:00 p.m.

Trial: June 17, 2014

DECLARATION OF ENOCH H. LIANG

I, ENOCH H. LIANG, declare as follows:

1. I am an attorney duly admitted to practice before this Court and an attorney in the law firm Lee Tran & Liang LLP, counsel of record herein for Defendant Biosuccess Biotech Co., Ltd ("Biosuccess"). I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Biosuccess's Motions in Limine Nos. 1-4.

3. Attached hereto as **Exhibit A** is a true and correct copy of the April 21, 2014 Hearing Transcript before this Court.

4. Without intending to waive attorney client privilege, I am attaching hereto as **Exhibits B and C** true and correct copies of redacted emails sent by Jeffrey King to Biosuccess's CEO Fred Wu, who later forwarded those emails to me. Exhibit B is a Feb. 8, 2013 email sent by King; Exhibit C is a May 8, 2013 email sent by King.

5. Attached hereto as **Exhibit D** are the USPTO Rules of Conduct, 37 C.F.R. Part 11.

6. Attached hereto as **Exhibit E** are the Washington State Rules of Professional Conduct, which I retrieved on May 5, 2014 from http://www.courts.wa.gov/court_rules/?fa=court_rules.list&group=ga&set=RPC.

7. Attached hereto as **Exhibit F** is Volume II of the Transcript of the Deposition of Fred Wu, held in Los Angeles, California on March 7, 2014.

8. Attached hereto as **Exhibit G** is Plaintiff Chang's Third Set of Requests for Admissions to Biosuccess.

9. Attached hereto as **Exhibit H** is a true and correct copy of the USPTO Manual of Patent Examining Procedure Section 711, which I retrieved on May 5, 2014 from http://www.uspto.gov/web/offices/pac/mpep/s711.html.

10. Attached hereto as **Exhibit I** is a true and correct copy of the USPTO Filing Years and Patent Application Serial Numbers, which I retrieved on May 5, 2014 from http://www.uspto.gov/web/offices/ac/ido/oeip/taf/filingyr.htm.

11. Attached hereto as **Exhibit J** is a true and correct copy of the USPTO Explanation of Provisional Patent Applications, which I retrieved on May 5, 2014 from http://www.uspto.gov/patents/resources/types/provapp.jsp.

12. Attached hereto as **Exhibit K** is a true and correct copy of pages 1-3 of Plaintiff Richard Chang's Expert Designation.

13. Attached hereto as **Exhibit L** is a true and correct copy of the parties' March 15, 2014 meet and confer email.

14. Attached hereto as **Exhibit M** is a true and correct copy of the USPTO records on May 1, 2014 for the three patent applications at issue.

15. Attached hereto as **Exhibit N** is a true and correct copy of the February 18, 2014 Subpoena for Documents only to Sughrue Mion.

16. Attached hereto as **Exhibit O** is a true and correct copy of the Transcript of the March 7, 2014 Deposition of Richard Chang.

17. Attached hereto as **Exhibit P** is a true and correct copy of the Transcript of the March 3, 2014 Deposition of Richard Chang.

18. Attached hereto as **Exhibit Q** is a true and correct copy of the January 3, 2014 Plaintiff Chang state court complaint against Dr. Han, which was later removed to the Northern District of California.

19. Attached hereto as **Exhibit R** is a true and correct copy of Judge Davila's April 21, 2014 Order Denying Remand.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed this 5th day of May, 2014, at South San Francisco, California.

/s/ Enoch H. Liang
Enoch H. Liang, Esq.