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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RICHARD L. CHANG, Plaintiff, v. BIOSUCCESS BIOTECH, CO., LTD., and DOES 1 through 10, Defendants.	Case No. CV13-01340 JAK (ANx) **NOTICE OF WITHDRAWAL OF DEFENDANT'S EX PARTE APPLICATION TO QUASH PLAINTIFF'S THIRD PARTY SUBPOENA [Dkt No. 89]**
BIOSUCCESS BIOTECH, CO., LTD., Counterclaimants, v. RICHARD L. CHANG, and DOES 1 through 10, Counter-Defendants.	***[DISCOVERY MATTER]*** Hon: Arthur Nakazato Place: Courtroom 6B Date: NONE Time: N/A

NOTICE OF WITHDRAWAL OF EX PARTE APPLICATION

Defendant Biosuccess hereby withdraws its *ex parte* application seeking to quash Plaintiff's December 30, 2013 third party subpoena to Defendant's former patent counsel Patent Networks Law Group PLLC (which called for production of attorney-client and work product privileged documents by January 14, 2014) for the following reason(s):

- Today, Plaintiff voluntarily withdrew its December 30, 2013 third party subpoena to Patent Networks;
- Today, Plaintiff issued a second third party subpoena to Patent Networks, calling for production of documents by January 27, 2014; and
- The parties' counsel are continuing to meet and confer in good faith in order to reach a stipulation regarding how to deal with attorney-client privileged and attorney work product documents called for by Plaintiff's third party subpoena to Patent Law Networks.

However, given the short timing of the called-for production in the third party subpoena to Patent Networks, Defendandant reserves all rights and remedies to seek court intervention—including on an *ex parte* basis—on Plaintiff's third party subpoena issued today.

Dated: January 15, 2014

Respectfully Submitted,

LEE TRAN LIANG & WANG LLP

By: /s/ Enoch H. Liang
Enoch H. Liang
Attorneys for Defendant
BIOSUCCESS BIOTECH, CO., LTD.