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4 Attorney for Applicant
Starship Entertainment Co., Ltd.

5 UNITED STATES DISTRICT COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 SAN JOSE DIVISION

8 *In re Ex Parte* Application of)
9) Case Number: 23-mc-80147-BLF
Starship Entertainment Co., Ltd.,)
10) **DECLARATION OF KYONGSOK**
Applicant.) **CHONG IN SUPPORT OF STARSHIP**
11) **ENTERTAINMENT CO., LTD.’S**
12) **REQUEST FOR PERMISSION TO ISSUE**
13) **NEW SUBPOENA TO GOOGLE LLC**
14)
15)
16)

17 I, Kyongsok Chong, declare as follows:

18 1. I am more than 21 years of age, am competent to testify on the matters stated in this
19 declaration, and, except as may be otherwise stated in this declaration, have personal knowledge
20 of the matters stated in this declaration.

21 2. I am an attorney licensed to practice law in the Republic of Korea, and I am the
22 Executive Partner at the LIWU Law Group in Seoul, Republic of Korea.

23 3. In Korean civil cases, to proceed with the civil case and to enforce a judgement, a
24 party must be identified and confirmed by his or her name, address, and date of birth.

25 4. A Korean civil case may be filed against an anonymous party where the identity of
26 the party is unknown, but the case must be amended with the name, address, and date of birth
27 during the course of the case; otherwise, the civil lawsuit will be dismissed by the court.
28

1 5. Pursuant to the discovery provided by Google LLC (hereinafter “**Google**”) in this
2 case, Starship Entertainment Co., Ltd. (hereinafter “**Applicant**”) has obtained names and addresses
3 that were registered to an associated AdSense account.

4 6. The names “park jimin” and “박주아” (“park joo-ah” in English) that were
5 obtained through the discovery are very common names in Korea, and there may be many people
6 with these same names.

7 7. The AdSense account also contained two physical addresses.

8 8. It is unclear whether either of the foregoing two individuals reside at the two
9 addresses.

10 9. While the Applicant may attempt to serve the complaint in the Korean civil case at
11 the addresses, and even if park jimin or park joo-ah reside at the addresses provided, if those
12 individuals deny that they are the owners or operators of the YouTube channels at issue (the
13 individuals may simply say that their names are coincidentally the same, and that their addresses
14 were misused), then it will be impossible for the Applicant to prove that the individuals are the
15 owners or operators of the YouTube channels, without the dates of birth of the individuals.

16 10. The most important information to identify a party in a Korean civil case is the
17 name of the individual and the date of birth of the individual, with the address being of less
18 importance.

19 11. If the Applicant can obtain the names and dates of birth of the anonymous
20 individuals, then the Applicant can seek a court order to obtain the registered address of the
21 anonymous individual from the local government using the names and dates of birth, because every
22 person in Korea is required to register their residential address with the local government.

23 12. On the other hand, with only a name and address, the court may issue an order for
24 the local government to disclose the identity of the person; however, the local government will be
25 unable to disclose the registered information of the person if there are multiple individuals in Korea
26 with the same name or if the addresses were misused, incorrect, or do not exist.

