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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

CSPC DOPHEN CORPORATION,
Plaintiff,
v.
ZHIXIANG HU,
Defendant.

No. 2:17-cv-01895-DAD-DB (PS)

TENTATIVE PRETRIAL ORDER

ZHIXIANG HU,
Counter Claimant,
v.
CSPC DOPHEN CORPORATION,
Counter Defendant.

On January 9, 2024, the court conducted a final pretrial conference in this case. Bryan J. Wilson and Yue Li appeared as counsel for plaintiff; defendant Dr. Zhixiang Hu appeared on behalf of himself. Having considered the parties’ joint pretrial statement and the views of the parties as expressed at the conference, the court issues this tentative pretrial order.

This case arises from a dispute between a pharmaceutical research and development company—plaintiff and counter defendant CSPC Dophen Corporation—and its former employee—defendant and counter claimant Dr. Zhixiang Hu—who allegedly secretly

1 incorporated a competing entity while still employed at CSPC Dophen Corporation, using CSPC
2 Dophen's d/b/a name "Dophen Biomed" and physical laboratory address. Plaintiff alleges that
3 defendant misrepresented that Dophen Biomed was the same as CSPC Dophen and
4 misappropriated CSPC Dophen's confidential, proprietary, and trade secret information. Plaintiff
5 asserts claims for breach of contract, breach of duty of loyalty, misappropriation of trade secrets,
6 and conversion. Dr. Hu's counterclaims allege that the counter-defendant CSPC Dophen
7 Corporation engaged in deceptive practices to unlawfully acquire Dr. Hu's mTgase site-specific
8 conjugation technology, promising him company ownership but failing to deliver on its
9 commitments. Furthermore, Dr. Hu claims that CSPC Dophen defaulted on his rightful
10 compensation, including salary, vacation pay, incentive stock shares, and stock dividends. Dr.
11 Hu's counterclaims are for breach of contract, violation of California Business & Professions
12 Code § 17200 *et seq.*, violation of California Labor Code § 203, and breach of fiduciary today.

13 I. JURISDICTION/VENUE

14 Jurisdiction is predicated on 28 U.S.C. §§ 1331, 1367. Jurisdiction is not contested.

15 Venue is proper pursuant to 28 U.S.C. § 1391(b). Venue is not contested.

16 II. JURY

17 Defendant Dr. Hu demanded a jury trial in the Joint Notice of Trial Readiness. (Doc. No.
18 323.) Plaintiff CSPC Dophen does not request a jury trial. The jury will consist of eight jurors,
19 although the court may adjust that number depending upon conditions in existence at the time of
20 the trial.

21 III. UNDISPUTED FACTS

22 1. Dr. Hu was an employee of CSPC Dophen.

23 IV. DISPUTED FACTUAL ISSUES¹

24 1. Whether CSPC Dophen hired Dr. Hu in October 2011 as director of CSPC
25 Dophen's Laboratory at 4070 Truxel Road, Sacramento, California.

26 ¹ As discussed at the pretrial conference, if Dr. Hu intends to list additional disputed facts not
27 already listed here, he may include them in his objections to this tentative pretrial order.
28 However, the court reminds Dr. Hu that each fact should be listed in a concise, one-sentence
format, not lengthy paragraphs, and should remain focused on factual content, not arguments.

1 2. Whether Dr. Hu’s employment agreement states “[a]ll CSPC employees are
2 required to execute a Non-Disclosure Agreement and an Intellectual Property Agreement.”

3 3. Whether Dr. Hu signed a Non-Disclosure Agreement (“NDA”) on April 4, 2013,
4 which states:

5 I will observe the strictest secrecy with respect to the Trade Secrets
6 disclosed to me and all information generated therefrom and will take
7 all affirmative steps necessary to maintain the trade secrets status of
8 the Trade Secrets. I will neither make use of nor disclose to third
9 parties the Trade Secrets, unless prior consent in writing is given by
10 the Company during the terms of my employment with the Company
11 and thereafter in any employment or business venture. I agree I will
12 never, directly or indirectly, for myself or others, use disseminate,
13 disclose, lecture upon, or otherwise make available to others any
14 confidential information, whether or not such confidential
15 information thereafter in whole or part becomes available to the
16 public. My agent(s), servant(s), employer(s), employee(s) and all
17 persons acting therefore also disclaim any claim of right in and to
18 such confidential information.

19 4. Whether Dr. Hu also signed a Policy of Conflict of Interest on April 4, 2013,
20 which states:

21 I will not engage in any conduct which would create a potential or
22 actual conflict of interest or create the appearance of such a conflict
23 in my employment relationship with the Company. Such conduct
24 includes, without limitation, divulging the Company’s trade secrets
25 for my own personal gain, seek employment with the Company’s
26 business competitors while still employed by the Company, usurping
27 the business opportunity of the company and any other activity which
28 may directly or indirectly harm the Company.

1 5. Whether, in April of 2014, while still employed by CSPC Dophen, Dr. Hu
2 incorporated an entity called Dophen Biomed, Inc. and listed the address as 4070 Truxel Road,
3 Sacramento, California.

4 6. Whether, Dophen Biomed, Inc.—founded by Dr. Hu—is affiliated with CSPC
5 Dophen.

6 7. Whether Dr. Hu applied for grants from the National Institutes of Health in the
7 name of Dophen Biomed, Inc.

8 8. Whether the National Institutes of Health grant filed by Dr. Hu under Dophen
9 Biomed, Inc. included research data and results of the DP303c drug candidate.

10 /////

1 9. Whether Dr. Hu submitted an Investigational New Drug (“IND”) application (IND
2 #130699) to the Food and Drug Administration under the name Dophen Biomed, Inc.

3 10. Whether CSPC Dophen entered into valid contracts with Dr. Hu (including the
4 employment agreement, NDA, and Conflict of Interest Policy).

5 11. Whether Dr. Hu took or used without authorization CSPC Dophen’s confidential,
6 proprietary, and/or trade secret information.

7 12. Whether Dr. Hu prevented CSPC Dophen from accessing its email accounts.

8 13. Whether Dr. Hu misappropriated CSPC Dophen’s funds, including depositing
9 CSPC Dophen’s revenues into Dophen Biomed, Inc.’s bank account.

10 14. Whether Dr. Hu incorporated Dophen Biomed, Inc., using CSPC Dophen’s d/b/a
11 name and address and misrepresented that Dophen Biomed, Inc. was part of CSPC Dophen.

12 15. Whether Dr. Hu took or used without authorization CSPC Dophen’s confidential,
13 proprietary, and/or trade secret information.

14 16. Whether Dr. Hu misappropriated CSPC Dophen’s funds, including depositing
15 CSPC Dophen’s revenues into Dophen Biomed, Inc.’s bank account.

16 17. Whether Dr. Hu usurped the business opportunity of CSPC Dophen.

17 18. Whether CSPC Dophen owns confidential information relating to the drug
18 candidate DP303c and antibody drug conjugates that derived independent economic value from
19 not being generally known.

20 19. Whether CSPC Dophen took reasonable steps to protect its confidential
21 information.

22 20. Whether Dr. Hu improperly acquired or used CSPC Dophen’s trade secrets
23 without authorization.

24 21. Whether Dr. Hu’s misappropriation was willful and malicious.

25 22. Whether Dr. Hu took control over CSPC Dophen’s email, computers, storage
26 devices, and payments from third parties without consent.

27 23. Whether Dr. Hu had an agreement with CSPC Dophen, not CSPC Limited, to
28 award Dr. Hu stock in CSPC Limited.

1 24. If such agreement exists, whether Dr. Hu performed under this agreement, despite
2 creating a competing entity using CSPC Dophen's d/b/a name and misappropriating CSPC
3 Dophen's confidential, proprietary, and/or trade secret information.

4 25. Whether CSPC Dophen's actions, not those of CSPC Limited, constituted
5 unlawful or fraudulent business practices.

6 26. Whether CSPC Dophen willfully failed to pay Dr. Hu's wages and unpaid vacation
7 time on his last day of employment.

8 27. Whether CSPC Dophen, the employer, owed Dr. Hu, the employee, a fiduciary
9 duty.

10 28. Whether CSPC-Dophen was registered by CSPC Limited in NJ and was doing
11 business in California.

12 29. Whether Dr. Hu was a research manager at Novozymes at Davis, a wholly owned
13 subsidiary of the Novo Nordisk Foundation.

14 30. Whether CSPC-Dophen solicited Dr. Hu to start a joint-venture company to work
15 on biological drugs based on Dr. Hu's transglutaminase conjugation technology (referred as
16 mTgase technology).

17 31. Whether, in its initial job offer, CSPC-Dophen required Dr. Hu's to transfer his
18 two mTgase patents to CSPC-Dophen as pre-requisition to join CSPC-Dophen.

19 32. Whether Dr. Jinxu Wang was the CEO of CSPC-Dophen.

20 33. Whether Dr. Jinxu Wang was the executive VP of CSPC Limited.

21 34. Whether Dr. Jinxu Wang was a board member of CSPC-Dophen.

22 35. Whether Dr. Jinxu Wang was a board member of CSPC Limited.

23 36. Whether Yingui Li was the VP of CSPC-Dophen.

24 37. Whether Yingui Li was the business director of CSPC Limited.

25 38. Whether Yingui Li was a board member of CSPC-Dophen.

26 39. Whether Dongchen Cai is the chairman and board member of both CSPC Dophen
27 and CSPC Limited.

28 40. Whether Jumin Sun was the Director of Finance of CSPC Limited.

- 1 41. Whether Jumin Sun was in charge of CSPC-Dophen's finance.
- 2 42. Whether CSPC Limited is a Chinese company.
- 3 43. Whether CSPC-Dophen was 100% owned by CSPC Limited.
- 4 44. Whether Dr. Hu was an employee of CSPC-Dophen and a vice president of CSPC
5 Limited, managing CSPC-Dophen on behalf of CSPC Limited.
- 6 45. Whether Dr. Hu's salary was paid one half in the USA by CPSC-Dophen, and one
7 half by CSPC Limited as arranged by CSPC Dophen since November 2011.
- 8 46. Whether, in March 2013, CSPC-Dophen awarded Dr. Hu stock options to
9 purchase 500,000 IPO shares of CSPC Stock at ¥1 per share. As part of the agreement, on April
10 4, 2013, Dr. Hu was asked to sign the NDA and Intellectual Property Agreement in exchange for
11 the stock options.
- 12 47. Whether on September 17, 2013, Dr. Hu purchased his stock option award,
13 500,000 CSPC IPO shares.
- 14 48. Whether CSPC Limited paid dividends based on 2 million common shares for
15 years 2013, 2014, and 2015.
- 16 49. During 2013, CSPC Limited encountered financial challenges, leading CSPC
17 Dophen to terminate two-thirds of its 15 employees-workforce. Moreover, the company was
18 three months overdue on its lab construction payment. Yingui Li and Dongchen Cai gave Dr. Hu
19 a mandate to explore viable solutions for CSPC-Dophen to attain self-sufficiency by the year
20 2014.
- 21 50. In an effort to diversify funding sources for CSPC Dophen, Dr. Jinxu Wang came
22 to Sacramento on April 17, 2014, to authorize Jasmine Xiong to register a US business entity to
23 apply for government funding. On April 21, 2014, Jasmine Xiong registered Dophen Biomed,
24 Inc., as part of this strategic initiative.
- 25 51. Whether, on June 12, 2014, Dophen Biomed filed an Antibody-Drug Conjugate
26 patent based on Dr. Hu's mTgase technology via Janet Xiao, a lawyer from Morrison Foerster.
- 27 52. Whether Dophen Biomed was awarded a Small Business Innovation Research
28 grant from NIH worth over \$1.2 million in early 2016.

1 53. Whether, in 2016, an online file sharing account was created by Dr. Hu to share
2 and deposit all IND enabling files related an Antibody-Drug Conjugate drug candidate named
3 DP303c. Whether all team members, plus Dr. Jinxu Wang and an external consultant were given
4 access.

5 54. Whether in April 2017, Dophen Biomed, with Jinxu Wang presence at the facility,
6 submitted an IND application to FDA for DP303c.

7 55. Whether on July 4, 2017, Jinxu Wang and Yingui Li traveled to California and
8 presented a termination package to Dr. Hu, suggesting Dr. Hu to continue working for CSPC
9 Dophen on a temporary basis as a consultant.

10 56. Whether on July 21, 2017, CSPC Dophen officially terminated Dr. Hu's
11 employment and then failed to pay Dr. Hu's 1.5 months' salary until October 9, 2017.

12 57. Whether on November 23, 2020, CSPC-Dophen fired its entire work force and
13 terminated its business registration in California, transferring everything to CSPC Limited in
14 China.

15 58. Whether on October 27, 2021, CSPC-Dophen's 4070 Truxel Lab was sold to
16 JOINN for \$4.5 million by CSPC Dophen Delaware.

17 59. Whether CSPC Dophen Delaware, registered by CSPC Limited, has no employee
18 nor physical presence in US.

19 60. Whether, on July 28, 2022, CSPC Limited entered into a \$1.2 billion deal with
20 Elevation Oncology, granting them global rights to an Antibody-Drug Conjugate drug that was
21 developed using Dr. Hu's Antibody-Drug Conjugate Patent.

22 61. Whether on February 14, 2023, CSPC Limited licensed the US/Europe rights for
23 its Antibody-Drug Conjugate drug CRB-701 for \$892.5 million, once again based on Dr. Hu's
24 Antibody-Drug Conjugate patent.

25 62. Whether on May 31, 2023, CSPC Dophen hastily issued a settlement check of
26 \$1319 to Dr. Hu, which was intended as a means to intimidate him.

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1 V. DISPUTED EVIDENTIARY ISSUES/MOTIONS IN LIMINE

2 The parties have not yet filed motions *in limine*. The court does not encourage the filing
3 of motions *in limine* unless they are addressed to issues that can realistically be resolved by the
4 court prior to trial and without reference to the other evidence which will be introduced by the
5 parties at trial. The parties anticipate filing the motions *in limine* listed below. Any motions *in*
6 *limine* counsel elects to file shall be filed no later than **28 days before trial**. Opposition shall be
7 filed no later than **21 days before trial** and any replies shall be filed no later than **14 days before**
8 **trial**. Upon receipt of any opposition briefs, the court will notify the parties if it will hear
9 argument on any motions *in limine* prior to the first day of trial.

10 Plaintiff's Anticipated Motions in Limine

11 1. Dr. Hu should be precluded from introducing any evidence or arguments
12 concerning dismissed parties: CSPC Pharmaceutical Group Limited ("CSPC Limited"), Yingui
13 Li, Jinxu Wang, Jumin Sun, and Dongchen Cai. Dr. Hu also should be precluded from raising
14 new claims and allegations against CSPC Limited, which are irrelevant and were forfeited by Dr.
15 Hu's failure to plead them in his counterclaims.

16 2. Dr. Hu should be precluded from presenting any evidence or arguments
17 concerning dismissed claims.

18 3. Dr. Hu should be precluded from arguing that CSPC Dophen or its parent is a
19 Chinese company. CSPC Dophen is not a Chinese company. Its parent, CSPC Limited, has been
20 dismissed.

21 4. Dr. Hu should be precluded from introducing any evidence or arguments that
22 disparage CSPC Dophen or its counsel.

23 5. Dr. Hu should be precluded from making any arguments that suggest CSPC
24 Dophen engaged in illegal activities or is under criminal investigation.

25 6. Dr. Hu should be precluded from arguing that CSPC Dophen breached the
26 employment contract by failing to pay his wages, unused vacation, or benefits. Without agreeing
27 with this assertion, CSPC Dophen tendered payment for the remaining \$1,319.64 claimed by Dr.
28 Hu on May 31, 2023, thereby resolving Dr. Hu's breach of contract claim. Dr. Hu should be

1 precluded from arguing he is owned stock because his allegations of a purported contract
2 involving stock options are against CSPC Limited, a dismissed party.

3 7. Dr. Hu should be precluded from offering evidence or arguments regarding patents
4 that he filed before his employment with CSPC Dophen and other alleged intellectual property
5 that he obtained before his employment with CSPC Dophen. Dr. Hu's counterclaims do not
6 allege patent infringement and these arguments are irrelevant and prejudicial.

7 8. Dr. Hu should be precluded from introducing any evidence that he withheld during
8 discovery or presenting any arguments based on evidence he destroyed or withheld.

9 9. Dr. Hu should be precluded from introducing or relying on any evidence that was
10 not produced during discovery.

11 Defendant's Anticipated Motions in Limine

12 1. CSPC Dophen should be precluded from use of exhibits derived from Jiaying
13 Fan's computer, Dr. Hu's cell phone, and SeanHu2020@gmail.com on the grounds of privacy
14 violations.

15 2. CSPC Dophen should be precluded from using the deposition testimony of
16 Jasmine Xiong and Dr. Hu.

17 VI. SPECIAL FACTUAL INFORMATION

18 Pursuant to Local Rule 281(b)(6), in their objections to this tentative pretrial order, the
19 parties shall provide any special factual information within either the disputed or undisputed facts
20 sections as appropriate.

21 VII. RELIEF SOUGHT

- 22 1. Plaintiff seeks monetary damages for violation of state and federal law.
- 23 2. Plaintiff seeks restitution and disgorgement of Dr. Hu's unjust enrichment.
- 24 3. Plaintiff seeks Punitive, exemplary, and enhanced damages.
- 25 4. Plaintiff seeks attorneys' fees and costs.
- 26 5. Plaintiff seeks prejudgment and post-judgment interest as authorized by law.
- 27 6. Plaintiff seeks an order and/or permanent injunction directing Dr. Hu to return all
28 CSPC Dophen's tangible and intangible property.

1 7. Defendant seeks return of his 500,000 CSCP IPO shares purchased via his stock
2 option award, unpaid stock dividends since 2016 plus interests and associated penalties.

3 8. Defendant seeks unpaid unused-vacation time and penalties for CSCP Dophen's
4 intentional withholding of his wages for 3 months after termination plus interest.

5 9. Defendant seeks compensatory, punitive, and enhanced exemplary damages for
6 unlawful and fraudulent business practices by CSCP Dophen. The allegations of unlawful and
7 fraudulent practices include deceiving Dr. Hu through the NDA and IP agreements,
8 misappropriating his patented technology and trade secrets, and using false pretenses to exploit
9 his inventions.

10 10. Defendant seeks license fee recovery. Specifically, he is seeking his rightful
11 portion of the license proceeds generated from the Antibody-Drug Conjugate drug deals executed
12 by CSCP Limited, which obtained the intellectual property (IP) as a result of CSCP Dophen's
13 dissolution.

14 11. Defendant seeks restitution and injunctive relief. Specifically, he seeks the return
15 of his intellectual property (IP), trade secrets, and the Antibody-Drug Conjugate patent, and
16 injunctive relief to prevent CSCP Limited, the successor of CSCP Dophen, from further using or
17 exploiting his IP, trade secrets, or the Antibody-Drug Conjugate patent.

18 12. Defendant seeks attorney fees and expenses incurred during his pro se legal
19 representation.

20 13. Defendant seeks compensatory damages for financial loss suffered as a result of
21 defending CSCP Dophen's frivolous suit including lost business opportunities, reputational
22 damage, or emotional distress.

23 VIII. POINTS OF LAW

24 The claims/counterclaims asserted in this action arise under federal and state law. All of
25 plaintiff's claims are brought against defendant Dr. Hu. All of Dr. Hu's counterclaims remain
26 against CSCP Dophen Corporation only.

- 27 1. The elements of, standards for, and burden of proof in a misappropriation of trade
28 secrets under the Defend Trade Secrets, 18 U.S.C. § 1832(a)(1), cause of action.

- 1 2. The elements of, standards for, and burden of proof in a breach of contract cause
2 of action.
- 3 3. The elements of, standards for, and burden of proof in a breach of duty of loyalty
4 cause of action.
- 5 4. The elements of, standards for, and burden of proof in a breach of fiduciary duty
6 cause of action.
- 7 5. The elements of, standards for, and burden of proof in a conversion cause of
8 action.
- 9 6. The elements of, standards for, and burden of proof in a California Business &
10 Professions Code § 17200 *et seq.* cause of action.²
- 11 7. The elements of, standards for, and burden of proof in a California Labor Code
12 § 203 cause of action.
- 13 8. The elements of, standards for, and burden of proof in an affirmative defense for
14 unclean hands.

15 Trial briefs addressing the points of law implicated by these remaining claims shall be
16 filed with this court no later than **14 days before trial** in accordance with Local Rule 285.

17 ANY CAUSES OF ACTION OR AFFIRMATIVE DEFENSES NOT EXPLICITLY
18 ASSERTED IN THE PRETRIAL ORDER UNDER POINTS OF LAW AT THE TIME IT
19 BECOMES FINAL ARE DISMISSED, AND DEEMED WAIVED.

20 IX. ABANDONED ISSUES

21 CSPC Dophen will not pursue the following claims at trial: violation of Lanham Act,
22 violation of the California Comprehensive Computer Data Access and Fraud Act, California
23 Penal Code § 502, defamation, and unfair competition.³

24 _____

25 ² The court will issue findings of fact and conclusions of law on Dr. Hu’s California Business
and Professions Code § 17200 unfair claim. *See* Section XVIII.

26 ³ As discussed at the pretrial conference, the parties are directed to clarify in their objections to
27 this tentative pretrial order which of their affirmative defenses, if any, have been abandoned. Any
28 claims or affirmative defenses that the parties believe remain for trial must be listed in the points
of law section above to be preserved for trial.

1 X. WITNESSES

2 Plaintiff's witnesses shall be those listed in **Attachment A**. Defendant's witnesses shall
3 be those listed in **Attachment B**. Each party may call any witnesses designated by the other.

4 A. **The court does not allow undisclosed witnesses to be called for any purpose,**
5 **including impeachment or rebuttal, unless they meet the following criteria:**

- 6 (1) The party offering the witness demonstrates that the witness is for the
7 purpose of rebutting evidence that could not be reasonably anticipated at
8 the pretrial conference, or
9 (2) The witness was discovered after the pretrial conference and the proffering
10 party makes the showing required in paragraph B, below.

11 B. Upon the post pretrial discovery of any witness a party wishes to present at trial,
12 the party shall promptly inform the court and opposing parties of the existence of
13 the unlisted witnesses by filing a notice on the docket so the court may consider
14 whether the witnesses shall be permitted to testify at trial. The witnesses will not
15 be permitted unless:

- 16 (1) The witness could not reasonably have been discovered prior to the
17 discovery cutoff;
18 (2) The court and opposing parties were promptly notified upon discovery of
19 the witness;
20 (3) If time permitted, the party proffered the witness for deposition; and
21 (4) If time did not permit, a reasonable summary of the witness's testimony
22 was provided to opposing parties.

23 XI. EXHIBITS, SCHEDULES, AND SUMMARIES

24 Plaintiff's exhibits are listed in **Attachment C**. Defendant's exhibits will be listed in
25 **Attachment D**, but because the list provided was inadequate, it is not included in this tentative
26 pretrial order. In his objections to this tentative pretrial order, defendant Dr. Hu is directed to
27 revise his exhibit list.

28 /////

1 No exhibit shall be marked with or entered into evidence under multiple exhibit numbers,
2 and the parties are hereby directed to meet and confer for the purpose of designating joint exhibits
3 and to provide a list of joint exhibits. All exhibits must be pre-marked as discussed below. At
4 trial, joint exhibits shall be identified as JX and listed numerically, e.g., JX-1, JX-2. Plaintiff's
5 exhibits shall be listed numerically, and defendants' exhibits shall be listed alphabetically.

6 The parties must prepare three (3) separate exhibit binders for use by the court at trial,
7 with a side tab identifying each exhibit in accordance with the specifications above. Each binder
8 shall have an identification label on the front and spine. The parties must exchange exhibits no
9 later than **35 days before trial**. Any objections to exhibits are due no later than **21 days before**
10 **trial**. The final exhibits are due **the Thursday before the trial date**. In making any objection,
11 the party is to set forth the grounds for the objection. As to each exhibit which is not objected to,
12 no further foundation will be required for it to be received into evidence, if offered.

13 **The court does not allow the use of undisclosed exhibits for any purpose, including**
14 **impeachment or rebuttal, unless they meet the following criteria:**

15 A. The court will not admit exhibits other than those identified on the exhibit lists
16 referenced above unless:

17 (1) The party proffering the exhibit demonstrates that the exhibit is for the
18 purpose of rebutting evidence that could not have been reasonably
19 anticipated, or

20 (2) The exhibit was discovered after the issuance of this order and the
21 proffering party makes the showing required in paragraph B, below.

22 B. Upon the discovery of exhibits after the discovery cutoff, a party shall promptly
23 inform the court and opposing parties of the existence of such exhibits by filing a
24 notice on the docket so that the court may consider their admissibility at trial. The
25 exhibits will not be received unless the proffering party demonstrates:

26 (1) The exhibits could not reasonably have been discovered earlier;

27 (2) The court and the opposing parties were promptly informed of their
28 existence;

1 (3) The proffering party forwarded a copy of the exhibits (if physically
2 possible) to the opposing party. If the exhibits may not be copied the
3 proffering party must show that it has made the exhibits reasonably
4 available for inspection by the opposing parties.

5 XII. DISCOVERY DOCUMENTS

6 Counsel must lodge the sealed original copy of any deposition transcript to be used at trial
7 with the Clerk of the Court no later than **14 days before trial**.

8 Plaintiff has indicated the intent to use the following discovery documents at trial:

- 9 1. Deposition testimony of Jasmine Xiong.
- 10 2. Deposition testimony of Dr. Hu.

11 XIII. FURTHER DISCOVERY OR MOTIONS

12 None. Discovery and law and motion are closed under the scheduling order issued in this
13 case.

14 XIV. STIPULATIONS

15 None.

16 XV. AMENDMENTS/DISMISSALS

17 None.

18 XVI. SETTLEMENT

19 The parties participated in a settlement conference before Magistrate Judge Deborah
20 Barnes on November 9, 2023, and those negotiations were unsuccessful. No further court
21 supervised settlement conference will be scheduled unless both parties indicate that a further
22 settlement conference may be productive.

23 XVII. JOINT STATEMENT OF THE CASE

24 This case arises from a dispute between a pharmaceutical research and development
25 company—plaintiff and counter defendant CSPC Dophen Corporation—and its former
26 employee—defendant and counter claimant Dr. Zhixiang Hu—who allegedly secretly
27 incorporated a competing entity while still employed at CSPC Dophen Corporation, using CSPC
28 Dophen’s d/b/a name “Dophen Biomed” and physical laboratory address. Plaintiff alleges that

1 defendant misrepresented that Dophen Biomed was the same as CSPC Dophen and
2 misappropriated CSPC Dophen’s confidential, proprietary, and trade secret information. Plaintiff
3 asserts claims for breach of contract, breach of duty of loyalty, misappropriation of trade secrets,
4 and conversion. Dr. Hu’s counterclaims allege that the counter-defendant CSPC Dophen
5 Corporation engaged in deceptive practices to unlawfully acquire Dr. Hu’s mTgase site-specific
6 conjugation technology, promising him company ownership but failing to deliver on its
7 commitments. Furthermore, Dr. Hu claims that CSPC Dophen defaulted on his rightful
8 compensation, including salary, vacation pay, incentive stock shares, and stock dividends. Dr.
9 Hu’s counterclaims are for breach of contract, violation of California Business & Professions
10 Code § 17200 *et seq.*, violation of California Labor Code § 203, and breach of fiduciary today.

11 **XVIII. SEPARATE TRIAL OF ISSUES**

12 Dr. Hu asserts a counterclaim against CSPC Dophen for violation of California Business
13 & Professions Code § 17200 (the “UCL”). Under California and federal authorities, there is no
14 right to a jury trial for UCL claims because they are equitable in nature. *Okura & Co. (Am.) v.*
15 *Careau Grp.*, 783 F. Supp. 482, 491 (C.D. Cal. 1991) (“[N]o right of jury trial attaches to [a
16 UCL] cause of action.”); *Cel-Tech Commc’ns, Inc. v. L.A. Cellular Tel. Co.*, 20 Cal. 4th 163, 179
17 (1999) (“Prevailing [UCL] plaintiffs are generally limited to injunctive relief and restitution.”);
18 *Hodge v. Superior Court*, 145 Cal. App. 4th 278, 284 (2006) (“There Is No Right To a Jury Trial
19 For a Section 17200 Cause of Action”); *id.* (“the UCL provides only for equitable remedies
20 Damages are not available.”). Accordingly, Dr. Hu is not entitled to a jury trial on his UCL
21 counterclaim. Therefore, the court will first try the jury claim and will then issue findings of fact
22 and conclusions of law on the UCL counterclaim based on the evidence presented during the jury
23 trial. *See GSI Tech., Inc. v. United Memories, Inc.*, No. 5:13-cv-01081-PSG, 2016 WL 3035698,
24 at *1, *3 (N.D. Cal. May 26, 2016).

25 **XIX. IMPARTIAL EXPERTS/LIMITATION OF EXPERTS**

26 None.

27 **XX. ATTORNEYS’ FEES**

28 In the event of a ruling in plaintiff’s favor for the misappropriation of trade secrets,

1 plaintiff will seek attorneys' fees pursuant to 18 U.S.C. § 1836(b)(3)(D) for the willful and
2 malicious misappropriation of trade secrets. Plaintiff proposes to file a motion within 28 days
3 after judgment is final as provided in Local Rule 293.

4 In the event that the ruling is in favor of the defendant and counterclaimant, Dr. Hu
5 reserves the right to seek attorney fees and all costs associated with pro se representation, to be
6 awarded on par with attorney fees for the pre pro se period, as part of his defense and
7 counterclaims.

8 **XXI. TRIAL PROTECTIVE ORDER AND REDACTION OF TRIAL EXHIBITS**

9 At the pretrial hearing, plaintiff's counsel clarified that plaintiff is no longer seeking to
10 negotiate a stipulation with defendant regarding sealing the courtroom when its confidential
11 information is offered into evidence and represented that plaintiff would instead stand on the
12 protective order (Doc. No. 44) previously entered in this case. However, that protective order
13 states that "[a]ny use of Protected Material at trial shall be governed by a separate agreement or
14 order." (Doc. No. 44 at 4.) Therefore, it is not clear to the court what plaintiff's intentions are
15 with regard to the information that plaintiff apparently believes is confidential. This subject may
16 be addressed in the objections filed to this tentative pretrial order.

17 **XXII. MISCELLANEOUS**

18 None.

19 **XXIII. ESTIMATED TIME OF TRIAL/TRIAL DATE**

20 Jury trial is scheduled for **September 9, 2024**, at 9:00 a.m. in Courtroom 4 before the
21 Honorable Dale A. Drozd. Trial is anticipated to last **6 to 7** court days. The parties are directed
22 to Judge Drozd's Standing Order in Civil Actions, available on his webpage on the court's
23 website.

24 Counsel are directed to contact Pete Buzo, courtroom deputy, at (916) 930-4016, no later
25 than one week prior to trial to ascertain the status of the trial date.

26 **XXIV. PROPOSED JURY VOIR DIRE AND PROPOSED JURY INSTRUCTIONS**

27 The parties shall file any proposed jury *voir dire* **14 days before trial**. Each party will be
28 limited to fifteen minutes of supplemental jury *voir dire*.

1 The court directs counsel to meet and confer in an attempt to generate a joint set of jury
2 instructions and verdicts. The parties shall file any such joint set of instructions **21 days before**
3 **trial**, identified as “Joint Jury Instructions and Verdicts.” To the extent the parties are unable to
4 agree on all or some instructions and verdicts, their respective proposed instructions are due **21**
5 **days before trial**.

6 Counsel shall e-mail a copy of all proposed jury instructions and verdicts, whether agreed
7 or disputed, as a Word document to dadorders@caed.uscourts.gov no later than **21 days before**
8 **trial**; all blanks in form instructions should be completed and all brackets removed.

9 Objections to proposed jury instructions must be filed **14 days before trial**; each
10 objection shall identify the challenged instruction and shall provide a concise explanation of the
11 basis for the objection along with citation of authority. When applicable, the objecting party shall
12 submit an alternative proposed instruction on the issue or identify which of his or her own
13 proposed instructions covers the subject.

14 **XXV. TRIAL BRIEFS**

15 As noted above, trial briefs are due **14 days before trial**.

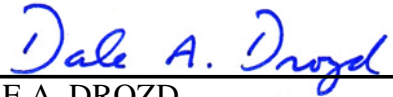
16 **XXVI. OBJECTIONS TO PRETRIAL ORDER**

17 Each party is granted **14 days from the date of entry of this order** to file objections to
18 the same. Each party is also granted **7 days thereafter** to respond to the other party’s objections.
19 If no objections are filed, the order will become final without further order of this court.

20 The parties are reminded that pursuant to Rule 16(e) of the Federal Rules of Civil
21 Procedure and Local Rule 283 of this court, this order shall control the subsequent course of this
22 action and shall be modified only to prevent manifest injustice.

23 IT IS SO ORDERED.

24 Dated: **January 11, 2024**

25 
26 DALE A. DROZD
27 UNITED STATES DISTRICT JUDGE
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ATTACHMENT A
Plaintiff's Witness List

1. Zhixiang Hu
2. Jasmine Xiong
3. Ashley Smith
4. Lixin Feng
5. Lisha Allen
6. Kuangzhong Gao
7. Peggy Tang
8. Dr. Hui Ouyang
9. Josephine Cardarelli
10. Mike Kunkel

ATTACHMENT B

Defendants' Witness List

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1. Dr. Sean Hu
2. Dr. Jinxu Wang
3. Mr. Yingui Li
4. Mr. Dongchen Cai
5. Mr. Jumin Sun
6. Dr. Janet Xiao
7. Ms. Jasmine Xiong
8. Ms. Lisha Allen
9. Ms. Ashley Smith
10. Dr. Lixin Feng
11. Mr. Tom (Kuanzhong) Gao
12. Dr. Hui Ouyang
13. Mike Kunkel
14. Josephine Cardarell

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ATTACHMENT C

Plaintiff's Exhibit List

Exh.	Description
1	Declaration of Pina Cardarelli ISO CSPC Dophen's Motion for Summary Judgment. 2022-06-17
2	Expert Report of Dr. Josephine ("Pina") Cardarelli. 2019-02-08
3	Expert Report Exhibit A: Josephine ("Pina") Cardarelli, Ph.D. Curriculum Vitae. (n/a) 2019-02-08
4	Expert Report Exhibit B: Materials Considered in connection with the preparation of the Cardarelli Expert Report. 2019-02-08
5	Declaration of Mike Kunkel ISO CSPC Dophen's Motion for Summary Judgment. 2022-06-17
6	Expert Report of Michael Kunkel. 2019-02-08
7	Expert Report Exhibit A: Michael Kunkel, Setec Investigations, Curriculum Vitae with Testimony. 2018-09- 13
8	Kunkel Expert Report Exhibit B: Samsung-USB_Devices. 2022-06-17
9	Kunkel Expert Report Exhibit C: Samsung Removable LNK File. 2022-06-17
10	Kunkel Expert Report Exhibit D: Samsung Network LNK File. 2022-06-17
11	Kunkel Expert Report Exhibit E: Samsung Cloud Storage. (n/a-), 2022-06-17
12	Kunkel Expert Report Exhibit F: Piriform webpage product description - What can you use it for. 2022-06- 17
13	Kunkel Expert Report Exhibit G: Piriform webpage product description - Wiping free disk space. 2022-06- 17
14	Kunkel Expert Report Exhibit H: CCleaner.com webpage product description - Including files and folders for cleaning. 2022-06-17
15	Kunkel Expert Report Exhibit I: Vostro CCleaner Wiped Files. 2022-06-17
16	Kunkel Expert Report Exhibit J: Vostro Minitool Log File Directory. 2022-06-17

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17	Kunkel Expert Report Exhibit K: Deleted Files from Backup File Directory. 2022-06-17
18	Kunkel Expert Report Exhibit L: Vostro Laptop USB Devices File Directory. 2022-06-17
19	Kunkel Expert Report Exhibit M: Dell Desktop USB Devices File Directory. 2022-06-17
20	Non-Disclosure of Confidential and Proprietary Information. (CSPC0000012), 2013-04-04
21	CSPC Dophen's Employee Manual. (CSPC0000054-CSPC0000088), undated
22	Conflict of Interest Policy with CSPC Dophen. (CSPC0000013), 2013-04-04
23	Sean Hu's W-2 from CSPC Dophen for the years 2012-2017. (CSPC0000102-CSPC0000107, 314), 2012-2017
24	CSPC Dophen's Safe Harbor 401(k) Plan for Sean Hu. (CSPC0000305-CSPC0000313), 1/1/2012 - 7/31/2017
25	Termination letter sent from CSPC Dophen to Sean Hu. (CSPC0000111), 2017-07-21
26	Excerpted copy of the January 10, 2019, deposition of Song "Jasmine" Xiong. 2019-01-10
27	Copy of an invoice sent from Sean under Dophen Biomed, Inc. to Heidelberg Pharma for purchase of Microbial Transglutaminase. (CSPC0000207), 2016-10-07
28	Email between Lisha Allen and Ashley Smith re: FW: Senior Accountant. (CSPC0089882-CPSC0089885), 2017-08-01
29	Chase Bank Statement December 1, 2017 thru December 29, 2017. (CHASE0000202-CHASE0000204), 2018-11-02
30	Chase Bank Statement December 30, 2017 thru January 31, 2018. (CHASE0000205-CHASE0000211), 2018- 11-02
31	Chase Bank Statement June 1, 2018 thru June 29, 2018. (CHASE0000226-CHASE0000235), 2018-11-02

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32	Chase Bank Statement June 30, 2018 thru July 31, 2018. (CHASE0000236-CHASE0000239), 2018-11-02
33	Chase Bank Statement August 1, 2018 thru August 31, 2018. (CHASE0000240-CHASE0000244), 2018-11-02
34	Chase Bank Statement September 1, 2018 thru September 28, 2018. (CHASE0000245-CHASE0000250), 2018-11-02
35	Documents produced by Ms. Song (Jasmine) Xiong in response to the subpoenas and letter from Morrison & Foerster. various dates
36	Email between Sean Hu and Jasmine Xiong re: Offer. (CSPC0089049-CPSC0089050), 2014-03-08
37	Email between Jasmine Xiong and Sean Hu re: Business License. (CSPC0077212-CSPC0077214), 2014-12- 09
38	Articles of Incorporation for Dophen Biomed, Inc. (CSPC0000225), 2014-04-22
39	Declaration of Jasmine Xiong in Support of Sean Hu's Motion to Disqualify Counsel. 2018-07-12
40	Email between Jasmine Xiong, Tina Ren and Li Yingui re: Dophen Budget Enforcement. (CSPC0078182- CSPC0078183), 2015-10-06
41	Letter dated February 17, 2015, to Yanhong Li from Jasmine Xiong. (CSPC0077227), 2015-02-17
42	Declaration of Jasmine Xiong in Support of Sean Hu's Opposition to CSPC Dophen's Motion to Compel Discovery Responses from Dr. Sean Hu. 2018-06-22
43	Email between Jasmine Xiong and Tiger Technologies re: Legal owner contact change for dophenbiomed.com (A-23529-71899). (CSPC0077987-CSPC0077988), 2015-05-01
44	National Institute of Health Grant Proposal. (CSPC0090215-CSPC0090278), 2015-12-29
45	State of California Statement of Information form. (CSPC0094338), 2016-03-15

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46	Declaration of Jasmine Xiong in Support of Sean Hu's Opposition to CSPP Pharmaceutical Group Limited's Motion to Dismiss. 2018-08-30
47	Declaration of Sean Hu in Support of Opposition to Plaintiff's Motion for Expedited Discovery. 2017-10- 20
48	Declaration of Sean Hu in Support of Sean Hu's Opposition to Motion to Quash or Modify Defendant's Subpoenas. 2018-12-07
49	E-mail chain between Peggy Tang and Sean Hu re: Hu's CV and BP Deck. 2017-10-06
50	Sean Hu PowerPoint presentation re Salvage Targeted Bio-Therapeutics for Cancer by Mitigating Toxicity. 2017-09-20
51	E-mail chain between Sean Hu and Jinxu Wang re: Recommending Lixen to move to Simon's group to manage ADC project. (CSPP0094520), 2017-04-10
52	E-mail between Sean Hu and Jinxu Wang re: DP303 IND Sponsor. (CSPP0094822-CSPP0094823), 2017-04- 12
53	E-mail chain between "Ichunlei," Sean Hu, Li Yingui and Jinxu Wang re: Fwd: email to Jinxu in 2011. (CSPP0094754-CSPP0094757), 2017-08-06
54	Email between Jasmine Xiong and Lan Tang re: Order Summary (GenScript order 470719 for quotation 1166031) -- Please review this order and reply for any changes immediately CRM:0106000000269. (CSPP0078075-CSPP0078078), 2017-08-07
55	Email between Jasmine Xiong and Sean Hu re: Business License. (CSPP0077212-CSPP0077214), 2014-12- 09
56	Sacramento Business Journal article: Local subsidiary of Chines pharamceutical giant in legal fight with researcher. (CSPP0094860-CSPP0094862), 2017-09-28
57	National Institute of Health Grant Proposal. (CSPP0090215-CSPP0090278), 2015-12-29
58	Email between Rubin Yang and Sean Hu re: Monthly Report. (CSPP0000315), 2016-12-01

1	59	Dophen BioMed November Monthly Report attached to R. Yang email. (CSPC0000316-CSPC0000321), 2016-11-30
2		
3	60	Email between Rubin Yang and Sean Hu re: January Report. (CSPC0000322), 2017-02-03
4		
5	61	Dophen BioMed November (sic) [January] Monthly Report attached to R. Yang email. (CSPC0000323- CSPC0000327), 2017-02-01
6		
7	62	Email between Rubin Yang and Sean Hu re: Feb Report. (CSPC0000328), 2017-03-01
8		
9	63	Dophen BioMed November (sic) [February] Monthly Report attached to R. Yang email. (CSPC0000329- CSPC0000331), 2017-02-28
10		
11	64	Email between Rubin Yang and Sean Hu re: March Report. (CSPC0000332), 2017-04-01
12		
13	65	Dophen BioMed March Monthly Report attached to R. Yang email. (CSPC0000333- CSPC0000336), 2017-03- 31
14		
15	66	Email between Rubin Yang and Sean Hu re: April Monthly Report. (CSPC0000337), 2017-04-29
16		
17	67	Dophen BioMed April Monthly Report attached to R. Yang email. (CSPC0000338- CSPC0000342), 2017-04- 28
18		
19	68	Email between Rubin Yang and Sean Hu re: May Report. (CSPC0000343), 2017-06-01
20		
21	69	Dophen BioMed May Monthly Report attached to R. Yang email. (CSPC0000344- CSPC0000345), 2017-05- 31
22		
23	70	Email between Rubin Yang, Sean Hu and Lisha Allen re: June Report. (CSPC0000346), 2017-07-02
24		
25	71	Dophen BioMed March [June] Monthly Report attached to R. Yang email. (CSPC0000347-CSPC0000354), 2017-06-31 (sic)
26		
27	72	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000355), 2017-
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73	Dophen BioMed March 2017 Monthly Report attached to L. Allen email. (CSPC0000356-CSPC0000366), 2017-03-30
74	Dophen BioMed March 2017 Monthly Report attached to L. Allen email. (CSPC0000367-CSPC0000377), 2017-03-30
75	Dophen BioMed August Monthly Report from L. Allen. (CSPC0000394- CSPC0000407), 2015-08-27
76	Email between Lisha Allen and Sean Hu re: Update on Production / Plan of Stability. (CSPC0000408), 2016- 07-08
77	DP303c Drug Product Characterization Table. (CSPC0000409-CSPC0000410), undated
78	DP303c Drug Product Stability Study Protocol. (CSPC0000411), undated
79	DP303c Drug Substance Stability Study Protocol. (CSPC0000419-CSPC0000427), undated
80	Dophen BioMed June Monthly Report. (CSPC0000428-CSPC0000437), 2016-07-04
81	Dophen BioMed June Monthly Report. (CSPC0000438-CSPC0000447), 2016-07-04
82	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000448), 2015- 12-01
83	Dophen BioMed November 2015 Monthly Report attached to L. Allen email. (CSPC0000449- CSPC0000455), 2015-11-30
84	Dophen BioMed November 2015 Monthly Report attached to L. Allen email. (CSPC0000456- CSPC0000462), 2015-11-30
85	Email between Lisha Allen and Sean Hu re: mTgase production used for DP303c batches. (CSPC0000463), 2017-02-26
86	M1-NHW mTgase Production SOP information sheet. (CSPC0000464- CSPC0000471), undated
87	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000472), 2016-

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88	Dophen BioMed April 2016 Monthly Report attached to L. Allen email. (CSPC0000473-CSPC0000487), 2016 04-27
89	Dophen BioMed April 2016 Monthly Report attached to L. Allen email. (CSPC0000488), 2016-04-27
90	Email between Lisha Allen and Sean Hu re: Report for DP303c Production Thus Far. (CSPC0000503), 2016- 04-07
91	Dophen BioMed March 2016 Monthly Report attached to L. Allen email. (CSPC0000504-CSPC0000515), 2016-04-03
92	Dophen BioMed March 2016 Monthly Report attached to L. Allen email. (CSPC0000516-CSPC0000527), 2016-04-03
93	Email between Lisha Allen and Sean Hu re: October Monthly Report. (CSPC0000528), 2016-11-03
94	Dophen BioMed October 2016 Monthly Report attached to L. Allen email. (CSPC0000529-CSPC0000541), 2016-10-31
95	Dophen BioMed October 2016 Monthly Report attached to L. Allen email. (CSPC0000542-CSPC0000554), 2016-10-31
96	Email between Lisha Allen and Sean Hu re: September Monthly Report. (CSPC0000555), 2015-09-30
97	Dophen BioMed September 2015 Monthly Report attached to L. Allen email. (CSPC0000556- CSPC0000569), 2015-09-28
98	Dophen BioMed September 2015 Monthly Report attached to L. Allen email. (CSPC0000570- CSPC0000583), 2015-09-28
99	ADC Reaction RT vs Time charts (native excel). (CSPC0000584), undated
100	Email between Lisha Allen and Sean Hu re: January Monthly Report. (CSPC0000585), 2016-02-01
101	Dophen BioMed January 2016 Monthly Report attached to L. Allen email.

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	(CSPC0000586-CSPC0000599), 2015-01-30 (sic)
102	Dophen BioMed January 2016 Monthly Report attached to L. Allen email. (CSPC0000600-CSPC0000613), 2015-01-30 (sic)
103	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000614), 2017-02-03
104	Dophen BioMed January 2017 Monthly Report attached to L. Allen email. (CSPC0000615-CSPC0000622), 2017-02-02
105	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000623), 2017-03-01
106	Dophen BioMed February 2017 Monthly Report attached to L. Allen email. (CSPC0000624-CSPC0000630), 2017-02-28
107	Dophen BioMed February 2017 Monthly Report attached to L. Allen email. (CSPC0000631-CSPC0000638), 2017-02-28
108	Email between Lisha Allen and Sean Hu re: May Monthly Report. (CSPC0000639), 2017-06-01
109	Dophen BioMed May 2017 Monthly Report attached to L. Allen email. (CSPC0000640-CSPC0000649), 2017- 05-30
110	Dophen BioMed May 2017 Monthly Report attached to L. Allen email. (CSPC0000650-CSPC0000659), 2017- 05-30
111	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000660), 2016-12-06
112	Dophen BioMed November 2016 Monthly Report attached to L. Allen email. (CSPC0000661- CSPC0000673), 2016-11-28
113	Dophen BioMed November 2016 Monthly Report attached to L. Allen email. (CSPC0000674- CSPC0000686), 2016-11-28
114	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000687), 2015-11-01

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115	Dophen BioMed October 2015 Monthly Report attached to L. Allen email. (CSPC0000688-CSPC0000702), 2015-10-30
116	Dophen BioMed October 2015 Monthly Report attached to L. Allen email. (CSPC0000703-CSPC0000717), 2015-10-30
117	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000718), 2017-04-29
118	Dophen BioMed April 2017 Monthly Report attached to L. Allen email. (CSPC0000719-CSPC0000726), 2017 04-28
119	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000727), 2016-01-01
120	Dophen BioMed December 2015 Monthly Report attached to L. Allen email. (CSPC0000728- CSPC0000738), 2015-12-30
121	Dophen BioMed December 2015 Monthly Report attached to L. Allen email. (CSPC0000739- CSPC0000749), 2015-12-30
122	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000750), 2017-01-04
123	Dophen BioMed December 2016 Monthly Report attached to L. Allen email. (CSPC0000751- CSPC0000766), 2016-12-29
124	Dophen BioMed December 2016 Monthly Report attached to L. Allen email. (CSPC0000767- CSPC0000782), 2016-12-29
125	Email between Lisha Allen and Sean Hu re: July Monthly Report. (CSPC0000783), 2015-08-01
126	Dophen BioMed July 2015 Monthly Report attached to L. Allen email. (CSPC0000784-CSPC0000797), 2015- 07-30
127	ADC Reaction RT vs Time charts (native excel). (CSPC0000798), undated
128	Dophen BioMed July 2015 Monthly Report attached to L. Allen email. (CSPC0000799-CSPC0000812), 2015- 07-30

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129	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000813), 2016-06-03
130	Dophen BioMed May 2016 Monthly Report attached to L. Allen email. (CSPC0000814-CSPC0000825), 2016- 05-31
131	Dophen BioMed May 2016 Monthly Report attached to L. Allen email. (CSPC0000826-CSPC0000837), 2016- 05-31
132	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000838), 2016-03-02
133	Dophen BioMed February 2016 Monthly Report attached to L. Allen email. (CSPC0000839-CSPC0000849), 2016-02-29
134	Dophen BioMed February 2016 Monthly Report attached to L. Allen email. (CSPC0000850-CSPC0000860), 2016-02-29
135	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0000861), 2015-07-03
136	Dophen BioMed June 2015 Monthly Report attached to L. Allen email. (CSPC0000862-CSPC0000872), 2015- 07-01
137	Dophen BioMed June 2015 Monthly Report attached to L. Allen email. (CSPC0000873-CSPC0000883), 2015- 07-01
138	Email between Lisha Allen and Sean Hu re: June Monthly Report. (CSPC0000884), 2017-07-01
139	Dophen BioMed June 2017 Monthly Report attached to L. Allen email. (CSPC0000885-CSPC0000891), 2017- 06-30
140	Dophen BioMed June 2017 Monthly Report attached to L. Allen email. (CSPC0000892-CSPC0000898), 2017- 06-30
141	Letter from Sean Hu to Center for Drug Evaluation & Research re submission of Investigational new drug application re clinical study of DP303c-101. (CSPC0036493), 2017-03-27

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142	Investigator's Brochure re Investigational Product Compound Number: DP303c. (CSPC0036502- CSPC0036526), 2017-03-22
143	IND 130699 (SDP303c) 2.2 Introduction to Summary. (CSPC0036577), undated
144	IND 130699 (SDP303c) 2.3 Drug Product. (CSPC0036579-CSPC0036583), undated
145	IND 130699 (SDP303c) 2.3 DP303c Drug Substance. (CSPC0036584-CSPC0036588), undated
146	IND 130699 (SDP303c) 2.3 Quality Overall Summary . (CSPC0036589), undated
147	IND 130699 (SDP303c) 2.4 Nonclinical Overview. (CSPC0036590-CSPC0036606), undated
148	IND 130699 (SDP303c) 2.5 Nonclinical Overview. (CSPC0036607-CSPC0036609), undated
149	IND 130699 (SDP303c) 2.6.1 Introduction. (CSPC0036610), undated
150	IND 130699 (SDP303c) 2.6.3 Pharmacology Tabulated Summary. (CSPC0036615-CSPC0036619), undated
151	IND 130699 (SDP303c) 2.6.2 Pharmacology Written Summary. (CSPC0036620-CSPC0036626), undated
152	IND 130699 (SDP303c) 2.6.5 Pharmacokinetics Summary. (CSPC0036627-CSPC0036638), undated
153	IND 130699 (SDP303c) 2.6.4 Pharmacokinetics Written Summary. (CSPC0036639), undated
154	IND 130699 (SDP303c) 2.6.7 Toxicology Tabulated Summary. (CSPC0036672), undated
155	IND 130699 (SDP303c) 2.6.6 Pharmacology Written Summary. (CSPC0036681), undated
156	IND 130699 (SDP303c) 3.2.A.2 Adventitious Agents Safety Evaluation. (CSPC0036695-CSPC0036702), undated
157	IND 130699 (SDP303c) 3.2.P.1 Description and Composition of Drug Product.

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	(CSPC0036703- CSPC0036705), undated
158	IND 130699 (SDP303c) 3.2.P.2 Pharmaceutical Development. (CSPC0036706- CSPC0036713), undated
159	IND 130699 (SDP303c) 3.2.P.3.2 Batch Formula. (CSPC0036714), undated
160	IND 130699 (SDP303c) 3.2.P.3.4 Controls of Critical Steps and Intermediates. (CSPC0036715), undated
161	IND 130699 (SDP303c) 3.2.P.3.3 Description of Manufacturing Process and Process Controls. (CSPC0036716-CSPC0036718), undated
162	IND 130699 (SDP303c) 3.2.P.3.1 Manufacturers. (CSPC0036719), undated
163	IND 130699 (SDP303c) 3.2.P.3.5 Process Validation and/or Evaluation. (CSPC0036720), undated
164	IND 130699 (SDP303c) 3.2.P.4.5 Excipients of Human or Animal Origin. (CSPC0036721), undated
165	IND 130699 (SDP303c) 3.2.P.4.1 Specifications. (CSPC0036722), undated
166	IND 130699 (SDP303c) 3.2.P.5.1 Specifications. (CSPC0036723-CSPC0036724), undated
167	IND 130699 (SDP303c) 3.2.P.5.2 Analytical Procedures. (CSPC0036725), undated
168	IND 130699 (SDP303c) 3.2.P.5.3 Validation of Analytical Procedures. (CSPC0036726), undated
169	IND 130699 (SDP303c) 3.2.P.5.4 Validation of Analytical Procedures. (CSPC0036727-CSPC0036731), undated
170	Certificate of Analysis. (CSPC0036732-CSPC0036733), undated
171	IND 130699 (SDP303c) 3.2.P.5.5 Characterization of Impurities. (CSPC0036734), undated
172	IND 130699 (SDP303c) 3.2.P.5.6 Justification of Specifications. (CSPC0036735), undated
173	IND 130699 (SDP303c) 3.2.P.6 Biotech Drug Product Reference Standards or

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	Materials. (CSPC0036736), undated
174	IND 130699 (SDP303c) 3.2.P.7 Drug Product Container Closure System. (CSPC0036737), undated
175	IND 130699 (SDP303c) 3.2.P.8.3 Stability Data. (CSPC0036738-CSPC0036753), undated
176	IND 130699 (SDP303c) 3.2.P.8.1 Stability Summary and Conclusion. (CSPC0036754-CSPC0036760), undated
177	IND 130699 (SDP303c) 3.2.S.1.3 General Properties. (CSPC0036761), undated
178	IND 130699 (SDP303c) 3.2.S.1.1 Nomenclature. (CSPC0036762), undated
179	IND 130699 (SDP303c) 3.2.S.1.2 Structure. (CSPC0036763-CSPC0036766), undated
180	IND 130699 (SDP303c) 3.2.S.2.4 Control of Critical Steps and Intermediates. (CSPC0036767), undated
181	IND 130699 (SDP303c) 3.2.S.2.3 Control of Materials. (CSPC0036768-CSPC0036775), undated
182	IND 130699 (SDP303c) 3.2.S.2.2 Description of Manufacturing Process and Process Controls. (CSPC0036776-CSPC0036780), undated
183	IND 130699 (SDP303c) 3.2.S.2.6 Manufacturing Process Development. (CSPC0036781-CSPC0036782), undated
184	IND 130699 (SDP303c) 3.2.S.2.1 Manufacturers. (CSPC0036783), undated
185	IND 130699 (SDP303c) 3.2.S.3.1 Elucidation of Structure and Other Characteristics. (CSPC0036784- CSPC0036796), undated
186	IND 130699 (SDP303c) 3.2.S.3.2 Impurities. (CSPC0036797-CSPC0036799), undated
187	IND 130699 (SDP303c) 3.2.S.4.2 Specification . (CSPC0036800-CSPC0036801), undated
188	IND 130699 (SDP303c) 3.2.S.4.1 Analytical Procedures. (CSPC0036802-CSPC0036807), undated

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189	IND 130699 (SDP303c) 3.2.S.4.3 Validation of Analytical Procedures. (CSPC0036808), undated
190	IND 130699 (SDP303c) 3.2.S.4.4 Batch Analyses. (CSPC0036809-CSPC0036812), undated
191	IND 130699 (SDP303c) 3.2.S.4.5 Justification of Specification. (CSPC0036813-CSPC0036816), undated
192	IND 130699 (SDP303c) 3.2.S.5 References Standards or Materials. (CSPC0036817), undated
193	IND 130699 (SDP303c) 3.2.S.6 Container Closure System. (CSPC0036818), undated
194	IND 130699 (SDP303c) 3.2.S.7.3 Stability Data. (CSPC0036819-CSPC0036831), undated
195	IND 130699 (SDP303c) 3.2.S.7.1 Stability Summary and Conclusions. (CSPC0036832-CSPC0036837), undated
196	IND 130699 (SDP303c) 3.2.S.1.3 General Properties. (CSPC0036838), undated
197	IND 130699 (SDP303c) 3.2.S.1.1 Nomenclature. (CSPC0036839), undated
198	IND 130699 (SDP303c) 3.2.S.1.2 Structure. (CSPC0036840-CSPC0036842), undated
199	IND 130699 (SDP303c) 3.2.S.2.4 Control of Critical Steps and Intermediates. (CSPC0036843), undated
200	IND 130699 (SDP303c) 3.2.S.2.3 Control of Materials. (CSPC0036844-CSPC0036852), undated
201	IND 130699 (SDP303c) 3.2.S.2.2 Description of Manufacturing Process and Process Controls. (CSPC0036853-CSPC0036863), undated
202	IND 130699 (SDP303c) 3.2.S.2.6 Manufacturing Process Development. (CSPC0036864), undated
203	IND 130699 (SDP303c) 3.2.S.2.1 Manufacturers. (CSPC0036865), undated
204	IND 130699 (SDP303c) 3.2.S.2.5 Process Validation and/or Evaluation. (CSPC0036866), undated

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206	IND 130699 (SDP303c) 3.2.S.3.2 Impurities. (CSPC0036880-CSPC0036885), undated
207	IND 130699 (SDP303c) 3.2.S.4.1 Specification. (CSPC0036886), undated
208	IND 130699 (SDP303c) 3.2.S.4.2 Analytical Procedures. (CSPC0036887- CSPC0036890), undated
209	IND 130699 (SDP303c) 3.2.S.4.3 Validation of Analytical Procedures (CSPC0036891), undated
210	IND 130699 (SDP303c) 3.2.S.4.4 Batch Analyses. (CSPC0036892-CSPC0036895), undated
211	IND 130699 (SDP303c) 3.2.S.4.5 Justification of Specification. (CSPC0036896- CSPC0036898), undated
212	IND 130699 (SDP303c) 3.2.S.5 References Standards or Materials. (CSPC0036899), undated
213	IND 130699 (SDP303c) 3.2.S.6 Container Closure System. (CSPC0036900), undated
214	IND 130699 (SDP303c) 3.2.S.7.3 Stability Data. (CSPC0036901-CSPC0036911), undated
215	IND 130699 (SDP303c) 3.2.S.7.1 Stability Summary and Conclusions. (CSPC0036912-CSPC0036917), undated
216	IND 130699 (SDP303c) 3.2.S.1.3 General Properties. (CSPC0036918), undated
217	IND 130699 (SDP303c) 3.2.S.1.1 Nomenclature. (CSPC0036919), undated
218	IND 130699 (SDP303c) 3.2.S.1.2 Structure. (CSPC0036920), undated
219	IND 130699 (SDP303c) 3.2.S.2.4 Control of Critical Steps and Intermediates. (CSPC0036921), undated
220	IND 130699 (SDP303c) 3.2.S.2.3 Control of Materials. (CSPC0036922- CSPC0036924), undated

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221	IND 130699 (SDP303c) 3.2.S.2.2 Description of Manufacturing Process and Process Controls. (CSPC0036925), undated
222	IND 130699 (SDP303c) 3.2.S.2.1 Manufacturers. (CSPC0036928), undated
223	IND 130699 (SDP303c) 3.2.S.2.6 Manufacturing Process Development. (CSPC0036929), undated
224	IND 130699 (SDP303c) 3.2.S.2.5 Process Validation and/or Evaluation. (CSPC0036930), undated
225	IND 130699 (SDP303c) 3.2.S.3.1 Elucidation of Structure and Other Characteristics. (CSPC0036931- CSPC0036935), undated
226	IND 130699 (SDP303c) 3.2.S.3.2 Impurities. (CSPC0036936-CSPC0036939), undated
227	IND 130699 (SDP303c) 3.2.S.4.1 Specification. (CSPC0036940), undated
228	IND 130699 (SDP303c) 3.2.S.4.2 Analytical Procedures. (CSPC0036941), undated
229	IND 130699 (SDP303c) 3.2.S.4.3 Validation of Analytical Procedures. (CSPC0036942), undated
230	IND 130699 (SDP303c) 3.2.S.4.4 Batch Analyses. (CSPC0036943-CSPC0036945), undated
231	IND 130699 (SDP303c) 3.2.S.4.5 Justification of Specification. (CSPC0036946-CSPC0036948), undated
232	IND 130699 (SDP303c) 3.2.S.5 References Standards or Materials. (CSPC0036949), undated
233	IND 130699 (SDP303c) 3.2.S.6 Container Closure System. (CSPC0036950), undated
234	IND 130699 (SDP303c) 3.2.S.7.3 Stability Data. (CSPC0036951), undated
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236	Email between Rubin Yang, Sean Hu and L. Allen re: mTgase new constructs. (CSPC0094892), 2016-08-29

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244	Q sepharose purification for NHW07282016. (CSPC0094905-CSPC0094906), undated
245	Email between Rubin Yang, Sean Hu and L. Allen re: mTgase production used for DP3O3c batches. (CSPC0094907), 2016-03-07
246	Sources 15s NHW purification.docx. (CSPC0094908-CSPC0094909), undated
247	Email between Rubin Yang, Sean Hu and L. Allen re: Flow chart. (CSPC0094910), 2017-03-30
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249	Email between Rubin Yang, Sean Hu and J. Lovinger re: Flow chart. (CSPC0094912), 2017-04-03
250	Flow chart and purification summary 04032017. (CSPC0094913-CSPC0094914), undated
251	Email between Rubin Yang, Sean Hu and J. Lovinger re: Flow chart. (CSPC0094915), 2017-04-03
252	Flow chart and purification summary 04032017. (CSPC0094916-CSPC0094917),

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2	253	Email between Rubin Yang and Sean Hu re: ELISA signal. (CSPC0094918), 2017-
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4	254	ELISA description signal table. (CSPC0094919), undated
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8	257	Dophen BioMed July 2015 Monthly Report attached to L. Allen email.
9		(CSPC0095699), 2015-07-30
10	258	Dophen BioMed July 2015 Monthly Report attached to L. Allen email.
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12	259	Email between Lisha Allen and Sean Hu re: July Monthly Report. (CSPC0095779),
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18	262	Email between Lisha Allen and Sean Hu re: Monthly Report. (CSPC0096249), 2017-
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20	263	Dophen BioMed January 2017 Monthly Report attached to L. Allen email.
21		(CSPC0096250-CSPC0096257), 2017-02-02
22	264	Dophen BioMed January 2017 Monthly Report attached to L. Allen email.
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24	265	Email between Sean Hu and Lisha Allen re: 6 mTgase mutants. (CSPC0118551),
25		2015-09-08
26	266	Six PromTgase mutants brief. (CSPC0118552-CSPC0118553), undated
27	267	Email between Lisha Allen and Sean Hu re: August Monthly Report.
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270	Email between Lisha Allen and Sean Hu re: bispecific powerpoint and DBCO compound. (CSPC0118583), 2017-02-17
271	Bispecific Antibody Preparation by Cross-linking (Copper Catalyst Click Chemistry Method PowerPoint. (CSPC0118584-CSPC0118589), undated
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273	DP3O3c HME03192016 Production Report. (CSPC0118591-CSPC0118610), 2017-01-11
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275	list of the Six PromTgase mutants. (CSPC0118614-CSPC0118617), undated
276	Email between Lixin Feng L. Allen and re: CoA's. (CSPC0118618), 2017-01-05
277	Certificate of Analysis. (CSPC0118619), 2016-04-29
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282	Dophen BioMed January 2016 Monthly Report attached to L. Allen email. (CSPC0118624-CSPC0118637), 2015-01-30 (sic)
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285	Dophen BioMed December 2015 Monthly Report attached to L. Allen email. (CSPC0118653- CSPC0118663), 2015-12-30
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293	Email between Sean Hu and Lisha Allen re: New mTgase ordered. (CSPC0118721), 2016-06-28
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299	ADC Conjugation Reaction Analysis by RP-HPLC. (CSPC0118736-CSPC0118741), 2016-10-10
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301	Email between Lisha Allen and J. Fang re: ADC filing. (CSPC0118747-CSPC0118748), 2017-01-19
302	DP303C Stability Study Results Overview. (CSPC0118749-CSPC0118779), 2017-01-18
303	DP303C Stability Study sample checklist. (CSPC0118780), undated
304	DP303C Reference Standard Characterization Checklist. (CSPC0118781-CSPC0118782), undated
305	DP303C HME07302016 Drug Product Lot Release Checklist. (CSPC0118783-CSPC0118784), undated
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307	DP303c and Component Lot History Tables 01062017. (CSPC0118791-CSPC0118793), undated
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309	CHW NHW protein and DNA sequences gene mutation information. (CSPC0118795), undated
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7	318	GS58134-1 pET39b-Mutant_1CHW Plasmid Map. (CSPC0120996-CSPC0120999),
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15	324	email between Lisha Allen and Sean Hure: re: SEC-HPLC Method Validation.
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19		(CSPC0122151), 2015-09-30
20	327	Dophen BioMed September 2015 Monthly Report attached to L. Allen email.
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24	329	ADC Reaction RT vs Time charts. (CSPC0122180), undated
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338	Photograph of Sean Hu in front of the office sign at 2945 Ramco St. #150, West Sacramento, CA, 95691. (CSPC0000010), 2013
339	CSPC Dophen Corporation employment offer letter to Sean Hu signed by Jinxu Wang. (CSPC0000048- CSPC0000049), 2011-09-27
340	Dophen Biomed Inc. Chase bank statement. (CSPC0000114-CSPC0000137), 2016-10-26
341	Confirmation Details of Dophen Biomed Inc. wire payment (CSPC0000141), undated
342	Screenshot of Sean Hu's text messages. (CSPC0000185), 7/4/2017 - 7/10/2017
343	CSPC Dophen Chase Bank Account (7205) statements (CSPC0000257-CSPC0000292), 2017-01-01
344	DP303c Study report prepared by Xiancheng Zeng and sponsored by Dophen Biomed Corporation. (CSPC0058132-CSPC0058158), 2016-03-28
345	NIH Grant Application (Phase I). (CSPC0073657-CSPC0073720), 2015-12-17
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347	Employment offer letter to Tianxin Wang signed by Sean Hu. (CSPC0073825-CSPC0073826), 2014-04-03
348	Email between Jasmine Xiong, Sean Hu and Zuofeng Feng at Gateway pharmaceutical re: Order for PBD. (CSPC0074010-CSPC0074013), 2015-04-10
349	Confidentiality Agreement between Dophen Biomedical and China Gateway Life Science (Holdings) Ltd. signed by Sean on behalf of Dophen Biomedical. (CSPC0074014-CSPC0074017), 2015-04-01
350	Master Services Agreement between Dophen Biomedical and China Gateway Life Science (Holdings) Ltd. Signed by Sean on behalf of Dophen Biomedical. (CSPC0074018-CSPC0074034), 2015-04-01
351	Email from Sean Hu to Peter Fang from Shanghai CP Guojian pharmaceutical Co., Ltd. re: Dophen's Patent Introduction. (CSPC0074057-CSPC0074064), 2015-05-27
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354	Email from Sean Hu instructing Jasmine Xiong and Lisha Allen re: how to set up your new Dophen mail on Outlook. (CSPC0074074-CSPC0074075), 2015-06-08
355	Email between Gan (Peter) Fang, Jasmine Xiong and Sean Hu re: CDA Agreement. (CSPC0074077), 2015-06- 16
356	Signed MSA between Dophen Biomed Corporation and a Shanghai biomedical company. (CSPC0074099- CSPC0074101), 2016-02-03
357	Signed sponsor letter by Sean Hu to Glycohub, Inc. on behalf of CSPC Dophen Corporation re NIH SBIR Phase I proposal. (CSPC0074516), 2016-08-22
358	Email from Sabrina Lichsteiner (Heidelberg Pharma GmbH) to Jasmine Xiong and Sean Hu re: Enzyme Shipment from Dophen. (CSPC0074549-CSPC0074550), 2016-

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359	Invoice to Heidelberg Pharma GmbH for €50,000 for Recombinant Microbial Transglutaminase (mTGase) Dophen Biomed, Inc. (CSPC0074551), undated
360	Specific technical descriptions from page 41 on re: DP303c and studies in NIH grant letter. (CSPC0076208- CSPC0076334), undated
361	Email between Sean Hu and Jim Rinehart, Yingui Li, and Jinxu Wang re: partnership between City of Sacramento and CSPC Dophen BioMed. (CSPC0076506- CSPC0076507), 2012-03-20
362	Invitation letter by Sean Hu on behalf of Dophen Biomed to Xiwu Hui to participate in drug research program. (CSPC0077172), 2014-07-10
363	NIH SBIR support letter from Jasmine Xiong, in which she stated that Dophen Biomed will lease space to Glycohub within CSPC Dophen R & D lab. (CSPC0077227), 2015-02-17
364	Email between Jasmine Xiong and Li Yanhong re: Supporting letter and lease. (CSPC0077232- CSPC0077234), 2015-04-01
365	Draft lease agreement between Dophen Biomed (landlord) and Glycohub (tenant), for a portion of the Building located in 4070 Truxel Road Sacramento, CA. (CSPC0077235-CSPC0077238), 2015-04-01
366	NIH SBIR support letter signed by Sean Hu stating that Dophen Biomed is leasing CSPC Dophen R& D lab to tenant Glycohub, Inc. (CSPC0077240), 2015-04-01
367	Request for Taxpayer Identification Number (Form W-9) for CSPC Dophen Corporation. (CSPC0077890- CSPC0077893), undated
368	CSPC Dophen Corp payroll, as a parallel to and a contrast to the Dophen Biomed payroll that contained Sean's name and other employees who worked under him . (CSPC0077953), 2013/10/26
369	Email between Jasmine Xiong and Sean Hu re Jasmine creating @dophenbiomed.com account for Sean Hu. (CSPC0078063-CSPC0078065), - 2013/11/25

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370	Email between Jasmine Xiong and Lan Tang re: Order Summary (GenScript order 470719 for quotation 1166031) -- Please review this order and reply for any changes immediately CRM:0106000000269. (CSPC0078075-CSPC0078078), 2014-06-30
371	Email between Jasmine Xiong and Sean Hu re: Fees for ADC prep and ADC Summit Poster. (CSPC0078083- CSPC0078093), 2014-08-07
372	Invoice from Dophen Biomed, Inc. to Heidelberg Pharma GmbH, for Recombinant Microbial Transglutaminase (mTGase), with the total amount of € 50,000.00 and requesting the payment to be made to Dophen Biomed Inc. (CSPC0078235), 2014-12-02
373	Email from Sean Hu to Audrey Jia re: Proposal for your IND filing. (CSPC0079092-CSPC0079102), 2016-10- 07
374	Email from Sean Hu to Jianguo Yang re: Information regarding to our bispecific antibody projects (CSPC0079552), 2016-07-21
375	Summary study for NIH grant, release date: April 2, 2016 (PDF) Meeting date: March 14, 2016 Request date: July 1, 2016. (CSPC0081470-CSPC0081482), 2016-05-12
376	Draft material transfer agreement between CSPC and Heidelberg Pharma. (CSPC0081553-CSPC0081562), 2016-04-02
377	Email from Sean Hu to Yan Wang re: please reply asap regarding your lunch choice. (CSPC0082452- CSPC0082453), 2015-09-29
378	Email between Sean Hu and Gan (Peter) Fang CGPJ Pharmaceuticals re: CDA agreement. (CSPC0082585- CSPC0082586), 2015-06-16
379	Email between Yingui Li and Sean Hu re: Fwd: Company registration. (CSPC0094330-CSPC0094333), 2015- 06-12
380	Email from Sean Hu to "seanhu2020@gmail.com" re: none. (CSPC0085216-CSPC0085216), 2017-08-07
381	Email between Sean Hu and Li Yanhong re: Supporting Letter and lease. (CSPC0087755-CSPC0087758), 2016-07-21

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382	Employment offer letter from Sean Hu to Song Xiong (Jasime Xiong). (CSPC0089050), 2016-02-11
383	Commercialization Plan of Dophen Biophen. (CSPC0089988-CSPC0089991), 2014-03-07
384	Office of Research integrity Small Organization Statement for Handling Allegations of Research Misconduct Involving Public ! Health Services Research and Related Activities. (CSPC0091228), 2015-12-17
385	Signed letter from Sean Hu to NIH Center for Scientific Review. (CSPC0091293), 2017-04-03
386	Letter from Yingui Li announcing Sean Hu's resignation from CSPC Dophen Corporation. (CSPC0091486), 2015-12-23
387	Termination letter outlining terms of Sean's termination. (CSPC0091487), 2017-07-10
388	Email between Li Yingui and Sean Hu re Dophen's Patent Introduction. (CSPC0093760-CSPC0093768), 2107 07-10
389	Bispecific Antibody Grant Application submitted by Sean on behalf of Dophen Biomed, Inc. (CSPC0094476- CSPC0094519), 2016-05-27
390	Commercial lease final agreement signed by Jasmine Xiong and Sean Hu on December 15, 2015. (CSPC0094583-CSPC0094587), 2017-04-05
391	Letter from Jasmine Xiong to Sean Hu attaching signed lease. (CSPC0094661-CSPC0094665), 2015-12-15
392	Letter from Ashley Smith to Lixin Feng & Yingui Li regarding Payroll Discrepancy Found During Audit -- Action Taken to Correct. (CSPC0094678), 2015-12-15
393	Dophen Biomed Form W-9 signed by Ashley Smith. (CSPC0094685), 2017-07-25
394	Department of Health and Human Services Payment Management System Request Access. (CSPC0094686- CSPC0094688), 2016-06-06
395	Payroll Details of each employee under Dophen Biomed Inc within Pay Period from 05/01/2017 to 07/31/2017. (CSPC0094689-CSPC0094691), 2016-08-08

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396	Research Collaboration and License Option Agreement between Heidelberg Pharma GmbH and Dophen Biomed. (CSPC0094762-CSPC0094774), 2017-07-31
397	E-mail between Sean Hu and Jinxu Wang re: DP303 IND Sponsor. (CSPC0094822-CSPC0094823), 2016-09- 22
398	Research Collaboration and License Option Agreement between Heidelberg Pharma GmbH and Dophen Biomed. (CSPC0094845-CSPC0094857), 2017-04-11
399	Response from California Secretary of State to Jasmine Xiong's request regarding name availability reservation with CA Secretary of State before registering Dophen Biomed, Inc. (CSPC0094858- CSPC0094859), 2016-09-22
400	Dophen BioMed Inc. California Business Entity Title. (CSPC0102727-CSPC0102728), 2014-04-23
401	Presentation by Sean Hu, on behalf of Dophen Biomed, titled "The most stable site-specific ADCs Made Simple." (CPSC0079888-CSPC0079918), 2017-09-28
402	Email from Sean Hu to Ashley smith re: Tax records and financial documents. (CSPC0096314), 2105-06-12
403	Assignment Agreement between Sean Hu, Lisha Allen, Dophen Biomed and CSPC Dophen Corporation. (CSPC0096337-CSPC0096342), 2018-03-07
404	Declaration of Lixin Feng iso CSPC Dophen Corporation's ex parte application for expedited discovery
405	Declaration of Sean Hu iso Motion for Disqualification of Counsel including exhibits at ECF Nos. Dkt 16-1 to 16-14. 2017-09-29
406	Declaration of Sean Hu iso Opposition to Pltf's Motion for Expedited Discovery including exhibits at ECF Nos. Dkt 17-1 to 17-2. 2017-10-19
407	Declaration of Lixin Feng iso CSPC Dophen Corporation's motion for expedited discovery at ECF No. 20-9. 2017-10-20
408	Declaration of Lisha Allen iso CSPC Dophen Corporation's motion for expedited discovery at ECF No. 20-12. 2017-10-27

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409	Declaration of Sean Hu iso Opposition to Plaintiff's motion for expedited discovery at ECF No. 20-18. 2017- 10-27
410	Declaration of Ashley Smith iso CSPC Dophen Corporation's motion for expedited discovery including exhibits at ECF Nos. Dkt 20-10 to 20-11. 2017-10-27
411	Declaration of Michael Kunkel iso CSPC Dophen Corporation's motion for expedited discovery including exhibits at ECF Nos. Dkt 20-13 to 20-16. 2017-10-27
412	Declaration of Lisha Allen in opposition to Sean Hu's motion for disqualification of counsel at ECF No. 28. 2017-10-27
413	Declaration of Yingui Li in opposition to Sean Hu's motion for disqualification of counsel including exhibits at ECF Nos. Dkt 27 to 27-9. 2017-11-02
414	Declaration of Ashley Smith in opposition to Sean Hu's motion for disqualification of counsel including exhibits at ECF Nos. Dkt 29 to 29-2. 2017-11-02
415	Declaration of Yingui Li iso CSPC Dophen Corporation's surreply iso opposition to motion for disqualification of counsel including exhibits at ECF Nos. Dkt 38-1 to 38-2. 2017-11-02
416	Declaration of Sean Hu iso Motion by Krogh & Decker LLP for leave to withdraw as counsel for defendant and counterclaimant Sean Hu at ECF No. 51-2. (n/a-), 2017-11-28
417	Declaration of Sean Hu iso Sean Hu's opposition to CSPC Dophen Corporation's motion to dismiss and motion to strike first amended counterclaims including exhibits at ECF Nos. Dkt 65-1 to 65-4. 2018-04-16
418	Declaration of Michael Kunkel iso CSPC Dophen Corporation's motion to compel discovery responses w Exs A-C at ECF No. Dkt 72-19. (n/a-), 2018-05-24
419	Declaration of Ashley Smith iso CSPC Dophen Corporation's motion to compel discovery responses w Ex. 1 at ECF No. Dkt 72-20. 2018-06-08
420	Declaration of Jiaying Fan iso Sean Hu's Opposition to CSPC Dophen Corporation's motion to dismiss and motion to strike first amended counterclaims [attached to jt

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	stmt re mtn to compel] at ECF No. Dkt 72-21. 2018-06-08
421	Declaration of Sean Hu iso Sean Hu's Opposition to CSPC Dophen Corporation's motion to dismiss and motion to strike first amended counterclaims [attached to jt stmt re mtn to compel] including exhibits at ECF Nos. Dkt 72-22 to 72-27. 2018-06-08
422	Declaration of Sean Hu iso Sean Hu's Opposition to CSPC Dophen Corporation's motion to dismiss and motion to strike first amended counterclaims including exhibits at ECF Nos. Dkt 74-1 to 74-3. 2018-06-08
423	Declaration of Jasmin Xiong iso Sean Hu's Opposition to CSPC Dophen Corporation's motion to compel discovery responses from Dr. Sean Hu at ECF No. 78-9. 2018-06-14
424	Declaration of Sean Hu iso Sean Hu's Opposition to CSPC Dophen Corporation's motion to compel discovery responses from Dr. Sean Hu including exhibits at ECF Nos. Dkt 78-10 to 78-12. 2018-06-22
425	Declaration of Sean Hu iso Sean Hu's Motion to disqualify counsel including exhibits at ECF Nos. Dkt 84-2 to 84-36. 2018-06-22
426	Declaration of Jasmine Xiong iso Sean Hu's Motion to disqualify counsel including exhibits at ECF Nos. Dkt 84-37 to 84-40. 2018-07-13
427	Declaration of Lisha Allen iso CSPC Dophen's Opposition to Motion to disqualify counsel at ECF No. 87-13. 2018-07-13
428	Declaration of Ashley Smith iso CSPC Dophen's Opposition to Motion to disqualify counsel including exhibits at ECF Nos. Dkt 87-1 to 87-3. 2018-07-27
429	Declaration of Yingui Li iso CSPC Dophen's Opposition to Motion to disqualify counsel including exhibits at ECF Nos. Dkt 87-14-to 87-31. 2018-07-27
430	Notice of Errata ad Correction to declaration of Sean Hu iso Sean Hu's motion to disqualify counsel including exhibits at ECF Nos. Dkt 88 to 88-1. 2018-07-27
431	Declaration of Sean Hu iso Sean Hu's opposition to CSPC Dophen's request for

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	continuance of hearing date for Defendant's motion for disqualification of counsel including exhibits at ECF Nos. Dkt 90-1 to 90-5. 2018 07-31
432	Sean Hu's Reply [declaration iso reply] to CSPC Dophen's opposition to motion for disqualification of counsel including exhibits at ECF Nos. Dkt 91-1 to 91-2. 2018-08-02
433	Declaration of Michael Kunkel [iso CSPC Mtn to Enforce Order] including exhibits at ECF Nos. Dkt 107-2 to 107-8. 2018-09-07
434	Declaration of Sean Hu iso Sean Hu's opposition to CSPC Dophen Corporation's Misleading Motion to Enforce Court Order including exhibits at ECF Nos. Dkt 110-1 to 110-9. (n/a-), 2018-10-15
435	Supplemental Declaration of Michael Kunkel [iso CSPC Mtn to Enforce Order] at ECF No. 112-1. 2018-11- 02
436	Declaration of Sean Hu iso motion for sanctions against counter-defendants' counsel including exhibits at ECF Nos. Dkt 113-1 to 113-5. (n/a-), 2018-11-09
437	Declaration of Jiaying Fan iso Sean Hu's Motion for Reconsideration including exhibits at ECF Nos. Dkt 116- 2 to 116-5. 2018-11-11
438	Declaration of Sean Hu iso Reply to Motion for Sanctions against Counter-Defendants' Counsel including exhibits at ECF Nos. Dkt 128-1 to 128-7. (n/a-), 2018-11-18
439	Declaration of Sean Hu iso Sean Hu's opposition to motion to quash or modify Defendant's subpoenas [Yingui Li Mtn to Quash] including exhibits at ECF Nos. Dkt 136-1 to 136-2. 2018-12-02
440	Declaration of Sean Hu iso Sean Hu's opposition to motion to quash or modify Defendant's subpoenas [Conjupro's Mtn to Quash] including exhibits at ECF Nos. Dkt 137-1 to 137-2. 2018-12-07
441	Declaration of Sean Hu iso Sean Hu's Request for Reconsideration by the District Court of Magistrate Judge's Ruling including exhibits at ECF Nos. Dkt 138-1 to 138-

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442	Declaration of Tom Gao iso Sean Hu's Amended Counterclaim [filed with Mtn for 30-day ext to file 2d Amended Counterclaim] at ECF No. 156-1. 2018-12-09
443	Declaration of Dr. Hui Ouyang iso Sean Hu's motion for summary judgment [attached to Second Amended Counterclaims, decl dated 1-30-2019] including exhibits at ECF Nos. Dkt 224-1 to 224-2. 2019-12-06
444	Declaration of Tom Gao iso Sean Hu's Amended Counterclaim [filed with 2d Amended Counterclaim] including exhibits at ECF Nos. Dkt 224-9 to 224-23. 2019-12-10
445	Declaration of Sean Hu iso Sean Hu's motion to enforce court's subpoenas to depose CSPC-Dophen's officers including exhibits at ECF Nos. Dkt 242-1 to 242-6. 2019-12-10
446	Declaration of Sean Hu iso Sean Hu's motion to compel discovery responses from CSPC-Dophen's including exhibits at ECF Nos. Dkt 243-1 to 243-5. 2020-01-31
447	Declaration of Dongchen Cai iso CSPC Dophen's opposition to Hu's motion to enforce court subpoenas to depose CSPC Dophen's officers at ECF No. 255-7. 2020-01-31
448	Declaration of Yingui Li iso CSPC Dophen's opposition to Hu's motion to enforce court subpoenas to depose CSPC Dophen's officers at ECF No. 255-8. 2020-03-06
449	Hu Exhibits A and B to Joint Statement re Renewed Motion to Compel Discovery Responses including exhibits at ECF Nos. Dkt 254-1 to 254-2. 2020-03-06
450	Declaration of Sean Hu iso Sean Hu's motion to enforce court's subpoenas to depose CSPC-Dophen's officers including exhibits at ECF Nos. Dkt 255-1 to 255-6. 2020-03-06
451	Declaration of Sean Hu regarding service of summons of counterclaim defendants' counsel Mr. Wilson including exhibits at ECF Nos. Dkt 277, 277-6. 2020-03-06
452	POS Dongchen Cai (attached to declaration) including exhibits at ECF No. Dkt 277-

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2	453	Declaration of Sean Hu iso his motion for leave to amend 2nd counterclaim including
3		exhibits at ECF Nos. Dkt 295-1 to 295-6. 2020-12-24
4	454	Declaration of Sean Hu iso his motion for sanction including exhibits at ECF Nos.
5		Dkt 296-1 to 296-8. 2022- 05-06
6	455	Declaration of Pina Cardarelli iso CSPC Dophen's motion for summary judgment
7		including exhibits at ECF No. Dkt 308-2 to 308-3. 2022-05-11
8	456	Declaration of Mike Kunkel iso CSPC Dophen's motion for summary judgment
9		including exhibits at ECF Nos. Dkt 308-4 to 308-5. 2022-06-17
10	457	Declaration of Sean Hu iso Sean Hu's opposition to CSPC Dophen's motion for
11		summary judgment including exhibits at ECF Nos. Dkt 310-2 to 310-11. 2022-06-20
12	458	Declaration of Sean Hu iso his response and opposition to CSPC Dophen
13		Corporation's objections to Magistrate Judge's order including exhibits at ECF Nos.
14		Dkt 318-1 to 318-2. 2022-06-28
15	459	Email between Sean Hu and Jinxu Wang re: My Salary pay 50% in RMB via
16		Hongkong. (CSPC0094775),
17	460	U.S. Patent Application US 2017/0106096. 2011-11-04
18	461	Dophen Biomed, Inc. Form FC55927. (CSPC0094338), 2016-03-15
19	462	International Application WO 2015/191883 A1. (CSPC0082954-CSPC0083033),
20		2016-10-27
21	463	Payroll Details of each employee under Dophen Biomed Inc within Pay Period from
22		05/01/2017 to 07/31/2017. (CSPC0094689-CSPC0094691), 2018-01-17
23	464	Department of Health and Human Services Payment Management System Request
24		Access. (CSPC0094686- CSPC0094688), 2016-08-09
25	465	Dophen Biomed Form W-9 signed by Ashley Smith. (CSPC0094685), 2016-08-08
26	466	NIH Grant Application Package. (CSPC0094522-CSPC0094554), 2015-12-28
27	467	Email between Qingxi Wang and Sean Hu re: Fw: Countersigned Agreement.
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2	468	Grant Progress Report. (CSPC0078262-CSPC0078281), 2016-10-02
3	469	Letter from Dr. Hu to Dr. Yu. (CSPC0078227-CSPC0078228), 2016-03-23
4	470	CSPC Dophen Quarterly Federal Tax Return. (CSPC0078205-CSPC0078207), 2016-
5		08-30
6	471	Email between Jasmine Xiong and Glycohub re: "Re: Urgent Supporting letter for
7		SBIR." (CSPC0077239), 2016-04-15
8	472	Email between Jasmine Xiong and Xi Chen re: Supporting letter and lease.
9		(CSPC0077225-CSPC0077226), 2015-04-01
10	473	Levena Biopharma Invoice. (CSPC0074561), 2015-02-17
11	474	Levena Biopharma Invoice. (CSPC0074560), 2016-10-07
12	475	NIH Notice of Award. (CSPC0094468-CSPC0094475), 2016-10-13
13	476	CSPC Dophen Corporation California Business Entity Title. (CSPC0000201), 2016-
14		02-29
15	477	Assignment Agreement between CSPC Dophen Corporation and Dophen Biomed,
16		Inc. (CSPC0000143- CSPC0000144), 2016-12-08
17	478	Payment re: "Payment to Dophen Biomed from CSPC." (CSPC0000142), 2017-06-30
18	479	Payment re: "Payment to Dophen Biomed from CSPC." (CSPC0000141), 2017-07-27
19	480	Buyer Final Closing Statement for property located at 4070 Truxel Road, Sacramento,
20		CA. (CSPC0000140), 2017-07-27
21	481	City of West Sacramento Business License No. 15009. (CSPC0057215), 2012-05-22
22	482	CMC Strategies for Antibody-Drug Conjugates - The Bioprocessing Summit.
23		(CSPC0000145-CSPC0000147), 2012-11-16
24	483	State of California Certificate of Qualification CSPC Dophen Corporation.
25		(CSPC0057216-CSPC0057217), 2017-08-01
26	484	CSPC Dophen Business Operations Tax Certificate for City of Sacramento.
27		(CSPC0000251), 2011-02-14
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485	CSPC Dophen Corporation Change of Address form sent to Secretary of State of the State of California regarding 4070 Truxel Road, Sacramento, CA. (CSPC0057221), 2012-05-03
486	CSPC Dophen Corp. Monthly Work Schedule and Report. (CSPC0122946), 2012-08-21
487	Dophen Biomed 2011 Annual Report. (CSPC0000255), 2011-11-30
488	Certificate of Status CSPC Dophen Corporation. (CSPC0057214), undated
489	Dophen Biomedical Business Operation Tax Notice. (CSPC0057222), 2011-02-11
490	Dophen Biomed Inc. Articles of Incorporation. (CSPC0000006), 2016-06-10
491	Grant Application for Novel enzymatic site-specific antibody drug conjugation technique to produce homogeneous antibody drug conjugate (ADC)s with improved safety, stability, and efficacy. (CSPC0057077- CSPC0057140), 2014-04-22
492	Dr. Sean Hu Employee File. (SMP00001-SMP000061), 2017-04-05
493	Chase Bank Statement June 28, 2016 thru June 30, 2016. (CHASE0000126-CHASE0000127), various
494	Chase Bank Statement July 1, 2016 thru July 29, 2016. (CHASE0000128-CHASE0000129), 2018-11-02
495	Chase Bank Statement July 30, 2016 thru August 31, 2016. (CHASE0000130-CHASE0000131), 2018-11-02
496	Chase Bank Statement September 1, 2016 thru September 30, 2016. (CHASE0000132-CHASE0000133), 2018-11-02
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498	Chase Bank Statement November 1, 2016 thru November 30, 2016. (CHASE0000136-CHASE0000139), 2018-11-02
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501	Chase Bank Statement February 1, 2017 thru February 28, 2017. (CHASE0000155-CHASE0000156), 2018- 11-02
502	Chase Bank Statement March 1, 2017 thru March 31, 2017. (CHASE0000160-CHASE0000161), 2018-11-02
503	Chase Bank Statement April 1, 2017 thru April 28, 2017. (CHASE0000168-CHASE0000169), 2018-11-02
504	Chase Bank Statement April 29, 2017 thru May 31, 2017. (CHASE0000173-CHASE0000174), 2018-11-02
505	Chase Bank Statement June 1, 2017 thru June 30, 2017. (CHASE0000175-CHASE0000178), 2018-11-02
506	State of California Certificate of Qualification CSPC Dophen Corporation. (CSPC0057210-CSPC0057213), 2018-11-02
507	ECF No. 25-2: Plaintiff's Dophen BioMed, Inc.'s Responses to CSPC Dophen's Form Interrogatories -- General (Set One). 2017-09-28
508	ECF No. 26-1: Notice of Recordation: initial assignment of the patent application recorded with the U.S. Patent and Trademark Office (-), 2017-10-25
509	ECF No. 26-2: Provisional Assignment -- corrective assignment recorded with the USPTO on October 20, 2016 , 2015-06-05
510	ECF No. 26-3: email between Janet Xiao, Sean Yu and Yan Qi re: Re: Re: Fwd: Dophen Company Name. 2016-10-20
511	ECF No. 26-4: Assignment Agreement re Homogenous Antibody Drug Conjugates via Enzymes Methods -- confirmatory assignment recorded with the USPTO on March 8, 2017. 2016-12-11
512	ECF No. 61-3:Declaration of Michael Kunkel, Director of Investigative Services of Setec Security Technologies, Inc. 2017-03-08

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513	ECF No. 150-3: Certified translation of Sean Hu txt messages. 2018-02-18
514	ECF No. 150-4: Certified translation of Sean Hu txt messages. 2017-11-02
515	ECF No. 150-5: Certified translation of Sean Hu txt messages. 2017-11-02
516	ECF No. 150-6: Certified translation of Sean Hu txt messages. 2017-11-02
517	ECF No. 150-7: Certified translation of Sean Hu txt messages. 2017-11-02
518	ECF No. 200-5: PowerPoint presentation produced by non-party Urban Real Estate Investment, Inc. in response to CSPC Dophen's Subpoena Duces Tecum dated January 18, 2019 (submitted under seal). 2017- 11-02
519	ECF No. 202-28: A copy of a check payable to ADCure Biomed, Inc. from Urban Real Estate Investment, Inc. for \$200,000 dated June 1, 2018 produced by non-party UREII. (UREII 001-UREII 001), 2018-05-03
520	ECF No. 202-29: email exchange dated October 6, 2017 between Dr. Hu and Peggy Tang of UREII re: My CV anf BP Deck (UREII 002-UREII 004), 2018-06-01
521	ECF No. 202-29: email exchange dated October 6, 2017 between Dr. Hu and Peggy Tang of UREII re: My CV anf BP Deck (UREII 005-UREII 036), 2017-10-06
522	ECF No. 302-2: CSPC Dophen Corporation State of Delaware Certificate of Incorporation. 2018-08-29
523	Wilson Declaration Exhibit B -- ECF No. 302-3: CPSC Dophen Corporation Certificate of Good Standing. 2019-05-31
524	ECF No. 302-14: Invoice sent from Sean Hu under Dophen Biomed, Inc. to Heidelberg Pharma for purchase of Microbial Transglutaminase dated October 7, 2016. 2017-07-21
525	Q4 20416 - PSC 272 FFR Report Source: Payment Management System. (CSPC0000227-CSPC0000235),
526	Grant Progress Report. (CSPC0057157), 2014-04-22
527	Hu Response to CSPC Interrogatories No. 4.
528	Hu Responses to CSPC Dophen's Interrogatories (Set One). 2022-05-25

1	529	Hu Verification for Responses to CSPC Dophen's Interrogatories (Set One). 2022-05-
2		25
3	530	Hu Supplemental Responses to CSPC Dophen's Interrogatories (Set One). 2022-05-25
4	531	Hu's Responses to CSPC Dophen's Interrogatories (Set Two). 2022-06-17
5	532	Hu's Supplemental Responses to CSPC Dophen's Interrogatories (Set One). 2018-06-
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7	533	Hu's Responses to CSPC's Request for Admissions -- Set One. 2018-07-09
8	534	Hu's Responses to Requests for Interrogatory Responses -- Set Three. 2017-11-20
9	535	Hu Verification (RFAs Set One, Rogs Set 3, RFPs Sets 3 & 4). 2017-11-30
10	536	Hu Responses to CSPC's 4th Set of Interrogatories (Rog No. 23). 2018-01-11
11	537	Hu Verification (Rogs Set 4). 2018-06-08
12	538	Hu's Responses to Requests for Interrogatory Responses -- Set Five. 2018-07-09
13	539	A Brief Account of Ownership Dispute between CSPC and Sean. (CSPC0000212-
14		CSPC0000216), 2017-08- 01
15	540	Thousand Talents Plan Dr. Hu Application. (CSPC0000236-CSPC0000240), 2017-
16		08-09
17	541	State of Delaware Certificate of Incorporation CSPC Dophen. 2019-08-29
18	542	State of Delaware Certificate of Good Standing CSPC Dophen. 2022-05-03
19	543	Email from Yingui Li to Jinxu Wang re: Heidelberg Pharma. (CSPC0094779), 2018-
20		02-06
21	544	CSPC Dophen Deposit Form and W-9. (CSPC0078092-CSPC0078093), 2014-12-02
22	545	Dophen Biomed Articles of Incorporate. (HU000049), 2014-04-22
23	546	NIH Grant Application Cover Letter. (CSPC0088044), 2017-04-04
24	547	Email from Sean Hu to Lennin Greenwood re: Request for additional information:
25		1R44GM121096 – 01 PI Name: Hu, Sean. (CSPC0086792-CSPC0086796), 2016-08-
26		24
27	548	Email from Xia Zuyong to Sean Hu re: Opportunity at Dophen. (CSPC0079428-
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	CSPC0079429), 2017-05-03
549	Commercial Lease Agreement between CSPC Dophen and Dophen Biomed, Inc. (CSPC0000245- CSPC0000250), 2016-12-01
550	Email from Pahl Andreas to Sean Hu re AW: MTA, linker design and amount of mAB and toxin. (CSPC0081539-CSPC0081552), 2015-09-29
551	Email from Dophen Biomed to Sabrina Lichtsteiner re Enzyme Shipment from Dophen. (CSPC0078229- CSPC0078234), 2016-10-13
552	Email from Sean Hu to Lixin Feng et al re: Draft IND application ready by end of this Month. (CSPC0057258), 2017-01-06

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ATTACHMENT D

Defendant's Exhibit List

As discussed at the final pretrial conference, in his objections to this tentative pretrial order, defendant Dr. Hu is directed to revise his exhibit list.