

Exhibit A

False statements made by Gaogao Han in Court Filings

Dkt. 155. P.11: *"Han was not the owner of hanshan.co"*

Han admits that he was the owner of Hanshan.co. Han also admits that, after he received the notice of infringement, he changed to contact information of Hanshan.co to someone in China. At the same time, Han established the Hanshan.Info website hosted by another company, replicated Hanshan.Co at Hanshan.Info, including all user accounts and content, and set up Hanshan.Co so that all traffic to Hanshan.Co would be redirected to Hanshan.Info. This setup existed well into 2015, as Plaintiff was able to download web posts from Hanshan.Co in July 2015.

(Dkt. 42 p.1 'Defendants Gaogao Han, Hanshan.co, and Hanshan.info ("Defendants") shall and hereby do respectfully move this Court to set aside the default...')

Dkt. 142 p 10: *"Yue claimed he received the last email on December 19, AT 2:24 PM, six minutes before Han's deposition (Han Decl. 18). It seems this email took much longer time than the previous two emails to reach Yue, more than four hours? Otherwise, Yue made false statement to the court again in order to get Defendant to be sanctioned."*

Han admits that he used the deferred-delivery feature of Microsoft Outlook to delay the delivery of this email, as Plaintiff later discovered from examining the headers of Han's email.

Dkt. 141-1 p12. *'On December 19, at 1:13 PM, Han produced 17 emails between him and GoDaddy.com and Domains by Proxy ("DBP"). Note, the time zone used in the email is EST (Mon 12/19/2016 1:13 PM), that is three hours earlier than the PST (December 19, 2016 at 10:13 AM). Interesting thing is if one looks at Yue's motion, dkt. 136, Decl. 14, one will see Yue claimed nto receive the email on December 19, T 2:24, six minutes before Han's deposition (see the snapshot below). It seems this email took much longer time to reach Yue, more than four hours? Otherwise, Yue lied to the court again in order to get Defendant to be sanctioned.'*

Han admits that Han used the deferred-delivery feature of Microsoft Outlook to delay the delivery of this email, as Plaintiff later discovered from examining the headers of Han's email.

Dkt. 51 p.6 *"It seems for the same email address proxy4783195@land1-private-registration.com, Plaintiff's YAHOO email can get through! That was just wonderful --- Plaintiff had shown that he had correspondence with Defendant. However, Plaintiff just lied to the court as what he did before."*

Han admits that he falsely accused Plaintiff of lying. In fact, Plaintiff truthfully described what he observed as email response. Han admits that Han deleted or disabled the contact email for Hanshan.Info. (see Dkt.42-1 ¶ 7, Han setting up an auto-response to instruct those sending email to the Hanshan.Info to register on the website and talk to admin over there, and Dkt. 51 p.6, Han "deleted the beneath mail boxes.") As stated previously, Han opened the email with Summons and Complaint from admin@hanshan.info on July 29, 2015. His subsequent deletion of the email boxes in August 2015.

Dkt. 51. P12 *"Plaintiff intentionally making a fake web page to support Plaintiff's point."*

Han admits that his accusation was false. The Court ordered that Han was deemed admitted that Han voted a flower emoticon under Plaintiff's blog article. Plaintiff did not make any fake web page.

Dkt. 51 p.12-13. *"the bold part is a lying..." "Plaintiff intentionally making a fake graph with address added to cheat the court", "Plaintiff intentionally making a fake fact to "prove" Defendant knowing his address"*

Han admits that Plaintiff did not lie to the Court. The Court already deemed Han admitted Han wrote the blog article.

Dkt. 95 pp.8-10. Han wrote that three of Plaintiff's sworn statements regarding the events were false.

Han admits that Plaintiff's statements were true. And Han's own statements were false. It was Han first referred to Han's own copying as theft, and initiated attack on Plaintiff. Initially, Plaintiff did not even mention Han publicly. Only after Han openly attacked Plaintiff, Plaintiff mentioned Han's copying of Tube.JS for the first time.

Dkt. 95 p.14 *"Han did not have idea about the Alexa Toolbar, and did not use the Toolbar."*

Han admits that he installed Alexa Toolbar. Plaintiff has shown evidence that Han did.

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Dkt. 95 p. 15 *“Yue made a perjury and lied to the court that he sent email to Han at admin@hanshan.info, admin@hanshan.co on October 22, 2015 and February 29, 2016”*

Han admits this statement was false. Plaintiff did send emails to these addresses and truthfully reported their statuses to the Court.

Dkt. 96 ¶ 10, *“After removing the Yue’s copyrighted code on October 11, 2014, Han wrote one-line back end code applied to photo and video presentation, respectively, to restored the same functionalities, as Yue’s code did, in both blog and microblog areas.”*

Han admits this to be misleading. Han copied some regular expression substitution code from others without fully understanding it and failed to make it work for the simplest cases.

Dkt. 96 ¶ 20, *“Han has no idea about Yue’s talking about ALEXA TOOLBAR... Han did not found Alexa Toolbar from Alexa.com site, probably because Han did (do) not register in that site, and do not have right to see the toolbar.”*

Han admits that he installed Alexa Toolbar on his computer, as Plaintiff’s evidence showed.

Dkt 156. p.4 “Yue filed many complaints to hanshan.co’s internet provider (“Goddady”) and registration company (“DBP”) from October 6, 2014, the second day of Han’s using the code, and made this issue to be public in his blogs and microblogs, including various false representations, in order to harm hanshan.co and prepared to make law suit intentionally, which forced hanshan.co shut down on October 19, 2014.”

Han admits that Yue had the legal right to notify DBP, Hanshan.co’s administrative contact of Han’s infringement, and that Yue made no false representations to anyone during the process. Han shutdown the Hanshan.co website. Han posted online to another person that the purpose of moving from Hanshan.Co to Hanshan.Info was to escape legal liability.

Dkt. 156. p6, “on October 11, 2014, Han wrote one-line back end code applied to photo and video presentation, respectively, to restored the same functionalities, as Yue’s code did, in both blog and microblog areas.”

For his so-called replacement code, Han admits that he copied the substitution code from DISCUZ.¹ Han’s replacement code was about 90 physical lines of code,

¹ Q. And then there is a parentheses and there is "a-z0-9"?

A. Yes.

Q. Do you understand what those two are?

A. I don't care. I don't care... I don't know the meaning.

Q. You don't know the meaning?

A. I don't care the meaning. I just use it. That's correct.

Q. So do you copy this code somewhere -- from somewhere? ...

and eventually became 204 lines of physical code. The resulting 19 pages of code performed a small subset of Tube.JS functions, and Han's code was not fully functional.

Dkt. 156. P.6: "After Han removed his copyrighted code from hanshan.co, Yue still persisted made various false representations to slanderously attack Han and hanshan.co (and hanshan.info later on) in his numerous articles and micro blogs, which forced hanshan.co shut down on October 19, 2014."

Han admits that his accusations above were false. All that Plaintiff stated about Han were true. Han admits that Plaintiff did nothing to force him to shut down Hanshan.Co. Instead, Han moved Hanshan.Co to Hanshan.Info, set up Hanshan.Co to redirect the traffic to Hanshan.Info, changed the contact information of Hanshan.Co from himself to someone in Beijing, in order to evade liability. See, Dkt. 108, Ex.A, Han discussing why he moved the website.

Dkt. 156. P.12. "Yue made a perjury and lied to the court that he sent email to Han at admin@hanshan.info, admin@hanshan.co on October 22, 2015 (see Han Decl. 23) and February 29, 2016 (see Han Decl. 24~26), while the "email addresses that Plaintiff served, admin@hanshan.co and admin@hanshan.info, ceased to exist by August 9, 2015."

Han admits that he closed these email accounts on August 9, 2015, after he received the Summons and Complaint by email on July 29, 2015, from the IP address 142.105.44.249 (the same IP address shown in Godaddy's records). Yue could not have known that Han closed these email accounts, and Yue truthfully stated that Yue sent emails to these addresses.

Dkt. 156. p.13 "Yue made a frivolous litigation, intentionally harass Han and HANSAHN, and to make unfair competition."

Han admits that Plaintiff made a sincere effort to dissuade Han from making further attacks and made a generous offer to resolve the dispute with Han by only asking Han to cooperate in responding to a California subpoena.

Dkt. 156. P.15-17 Han's quoting of the statements of the defamation defendant Wenbin Yang.

Han knowingly quoted Yang's statements, some of which are subjects of Yue's defamation lawsuit against Yang, currently pending in Alameda County Superior Court.

A. Okay. I get the code from -- I get the code from the -- from somewhere.

...

Q. Where did you get the code? So you copy the code?

A. I got the code from -- from the Discuz!, the software, from the blog.