

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

<p>In Re Subpoenas Issued to Jackson Chen and Scott Ouyoung</p>	<p>N. D. Ill. Case No. 1:05-cv-04890¹ Judge Coar Magistrate Judge Schenkier</p>
<p>U.S. FAUCETS, INC. and JAS CORP., Plaintiffs, vs. HOME DEPOT USA, INC.; HOME EXPO; GLOBAL UNION; PEGASUS, et al., Defendants.</p>	<p>Underlying Action Northern District of Georgia Case No. 1:03-CV-1572-WSD Judge William S. Duffey, Jr.</p>

FILED
AUG 25 2005

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

**JACKSON CHEN'S AND SCOTT OUYOUNG'S
EXHIBITS PERTAINING TO THEIR MOTION TO QUASH**

Exhibit No.	Description
Q	Declaration of Keith E. Yurko, dated August 24, 2005
R	Five Subpoenas Addressed to Jackson Chen, dated August 18, 2005
S	Five Subpoenas Addressed to Scott Ouyoung, dated August 18, 2005
T	Declaration of Jackson Chen, dated August 25, 2005
U	Declaration of Scott Ouyoung, dated August 25, 2005
V	Letter from Plaintiffs' Counsel to Counsel for Home Depot, dated June 9, 2005

¹ In Case No. 1:05-cv-04538, which is assigned to Judge Plunkett and Magistrate Judge Schenkier, the Court has before it two motions to quash related to subpoenas issued in the Northern District of Illinois and related to the same underlying case pending in the Northern District of Georgia. Exhibits to those motions were filed as Danze, Inc.'s and Globe Union Industrial Corporation's Exhibits Pertaining to Their Motions to Quash and include Joint Exhibits A-N. (Dkt. 10.) In Case No. 1:05-cv-04895, which is assigned to Judge Marovich and Magistrate Judge Soat Brown, the Court has before it a third motion to quash related to subpoenas issued in the Northern District of Illinois and related to the same underlying case pending in the Northern District of Georgia. Exhibits to that motion were filed as Keith Yurko's Exhibits Pertaining to His Motion to Quash and include Exhibits M-P. These exhibits will begin with Exhibit Q.

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EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re Subpoenas Issued to Keith E. Yurko	N. D. Ill. Case No. _____ ¹ Judge _____ Magistrate Judge _____
U.S. FAUCETS, INC. and JAS CORP., Plaintiffs, vs. HOME DEPOT USA, INC.; HOME EXPO; GLOBAL UNION; PEGASUS, et al., Defendants.	Underlying Action Northern District of Georgia Case No. 1:03-CV-1572-WSD Judge William Duffey, Jr.

DECLARATION OF KEITH E. YURKO

Keith E. Yurko, being first duly sworn on oath, states as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called upon, could truthfully and accurately testify to them.
2. I am an employee and officer (secretary) of Danze, Inc. ("Danze"), a Delaware corporation. Until about April 14, 2005, when its name was changed, Danze was named Globe Union America Corporation ("GUA").
3. Danze has a warehouse and office at 2 Territorial Court, Suite A, Bolingbrook, Illinois. I am employed by Danze at this location.

¹ In Case No. 1:05-cv-04538, which is assigned to Judge Plunkett and Magistrate Judge Schenkier, the Court has before it two motions to quash related to subpoenas issued in the Northern District of Illinois and related to the same underlying case pending in the Northern District of Georgia.

4. Danze is an indirect subsidiary of Globe Union Industrial Corporation ("GUIC"). GUIC is a publicly held company which is incorporated in the Republic of China (Taiwan). Danze is just one of many of GUIC's direct and indirect subsidiaries.
5. I am not an officer, director, employee, or managing agent of GUIC.
6. GUIC does not have an office in Bolingbrook or elsewhere in Illinois. Nor are there any GUIC employees who are employed at Danze's facility in Bolingbrook or elsewhere in Illinois.
7. On Tuesday afternoon, August 16, 2005, a man who I understand to be a process server delivered a subpoena to me at Danze's office in Bolingbrook. A copy of that subpoena, including Exhibit 1 to it, is attached as Exhibit M-1 to the Exhibits I filed with my Motion to Quash.
8. During the afternoon of Friday, August 19, 2005, I was visited at Danze's office in Bolingbrook by the same process server.
9. The process server handed me a stack of documents. I briefly looked at them and noted that they included several subpoenas addressed to me and several other subpoenas addressed to Scott Ouyoung and Jackson Chen.
10. Scott Ouyoung is the president of GUIC. He is a citizen of, and resides and works in, Taiwan.
11. Mr. Ouyoung is not an officer, employee or managing agent of Danze. He is Danze's sole director. He does not maintain an office in Bolingbrook.
12. Jackson Chen is a vice-president and director of GUIC. He also is a citizen of, and resides and works in, Taiwan.

13. Mr. Chen is not an officer, director, employee or managing agent of Danze and he does not maintain an office in Bolingbrook.

14. I am not, and never have been, authorized by either Mr. Ouyoung or Mr. Chen to accept subpoenas or other process on their behalf.

15. When the process server came to Danze's office on April 19 and handed me the stack of papers, he said: "I don't know why they are doing this."

16. When I noticed that the stack of papers the process server handed me included several subpoenas addressed to Messrs. Ouyoung and Chen, I kept those addressed to me but handed the subpoenas addressed to Messrs. Ouyoung and Chen back to the process server and told him I was not authorized to accept them. I asked him to do me a favor and take them back. He said: "If you are asking me to take these back to my office, I can't. I was told to leave them, regardless." He also said, "I told them you wouldn't accept them." He then put them on a stack of boxes in the vestibule of Danze's office and left.

17. After the process server left, I looked more closely at the subpoenas he left with me. There were eight of them. They each appeared to me to command me to appear for a deposition in Chicago, Illinois on Tuesday, August 30, 2005. They were addressed to me as follows:

Keith E. Yurko (at my home address);
Keith E. Yurko (at my business address);
Keith E. Yurko, an individual (at my business address);
Keith E. Yurko, an officer of Danze, Inc. (at my business address);
Keith E. Yurko, on behalf of Danze, Inc. (at my home address);
Keith E. Yurko, on behalf of Danze, Inc. (at my business address);
Keith E. Yurko, an officer of GUA (at my business address); and
Keith E. Yurko, on behalf of GUA (at my business address).

Copies of these subpoenas are attached as Exhibits M-2 through M-9 to the Exhibits I filed with my Motion to Quash.

18. I left the subpoenas addressed to Messrs. Ouyoung and Chen where the process server put them in the vestibule of Danze's office until I had a chance to talk with counsel on Monday morning, August 22, 2005. I then looked briefly at them and arranged for copies to be sent to counsel.

19. The subpoenas the process server left in Danze's vestibule included the following subpoenas addressed to Jackson Chen, each of which appeared to me to command him to appear for a deposition in Chicago, Illinois on Friday, August 26, 2005. They were addressed to Mr. Chen as follows:

Jackson Chen (at Danze's office address);
Jackson Chen, on behalf of Danze, Inc. (at Danze's office address);
Jackson Chen, on behalf of GUA (at Danze's office address);
Jackson Chen, an Officer, Director and/or Managing Agent of Danze, Inc. (at Danze's office address); and
Jackson Chen, an Officer, Director and/or Managing Agent of GUA (at Danze's office address)

Copies of these subpoenas are attached as Exhibits R-1 through R-5 to the Exhibits filed by Messrs. Chen and Ouyoung in support of their Motion to Quash.

20. The subpoenas the process server left in Danze's vestibule included the following subpoenas addressed to Scott Ouyoung, each of which appeared to me to command him to appear for a deposition in Chicago, Illinois on Wednesday, August 31, 2005. They were addressed to Mr. Ouyoung as follows:

Scott Ouyoung (at Danze's office address);
Scott Ouyoung, on behalf of Danze, Inc. (at Danze's office address);
Scott Ouyoung, on behalf of GUA (at Danze's office address);
Scott Ouyoung, Director of Danze, Inc. (at Danze's office address); and
Scott Ouyoung, Director of GUA (at Danze's office address).


Copies of these subpoenas are attached as Exhibits S-1 through S-5 to the Exhibits filed by Messrs. Chen and Ouyoung in support of their Motions to Quash.

21. Also included in the documents left by the process server on April 19 were three checks, each in the amount of \$46.25, made payable to Mr. Ouyoung, Mr. Chen and me.

22. I know both Messrs. Ouyoung and Chen and know that they both have extremely busy schedules. I cannot imagine any way in which either could come to Chicago for a deposition on such short notice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24TH day of August, 2005.



Keith E. Yurko

EXHIBIT R

AOB (1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Jackson Chen, on behalf of Danze, Inc.
2 Territorial Ct., Suite A, Bolingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below
testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition
in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606	August 26, 2005 10:00 a.m.


YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers,
directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated,
the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR	DATE
	August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115; Attorney for Plaintiffs

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on	DATE	SIGNATURE OF SERVER
		ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(e) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (e)(3)(B)(ii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(ii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an untested expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Subpoena (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Jackson Chen, an Officer, Director and/or Managing Agent of Danze, Inc.
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below
testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition
in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60608	August 26, 2005 10:00 a.m.

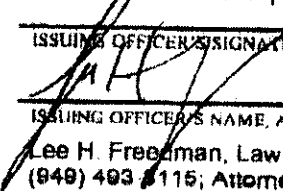
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers,
directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated,
the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR	DATE
	August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493 1115; Attorney for Plaintiffs

Doc. Rule 43, Federal Rules of Civil Procedure, Part C & D on next page.

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____
 _____ ADDRESS OF SERVER _____

Rule 45, Federal Rules of Civil Procedure, Parts C & D**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an untested expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

SA026 (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Jackson Chen, an Officer, Director and/or Managing Agent of Globe Union America Corporation
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below
testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition
in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Weish & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606	August 26, 2005 10:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME
-------	---------------

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers,
directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated,
the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR	DATE
	August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115; Attorney for Plaintiffs

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(e) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clauses (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unstated expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

AO 78 (Rev. 1/94) Subpoena in a Civil Case

Issued by the UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Jackson Chen
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606

August 26, 2005 10:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE

DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR

DATE

August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115; Attorney for Plaintiffs

(See Rule 43, Federal Rules of Civil Procedure, Parts C & D on next page)

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Jackson Chen, on behalf of Globe Union America Corporation
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below
to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition
in the above case.

PLACE OF DEPOSITION

Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606

DATE AND TIME

August 26, 2005 10:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified below (list documents or objects):

PLACE

DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers,
directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated,
the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR

DATE

August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Leo H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8114; Attorney for Plaintiffs

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

EXHIBIT S

SD 4086 (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(In the United States District
Court for the Northern District
of Georgia)

TO:

Scott Ouyoung, on behalf of Globe Union America Corporation
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606

August 31, 2005 9:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE

DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR

DATE

August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115, Attorney for Plaintiffs

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____
 ADDRESS OF SERVER _____

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unstated expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(In the United States District
Court for the Northern District
of Georgia)

TO:

Scott Ouyoung, on behalf of Danze, Inc.
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606

August 31, 2005 9:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE

DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR

DATE

August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115; Attorney for Plaintiffs

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____
 ADDRESS OF SERVER _____

Rule 45, Federal Rules of Civil Procedure, Parts C & D**(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Scott Ouyoung, Director of Globe Union America Corporation
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below
testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition
in the above case.

PLACE OF DEPOSITION	DATE AND TIME
Weish & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606	August 31, 2005 9:00 a.m.

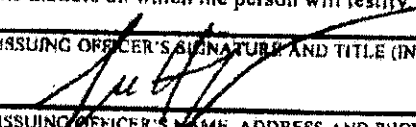
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers,
directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated,
the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR	DATE
	August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115; Attorney for Plaintiffs

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on other pages)

AO 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____
 _____ ADDRESS OF SERVER _____

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance,
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unstained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

SAOER (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al.

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Scott Ouyoung, Director of Danze, Inc.
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

Weish & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606

August 31, 2005 9:00 a.m.

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PLACE

DATE AND TIME

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PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR

DATE

August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8115; Attorney for Plaintiffs

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

AD 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

	DATE	PLACE
SERVED		
SERVED ON (PRINT NAME)	MANNER OF SERVICE	
SERVED BY (PRINT NAME)	TITLE	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct

Executed on _____ DATE	_____ SIGNATURE OF SERVER
	_____ ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(ii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

U.S. FAUCETS, INC. and JAS CORP.

SUBPOENA IN A CIVIL CASE

V.

HOME DEPOT USA, INC.; HOME EXPO;
GLOBAL UNION; PEGASUS, et al

Case Number: 1:03-CV-1572-WSD
(in the United States District
Court for the Northern District
of Georgia)

TO:

Scott Ouyoung
2 Territorial Ct., Suite A, Bollingbrook, IL 60440

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

Welsh & Katz, Ltd., 120 S. Riverside Plaza, 22nd Floor, Chicago, IL 60606

August 31, 2005 9:00 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE

DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR

DATE

August 18, 2005

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Lee H. Freedman, Law Offices of Carlos F. Negrete, 27422 Calle Arroyo, San Juan Capistrano, California 92675,
(949) 493-8116; Attorney for Plaintiff

AD 88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____
 _____ ADDRESS OF SERVER _____

Rule 45, Federal Rules of Civil Procedure, Parts C & D

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection is made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of

clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an untested expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

EXHIBIT T

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re Subpoenas Issued to Jackson Chen and Scott Ouyoung	N. D. Ill. Case No. _____ ¹ Judge _____ Magistrate Judge _____
U.S. FAUCETS, INC. and JAS CORP., <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> HOME DEPOT USA, INC.; HOME EXPO; GLOBAL UNION; PEGASUS, et al., <p style="text-align: center;">Defendants.</p>	Underlying Action Northern District of Georgia Case No. 1:03-CV-1572-WSD Judge William Duffey, Jr.

DECLARATION OF JACKSON CHEN

Jackson Chen, being first duly sworn on oath, states as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called upon, could truthfully and accurately testify to them.
2. I am a vice-president and director of Globe Union Industrial Corporation, a publicly-held corporation which is incorporated in the Republic of China (Taiwan) and has its

¹ In Case No. 1:05-cv-04538, which is assigned to Judge Plunkett and Magistrate Judge Schenkier, the Court has before it two motions to quash related to subpoenas issued in the Northern District of Illinois and related to the same underlying case pending in the Northern District of Georgia.

principal place of business at 22 Chien Kuo Road, Taichung Export Processing Zone, Tantz, Taiwan, Republic of China.

3. I am a resident of the Republic of China (Taiwan) and do not maintain a residence or office at any place in the United States.

4. GUIC has many subsidiaries, both direct and indirect.

5. One of GUIC's indirect subsidiaries is Danze, Inc. ("Danze"), which before April 14, 2005, was known as Globe Union America Corporation ("GUA"). Danze's president is Michael Werner. I am not an officer, director, employee or managing agent of Danze.

6. I understand that Danze maintains a warehouse and office in Bolingbrook, Illinois. I do not have an office there.

7. I have been informed that the secretary of Danze is Keith E. Yurko and that Mr. Yurko is employed by Danze at its Bolingbrook office.

8. I have never authorized Mr. Yurko to accept service of subpoenas (or any other process) on my behalf and to the best of my knowledge, he has no such authority.

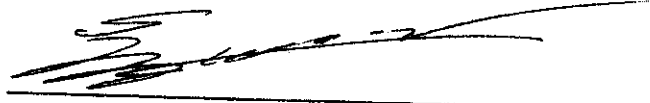
9. Nevertheless, I have been informed that, on Friday afternoon, August 19, 2005, Illinois time, a process server left five subpoenas addressed to me (at Danze's Bolingbrook office address, which is not my address) (the "Subpoenas"). I understand he left the Subpoenas even though Mr. Yurko told him he was not authorized to accept them.

10. I learned of this on Wednesday of this week, August 24, 2005, Taiwan time, which is Tuesday, August 23, 2005, in Chicago.

11. I also understand that on Friday, August 19, 2005, copies of some of these Subpoenas were delivered to Corporation Service Company ("CSC") in Springfield, Illinois.
12. I understand that CSC is the agent for service of process on Danze. However, I have never authorized it to accept service of subpoenas or any other process on my behalf and I do not believe it has such authority.
13. Also, I understand that the Subpoenas purport to require my attendance at a deposition in Chicago on Friday, August 26, 2005, at 10:00 a.m. Chicago time.
14. Needless to say, Taiwan is many thousands of miles from Chicago.
15. This week and next I need to be in Taiwan. I am responsible for the operations of a subsidiary of GUIC here and all of this week (and into next week) I am tied up virtually every minute with an important company acquisition which is at a very sensitive point. My leaving could put my company's ability to complete this acquisition at substantial risk.
16. For these reasons, among many others, there is no way that, on such short notice, I could be in Chicago for a deposition on Friday, August 26 (Chicago time).
17. I do not reside, am not employed, and do not regularly transmit business in person within 100 miles of Chicago, Illinois. In fact, it has been years since I have been in the United States. I have not been in the Chicago area for many years.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25 day of August, 2005.

A handwritten signature in black ink, appearing to read 'Jackson Chen', written over a horizontal line.

Jackson Chen

EXHIBIT U

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

<p>In Re Subpoenas Issued to Jackson Chen and Scott Ouyoung</p>	<p>N. D. Ill. Case No. _____¹ Judge _____ Magistrate Judge _____</p>
<p>U.S. FAUCETS, INC. and JAS CORP., Plaintiffs, vs. HOME DEPOT USA, INC.; HOME EXPO; GLOBAL UNION; PEGASUS, et al., Defendants.</p>	<p>Underlying Action Northern District of Georgia Case No. 1:03-CV-1572-WSD Judge William Duffey, Jr.</p>

DECLARATION OF SCOTT OUYOUNG

Scott Ouyoung, being first duly sworn on oath, states as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called upon, could truthfully and accurately testify to them.

2. I am the president of Globe Union Industrial Corporation, a publicly-held corporation which is incorporated in the Republic of China (Taiwan) and has its principal place

¹ In Case No. 1:05-cv-04538, which is assigned to Judge Plunkett and Magistrate Judge Schenkier, the Court has before it two motions to quash related to subpoenas issued in the Northern District of Illinois and related to the same underlying case pending in the Northern District of Georgia.

of business at 22 Chien Kuo Road, Taichung Export Processing Zone, Tantz, Taiwan, Republic of China.

3. I am a resident of the Republic of China (Taiwan) and do not maintain a residence or office at any place in the United States.

4. GUIC has many subsidiaries, both direct and indirect.

5. One of GUIC's indirect subsidiaries is Danze, Inc. ("Danze"), which before April 18, 2005, was known as Globe Union America Corporation ("GUA"). I am the director of Danze. Danze's president is Michael Werner. I am not an officer, employee or managing agent of Danze.

6. Danze maintains a warehouse and office in Bolingbrook, Illinois. I do not have an office there.

7. Keith E. Yurko is Danze's secretary. Mr. Yurko is employed by Danze at its Bolingbrook office.

8. I have never authorized Mr. Yurko to accept service of subpoenas (or any other process) on my behalf and to the best of my knowledge, he has no such authority.

9. Nevertheless, I have been informed that, on Friday afternoon, August 19, 2005, Illinois time, a process server left five subpoenas addressed to me (at Danze's Bolingbrook office address, which is not my address) (the "Subpoenas"). I understand he left the Subpoenas after Mr. Yurko told him he was not authorized to accept them.

10. I learned of this on Wednesday of this week, August 24, 2005, Taiwan time, which is Tuesday, August 23, 2005, in Chicago.

11. I also understand that on Friday, August 19, 2005, copies of some of the Subpoenas were delivered to Corporation Service Company ("CSC") in Springfield, Illinois.

12. I understand that CSC is the agent for service of process on Danze. However, I have never authorized it to accept service of subpoenas or any other process on my behalf and I do not believe it has such authority.

13. Also, I understand that the Subpoenas purport to require my attendance at a deposition in Chicago on Wednesday, August 31, 2005, at 10:00 a.m. Chicago time.

14. Needless to say, Taiwan is many thousands of miles from Chicago.

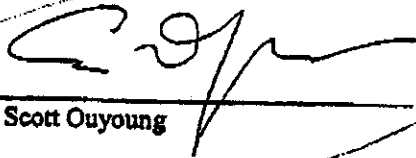
15. I am presently in the hospital for surgery on my nose and may still be here on Friday of this week—August 26 in Chicago. In any event, when I am released, I will need to spend some time at home recovering and I will be unable to travel by air for awhile because of pressure changes in aircraft.

16. For these reasons, among many others, there is no way that, on such short notice, I could be in Chicago for a deposition on Wednesday, August 31 (Chicago time).

17. I do not reside, am not employed, and do not regularly transact business in person within 100 miles of Chicago, Illinois.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25 day of August, 2005.



Scott Ouyoung

EXHIBIT V

LAW OFFICES OF
CARLOS F. NEGRETE
ATTORNEYS AT LAW
27422 CALLE ARROYO
SAN JUAN CAPISTRANO, CALIFORNIA 92675-2747
Telephone (949) 493-8115
Fax (949) 493-8170

June 9, 2005

VIA FACSIMILE: (404) 881-4411, EMAIL AND MAIL

Ronan P. Doherty, Esq.
BONDURANT MIXSON & ELMORE
1201 W Peachtree St, N.W.
3900 One Atlantic Center
Atlanta, GA 30309

Re: U.S. Faucets, Inc., et al. v. Home Depot USA, Inc., et al.

Subject: Response to June 6, 2005 Letter / Email

Dear Mr. Doherty:

I am in receipt of the letter you sent to Mr. Negrete and me dated June 6, 2005, in which you request our reasons for requiring the depositions of the Globe Union witnesses.

Although I have discussed this issue and our reasons for taking these depositions previously, I will accommodate your request that they be set forth in writing.

Although you would like to believe so, the Court has not stricken any portions of the operative Complaint and has merely dismissed without prejudice, pending a ruling on our Motion for Reconsideration, five (5) of Plaintiffs' fourteen (14) causes of action. The claims that remain against Home Depot, Expo Design Centers (or Home Expo), and Pegasus include the following: Interference with Civil Rights, Civil Conspiracy to Violate California's Unruh Civil Rights Act, Violation of California's Civil Rights Act, Intentional Interference with Prospective Advantage, Negligent Interference with Prospective Advantage, Intentional Inducement of Breach of Contract, Trade Libel, Breach of Implied Covenant of Good Faith and Fair Dealing, and Civil Conspiracy.

All of the facts and allegations set forth in the Complaint must be taken by the Court as true. My clients, U.S. Faucets, Inc. and Jas Corp. (collectively referred to as "USF"), have alleged certain conduct between Home Depot (and Expo and Pegasus) and Globe Union America Corporation ("GUA") related to each of the remaining claims,

including the fact that Home Depot terminated its business relationship with USF then proceeded to sell, within a month, faucets and other bathroom fixtures that were duplicates, copies and/or knock-offs of USF's products. Based on the length of time it takes to manufacture and ship such products for sale by Home Depot, USF has alleged that Home Depot knew prior to terminating its relationship with USF that these GUA products it was going to sell were in fact duplicates, copies and/or knock-offs of USF's products, entered into a business relationship with GUA knowing it would terminate its relationship with USF in order to sell such duplicates, copies and/or knock-off products at a more cost effective rate, and intended to seriously damage USF (who would then become a competitor of GUA and Home Depot upon termination) to the point that USF would face financial ruin and diminish its effect as a competitor of Home Depot.

More importantly, if the claims involve Globe Union Industrial Corporation and not GUA (as both Home Depot and GUA apparently allege), although GUA was formed by GUIC and run by the same officers and/or directors of GUIC for the purpose of selling products manufactured by GUIC in the United States (according to GUIC's own website), then the dismissal of GUA clearly has no effect on the allegations against Home Depot

Please be advised that USF was not aware of the true name of Globe Union when the complaint was filed and always believed that the North American business address in Illinois upon whom the Complaint was served was for the Globe Union entity (whether GUA or GUIC) with whom Home Depot had the business relationship set forth in the Complaint. It was GUA, not GUIC, who chose to file a response to the Complaint although they continued to allege that they were not the proper party. We still contend, and such contention is supported by GUIC's own website, that the Illinois address is the proper business address for GUIC in the United States. In fact, GUIC's website states that "Globe Union's general offices for North American sales, marketing and distribution of Danze and Gerber branded products as well as Private Brands is located at two facilities in the Chicago metropolitan area." The website does not distinguish the address as belonging to GUA or GUIC. In fact, the website also lists the Illinois address as the "headquarters of Globe Union Group, Inc."

If GUA filed its Answer when GUIC was the proper defendant and was properly served at the Illinois address, the GUIC may be in default of the operative Complaint and Globe Union never had standing to bring its motions. The discovery we request should also resolve this issue. The claim by GUA that it is a separate and distinguishable entity from GUIC and that GUIC does not maintain a business address at the Illinois address goes against Globe Union's motto set forth on its website of "One Family, One Vision".

Each and every one of these allegations remain active in this case. The only difference is that GUA is no longer a defendant (pending ruling on the motion for reconsideration).

As to the specific GUA and GUIC past and present officers, directors and employees we intend to depose, each has been identified by GUA as potentially having knowledge of the facts and issues presented in this case. In fact, I am surprised that Home Depot failed to identify most of these individuals in its Initial Disclosures and continues to refuse to identify them in Home Depot's recent response to USF's interrogatories. As individuals who may have information that may tend to lead to admissible evidence. In fact, in the recent responses that you personally executed, Home Depot failed to identify anybody from GUA or GUIC as having such knowledge.

Furthermore, USF believes that most of the relevant information concerning USF's allegations are exclusively in the possession, custody and control of Home Depot (and Expo and Pegasus) and Globe Union (both GUA and GUIC).

I will address each GUA and GUIC witness, as follows:

1. **Scott Ouyoung and David Yen**

According to the Illinois Secretary of States Office, Mr. Ouyoung was listed as a director of GUA. We also know that Mr. Ouyoung is the president and/or CEO of GUIC. Mr. Ouyoung informed USF in or around 1997 that he was forming GUA to handle sales in the United States. Mr. Ouyoung had several meetings and communications with USF offering to purchase USF. Recently, David Yen, another officer and/or director of GUIC, recently contacted USF following the Court's order on GUA's motion to dismiss gloating that the case was dismissed against "them" and that Mr. Ouyoung wanted to meet with them. Mr. Yen and Mr. Ouyoung's recent conduct shows that any corporate line between GUIC and GUA is very thin at best.

With regard to Mr. Ouyoung, GUA states in its Initial Disclosures, "Mr. Ouyoung is likely to have knowledge of Home Depot's purchase of Pegasus faucets, the relationship between GUIC and Home Depot, and between Globe Union and GUIC. Mr. Ouyoung has knowledge of any discussions that may have taken place with Jack Chang [of USF] regarding their respective companies, and the single visit to U.S. Faucets' facilities."

USF believes that the testimony of Mr. Ouyoung and Mr. Yen will shed light on, among other things, the opportunity GUA or GUIC had to manufacture and sell duplicates, copies, or knock offs of USF's products; the motives behind such conduct; Home Depot's involvement in or participation with such conduct; the financial benefit Home Depot gained from its relationship with Globe Union and its termination of Home Depot's business relationship with USF; and the relationship between GUA and GUIC and which is the proper defendant (or if both are proper defendants).

As such, Mr. Ouyoung's and Mr. Yen's testimony highly relevant to the issues remaining in this case (as well as to Home Depot's defenses).

2. **Keith Yurko**

Mr. Yurko first provided a declaration in support of GUA's Transfer Motion in April 2003. In the declaration, Mr. Yurko identified himself as a Vice President of GUA. Mr. Yurko declared that GUA's business involved the sale, marketing and distribution of faucets, showerheads, and related bathroom fixtures "sold by GUA's ultimate parent company, Globe Union Industrial Corporation." He further declared that "GUA's business also focuses on marketing and support of GUIC's direct import business of faucets, parts, and/or accessories to original equipment manufacturers, wholesalers and retailers" and that "GUA has a servicing agreement with GUIC relating to certain of GUIC's existing clients, including Home Depot" which involves, among other things, product replacements and product knowledge and support to Home Depot. More importantly, Mr. Yurko states that GUA's staff in its Atlanta office is charged with the "responsibility for assisting and servicing GUIC's relationships with Home Depot."

With regard to Mr. Yurko, GUA, in its Initial Disclosures, states, "Mr. Yurko has knowledge of the relationship between Globe Union and GUIC, the relationship of both companies with Home Depot, and the business dealings between the companies. **He also has knowledge of the visit to U.S. Faucets' facilities in California. Mr. Yurko has knowledge of the negotiations with Home Depot regarding the Pegasus product line and Globe Union's provision of marketing and sales support to GUIC in connection with its relationship with Home Depot.**" (Emphasis added.)

As such, Mr. Yurko's testimony is highly relevant to the issues remaining in this case (as well as to Home Depot's defenses).

3. **Steve Farmer**

GUA, in its Initial Disclosures, states, "Mr. Farmer was an account executive with Globe Union [apparently GUA] during the relevant time period, **and has knowledge** of the relationship between Globe Union and GUIC, the relationship of both companies with Home Depot, and the business dealings between the companies, including the negotiations with Home Depot regarding the Pegasus product line and Globe Union's provision of marketing and sales support to GUIC in connection with its relationship with Home Depot."

As such, Mr. Yurko's testimony is highly relevant to the issues remaining in this case (as well as to Home Depot's defenses).

4. **Jackson Chen, Annie Yu, and Robert Chang**

GUA, in its Initial Disclosures, states that these individuals "may have knowledge of the **sale of Pegasus faucets to Home Depot for its Expo Design Centers**, the relationship between GUIC and Home Depot, and the relationship between Globe Union and GUIC." These issues are central to USF's claims.

As such, Mr. Chen's, Ms. Yu's, and Mr. Chang's testimony is highly relevant to the issues remaining in this case (as well as to Home Depot's defenses).

5. **Charles Frankel**

GUA, in its Initial Disclosures, states, "Mr. Frankel was employed by Globe Union Canada during the relevant time period and may have knowledge of the sale of Pegasus faucets to Home Depot for its Expo Design Centers, the relationship between GUIC and Home Depot, and the relationship between Globe Union and GUIC." As stated above, these issues are central to USF's claims.

As such, Mr. Frankel's testimony is highly relevant to the issues remaining in this case (as well as to Home Depot's defenses).

GUA also states in its Initial Disclosures that other employees or representatives, both present and former, of GUA, GUIC or Globe Union Canada may

knowledge relating to the issues in this case. USF has the right to take the testimony of the witnesses listed above to determine whether any other presently unnamed witnesses exist who may have relevant information.

As stated above, the most disturbing thing about this situation is that Home Depot failed to disclose the names of any of these witnesses other than Keith Yurko in its Initial Disclosures, especially in light of the fact that Home Depot now takes the position (in its discovery responses) that it will not produce any documents or information regarding Home Depot's business relationship with any Globe Union entity. The fact that you apparently are not producing documents at this time and have only just begun to "conduct a reasonable search for . . . non-privileged" documents responsive to USF's document request, now forces USF to seek relevant information from other sources. USF is now forced to take the depositions of any person currently known to them who may possibly have that relevant information.

I apparently must remind you that USF, pursuant to FRCP Rule 26(b), has the right to obtain discovery from any source who has information **reasonably calculated to lead to the discovery of admissible evidence.**" (Emphasis added.) The identification alone by Globe Union in its Initial Disclosures satisfies this standard. However, the other factors I describe above clearly support our request to take the depositions of each of these witnesses.

As we have informed you previously, although we believe several if not all of these witnesses travel back and forth between Taiwan and the United States, we are prepared to take the deposition of Mr. Ouyoung, Mr. Yen, Mr. Chen, Mr. Chang, Ms. Yu, and Mr. Frankel in Taiwan during one single visit to GUIC's Taiwan headquarters. We believe the expense of such a trip is warranted in light of the fact that millions of dollars are at stake in this case.

As I have provided you our bases for seeking these depositions, I hope that you reciprocate and provide me in specific detail your bases under which you would move for a protective order (which should be more than the fact that the claims against GUA have been dismissed with prejudice).

Ronan P. Doherty, Esq.
June 10, 2005
Page 7

I look forward to your response. Should you have any questions, please feel free to give me a call.

Very truly yours,

LAW OFFICES OF CARLOS F. NEGRETE

LEE H. FREEDMAN

cc: Jeffrey O. Bramlett, Esq. (via email only)
Nancy Rigby, Esq. (via email only)
Tammy L. Adkins, Esq. (via email only)
Carlos F. Negrete, Esq. (via email only)

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2005, I served a true and correct copy of the foregoing *Jackson Chen's and Scott Ouyoung's Exhibits Pertaining to Their Motion to Quash* upon counsel for all parties in the underlying action by causing the exhibits to be delivered to them by overnight delivery, and upon Plaintiffs' local counsel in this action by messenger delivery, addressed as follows:

Carlos F. Negrete, Esq.
Offices of Carlos F. Negrete
27422 Calle Arroyo
San Juan Capistrano, CA 92675-2747

Jeffrey O. Bramlett, Esq.
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1201 West Peachtree St., N.W.
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