

WR

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>FILED AUG 25 2005 MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT</p> <p>Underlying Action Northern District of Georgia Case No. 1:03-CV-1572-WSD Judge William S. Duffey, Jr.</p>

**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.

Timothy C. Klenk
Christian M. Poland
BRYAN CAVE LLP
161 North Clark, Suite 4800
Chicago IL 60601-3213
Telephone: (312) 602-5000
Facsimile: (312) 602-5050

Tammy L. Adkins
McGuireWoods LLP
77 West Wacker Drive, Suite 4100
Chicago, IL 60601
Telephone: (312) 750-5727
Facsimile: (312) 920-6193

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

- (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.

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

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 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 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.

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