

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NORTH AMERICAN KARAOKE-WORKS TRADE
ASSOCIATION, INC.,

Plaintiff-Counterclaim
Defendant,

-against-

CENTRAL GROUP INTERNATIONAL, LLC,

Defendant-
Counterclaimant,

-against-

SAM CHAN and RAY YIM,

Counterclaim
Defendants.

Case No.

06-cv-
5158 (LTS) (MHD)

ECF CASE

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DECLARATION OF SAM CHAN

Sam Chan declares as follows:

1. I am named as a counterdefendant in this action.
2. I am an officer of the North American Karaoke-works Trade Association, Inc. ("NAKTA").
3. NAKTA is a non-profit professional association for the karaoke industry.
4. I do not receive any compensation for my services to NAKTA, nor do I ever expect to be compensated for those services.
5. In addition to my role in NAKTA, I am a principal in ABC Target Inc. which operates a karaoke club known as Galaxy 45 in New York, New York ("Galaxy").

6. Galaxy is a licensee of Entral Group International, LLC ("EGI").

7. Galaxy does not use NAKTA's library of materials; therefore, I do not receive any monetary benefit from NAKTA's works.

8. I make the foregoing declaration under penalty of perjury.

Dated: New York, New York
September 25, 2006



Sam Chan