

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NORTH AMERICAN KARAOKE-WORKS
TRADE ASSOCIATION, INC.

Plaintiff and Counterclaim Defendant,
v.

ENTRAL GROUP INTERNATIONAL, LLC,
Defendant and Counterclaim Plaintiff,

v.

SAM CHAN and RAY YIM,
Counterclaim Defendants.

Case No. 06-CV-5158 (LTS)(MHD)

**DECLARATION OF ROBERT E. HANLON IN SUPPORT OF
DEFENDANT AND COUNTERCLAIM PLAINTIFF'S REPLY
MEMORANDUM IN SUPPORT OF THE STRIKING OF
PLAINTIFF'S AND COUNTERCLAIM DEFENDANTS' PLEADINGS**

ROBERT E. HANLON, pursuant to 28 U.S.C. § 1746, hereby declares under
penalty of perjury:

1. I am partner in the law firm of Alston & Bird LLP ("A&B") and am a
member in good standing of the Bars of the States of New York and New Jersey, the
United States District Courts for the Southern and Eastern Districts of New York and the
Districts of New Jersey and Arizona, the United States Court of Appeals for the Second
Circuit and the United States Supreme Court. I am familiar with the facts and
circumstances in this action.

2. My firm and I presently serve as counsel to Entral Group International, LLC
("EGI"), Defendant and Counterclaim Plaintiff in this action.

3. Attached hereto are true and accurate copies of the following orders issued by the Court in connection with the above referenced matter and referenced in Defendant and Counterclaim Plaintiff's Reply Memorandum in Support of the Striking of Plaintiff's and Counterclaim Defendants' Pleadings:

- a. Exhibit A – Initial Conference Order dated July 25, 2006.
- b. Exhibit B – Order dated October 16, 2006.
- c. Exhibit C – Docket reflecting Minute Order dated December 1, 2006.

4. Attached hereto are courtesy copies of the following unreported cases cited in Defendant and Counterclaim Plaintiff's Reply Memorandum in Support of the Striking of Plaintiff's and Counterclaim Defendants' Pleadings:

- a. Exhibit D – *Pastorello v. City of New York*, No. 95 Civ. 470, 2003 WL 22118972 (S.D.N.Y. Sept. 11, 2003); and
- b. Exhibit E – *Yeboah v. U.S.*, No. 99 Civ. 4923, 2000 WL 1576886 (S.D.N.Y. Oct. 20, 2000).

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

Dated: New York, New York
January 26, 2007

s/ Robert E. Hanlon

Robert E. Hanlon, Esq.