## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NORTH AMERICAN KARAOKE-WORKS TRADE ASSOCIATION, INC.,

Case No.

Plaintiff-Counterclaim Defendant,

06cv5158(LTS)(MHD)

-against-

ECF CASE

ENTRAL GROUP INTERNATIONAL, LLC,

Defendant-Counterclaimant,

-against-

SAM CHAN and RAY YIM,

Counterclaim Defendants.

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## **DECLARATION OF DAVID J. HOFFMAN**

1. I am counsel for the Counterclaim Defendants in this action.

2. Attached hereto as Exhibit A is a true copy of a chart derived from information contained in the copyright registration certificates attached as Exhibits to EGI's Counterclaim.

3. Attached hereto as Exhibit B is a true copy of the Declaration of Nicolas Chai, dated November 1, 2006.

4. Attached hereto as Exhibit C is a true copy of the TCW-Cinepoly Agreement dated March 1, 2003.

5. Attached hereto as Exhibit D is a true copy of the TCW-EGI Master Agreement dated June 1, 2003.

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6. Attached hereto as Exhibit E is a true copy of the Declaration of Hung Tk, dated December 17, 2003.

7. Attached hereto as Exhibit F is a true copy of the Declaration of Raymond Lo, dated October 29, 2003.

8. Attached hereto as Exhibit G is a true copy of the Declarations of Chan Fai Hung, Kitty Ng, and Ng Yu.

9. Attached hereto as Exhibit H is a true copy of the Copyright Designs and Patents Act of 1988 (UK).

10. Attached hereto as Exhibit I is a true copy of a Memorandum of Law dated February 28, 2006.

11. Attached hereto as Exhibit J is a true copy of the Outlet License Agreement, dated January 1, 2004.

12. Attached hereto as Exhibit K is a true copy of the transcript of the deposition of Sam Chan, pp. 54-55.

13. Attached hereto as Exhibit L is a true copy of the transcript of the deposition of Sam Chan, pp. 110-111.

14. Attached hereto as Exhibit M is a true copy of the permanent injunction on consent in Entral Group International v. Galaxy Bar & Restaurant.

15. Attached hereto as Exhibit N is a true copy of the permanent injunction on consent in Entral Group International v. Melody of Flushing.

 Attached hereto as Exhibit O is a true copy of a karaoke blanket license dated October 1, 2003, an exhibit in EMI World Entertainment v.
Priddis Music, Inc.

- 17. I declare the foregoing under penalty of perjury.
- Dated: New York, New York July 30, 2007

/s/\_\_\_\_ David J. Hoffman 18. Pursuant to 28 USC 1746 I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York July 30, 2007

warenne

Sam Chan