

Chan

A. Okay.

Q. Have you ever processed any of the content in your system to do something like that, that is to extract the audio portion of the content and save it, I understand in a different format, not in a karaoke format, but in a different format at any time?

A. No. Not at all.

Q. To your knowledge has your partner ever done that?

A. Not at all.

Q. To your knowledge has anyone else in connection with your club and the material in your system ever done that?

A. No.

Q. Let me just review something briefly. You say you began being involved with Galaxy 45 in January or February of 2005?

A. Yes.

Q. At that time was Mr. Nicholas Chai an employee of Galaxy 45?

A. No. According to my previous partner, that he was employed under him I believe on the year 2002 and year 2003 at that

1 Chan

2 moment I believe.

3 Q. That is not your current partner?

4 A. No.

5 Q. So Mr. Chai was employed not by
6 you or the present owners of the club, but by
7 some previous owners of the club?

8 A. Yes.

9 Q. A number of years before you were
10 there?

11 A. Yes. But under the same
12 corporations.

13 Q. Mr. Chan, I would like to do
14 something that was required to be done
15 earlier.

16 Would you mark this as Plaintiff's
17 Exhibit 24, subpoena.

18 (Plaintiff's Exhibit 24, subpoena,
19 marked for identification, as of this
20 date.)

21 Q. Mr. Chan, I am giving you a
22 document that has been marked as Plaintiff's
23 Exhibit 24, it is a subpoena issued by the
24 United States District Court for the Eastern
25 District of New York, and it is addressed to