

1 Chan

2 you guys have the right, that what Cheng's
3 work is for playing in public. That is what I
4 relate Cheng's work, that is -- but, okay,
5 make sure go out to find, okay, go out to find
6 out if any license that have to be complied
7 before you guys play commercially.

8 Q. Did you tell them that they needed
9 a separate license for Cheng's work?

10 A. Yes. ASCAP.

11 Q. Did you tell them that ASCAP was
12 the only license that they needed for Cheng's
13 work?

14 A. No. I said you guys -- besides
15 ASCAP you guys have to go out to find any
16 other license compliance, to comply to play
17 the video in the public.

18 Q. Did you make copies of the hard
19 drives to give to members?

20 A. Yes, based on their request, yes.

21 Q. How many members did you make
22 copies for?

23 A. I believe 100 Fun, Melody and what
24 is it, I believe there is one more. What is
25 this guy's name. I have to look at the

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2 record.

3 Q. Was it YHLC?

4 A. Yes.

5 Q. Black Swan?

6 A. Yes, thanks for reminding me.

7 Q. Is there another club beyond those
8 three?

9 A. I believe that is it.

10 Q. Did you install Cheng's content --

11 A. We never installed --

12 Q. Let me finish the question. Did
13 you install Cheng's content in Galaxy 45?

14 A. No.

15 Q. Do you believe that these clubs
16 needed additional licenses from other sources
17 aside from ASCAP to use Cheng's work?

18 MR. HOFFMAN: Objection.

19 A. I am still in the discovery period
20 for my club -- for this non-profit
21 organization. And I am -- that is why I have
22 Mr. Hoffman, our legal consultant to see, you
23 know, if any license right that we need
24 besides ASCAP to play in public. But for our
25 club we never using it for any public use. In