

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, )	)	09 Civ. 8811 (JSR)
	)	
Plaintiff, )	)	ECF CASE
	)	
v. )	)	JURY TRIAL DEMANDED
GALLEON MANAGEMENT, L.P., et, al. )	)	
	)	
Defendants. )	)	
	)	

**DEFENDANT CHOO-BENG LEE’S ANSWER TO THE AMENDED COMPLAINT**

Defendant Choo-Beng Lee (“Lee”), by and through his undersigned counsel, for his Answer to the Amended Complaint (the “Complaint”), hereby responds to the allegations of the Complaint as follows. This Answer employs the same section headings and titles as the Complaint, but Lee does so only for convenience’s sake, and does not admit the admit or concede the accuracy or truthfulness of any of the headings or titles in the Complaint.

**SUMMARY**

1. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.
2. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.
3. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.
4. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

5. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**DEFENDANTS**

6. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

7. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

8. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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25. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

26. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**RELEVANT ENTITIES**

27. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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40. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

41. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**A. Insider-Trading in Polycom Securities**

42. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

43. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**a. Polycom's Q4 2005 Earnings Release – January 25, 2006**

44. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

45. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

46. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

47. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

48. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

49. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**II. Polycom's Q1 2006 Earnings Release**

50. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

51. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

52. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

53. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**B. Insider Trading in Hilton Securities**

54. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

55. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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64. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

65. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**C. Insider Trading in Google Securities**

66. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

67. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

68. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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77. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**D. Insider Trading in Kronos Securities**

78. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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80. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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89. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

90. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**E. Insider Trading in Intel Securities**

91. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**(a) Intel's Q4 2006 Earnings Release – January 16, 2007**

92. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

93. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

94. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

95. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

96. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**II. Intel's Q1 2007 Earnings Release – April 17, 2007**

97. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

98. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

99. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

100. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

101. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**III. Intel's Q3 2007 Earnings Release – October 16, 2007**

102. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

103. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**F. Insider Trading in Clearwire Securities**

104. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

105. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

106. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

107. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

108. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

109. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

110. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

111. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**G. Insider Trading in PeopleSupport Securities**

112. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

113. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

114. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

115. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

116. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**H. Insider Trading in Akamai Securities**

117. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

118. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

119. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

120. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

121. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

122. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**I. Insider Trading in SUN Securities**

123. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

124. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

125. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

126. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

127. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

128. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

129. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**J. Insider Trading in AMD Securities**

130. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

131. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

132. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

133. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

134. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

135. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

136. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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141. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

142. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

143. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**K. Insider Trading in IBM Securities**

144. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

145. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

146. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

147. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

148. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**L. Insider Trading in Atheros Securities**

149. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

150. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

151. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

152. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

153. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

### **CLAIMS FOR RELIEF**

#### **CLAIM I**

#### **Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder (Against All Defendants)**

154. Lee repeats and realleges each and every response in paragraphs 1 to 153 as if fully set forth herein.

155. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

156. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

157. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

158. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

159. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

160. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

161. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.



162. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

163. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

164. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

**CLAIM II**  
**Violations of Section 17(a) of the Securities Act**  
**(Against Galleon, Rajaratnam, Goel, Chiesi, Kurland, New Castle, Khan, Lee, Lee, Lee & Lee, Spherix Capital, Hariri, Shankar, Schottenfeld, Fortuna and S2 Capital)**

165. Lee repeats and realleges every response in paragraphs 1 to 164 as if fully set forth herein.

166. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

167. On the advice of counsel Lee invokes his rights under the Fifth Amendment and declines to Answer.

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**RELIEF SOUGHT**

On the advice of counsel Lee invokes his right under the Fifth Amendment and declines to respond to the relief sought.

Respectfully submitted:

By: \_\_\_\_\_ /s/  
JEFFREY L. BORNSTEIN  
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laura.brevetti@klgates.com

Dated: December 18, 2009

*Attorneys for Defendant Choo-Beng Lee*