

Judge: Paul B. Snyder
Location: Tacoma
Chapter: 15
Date of Hearing: 2/28/06
Response Date: 2/24/06

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9 UNITED STATES BANKRUPTCY COURT
10 WESTERN DISTRICT OF WASHINGTON

11 In re:

12 Petition of HO SEOK LEE as Court-Appointed
13 Manager of YOUNG CHANG CO. LTD,

14 Debtor in Foreign Bankruptcy.

No. 06-40043

DECLARATION OF MICHAEL YI
IN SUPPORT OF MOTION TO ALLOW
SERVICE BY REGISTERED MAIL

15 Michael Yi, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury as
16 follows:

17 1. I am the ACTING President of A N D Music Corp., a Delaware Corporation
18 located in Lakewood, Washington.

19 2. A N D Music Corp. is a subsidiary of Young Chang Co. LTD., a Korean
20 corporation.
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1 3. Mr. Back Lee, an employee of Samick Music Corp. (a US subsidiary of
2 Samsung) informed me of the contents of the US Bankruptcy Court's January 26, 2006 order
3 before I had received a copy of it from counsel. This leads me to believe that Samsung is
4 aware of this Chapter 15 proceeding.

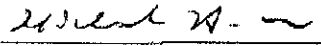
5 4. Korean citizens were on national holiday for the New Year celebration
6 between January 26 and February 6.

7 5. Young Chang mailed Samsung copies of its Chapter 15 Petition and the
8 Application for Recognition of Foreign Proceeding, and supporting declarations via the
9 Korean Postal Office. The return receipt, a copy of which is attached here to as Exhibit 1,
10 states that Korean Postal Office employee Seung Gun Baik delivered the documents to
11 Samsung employee Soon Mun Kwon at Samsung's Korean offices on February 7, 2006.

12 6. The Republic of Korea's court system does not have the equivalent of personal
13 service in the US. All court documents are delivered to litigants by the courts.

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

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16 Executed at Los Angeles, California, on February 10, 2006

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20 Wanhee Lee aka Michael Yi