

1 DONGXIAO YUE
2777 ALVARADO ST., SUITE C
2 SAN LEANDRO, CA 94577

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 DONGXIAO YUE,

11 Plaintiff,

12 v.

13 GAOGAO HAN, an individual,
14 HANSHAN.CO, HANSHAN.INFO
15 and DOES 1-10

16 Defendants.
17

Case No. 3:15-cv-03463-HSG (SK)

DECLARATION OF DONGXIAO YUE ON
THE PARTIES' PRODUCTION OF
DOCUMENTS

Hearing Date: December 8, 2016
Judge: The Honorable Sallie Kim

18 1. I am the plaintiff of this lawsuit. I have knowledge of the matters stated herein, and if
19 called upon to do so, I could and would competently so testify.

20 2. I make this declaration to refute Defendant's Gaogao Han's various representations on
21 production of documents.

22 3. On September 28, 2016, Han emailed his responses to my discovery requests served in
23 July 2016. With the email he attached 4 documents in a 15 megabyte RAR file, named "Answer's
24 docs.rar". Below is a screenshot of Han's email.
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- 4. RAR is a format similar to the ZIP format, both compress and pack folders of files.
- 5. On October 17, 2016, I sent Han an email with a link to download a 280MB ZIP file from ZZB server.
- 6. On November 21, 2016, Han requested that I sent him the ZIP file to him by email.



1 7. I checked the server log, and found Han did not make any attempt to download the file. I
2 told Han the file being 280MB was too big to email, and asked Han to download it.

3 8. On November 29, 2016, Han emailed me stating that he could not successfully download
4 the file. Han asked me to split the file.

5 9. I checked the server log, found that he downloaded about 280MB from the ZZB server on
6 November 28, 2016.

7 10. Immediately after getting Han's email, I split the 280MB ZIP file into 28 smaller files, and
8 provide the links for Han to download. Below was my email message to Han:



15 Mr. Han,

16 As I stated, electronic download is a valid method of delivery of e-discovery documents.
17 For your convenience, I have split the files into 28 10MB ones.

18 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.001>

19 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.002>

20 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.003>

21 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.004>

22 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.005>

23 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.006>

24 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.007>

25 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.008>

26 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.009>

27 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.010>

28 <http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.011>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.012>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.013>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.014>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.015>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.016>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.017>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.018>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.019>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.020>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.021>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.022>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.023>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.024>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.025>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.026>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.027>

<http://zzwave.com/confidential/yue-v-han-pd1-1037-split.zip.028>

On 2016-11-29 10:41, G. Han wrote:

Mr. Yue,

I have tried to download your documents, but could not made it successfully.

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EXHIBIT A

INSTRUCTIONS FOR GAOGAO HAN ON HOW TO JOIN SPLIT ZIP FILES

Message 15 of 438



From Don Yue
To G. Han
Cc Dongxiao Yue, yuedongxiao@gmail.com
Reply-To ydx@netbula.com
Date Fri 20:36

Mr. Han,

See attached instructions.
If you can't understand or follow the instructions, let me know.

On 2016-12-02 12:03, Don Yue wrote:

Mr. Han,

Did you read my email below?
It seems that your computer skills are so limited, I have to teach you the basics.

On 2016-12-01 20:18, Don Yue wrote:

Mr. Han,

Please use the open source solution 7zip to combine the split files.
<http://www.7-zip.org/download.html>

BTW, I just tested the online download from zzwave.com, and it worked fine.

On 2016-12-01 18:36, G. Han wrote:

Mr. Yue,

Thanks a lot that you sent me the separated 28 zip files. However, your files are still not readable.

Your files are unknown format or damaged. You may try to send in PDF format itself.

Gaogao Han

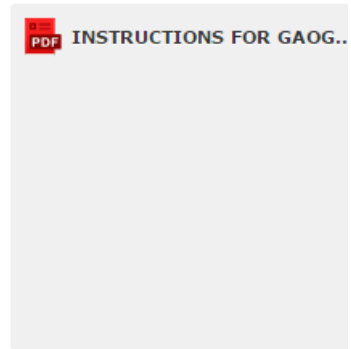
P.S. See the error message for the first two files:

The following is the first file:

The following is the second file:

FROM: Dongxiao Yue [mailto:dxyue2016@outlook.com]
SENT: Thursday, December 01, 2016 3:05 AM
TO: ydx@netbula.com
CC: G. Han <my2888@outlook.com>; yuedongxiao@gmail.com
SUBJECT: Plaintiff's Production (split 1 of 28)

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Dongxiao Yue, Ph.D.



INSTRUCTIONS FOR GAOGAO HAN ON HOW TO JOIN SPLIT ZIP FILE

STEP 1.

Download 7ZIP, an open source application, from <http://www.7-zip.org/download.html> . Choose the proper OS. Install.

STEP 2.

Right click on the first file. See picture below.

STEP 3.

You should see 7zip interface with the ZIP file. See picture.

STEP 4:

Select the ZIP file, click on the Extract button.

STEP 5:

Extract.

See pictures.

The screenshot shows a Windows File Explorer window titled 'C:\Temp'. The address bar indicates the current location is 'This PC > Local Disk (C:) > Temp'. The file list contains 29 files, all named 'yue-v-han-pd1-1037-split.zip.000' through 'yue-v-han-pd1-1037-split.zip.028'. The first file is selected, and a context menu is open over it. The context menu includes options such as 'Open with', 'Scan with AVG', 'AxCrypt', 'Send to', 'Cut', 'Copy', 'Create shortcut', 'Delete', 'Rename', and 'Properties'. A secondary sub-menu is also visible, showing options like 'Open archive', 'Extract files...', 'Extract Here', 'Test archive', 'Add to archive...', and 'Compress and email...'.

Name	Date modified	Type	Size
yue-v-han-pd1-1037-split.zip.000			10,240 KB
yue-v-han-pd1-1037-split.zip.001			10,240 KB
yue-v-han-pd1-1037-split.zip.002			10,240 KB
yue-v-han-pd1-1037-split.zip.003			10,240 KB
yue-v-han-pd1-1037-split.zip.004			10,240 KB
yue-v-han-pd1-1037-split.zip.005			10,240 KB
yue-v-han-pd1-1037-split.zip.006			10,240 KB
yue-v-han-pd1-1037-split.zip.007			10,240 KB
yue-v-han-pd1-1037-split.zip.008			10,240 KB
yue-v-han-pd1-1037-split.zip.009			10,240 KB
yue-v-han-pd1-1037-split.zip.010			10,240 KB
yue-v-han-pd1-1037-split.zip.011			10,240 KB
yue-v-han-pd1-1037-split.zip.012			10,240 KB
yue-v-han-pd1-1037-split.zip.013			10,240 KB
yue-v-han-pd1-1037-split.zip.014			10,240 KB
yue-v-han-pd1-1037-split.zip.015			10,240 KB
yue-v-han-pd1-1037-split.zip.016			10,240 KB
yue-v-han-pd1-1037-split.zip.017			10,240 KB
yue-v-han-pd1-1037-split.zip.018	11/29/2016 9:16 PM	018 File	10,240 KB
yue-v-han-pd1-1037-split.zip.019	11/29/2016 9:16 PM	019 File	10,240 KB
yue-v-han-pd1-1037-split.zip.020	11/29/2016 9:16 PM	020 File	10,240 KB
yue-v-han-pd1-1037-split.zip.021	11/29/2016 9:16 PM	021 File	10,240 KB
yue-v-han-pd1-1037-split.zip.022	11/29/2016 9:16 PM	022 File	10,240 KB
yue-v-han-pd1-1037-split.zip.023	11/29/2016 9:16 PM	023 File	10,240 KB
yue-v-han-pd1-1037-split.zip.024	11/29/2016 9:16 PM	024 File	10,240 KB
yue-v-han-pd1-1037-split.zip.025	11/29/2016 9:16 PM	025 File	10,240 KB
yue-v-han-pd1-1037-split.zip.026	11/29/2016 9:16 PM	026 File	10,240 KB
yue-v-han-pd1-1037-split.zip.027	11/29/2016 9:16 PM	027 File	10,240 KB
yue-v-han-pd1-1037-split.zip.028	11/29/2016 9:16 PM	028 File	4,564 KB

The screenshot shows a Windows File Explorer window with the address bar set to 'This PC > Local Disk (C:) > Temp'. The ribbon is set to 'View', and the 'Details' view is selected. Three files are listed in the main pane:

Name	Date modified	Type	Size
yue-v-han-pd1-1037-split.zip.001	11/29/2016 9:16 PM	001 File	10,240 KB
yue-v-han-pd1-1037-split.zip.002	11/29/2016 9:16 PM	002 File	10,240 KB
yue-v-han-pd1-1037-split.zip.003	11/29/2016 9:16 PM	003 File	10,240 KB

A context menu is open over the first file, showing the following options:

- Add
- Extract
- Test
- Copy
- Move
- Delete
- Info

The context menu also shows a table of file details for the selected file:

Name	Size	Packed Size	Modified	Created	Accessed	Attributes
yue-v-han-p...	287 788 834	287 788 834	2016-11-29 21:12	2016-11-29 21:13	2016-11-29 21:13	A

At the bottom of the window, the status bar indicates '0 object(s) selected'.

