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9 Attorneys for Specially-Appearing Defendants
10 Pangang Group Company, Ltd., Pangang Group
Steel Vanadium & Titanium Company, Ltd.,
11 Pangang Group Titanium Industry Company,
Ltd., and Pangang Group International Economic
& Trading Company

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14
15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 PANGANG GROUP COMPANY, LTD.,
19 PANGANG GROUP STEEL VANADIUM &
TITANIUM COMPANY, LTD.,
20 PANGANG GROUP TITANIUM
INDUSTRY COMPANY, LTD., and
21 PANGANG GROUP INTERNATIONAL
ECONOMIC & TRADING COMPANY,

22 Defendants.
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CASE NO. CR 11-0573 JSW

**SPECIALLY-APPEARING
DEFENDANTS' NOTICE OF MOTION
AND SECOND MOTION TO QUASH
SERVICE OF SUMMONSES**

Hearing Date: March 21, 2013 at 2:00 p.m.

1 TO THE COURT, THE GOVERNMENT, ALL PARTIES AND THEIR ATTORNEYS OF
2 RECORD:

3 PLEASE TAKE NOTICE that on March 21, 2013 at 2:00 p.m., or as soon thereafter as the
4 parties may be heard, in Courtroom 11 on the 19th Floor of the San Francisco Courthouse, 450
5 Golden Gate Avenue, San Francisco, CA 94102, specially appearing defendants Pangang Group
6 Co., Ltd., Pangang Group Titanium Industry Co., Ltd., and Pangang Group International
7 Economic & Trading Co. will and hereby do move to quash the service of summonses purportedly
8 made as asserted in the Government's Notice Regarding Service of Summonses on Pangang
9 Group Defendants (Dkt. No. 210), filed on December 6, 2012.

10 This motion is made on the grounds that the Government has not complied with the
11 requirements for service of process under Rules 4 and 9 of the Federal Rules of Criminal
12 Procedure.

13 This motion is based on this Notice of Motion and Motion; the supporting Memorandum
14 and Points of Authorities, and the Declarations of Lai Yizhong, Liu Yanxiong, Song Chengbin,
15 Wang Gang, and Zhou Xia, filed concurrently herewith; the records and files of this Court, and all
16 other matters of which the Court may take judicial notice.

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19 DATED: February 7, 2013

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Robert P. Feldman

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Robert P. Feldman

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John M. Potter

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Attorneys for Specially-Appearing Defendants
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Steel Vanadium & Titanium Company, Ltd.,
Pangang Group Titanium Industry Company,
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