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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.

CASE NO. CR 11-0573 JSW

**DECLARATION OF ZHOU XIA IN
SUPPORT OF SPECIALLY-APPEARING
DEFENDANTS' SECOND MOTION TO
QUASH SERVICE OF SUMMONSES**

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

DECLARATION OF ZHOU XIA

I, ZHOU XIA, declare as follows:

1. My name is Zhou Xia. I also use the name Bella Zhou in English. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
2. I am currently employed by the Chengdu West Union Chemical Corporation (“West Union”). I began full-time permanent employment with West Union in October 2011. I have never been employed by Pangang Group Company Ltd. (“Pangang Group”) or Pangang Group Titanium Industry Company Ltd. (“Pangang Group Titanium”) or any of their related companies or subsidiaries.
3. In October 2012, I attended a conference hosted by the Society of Plastics Engineers Color and Appearance (“SPECAs Conference”) in Louisville, Kentucky. I attended that conference solely in my capacity as a West Union employee.
4. Prior to attending the SPECAs Conference, I corresponded via email with Sandra Davis, the General Chair of the SPECAs Conference, about logistics for attending the conference. I have reviewed Exhibits 6, 7 and 8 to the Government’s Notice Regarding Services of Summonses on Pangang Group Defendants, dated December 6, 2012, and those three exhibits are true and correct copies of my email correspondence with Ms. Davis.
5. In my emails to Ms. Davis, I stated that I worked for the Pangang Titanium Industry Company, Ltd. in China. I have never worked for Pangang Titanium Industry Company, Ltd. in China and I have never been employed by Pangang Group Titanium, which is located in Sichuan Province, China. Nobody from Pangang Group Titanium requested that I attend the SPECAs Conference and I did not communicate with anybody from Pangang Group Titanium about my plans to attend the SPECAs conference. I wrote to Ms. Davis in my capacity as a West Union employee and, as noted above, attended the SPECAs Conference in my capacity as a West Union employee.
6. West Union paid all of my expenses to attend the SPECAs Conference. To my knowledge, Pangang Group Titanium did not know I was attending this conference.
7. In my emails to Ms. Davis, I used the email address bella@pangang-titanium.com. I did not obtain this email address from Pangang Group Titanium and this email address is not related to Pangang Group Titanium in any way. I did not use this email address when I corresponded with Pangang Group Titanium.
8. I signed my emails to Ms. Davis with the signature block as follows:

PANGANG TITANIUM INDUSTRY CO., LTD
PANGANG JINMAO MANSION, NO. 266 SHAWAN ROAD
CHENGDU CITY, CHINA 61031
Tel: +86 28 61500891 611

Fax: +86 28 61500892
Mobile: +86-13558899147
Email: bella@pangang-titanium.com

The address listed above that I put in my signature block is not my address, nor is it the address of West Union. Rather my correct business address is that of West Union, which is:

West Union Chemical Corporation
Room 906, Building A, Renhe Spring Plaza, No. 19
22nd Section Rd, 2nd Ring Rd.
Chengdu City, Sichuan Province, PRC.

9. In my emails to Ms. Davis, I stated that I would be attending the SPECA Conference with a man named Xie Hao. I did in fact attend the SPECA Conference together with Mr. Xie. I identified Mr. Xie to Ms. Davis as the General Manager of Tinox Chemical LLC, an entity which I stated was the Chicago Branch Office of Pangang Titanium Co., Ltd. In fact, Tinox Chemical is not the Chicago Branch Office of Pangang Group Titanium. Rather, Tinox Chemical is an affiliate of West Union and is not related to Pangang Group Titanium or any other Pangang Group related companies or subsidiaries.

10. My statements and actions described above were made at the direction of my employer.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 23 day of January 2013 in Beijing, China.


Zhou Xia