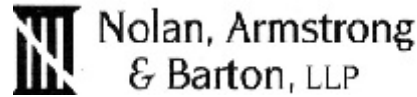


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16 Attorneys for Defendant  
17 WALTER LIEW

18  
19 IN THE UNITED STATES DISTRICT COURT  
20 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
21 SAN FRANCISCO DIVISION

22		)	<b>Case No. CR 11-00573 JSW</b>
23	UNITED STATES OF AMERICA,	)	
24		)	<b>ERRATA TO DEFENDANT’S MOTION</b>
25	Plaintiff,	)	<b>FOR AN ORDER REVOKING THE</b>
26		)	<b>DETENTION ORDER AND GRANTING</b>
27	vs.	)	<b>PRETRIAL RELEASE</b>
28		)	<b>Date: January 25, 2012</b>
	WALTER LIEW and	)	<b>Time: 11:00 A.M.</b>
	CHRISTINA LIEW,	)	
		)	<b>Dept: Hon. Magistrate Judge</b>
	Defendants.	)	<b>Nathaniel Cousins</b>

23 The undersigned prepared defendant WALTER LIEW’s motion for an order  
24 revoking the detention order and granting pretrial release, which was filed on January 18,  
25 2012. See Doc #48. After reviewing the motion, counsel has discovered errors in the  
26 pleading. An errata sheet has been prepared and notes the following errors:

- 27 1. Page 16, lines 13-15, under Opening/Closing Date for the Mega
- 28 International Commercial Letter of Credit, should read: Received in 2009 or 2010 for

1 projects involving Pangang Group Company, Ltd.

2           2.       Page 16, lines 16-18, under Opening/Closing Date for the Mega  
3 International Commercial Letter of Credit, should read: Received in late 2010 or early  
4 2011 for projects involving Jinzhou Company.

5           3.       Pages 31-32, lines 23-3 should read: Prior to his arrest, Mr. Liew spoke  
6 with the vice president of Altairnano Technologies of Reno, Nevada about contracting  
7 work to complete the process and production engineering for an LTO production plant.

8           The undersigned also prepared Mr. Liew's declaration that was submitted as  
9 Exhibit F in support of his motion for an order revoking the detention order and granting  
10 pretrial release. See Doc #48-7. After reviewing the declaration, counsel has discovered  
11 errors in the document. An errata sheet has been prepared and notes the following errors:

12           1.       Page 5, paragraph 29 should read: One L/C was received from Jinzhou  
13 Company in late 2010 or early 2011 for a 30,000 tons per year project based on an order  
14 for equipment. The other L/C was received from Pangang Group Company Ltd. in late  
15 2009 or 2010 for a 100,000 tons per year project for engineering services.

16           2.       Page 7, paragraph 36.A should read: I was not invited to a banquet at the  
17 Diaoyutai State Guesthouse and did not meet with Zhuzhou Tan, Yujie Zhang, Shichang  
18 Qiao, and Deyao Kang at that time.

19           3.       Page 8, paragraph 37.B should read: He then became an editor of a  
20 medical journal before retiring around 1990.

21           4.       Page 9, paragraph 38.B should read: Prior to my arrest, I spoke with the  
22 vice-president of Alairnano Technologies of Reno, Nevada about contracting work to  
23 complete the process and production engineering for an LTO production plant.

24           I declare under penalty of perjury, as defined by the laws of the state of California  
25 and the United States, that the foregoing is true and correct to the best of my knowledge,  
26 except as to those items alleged on information and belief and, as to those items, I believe  
27 them to be true.

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Executed in Berkeley, California on this 25th day of January, 2012.

*/s/ James S. Thomson*

JAMES S. THOMSON