



- 1 PETER SUEN SUK TAK )
- 2 Eastern Vanguard Group Limited )
- 3 Creque Building, Main Street, P.O. Box 116 )
- 4 Road Town, Tortola )
- 5 British Virgin Islands )
- 6 JAMES CHARLES SIMMONS, JR. )
- 7 5045 N. 58th Ave., #23A )
- 8 Glendale, AZ 85301 )
- 9 MICHAEL E. CHO )
- 10 839 Faxon Avenue )
- 11 San Francisco, CA 94112 )
- 12 TO FAI CHENG )
- 13 1800 Van Ness, 2nd Fl. )
- 14 San Francisco, CA 94109 )
- 15 JEAN YUEN )
- 16 439 - 3rd Avenue )
- 17 San Francisco, CA 94118 )
- 18 Y & T INC., dba TOKYO INTERNATIONAL )
- 19 INVESTMENT LTD. )
- 20 1800 Van Ness Ave., 2nd Fl. )
- 21 San Francisco, CA 94109 )
- 22 WING MING TAM )
- 23 c/o Tokyo International Investment Ltd. )
- 24 1800 Van Ness Ave., 2nd Fl. )
- 25 San Francisco, CA 94109 )
- 26 GUO QUAN ZHANG )
- c/o Tokyo International Investment Ltd. )
- 1800 Van Ness Ave., 2nd Fl. )
- San Francisco, CA 94109 )

**Respondents.**

Respondent Jean Yuen hereby objects to the Notice of Deposition and Request for Documents directed to Jean Yuen, for the following reasons:

OBJECTION TO NOTICE OF DEPOSITION AND REQUEST FOR DOCUMENTS TO JEAN YUEN- 2

**SIRIANNI & YOUTZ**  
3410 COLUMBIA CENTER  
701 FIFTH AVENUE  
SEATTLE, WASHINGTON 98104-7032  
(206) 223-0303

1           1.     The respondent is not obligated to produce the documents for  
2 lack of personal jurisdiction.

3           2.     The respondent is not obligated to produce the documents  
4 because the securities division does not have subject matter jurisdiction over this  
5 matter.

6           3.     The requests are overly broad and call for information that is  
7 neither relevant nor likely to lead to admissible evidence.

8           4.     Request 10 is vague and ambiguous.

9           5.     Insufficient time has been provided to respond to these requests.

10 DATED: April 27, 1998.

SIRIANNI & YOUTZ



Chris R. Youtz (WSBA #7786)  
Attorneys for Respondents

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26 OBJECTION TO NOTICE OF DEPOSITION AND  
REQUEST FOR DOCUMENTS TO JEAN YUEN- 3

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DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington and the United States, that on April 27, 1998, I caused a copy of this document, together with its corresponding Arizona Corporation Commission Docket Control Center Cover Sheet, to be served upon attorneys for the Arizona Corporation Commission by facsimile & First Class Mail, addressed as follows:

Mark C. Knops, Senior Counsel  
ARIZONA CORPORATION COMMISSION  
Securities Division  
1300 West Washington, Third Floor  
Phoenix, AZ 85007-2996  
Phone: (602) 542-4242  
Fax No.: (602) 594-7470

On April 27, 1998 I also mailed the original and ten copies of this document, with one original of its corresponding ACC Docket Control Center Cover Sheet, to the Arizona Corporations Commission, addressed as follows:

ARIZONA CORPORATION COMMISSION  
Attn: Docket Control Center  
1200 West Washington, Suite 208,  
Phoenix, Arizona 85007  
Phone: (602)542-3477

Signed on April 27, 1998, at Seattle, WA

  
Bonnie Deblinger