

- 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 Y & T INC. dba TOKYO INTERNATIONAL INVESTMENT LTD. hereby objects to the Notice of Deposition and Request for Documents directed to the

OBJECTION TO NOTICE OF DEPOSITION AND REQUEST FOR DOCUMENTS TO THE CUSTODIAN OF RECORDS OF RESPONDENT Y & T INC. dba TOKYO INTERNATIONAL INVESTMENT LTD- 2

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

1 Custodian of Records for Y & T INC. dba TOKYO INTERNATIONAL INVESTMENT LTD.,
2 for the following reasons:

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

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

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

10 4. Requests D and F are vague and ambiguous.

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

12 6. Many of the documents requested have been previously
13 produced, and this demand is unduly burdensome.

14 DATED: April 27, 1998.

15 SIRIANNI & YOUTZ

16
17 
18 Chris R. Youtz (WSBA #7786)
19 Attorneys for Respondents

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

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