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Judgment Creditor Potrans International, Inc.

7
8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF ORANGE - UNLIMITED JURISDICTION**

10 POTRANS INTERNATIONAL, INC., a
11 Nevada corporation,

12 Plaintiff,

13 vs.

14 ALBERT CHEN, an individual;
REGINA CHEN, an individual; BOB
15 DOONG, an individual; ALICE LIN
(a.k.a. Alice Huey-Hwa Lin a.k.a.
16 Alice Huey Hwa Lin), an
individual; CONNECT DEVICES,
17 INC., a California corporation;
SAFE-T-GUARDIAN, INC., a
18 California corporation; POTRANS
ELECTRICAL CORP., LTD., a
19 California corporation; and DOES
1-20, inclusive,

20 Defendants.

21 AND RELATED CROSS ACTION

CASE NO. 04 CC 05622

[Assigned to Judge
H. Warren Siegel, Dept. C13]

**ASSIGNMENT OF JUDGMENT FROM
PLAINTIFF AND JUDGMENT
CREDITOR POTRANS
INTERNATIONAL, INC. TO
POTRANS ELECTRICAL CO., LTD.**

22 For value received, plaintiff and judgment creditor Potrans
23 International, Inc. ("PII") herein, assigns to Potrans Electrical Co.,
24 Ltd. ("PEC"), a Taiwan company, the money judgment ("Judgment") rendered
25 in the above-entitled action in favor of PII and against defendants
26 Albert Chen, Regina Chen, Bob Doong, Alice Lin, a.k.a. Alice Huey-Hwa
27 Lin, Connect Devices, Inc., Safe-T-Guardian, Inc. and Potrans Electrical
28 Corp., Ltd. (collectively referred to herein as "Chen Defendants"),

1 entered on May 22, 2006. A copy of the Judgment is attached hereto as
2 **Exhibit "1."** A copy of the Abstract of Judgment, recorded in the Orange
3 County Clerk-Recorder's office on June 30, 2006, as document number
4 2006000441718, is attached hereto as **Exhibit "2."**

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PII intends hereby to transfer all of its rights, title, and interest
in any sums of money due by reason of the Judgment to PEC.

POTRANS INTERNATIONAL, INC.

Dated: June 28, 2007

By:

Print: DING-HO DOONG

Title: Chairman & CEO

POTRANS ELECTRICAL CO., LTD.

Dated: June 28, 2007

By:

Print: DING-HO DOONG

Title: Chairman

EXHIBIT "1"

COPY

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

MAY 22 2006

ALAN SLATER, Clerk of the Court

Alan Slater
BY S. OCHOA

1 HOLLAND & KNIGHT LLP
2 Mark S. Shipow (State Bar No. 91134)
3 Richard H. Lee (State Bar No. 223553)
4 633 West Fifth Street, 21st Floor
5 Los Angeles, California 90071-2040
6 Telephone (213) 896-2400
7 Facsimile (213) 896-2450

8 Attorneys for Plaintiff and Cross-Defendant
9 Potrans International, Inc. and Cross-Defendant
10 Potrans Electrical Co., Ltd.

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF ORANGE

13 POTRANS INTERNATIONAL, INC., a
14 Nevada corporation,

15 Plaintiff,

16 vs.

17 ALBERT CHEN, an individual; REGINA
18 CHEN, an individual; BOB DOONG, an
19 individual; ALICE LIN (aka Alice Huey-
20 Hwa Lin), an individual; CONNECT
21 DEVICES, INC., a California corporation;
22 SAFE-T-GUARDIAN, INC., a California
23 corporation; POTRANS ELECTRICAL
24 CORP., LTD., a California corporation;
25 ~~and DOCS 1-20, inclusive,~~

26 Defendants.

27 ALBERT CHEN, an individual; REGINA
28 CHEN, an individual; and BOB DOONG,
an individual,

Cross-Complainants,

vs.

POTRANS INTERNATIONAL, INC., a
Nevada corporation; POTRANS
ELECTRICAL CO., LTD., a Taiwanese
corporation; and ~~DOCS 1-50, inclusive,~~

Cross-Defendants.

Case No. 04CC05622
Unlimited Civil Case

~~PROPOSED~~ JUDGMENT

Judge: Hon. John M. Watson
Dept.: C15

Complaint Filed: May 7, 2004
Trial Date: January 30, 2006
Verdict Date: March 16, 2006

1 This action came on regularly for trial by jury on January 30, 2006 in Department C15 of
2 the Orange County Superior Court, the Hon. John M. Watson presiding. Plaintiff and cross-
3 defendant Potrans International, Inc. ("PII") and cross-defendant Potrans Electrical Co., Ltd.
4 ("PEC") were represented by Mark Shipow, Esq. and Richard Lee, Esq. of Holland & Knight
5 LLP. Defendants and cross-complainants Albert Chen, Regina Chen, and Bob Doong, and
6 defendants Alice Lin (aka Alice Huey-Hwa Lin), Connect Devices, Inc. ("CDI"), Safe-T-
7 Guardian, Inc. ("STG"), and Potrans Electrical Corp, Ltd. based in Irvine ("Potrans-California"
8 or "PECL") were represented by Bob Hartmann, Esq., Richard Cauley, Esq., Jason Witten, Esq.
9 and Erick Wolf, Esq. of Wang, Hartmann & Gibbs, PC. A jury of 12 persons was duly
10 impaneled and sworn, and witnesses were sworn and testified.

11 On March 10 and 13, 2006, on motion submitted by PII and PEC and after argument of
12 counsel, the Court granted PII's and PEC's motion for a directed verdict on the First Amended
13 Cross-Complaint of Albert Chen, Regina Chen, and Bob Doong (collectively, "Cross-
14 Complainants") as follows:

- 15 • 1st Cause of Action (Wrongful Termination in Violation of Public Policy):
16 granted as to the allegations contained within Paragraph 33 of the First Amended
17 Cross-Complaint;
- 18 • 2nd Cause of Action (Breach of Contract under Incentive Bonus Agreement):
19 granted in accordance with Cross-Complainants' withdrawal of this cross-claim;
- 20 • 4th Cause of Action (Breach of Contract by Albert Chen): granted as against PEC,
21 such that PII is the only remaining cross-defendant on this claim;
- 22 • 5th Cause of Action (Breach of Covenant of Good Faith and Fair Dealing by
23 Albert Chen): granted as against PEC, such that PII is the only remaining cross-
24 defendant on this claim;
- 25 • 6th Cause of Action (Promissory Estoppel by Albert Chen) – granted as against
26 PEC, such that PII is the only remaining cross-defendant on this claim;
- 27 • 10th Cause of Action (Unjust Enrichment): granted;
- 28 • 11th Cause of Action (Defamation) – granted as for Regina Chen and Bob Doong

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such that Albert Chen is the only remaining cross-complainant, and granted as against PII such that PEC is the only remaining cross-defendant.

On March 13, 2006, on motion submitted by Defendants and after argument of counsel, the Court granted Defendants' motion for a directed verdict as to PII's 9th Cause of Action of the First Amended Complaint for Unjust Enrichment. Further, on March 13, 2006, PII withdrew its 6th Cause of Action for Breach of Contract.

After being duly instructed by the Court on the claims of plaintiff PII and the remaining cross-claims of Cross-Complainants, the jury deliberated and thereon duly returned on March 16, 2006 with the following special verdicts:

Questions on Plaintiff's Complaint - Liability and Damages:

We the jury find in favor of Plaintiff Potrans International, Inc. ("PII") on its Complaint:

Answer: YES

What is the total amount of damages you award to PII?

Answer: \$3,717,969.00

Do you find that all seven Defendants are jointly and severally liable for the total amount you entered for Question 1b?

Answer: YES

Question on Cross-Complainants' First Amended Cross-Complaint (Liability):

Do you find in favor of any or all of the Cross-Complainants Albert Chen, Regina Chen, and/or Bob Doong on the Cross-Complaint?

Albert Chen: Answer: NO

Regina Chen: Answer: NO

Bob Doong: Answer: NO

On May 18, 2006, as to the issues of prejudgment interest and costs, having taken the issues under submission after briefing and argument on May 15, 2006, the Court granted PII's Motion for Entry of Judgment Awarding Prejudgment Interest at a rate of 7 percent per annum,

1 ruling that the accrual dates for the different categories of damages specified by PII were
2 reasonable to show the existence of each breach and the liquidated claims that resulted from the
3 breaches. Such damages were capable of calculation of those dates. Also on May 18, 2006, the
4 Court denied Defendants' Motion to Tax Costs, ruling that PII's reimbursable costs of
5 \$214,087.03 were proper on their face, and that they were reasonable given the complexity of the
6 case & the sophistication of the presentation.

7
8 NOW, THEREFORE, IT IS ADJUDGED, ORDERED, AND DECREED as follows:

- 9
- 10 • The 6th Cause of Action of the First Amended Complaint (Breach of Contract) is
11 dismissed;
 - 12 • The 9th Cause of Action of the First Amended Complaint (Unjust Enrichment) is
13 dismissed;
 - 14 • The 1st Cause of Action of the First Amended Cross-Complaint (Wrongful
15 Termination in Violation of Public Policy) is dismissed as to the allegations
16 contained within Paragraph 33;
 - 17 • The 2nd Cause of Action of the First Amended Cross-Complaint (Breach of
18 Contract under Incentive Bonus Agreement) is dismissed;
 - 19 • The 4th Cause of Action of the First Amended Cross-Complaint (Breach of
20 Contract by Albert Chen) is dismissed as against PEC;
 - 21 • The 5th Cause of Action of the First Amended Cross-Complaint (Breach of
22 Covenant of Good Faith and Fair Dealing by Albert Chen) is dismissed as against
23 PEC;
 - 24 • The 6th Cause of Action of the First Amended Cross-Complaint (Promissory
25 Estoppel by Albert Chen) is dismissed as against PEC;
 - 26 • The 10th Cause of Action of the First Amended Cross-Complaint (Unjust
27 Enrichment) is dismissed;
 - 28 • The 11th Cause of Action of the First Amended Cross-Complaint (Defamation) –
as to Regina Chen and Bob Doong is dismissed, and as to Albert Chen is

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dismissed as against PII;

- Cross-defendants shall have and recover nothing as to the remaining claims of the First Amended Cross-Complaint;
- As to the claims for breach of fiduciary duty, fraud, constructive fraud, conversion, fraudulent transfer, rescission and constructive trust contained in the First Amended Complaint, PII shall have and recover from Albert Chen, Regina Chen, Bob Doong, Alice Lin, CDI, STG, and Potrans-California/PECL, jointly and severally:

(1) the sum of \$3,717,969.00, together with:

(2) costs as approved by the Court in the amount of \$214,087.03;

(3) prejudgment interest for the amount of \$488,990.98 through May 18, 2006, plus \$713.03 per day for each day after May 18, 2006 until the date of the entry of this Judgment, which arises as follows:

(a) Interest on \$1,232,418.00 at the rate of 7 percent per annum commencing from November 21, 2003 to May 18, 2006 (the date of the Court's ruling on PII's Motion for Awarding Prejudgment Interest) for the total amount of \$214,845.91, plus \$236.35 for each day afterward until the date of the entry of this Judgment;

(b) Interest on \$856,417.00 at the rate of 7 percent per annum commencing from December 19, 2003 to May 18, 2006 (the date of the Court's ruling on PII's Motion for Awarding Prejudgment Interest) for the amount of \$144,699.28, plus \$164.24 per day for each day afterward until the date of the entry of this Judgment;

(c) Interest on \$1,624,134.00 at the rate of 7 percent per annum commencing from March 31, 2005 to May 18, 2006 (the date of the Court's ruling on PII's Motion for Awarding Prejudgment Interest) for the amount of \$128,640.31, plus \$311.48 per day for each day afterward until the date of the entry of this Judgment;

EXHIBIT "2"

ORIGINAL

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, State Bar number, and telephone number):
 Recording requested by and return to:
 Richard H. Lee (SBN 223553)
 HOLLAND & KNIGHT LLP
 633 West Fifth Street
 Suite 2100
 Los Angeles, CA 90071
 213-896-2400

ATTORNEY FOR JUDGMENT CREDITOR ASSIGNEE OF RECORD

Recorded in Official Records, Orange County
 Tom Daly, Clerk-Recorder
 79.00
 2006000441718 12:05pm 06/30/06
 115 45 A03 2
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SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange
 STREET ADDRESS: 700 Civic Center Drive West
 MAILING ADDRESS:
 CITY AND ZIP CODE: Santa Ana, CA 92702
 BRANCH NAME: Central Justice Center

FOR RECORDER'S USE ONLY

PLAINTIFF: Potrans International, Inc.
 DEFENDANT: Albert Chen, et al.

CASE NUMBER:
 04CC05622 ✓

ABSTRACT OF JUDGMENT—CIVIL AND SMALL CLAIMS Amended

FOR COURT USE ONLY

1. The judgment creditor assignee of record applies for an abstract of judgment and represents the following:
 a. Judgment debtor's Name and last known address:
 Albert Chen
 71 Raglccreek
 Irvine, CA 92618-3956

b. Driver's license No. and state: A6634987 - Calif. Unknown
 c. Social security No.: 611-26-6705 Unknown
 d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address): Albert Chen
 R. Craig Scott (counsel on behalf of Albert Chen)
 1301 Dove St., Suite 1000, Newport Beach, CA 92660

2. Information on additional judgment debtors is shown on page 2. 4. Information on additional judgment creditors is shown on page 2.
 3. Judgment creditor (name and address): Potrans International, Inc.
 16591 Noyes Ave., Irvine, CA 92606
 Date: June 27, 2006
 Richard Lee

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed: \$ 4,423,899.13 (4,421,047.01 plus 2713.03 per doc after 5/19/06)
 7. All judgment creditors and debtors are listed on this abstract.
 8. a. Judgment entered on (date): May 22, 2006 until date of entry of Judgment.
 b. Renewal entered on (date):
 9. This judgment is an installment judgment.

10. An execution lien attachment lien is endorsed on the judgment as follows:
 a. Amount: \$ 0.00
 b. In favor of (name and address):
 11. A stay of enforcement has
 a. not been ordered by the court.
 b. been ordered by the court effective until (date):
 12. a. I certify that this is a true and correct abstract of the judgment entered in this action.
 b. A certified copy of the judgment is attached.
 Clerk, by Pearl O'Neill, Deputy
 ALAN SLATER PEARL O'NEILL



This abstract issued on (date):
 JUN 28 2006

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PLAINTIFF: Potrans International, Inc.	CASE NUMBER:
DEFENDANT: Albert Chen, et al.	04CC05622

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (name and address):

14. Judgment creditor (name and address):

15. Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address
 Regina Chen
 71 Eaglecreek
 Irvine, CA 92618-3956

Driver's license No. & state: A6634986 - Calif. Unknown
 Social security No.: 624-26-1456 Unknown
 Summons was personally served at or mailed to (address):
 R. Craig Scott (counsel on behalf of Regina Chen)
 1301 Dove St., Suite 1000
 Newport Beach, CA 92660

17. Name and last known address
 Bob Doong
 247 Stanford Ct.
 Irvine, CA 92612-1666

Driver's license No. & state: Unknown
 Social security No.: 622-44-3306 Unknown
 Summons was personally served at or mailed to (address):
 R. Craig Scott (counsel on behalf of Bob Doong)
 1301 Dove St., Suite 1000
 Newport Beach, CA 92660

18. Name and last known address
 Alice Lin (aka Alice Huey-Hwa Lin)
 3 Altezza
 Irvine, CA 92606

Driver's license No. & state: A5795908 - Calif. Unknown
 Social security No.: 626-22-4742 Unknown
 Summons was personally served at or mailed to (address):
 R. Craig Scott (counsel on behalf of Alice Lin)
 1301 Dove St., Suite 1000
 Newport Beach, CA 92660

19. Name and last known address
 Connect Devices, Inc.
 16591 Noyes Ave.
 Irvine, CA 92606
 (dissolved)

Driver's license No. & state: Unknown
 Social security No.: Unknown
 Summons was personally served at or mailed to (address):
 R. Craig Scott (on behalf of Connect Devices, Inc.)
 1301 Dove St., Suite 1000
 Newport Beach, CA 92660

20. Name and last known address
 Safe-T-Guardian, Inc.
 3002 Dow Ave., Suite 524
 Tustin, CA 92780

Driver's license No. & state: Unknown
 Social security No.: Unknown
 Summons was personally served at or mailed to (address):
 R. Craig Scott (on behalf of Safe-T-Guardian, Inc.)
 1301 Dove St., Suite 1000
 Newport Beach, CA 92660

21. Name and last known address
 Potrans Electrical Corp., Ltd.
 17220 Newhope St., #101 - 102
 Fountain Valley, CA 92708
 (agent for service of process)

Driver's license No. & state: Unknown
 Social security No.: Unknown
 Summons was personally served at or mailed to (address):
 Wang Hartmann & Gibbs (on behalf of Defendant)
 1301 Dove St., Suite 1050
 Newport Beach, CA 92660

22. Continued on Attachment 22.

1 PROOF OF SERVICE
2 STATE OF CALIFORNIA, COUNTY OF ORANGE

3 I am employed in the County of Orange, State of California. I am over the age of
4 18 and not a party to the within action; my business address is 98 Discovery, Irvine,
5 CA 92618.

6 On July 28, 2008, I served the foregoing document(s) described as:

7 ASSIGNMENT OF JUDGMENT FROM PLAINTIFF AND JUDGMENT CREDITOR POTRANS INTERNATIONAL,
8 INC. TO POTRANS ELECTRICAL CO., LTD.

9 on all interested parties in this action

10 [X] by placing [] the original [X] a true copy thereof enclosed in sealed
11 envelopes addressed as follows:

12 SEE ATTACHED SERVICE LIST

13 [X] BY MAIL

14 [] *I deposited such envelope in the mail at Irvine, California.
15 The envelope was mailed with postage thereon fully prepaid.

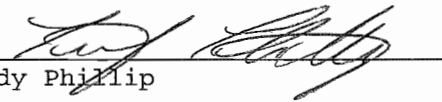
16 [X] As follows: I am readily familiar with the firm's practice of collection
17 and processing correspondence for mailing. Under that practice it would be deposited
18 with U.S. postal service on that same day with postage thereon fully prepaid at
19 Irvine, California in the ordinary course of business. I am aware that on motion of
20 the party served, service is presumed invalid if postal cancellation date or postage
21 meter date is more than one day after date of deposit for mailing in affidavit.

22 [] ** (BY FACSIMILE)

23 Executed on July 28, 2008, at Irvine, California.

24 [X] (State) I declare under penalty of perjury under the laws of the
25 State of California that the above is true and correct.

26 [] (Federal) I declare that I am employed in the office of a member of the
27 bar of this court at whose direction the service was made.

28 
Trudy Phillip

SERVICE LIST

1		
2	Mr. Albert Chen	Mr. Albert Chen
3	Ms. Regina Chen	Ms. Regina Chen
4	19461 Sierra Seco Rd.	42 Bombay
	Irvine, CA 92603	Irvine, CA 92620
5	Mr. Bob Doong	Ms. Alice Lin
6	247 Stanford Ct., #120	3 Altezza
	Irvine, CA 92612	Irvine, CA 92606
7	Connect Devices, Inc.	Safe-T-Guardian, Inc.
8	16591 Noyes Ave.	3002 Dow Ave., Suite 524
	Irvine, CA 92606	Tustin, California 92780
9	Potrans Electrical Corp., Ltd.	Mr. Albert Chen
10	16591 Noyes Ave.	Ms. Regina Chen
	Irvine, CA 92606	71 Eaglecreek
		Irvine, CA 92618
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