

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 11-23557-CIV-UNGARO**

ACUSHNET COMPANY, *et al.*,

Plaintiffs,

vs.

TANG HAINAN, *et al.*,

Defendants.

**DECLARATION OF STEPHEN M. GAFFIGAN IN SUPPORT OF
REQUEST FOR CLERK'S ENTRY OF DEFAULT**

I, Stephen M. Gaffigan, declare and say:

1. I am an attorney duly licensed to practice before this Court, and am one of the counsels for Plaintiffs, Acushnet Company, Callaway Golf Company, Roger Cleveland Golf Company, Inc., SRI Sports Limited, Karsten Manufacturing Corporation, and Taylor Made Golf Company, Inc. (collectively "Plaintiffs"), in the above-captioned matter. I make this declaration, which is filed in support of Plaintiffs' Request for Clerk's Entry of Default, and I could and would testify competently to the matters set forth herein.

2. On September 30, 2011, Plaintiffs filed the Complaint in this action against Defendants Tang Hainan and Xud Zhang (collectively the "Defendants"). On November 7, 2011, Defendants were served with the Summons and a copy of the Complaint via electronic mail. (D.E. 15 and 16.) Attached hereto as Composite Exhibit "A" are true and correct copies of the Proofs of Service on file with the Court, reflecting that Defendants were each served with the Summons and a copy of the Complaint on November 7, 2011 via electronic mail.

3. On November 9, 2011, Plaintiff served the Summons and Complaint on Defendants via public announcement, which became effective January 8, 2012 pursuant to Rule 4(f)(2)(A), Federal Rules of Civil Procedure, and Article 84 of the Peoples Republic of China's

Civil Procedure Code. (D.E. 29 and 30.) Attached hereto as Composite Exhibit "B" are true and correct copies of the Proofs of Service on file with the Court, reflecting that each Defendant was served with the Summons and a copy of the Complaint via public announcement.

4. More than 21 days have elapsed since the date on which service of the Summons and Complaint was effective.

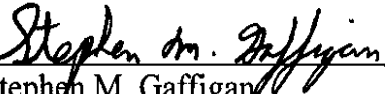
5. Defendants have not been granted any extension of time to respond to the Complaint.

6. Defendants have failed to answer or otherwise respond to the Complaint, or serve a copy of the answer or other response upon Plaintiff's attorneys of record.

7. I am informed and believe that Defendants are neither infants nor incompetent persons.

8. I am informed and believe that Defendants are not in the military service.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2012 at Fort Lauderdale, Florida.



Stephen M. Gaffigan

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 11-23557-CIV-UNGARO

ACUSHNET COMPANY, *et al.*,

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Defendants.

CERTIFICATE OF SERVICE

I certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am an employee of Investigative Consultants, a licensed private investigative firm.

On November 7, 2011, I served a true and accurate copy via electronic mail of the document(s) entitled:

1. Complaint
2. Civil Cover Sheet
3. Summons
4. AO-120 Form
5. *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets Tied to the Counterfeiting Operation ("*Ex Parte* Application for TRO")
6. Memorandum in Support of *Ex Parte* Application for TRO
7. Proposed Order in Support of *Ex Parte* Application for TRO

8. Declaration of Stephen M. Gaffigan in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
9. Declaration of Lisa Rogan in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
10. Declaration of Mike Dow in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
11. Declaration of Donald J. Reino in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
12. Declaration of Jud Hawken in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
13. Declaration of Jeni B. Zuercher in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
14. Declaration of Brandon Tanori in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
15. Corporate Disclosure Statement by Acushnet Company
16. Corporate Disclosure Statement by Callaway Golf Company
17. Corporate Disclosure Statement by Karsten Manufacturing Corporation
18. Corporate Disclosure Statement by Taylor Made Golf Company, Inc.
19. Corporate Disclosure Statement by Roger Cleveland Golf Company, Inc.
20. Corporate Disclosure Statement by SRI Sports Limited
21. Order Setting Initial Planning and Scheduling Conference
22. Order Granting *Ex Parte* Application for TRO

for the following civil action:


ACUSHNET COMPANY, et al. vs. TANG HAINAN, et al.

on Defendant Tang Hainan at the following e-mail addresses:

3841220@qq.com
banghaoxman@hotmail.com
ca50179@gmail.com
downzq87@gmail.com
easybuygolf@gmail.com
golfsales365@gmail.com
golfsuno@gmail.com
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info@golfsuno.com
mbtflygogo@gmail.com
mygolfpurchase@gmail.com
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sunogolf@gmail.com
tklink099@googlemail.com
xhct105@gmail.com
xhct105@hotmail.com
xiepengboy@hotmail.com
yoyohai071@gmail.com
zhangxing@126.com

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

Executed on November 8, 2011, at Torrance, California.



Brandon Tanori

From:
Bcc: "ca50179@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "xiepengboy@hotmail.com"; "easybuygolf@gmail.com"; "service@golddiscount.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "service@golfdirect.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "xhct105@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "yoyohai071@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mbtflygogo@gmail.com"; "agolf@gmail.com"; "golfsales365@gmail.com"; "xhct105@hotmail.com"; "golfsuno@gmail.com"; "golfsuno@golfsuno.com"; "support@golfsuno.com"; "info@golfsuno.com"; "webmaster@golfsuno.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "banghaoxman@hotmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "ca50179@gmail.com"; "golfsales365@gmail.com"; "ca50179@gmail.com"; "ca50179@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "roger_coo@hotmail.com"; "yoyohai071@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "ca50179@gmail.com"; "yoyohai071@gmail.com"; "zhangxing@126.com"; "tklink099@googlemail.com"; "mbtflygogo@gmail.com"; "mbtflygogo@gmail.com"; "mbtflygogo@gmail.com"; "ca50179@gmail.com"; "3841220@qq.com"; "idealgolfclubs.com@domainsbyproxy.com"; "mbtflygogo@gmail.com"; "golfsales365@gmail.com"; "banghaoxman@hotmail.com"; "downzq87@gmail.com"; "yoyohai071@gmail.com"; "02054975162@tom.com"; "3841220@qq.com"; "agolf@gmail.com"; "banghaoxman@hotmail.com"; "ca50179@gmail.com"; "downzq87@gmail.com"; "easybuygolf@gmail.com"; "golfsales365@gmail.com"; "idealgolfclubs.com@domainsbyproxy.com"; "mbtflygogo@gmail.com"; "mygolfpurchase@gmail.com"; "proxy2603679@1and1-private-registration.com"; "roger_coo@hotmail.com"; "service@golddiscount.com"; "service@golfdirect.com"; "sssqw@122.cc"; "tklink099@googlemail.com"; "xhct105@gmail.com"; "xhct105@hotmail.com"; "xiepengboy@hotmail.com"; "yoyohai071@gmail.com"; "zhangxing@126.com"; "service@greatestgolfclubs.com"; "service@golfstore18.com"; "sunogolf@gmail.com"; "service@golfsales365.com"

Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 1 of 13

Date: Monday, November 07, 2011 9:14:00 AM

Attachments: [111006- Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex A to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex Parte App for TRO, PI, Asset Freeze.pdf](#)
[111006- Memo iso TRO, PI, Asset Freeze.pdf](#)
[111006- Prop Order iso TRO, PI, Asset Freeze.pdf](#)
[111013- Corporate Disclosure Statement -Acushnet Company.pdf](#)
[111013- Corporate Disclosure Statement -Callaway Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -Karsten.pdf](#)
[111013- Corporate Disclosure Statement -Roger Cleveland Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -SRI Sports.pdf](#)
[111013- Corporate Disclosure Statement -Taylor Made.pdf](#)
[111018 - order setting initial planning and scheduling conference.pdf](#)
[111103 - Order Granting TRO.pdf](#)
[110930- AO-120 Form.pdf](#)
[110930- Civil Cover Sheet.pdf](#)
[110930- Complaint.pdf](#)
[111006- Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

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[111006- Ex B to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[110930- Summons -Hainan.pdf](#)

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Date: Monday, November 07, 2011 9:32:00 AM
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[111006- Ex E to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)

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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 6 of 13
Date: Monday, November 07, 2011 9:32:00 AM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 1.pdf](#)

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Date: Monday, November 07, 2011 9:32:00 AM
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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 8 of 13
Date: Monday, November 07, 2011 9:32:00 AM
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Date: Monday, November 07, 2011 9:32:00 AM
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To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

From:
Bcc: "ca50179@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "xiepengboy@hotmail.com"; "easybuygolf@gmail.com"; "service@golddiscount.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "service@golfdirect.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "xhct105@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "yoyohai071@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mbtflygogo@gmail.com"; "agolf@gmail.com"; "golfsales365@gmail.com"; "xhct105@hotmail.com"; "golfsuno@gmail.com"; "golfsuno@golfsuno.com"; "support@golfsuno.com"; "info@golfsuno.com"; "webmaster@golfsuno.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "banghaxman@hotmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "ca50179@gmail.com"; "golfsales365@gmail.com"; "ca50179@gmail.com"; "ca50179@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "roger_coo@hotmail.com"; "yoyohai071@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "ca50179@gmail.com"; "yoyohai071@gmail.com"; "zhangxing@126.com"; "tklink099@googlemail.com"; "mbtflygogo@gmail.com"; "mbtflygogo@gmail.com"; "mbtflygogo@gmail.com"; "ca50179@gmail.com"; "3841220@qq.com"; "idealgolfclubs.com@domainsbyproxy.com"; "mbtflygogo@gmail.com"; "golfsales365@gmail.com"; "banghaxman@hotmail.com"; "downzq87@gmail.com"; "yoyohai071@gmail.com"; "02054975162@tom.com"; "3841220@qq.com"; "agolf@gmail.com"; "banghaxman@hotmail.com"; "ca50179@gmail.com"; "downzq87@gmail.com"; "easybuygolf@gmail.com"; "golfsales365@gmail.com"; "idealgolfclubs.com@domainsbyproxy.com"; "mbtflygogo@gmail.com"; "mygolfpurchase@gmail.com"; "proxy2603679@1and1-private-registration.com"; "roger_coo@hotmail.com"; "service@golddiscount.com"; "service@golfdirect.com"; "sssqw@122.cc"; "tklink099@googlemail.com"; "xhct105@gmail.com"; "xhct105@hotmail.com"; "xiepengboy@hotmail.com"; "yoyohai071@gmail.com"; "zhangxing@126.com"; "service@greatestgolfclubs.com"; "service@golfstore18.com"; "sunogolf@gmail.com"; "service@golfsales365.com"

Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 13 of 13
Date: Monday, November 07, 2011 9:32:00 AM
Attachments: [111006- Ex D to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex E to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex F to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex C to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

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From:
To: "service@golfbuydiscount.com"
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 1 of 13
Date: Monday, November 07, 2011 12:44:00 PM
Attachments: [111006- Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex A to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex Parte App for TRO, PI, Asset Freeze.pdf](#)
[111006- Memo iso TRO, PI, Asset Freeze.pdf](#)
[111006- Prop Order iso TRO, PI, Asset Freeze.pdf](#)
[111013- Corporate Disclosure Statement -Acushnet Company.pdf](#)
[111013- Corporate Disclosure Statement -Callaway Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -Karsten.pdf](#)
[111013- Corporate Disclosure Statement -Roger Cleveland Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -SRI Sports.pdf](#)
[111013- Corporate Disclosure Statement -Taylor Made.pdf](#)
[111018 - order setting initial planning and scheduling conference.pdf](#)
[111103 - Order Granting TRO.pdf](#)
[110930- AO-120 Form.pdf](#)
[110930- Civil Cover Sheet.pdf](#)
[110930- Complaint.pdf](#)
[111006- Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

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Date: Monday, November 07, 2011 12:44:00 PM
Attachments: [111006- Ex A to Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex A to Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex A to Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex A to Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[110930- Summons -Hainan.pdf](#)

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To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 3 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [111006- Ex A to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)

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Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [111006- Ex B to Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)

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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 5 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [111006- Ex C to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex D to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex E to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)

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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 6 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 1.pdf](#)

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To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 7 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 2.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

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To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 8 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 3.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

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To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 9 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 4.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

From:
To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 10 of 13
Date: Monday, November 07, 2011 12:57:00 PM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 5.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

From:
To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 11 of 13
Date: Monday, November 07, 2011 12:58:00 PM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 6.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

From:
To: ["service@golfbuydiscount.com"](mailto:service@golfbuydiscount.com)
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 12 of 13
Date: Monday, November 07, 2011 12:58:00 PM
Attachments: [111006- Ex B to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 13 of 13
Date: Monday, November 07, 2011 12:58:00 PM
Attachments: [111006- Ex D to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex E to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex F to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex C to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

To Defendant Tang Hainan. Attached hereto, please find documents in connection with the above referenced matter.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 11-23557-CIV-UNGARO

ACUSHNET COMPANY, *et al.*,

Plaintiffs,

vs.

TANG HAINAN, *et al.*,

Defendants.

CERTIFICATE OF SERVICE

I certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am an employee of Investigative Consultants, a licensed private investigative firm.

On November 7, 2011, I served a true and accurate copy via electronic mail of the document(s) entitled:

1. Complaint
2. Civil Cover Sheet
3. Summons
4. AO-120 Form
5. *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets Tied to the Counterfeiting Operation (“*Ex Parte* Application for TRO”)
6. Memorandum in Support of *Ex Parte* Application for TRO
7. Proposed Order in Support of *Ex Parte* Application for TRO

8. Declaration of Stephen M. Gaffigan in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
9. Declaration of Lisa Rogan in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
10. Declaration of Mike Dow in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
11. Declaration of Donald J. Reino in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
12. Declaration of Jud Hawken in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
13. Declaration of Jeni B. Zuercher in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
14. Declaration of Brandon Tanori in Support of *Ex Parte* Application for TRO, together with supporting Exhibits
15. Corporate Disclosure Statement by Acushnet Company
16. Corporate Disclosure Statement by Callaway Golf Company
17. Corporate Disclosure Statement by Karsten Manufacturing Corporation
18. Corporate Disclosure Statement by Taylor Made Golf Company, Inc.
19. Corporate Disclosure Statement by Roger Cleveland Golf Company, Inc.
20. Corporate Disclosure Statement by SRI Sports Limited
21. Order Setting Initial Planning and Scheduling Conference
22. Order Granting *Ex Parte* Application for TRO

for the following civil action:

ACUSHNET COMPANY, et al. vs. TANG HAINAN, et al.

on Defendant Xud Zhang at the following e-mail addresses:

3841220@qq.com
banghaoxman@hotmail.com
ca50179@gmail.com
downzq87@gmail.com
easybuygolf@gmail.com
golfsales365@gmail.com
golfsuno@gmail.com
golfsuno@golfsuno.com
idealgolfclubs.com@domainsbyproxy.com
info@golfsuno.com
mbtflygogo@gmail.com
mygolfpurchase@gmail.com
proxy2603679@land1-private-registration.com
roger.coo@hotmail.com
service@golfbuydiscount.com
service@golfdiscountdirect.com
service@golfsales365.com
service@golfstore18.com
service@greatestgolfclubs.com
sunogolf@gmail.com
tklink099@googlemail.com
xhct105@gmail.com
xhct105@hotmail.com
xiepengboy@hotmail.com
yoyohai071@gmail.com
zhangxing@126.com

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

Executed on November 8, 2011, at Torrance, California.



Brandon Tanori

From:

Bcc: "ca50179@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "xiepengboy@hotmail.com"; "easybuygolf@gmail.com"; "service@golddiscount.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "service@golfdirect.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "xhct105@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "yoyohai071@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mbtflygogo@gmail.com"; "agolf@gmail.com"; "golfsales365@gmail.com"; "xhct105@hotmail.com"; "golfsuno@gmail.com"; "golfsuno@golfsuno.com"; "support@golfsuno.com"; "info@golfsuno.com"; "webmaster@golfsuno.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "banghaoxman@hotmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mygolfpurchase@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "ca50179@gmail.com"; "golfsales365@gmail.com"; "ca50179@gmail.com"; "ca50179@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "roger_coo@hotmail.com"; "yoyohai071@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "ca50179@gmail.com"; "yoyohai071@gmail.com"; "zhangxing@126.com"; "tklink099@goolemail.com"; "mbtflygogo@gmail.com"; "mbtflygogo@gmail.com"; "mbtflygogo@gmail.com"; "ca50179@gmail.com"; "3841220@qq.com"; "idealgolfclubs.com@domainsbyproxy.com"; "mbtflygogo@gmail.com"; "golfsales365@gmail.com"; "banghaoxman@hotmail.com"; "downzq87@gmail.com"; "yoyohai071@gmail.com"; "02054975162@tom.com"; "3841220@qq.com"; "agolf@gmail.com"; "banghaoxman@hotmail.com"; "ca50179@gmail.com"; "downzq87@gmail.com"; "easybuygolf@gmail.com"; "golfsales365@gmail.com"; "idealgolfclubs.com@domainsbyproxy.com"; "mbtflygogo@gmail.com"; "mygolfpurchase@gmail.com"; "proxy2603679@1and1-private-registration.com"; "roger_coo@hotmail.com"; "service@golddiscount.com"; "service@golfdirect.com"; "sssqw@122.cc"; "tklink099@goolemail.com"; "xhct105@gmail.com"; "xhct105@hotmail.com"; "xiepengboy@hotmail.com"; "yoyohai071@gmail.com"; "zhangxing@126.com"; "service@greatestgolfclubs.com"; "service@golfstore18.com"; "sunogolf@gmail.com"; "service@golfsales365.com"

Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 1 of 13

Date: Monday, November 07, 2011 10:45:00 AM

Attachments: [111006- Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
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[111006- Ex A to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
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[111006- Prop Order iso TRO, PI, Asset Freeze.pdf](#)
[111013- Corporate Disclosure Statement -Acushnet Company.pdf](#)
[111013- Corporate Disclosure Statement -Callaway Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -Karsten.pdf](#)
[111013- Corporate Disclosure Statement -Roger Cleveland Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -SRI Sports.pdf](#)
[111013- Corporate Disclosure Statement -Taylor Made.pdf](#)
[111018 - order setting initial planning and scheduling conference.pdf](#)
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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 3 of 13
Date: Monday, November 07, 2011 10:55:00 AM
Attachments: [111006- Ex A to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)

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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 4 of 13

Date: Monday, November 07, 2011 10:56:00 AM

Attachments: [111006- Ex B to Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)

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Attachments: [111006- Ex C to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex D to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 10 of 13
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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 11 of 13
Date: Monday, November 07, 2011 10:56:00 AM
Attachments: [decl. of gaffigan iso appl. for tro - ex. a - part 6.pdf](#)

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"service@golfdirect.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com";
"xhct105@gmail.com"; "golfsales365@gmail.com"; "yoyohai071@gmail.com"; "yoyohai071@gmail.com";
"golfsales365@gmail.com"; "golfsales365@gmail.com"; "golfsales365@gmail.com"; "mbtflygogo@gmail.com";
"agolf@gmail.com"; "golfsales365@gmail.com"; "xhct105@hotmail.com"; "golfsuno@gmail.com";
"golfsuno@golfsuno.com"; "support@golfsuno.com"; "info@golfsuno.com"; "webmaster@golfsuno.com";
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Subject:

Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 12 of 13

Date:

Monday, November 07, 2011 10:56:00 AM

Attachments:

[111006- Ex B to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

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Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 13 of 13
Date: Monday, November 07, 2011 10:56:00 AM
Attachments: [111006- Ex D to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex E to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex F to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex C to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

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To: "service@golfbuydiscount.com"
Subject: Acushnet Company, et al. v. Hainan, et al.; Case No.: 11-cv-23557 (Southern District of Florida) 1 of 13
Date: Monday, November 07, 2011 1:49:00 PM
Attachments: [111006- Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex A to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex Parte App for TRO, PI, Asset Freeze.pdf](#)
[111006- Memo iso TRO, PI, Asset Freeze.pdf](#)
[111006- Prop Order iso TRO, PI, Asset Freeze.pdf](#)
[111013- Corporate Disclosure Statement -Acushnet Company.pdf](#)
[111013- Corporate Disclosure Statement -Callaway Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -Karsten.pdf](#)
[111013- Corporate Disclosure Statement -Roger Cleveland Golf Company.pdf](#)
[111013- Corporate Disclosure Statement -SRI Sports.pdf](#)
[111013- Corporate Disclosure Statement -Taylor Made.pdf](#)
[111018 - order setting initial planning and scheduling conference.pdf](#)
[111103 - Order Granting TRO.pdf](#)
[110930- AO-120 Form.pdf](#)
[110930- Civil Cover Sheet.pdf](#)
[110930- Complaint.pdf](#)
[111006- Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

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[111006- Ex A to Decl of Reino iso TRO, PI, Asset Freeze.pdf](#)
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[111006- Ex A to Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Hawken iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Rogan iso TRO, PI, Asset Freeze.pdf](#)
[110930- Summons -Zhang.pdf](#)

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Date: Monday, November 07, 2011 1:59:00 PM
Attachments: [111006- Ex A to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Dow iso TRO, PI, Asset Freeze.pdf](#)
[111006- Ex B to Decl of Zuercher iso TRO, PI, Asset Freeze.pdf](#)

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[111006- Ex E to Decl of Tanori iso TRO, PI, Asset Freeze.pdf](#)

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[111006- Ex C to Decl of Gaffigan iso TRO, PI, Asset Freeze.pdf](#)

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EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 11-23557-CIV-UNGARO

ACUSHNET COMPANY, *et al.*,

Plaintiffs,

vs.

TANG HAINAN, *et al.*,

Defendants.

PROOF OF SERVICE

I certify and declare that I am over the age of 18 years, employed by the law firm of Stephen M. Gaffigan, P.A. in the County of Kings, and not a party to the above-entitled cause.

On November 9, 2011, I effectuated service of process on Defendant Tang Hainan via public announcement by publishing a true and accurate copy of the following document(s) on the Defendant's websites identified on the Schedule A via <http://www.servingnotice.com/hainan/index.html>, pursuant to Rule 4(f)(2)(A), Federal Rules of Civil Procedure, and also pursuant to Article 84 of the Peoples Republic of China's Civil Procedure Code which authorizes service via public announcement (to be effective 60 days after public announcement):

1. Complaint
2. Summons

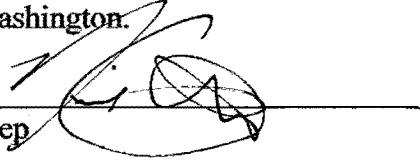
for the following civil action:

ACUSHNET COMPANY, et al. v. TANG HAINAN, et al.

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

Executed on December 2, 2011, at Seattle, Washington.

Neil Estep

A handwritten signature in black ink, appearing to read "Neil Estep", is written over a horizontal line. The signature is stylized and somewhat cursive.

SCHEDULE A

1. golfmartdeal.com
2. golfclubcheap.com
3. golfsuper118.com
4. greatestgolfclubs.com
5. tmgolfclub.com
6. yourgolfhomes.com
7. golfsaleworld.com
8. buzzgolfclubs.com
9. golfbuydiscount.com
10. golfdiscountdirect.com
11. taylormader9irons.org
12. usgolfsale18.com
13. onlinegolf18.com
14. golfzone18.com
15. igolfnuts.com
16. allstockonline.com
17. idealgolfclubs.com
18. clubsgolfsale.com
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20. discountgolfclubs18.com
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25. golfseasonss.com
26. golfstore18.com
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33. mygolfclubsforsale.com
34. mygolfpurchase.com
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36. pickgolfclubs.com
37. putterbuy.com
38. usdiscountgolf.com
39. wholesalegolf118.com
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43. bestsportinglife.com
44. golfstoreorder.com
45. prosportsoutdoor.com

46. sportingturner.com
47. sportssaleonline.com
48. athleticsbar.com
49. golfheavenus.com
50. golfsuperworld.com
51. golfworld18.com
52. greatsnowboots.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 11-23557-CIV-UNGARO

ACUSHNET COMPANY, *et al.*,

Plaintiffs,

vs.

TANG HAINAN, *et al.*,

Defendants.

PROOF OF SERVICE

I certify and declare that I am over the age of 18 years, employed by the law firm of Stephen M. Gaffigan, P.A. in the County of Kings, and not a party to the above-entitled cause.

On November 9, 2011, I effectuated service of process on Defendant Xud Zhang via public announcement by publishing a true and accurate copy of the following document(s) on the Defendant's websites identified on the Schedule A via <http://www.servingnotice.com/hainan/index.html>, pursuant to Rule 4(f)(2)(A), Federal Rules of Civil Procedure, and also pursuant to Article 84 of the Peoples Republic of China's Civil Procedure Code which authorizes service via public announcement (to be effective 60 days after public announcement):

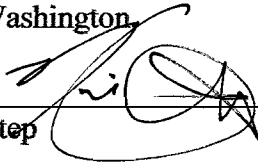
1. Complaint
2. Summons

for the following civil action:

ACUSHNET COMPANY, et al. v. TANG HAINAN, et al.

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

Executed on December 2, 2011, at Seattle, Washington.



Neil Estep

SCHEDULE A

1. golfmartdeal.com
2. golfclubcheap.com
3. golfsuper118.com
4. greatestgolfclubs.com
5. tmgolfclub.com
6. yourgolfhomes.com
7. golfsaleworld.com
8. buzzgolfclubs.com
9. golfbuydiscount.com
10. golfdiscountdirect.com
11. taylormader9irons.org
12. usgolfsale18.com
13. onlinegolf18.com
14. golfzone18.com
15. igolfnuts.com
16. allstockonline.com
17. idealgolfclubs.com
18. clubsgolfsale.com
19. comeongolf.com
20. discountgolfclubs18.com
21. golfclubsbest.com
22. golfequipline.com
23. golfsale18.com
24. golfsaleus.com
25. golfseasonss.com
26. golfstore18.com
27. golfstore365.com
28. golfwholesale365.com
29. golfwholesaleseller.com
30. golfwon.com
31. hotsalegolf.com
32. lovegolfclubs.com
33. mygolfclubsforsale.com
34. mygolfpurchase.com
35. pickgf.com
36. pickgolfclubs.com
37. putterbuy.com
38. usdiscountgolf.com
39. wholesalegolf118.com
40. golfsuperprice.com
41. higolfclubs.com
42. lovegolfonline.com
43. bestsportinglife.com
44. golfstoreorder.com
45. prosportsoutdoor.com

46. sportingturner.com
47. sportssaleonline.com
48. athleticsbar.com
49. golfheavenus.com
50. golfsuperworld.com
51. golfworld18.com
52. greatsnowboots.com

