LIN OUYANG
1124 WEST ADAMS BLVD.
LOS ANGELES, CA 90007-2317
TEL: (213) 747-5296
PLAINTIFF IN PRO PER

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

SEP 26 2016

Sherri R. Carter, Executive Officer/Clerk
By Raul Sanchez, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, UNLIMITED JURISDICTION

LIN OUYANG, Plaintiff, v. ACHEM INDUSTRY AMERICA, INC., a California Corporation, et al., Defendants.	Case No. BC556293 **PLAINTIFF LIN OUYANG'S NOTICE OF MOTION AND MOTION FOR AWARD OF SANCTIONS UNDER C.C.P. §128.5; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF LIN OUYANG** Date: October 27, 2016 Time: 8:30 a.m. Dept. 15, Hon. Richard L. Fruin Jr.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on October 27, 2016, at 8:30 am, or as soon after that as the matter can be heard, in Department 15 of the above-entitled Court, located at 111 N. Hill Street, Los Angeles, California, Honorable Richard L. Fruin, Jr. presiding, plaintiff Lin Ouyang ("plaintiff"), will move the Court for an award of the reasonable expenses, including attorney's fees, incurred by plaintiff, against defendant Achem Industry America, Inc. ("defendant") and its attorney of record Ray Hsu and Law Office of Ray Hsu, in the amount of $2,000, as well as such other sum and/or sanction as the court may find just and reasonable.

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OCT 06 2016

Sherri R. Carter, Executive Officer/Clerk
By Victor Sino-Cruz, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, UNLIMITED JURISDICTION

LIN OUYANG,

Plaintiff,

v.

ACHEM INDUSTRY AMERICA, INC., a California Corporation, et al.,

Defendants.

Case No. BC556293

PLAINTIFF LIN OUYANG'S OPPOSITION TO DEFENDANT ACHEM INDUSTRY AMERICA, INC.'S MOTION FOR JUDGMENT ON THE PLEADINGS; PLAINTIFF LIN OUYANG'S REQUEST FOR PAYMENT OF EXPENSES AS SANCTIONS UNDER C.C.P. §128.5 AGAINST DEFENDANT ACHEM INDUSTRY AMERICA, INC. AND ITS ATTORNEY OF RECORD RAY HSU; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF LIN OUYANG

Date: October 21, 2016

Time: 8:30 a.m.

Dept. 15, Hon. Richard L. Fruin Jr.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, UNLIMITED JURISDICTION

LIN OUYANG,

Plaintiff,

v.

ACHEM INDUSTRY AMERICA, INC., a California Corporation, et al.,

Defendants.

Case No. BC556293

PLAINTIFF LIN OUYANG'S OPPOSITION TO DEFENDANT ACHEM INDUSTRY AMERICA, INC.'S MOTION FOR LEAVE TO FILE A CROSS-COMPLAINT; PLAINTIFF LIN OUYANG'S REQUEST FOR PAYMENT OF EXPENSES AS SANCTIONS UNDER C.C.P. §128.5 AGAINST DEFENDANT ACHEM INDUSTRY AMERICA, INC. AND ITS ATTORNEY OF RECORD RAY HSU; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF LIN OUYANG

[PLAINTIFF'S MOTION FOR AWARD OF SANCTIONS UNDER C.C.P. §128.5 WAS FILED SEP 26, 2016]

Date: October 21, 2016

Time: 8:30 a.m.

Dept. 15, Hon. Richard L. Fruin Jr.