

**Exhibit T**

**From:** [Tyler Rutherford](#)  
**To:** [Bassett, Nicholas](#); ["Patrick Linsey"](#); [Joseph M. Pastore](#); [Melissa McClammy](#)  
**Cc:** [Luft, Avi E.](#); [Barron, Douglass E.](#); [Farmer, Will C.](#); [Sutton, Ezra](#); [Song, Luyi](#)  
**Subject:** [EXT] RE: Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests  
**Date:** Wednesday, July 26, 2023 4:28:31 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good afternoon Nick,

Kalixun Trading Limited and Xuebing Wang will not be retaining us. Thus, as previously stated, we cannot accept service of the subpoenas on behalf of Kalixun Trading Limited and Xuebing Wang.

Best regards,  
Tyler

**Tyler W. Rutherford** | Associate Attorney  
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**Sent:** Wednesday, July 26, 2023 7:09 AM  
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**Cc:** Luft, Avi E. <[aviluft@paulhastings.com](mailto:aviluft@paulhastings.com)>; Barron, Douglass E. <[douglassbarron@paulhastings.com](mailto:douglassbarron@paulhastings.com)>; Farmer, Will C. <[willfarmer@paulhastings.com](mailto:willfarmer@paulhastings.com)>; Sutton, Ezra <[ezrasutton@paulhastings.com](mailto:ezrasutton@paulhastings.com)>; Song, Luyi <[luyisong@paulhastings.com](mailto:luyisong@paulhastings.com)>  
**Subject:** RE: Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests

Good morning Nick,

To follow up on our response yesterday, please see the attached HCHK Creditors' Omnibus Objection to the Trustee's Requests for Production of Documents, Interrogatories, Subpoenas and Requests for Admission.

We are still waiting for a decision from Kalixun Trading Limited and Xuebing Wang concerning whether we are going to represent them. We will let you know as soon as we have an answer either way.

We understand and appreciate your position that last week's conference was sufficient; however, we disagree.

The HCHK Creditors reserve all rights and the option to object further to the Trustee's discovery requests.

Best regards,  
Tyler

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**From:** Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>

**Sent:** Tuesday, July 25, 2023 6:57 PM

**To:** Tyler Rutherford <[trutherford@pastore.net](mailto:trutherford@pastore.net)>; 'Patrick Linsey' <[plinsey@npmlaw.com](mailto:plinsey@npmlaw.com)>; Joseph M. Pastore

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<[willfarmer@paulhastings.com](mailto:willfarmer@paulhastings.com)>; Sutton, Ezra <[ezrasutton@paulhastings.com](mailto:ezrasutton@paulhastings.com)>; Song, Luyi <[luyisong@paulhastings.com](mailto:luyisong@paulhastings.com)>

**Subject:** RE: Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests

Thank you, but I'm not sure I'm following. Are you waiting to hear from your clients about the discovery requests, or have they already determined they are objecting to them? And when you say "object," I assume that means your clients are objecting wholesale—i.e., they are not agreeing to answer any interrogatories or RFAs, produce any documents, or sit for any depositions. Please confirm. It is important we are on the same page before we seek relief from the Court.

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**PAUL  
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**Nick Bassett | Partner | Financial Restructuring Group**

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**Sent:** Tuesday, July 25, 2023 6:47 PM

**To:** Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>; 'Patrick Linsey' <[plinsey@npmlaw.com](mailto:plinsey@npmlaw.com)>; Joseph M. Pastore

<[JPastore@pastore.net](mailto:JPastore@pastore.net)>; Melissa McClammy <[mmcclammy@pastore.net](mailto:mmcclammy@pastore.net)>

**Cc:** Luft, Avi E. <[aviluft@paulhastings.com](mailto:aviluft@paulhastings.com)>; Barron, Douglass E. <[douglassbarron@paulhastings.com](mailto:douglassbarron@paulhastings.com)>; Farmer, Will C.

<[willfarmer@paulhastings.com](mailto:willfarmer@paulhastings.com)>; Sutton, Ezra <[ezrasutton@paulhastings.com](mailto:ezrasutton@paulhastings.com)>; Song, Luyi <[luyisong@paulhastings.com](mailto:luyisong@paulhastings.com)>

**Subject:** [EXT] RE: Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests

Good evening Nick,

Thank you for your response. We are waiting to hear from our clients. We should have an answer to you shortly, tomorrow morning at the latest. However, as stated during last week's conference, our clients intend to object to the Trustee's discovery requests.

Best regards,

Tyler

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**From:** Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>  
**Sent:** Tuesday, July 25, 2023 11:45 AM  
**To:** Tyler Rutherford <[trutherford@pastore.net](mailto:trutherford@pastore.net)>; 'Patrick Linsey' <[plinsey@npmlaw.com](mailto:plinsey@npmlaw.com)>; Joseph M. Pastore <[JPastore@pastore.net](mailto:JPastore@pastore.net)>; Melissa McClammy <[mmcclammy@pastore.net](mailto:mmcclammy@pastore.net)>  
**Cc:** Luft, Avi E. <[aviluft@paulhastings.com](mailto:aviluft@paulhastings.com)>; Barron, Douglass E. <[douglassbarron@paulhastings.com](mailto:douglassbarron@paulhastings.com)>; Farmer, Will C. <[willfarmer@paulhastings.com](mailto:willfarmer@paulhastings.com)>; Sutton, Ezra <[ezrasutton@paulhastings.com](mailto:ezrasutton@paulhastings.com)>; Song, Luyi <[luyisong@paulhastings.com](mailto:luyisong@paulhastings.com)>  
**Subject:** RE: Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests

Tyler,

Thank you for your email. Please let us know as soon as possible whether you are representing Kalixun Trading Limited and Xuebing Wang and are authorized to accept service on their behalf.

Regarding your question, as you know, we had a conference with your colleagues, Joseph Pastore and Melissa Rose McClammy, last Thursday, July 20, concerning the discovery we are seeking in relation to your clients' motion to intervene. We explained on that call the nature of the discovery we need and the basis for such discovery. No further conference is necessary at this time (although we are happy to meet and confer with you on the requests themselves).

Please let us know by the end of the day today whether you will be voluntarily responding to our discovery requests so we can seek appropriate relief from the Court as necessary.

Regards,  
Nick

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**PAUL  
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**From:** Tyler Rutherford <[trutherford@pastore.net](mailto:trutherford@pastore.net)>  
**Sent:** Monday, July 24, 2023 4:54 PM  
**To:** 'Patrick Linsey' <[plinsey@npmlaw.com](mailto:plinsey@npmlaw.com)>; Joseph M. Pastore <[JPastore@pastore.net](mailto:JPastore@pastore.net)>; Melissa McClammy <[mmcclammy@pastore.net](mailto:mmcclammy@pastore.net)>  
**Cc:** Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>; Luft, Avi E. <[aviluft@paulhastings.com](mailto:aviluft@paulhastings.com)>; Barron, Douglass E. <[douglassbarron@paulhastings.com](mailto:douglassbarron@paulhastings.com)>; Farmer, Will C. <[willfarmer@paulhastings.com](mailto:willfarmer@paulhastings.com)>; Sutton, Ezra <[ezrasutton@paulhastings.com](mailto:ezrasutton@paulhastings.com)>; Song, Luyi <[luyisong@paulhastings.com](mailto:luyisong@paulhastings.com)>  
**Subject:** [EXT] RE: Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests

Dear Counsel:

We are in receipt of your email dated July 21, 2023. Our clients have instructed us to accept service of the subpoenas. However,

please note that we do not represent Kalixun Trading Limited or Xuebing Wang. We are in the process of ascertaining whether we will represent them in connection with these subpoenas, but we cannot accept service on behalf of Kalixun Trading Limited or Xuebing Wang at this time.

Separately, please advise (i) if and when you held a Rule 26(f) conference, (ii) who participated in said conference, and (iii) what discovery plan was agreed to by the parties at said conference.

Best regards,

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**Sent:** Friday, July 21, 2023 6:19 PM

**To:** Joseph M. Pastore <[JPastore@pastore.net](mailto:JPastore@pastore.net)>; Melissa McClammy <[mmcclammy@pastore.net](mailto:mmcclammy@pastore.net)>; Tyler Rutherford <[trutherford@pastore.net](mailto:trutherford@pastore.net)>

**Cc:** Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>; Luft, Avi E. <[aviluft@paulhastings.com](mailto:aviluft@paulhastings.com)>; Barron, Douglass E. <[douglassbarron@paulhastings.com](mailto:douglassbarron@paulhastings.com)>; Farmer, Will C. <[willfarmer@paulhastings.com](mailto:willfarmer@paulhastings.com)>; Sutton, Ezra <[ezrasutton@paulhastings.com](mailto:ezrasutton@paulhastings.com)>; Song, Luyi <[luyisong@paulhastings.com](mailto:luyisong@paulhastings.com)>

**Subject:** Luc A. Despins, Chapter 11 Trustee v. HCHK Technologies, Inc., et al. (A.P. # 23-05013) Service of Subpoenas/Written Discovery Requests

Dear Counsel:

Please find attached for service on the Proposed Intervenor, Kalixun Trading Limited, and Xuebing Wang, the subpoenas/discovery requests specifically set forth below. Thanks and have a good weekend.

Sincerely,

Patrick Linsey

Subpoenas/Discovery Requests for Service:

The Trustee's Requests for Admission to:

- 1332156 B.C. LTD;
- GWGPNZ Limited;
- Japan Himalaya League, Inc.; and
- Shin Hsin Yu.

*and*

The Trustee's First Set of Requests for Production of Documents to the Proposed Intervenor.

*and*

The Trustee's First Set of Interrogatories to the Proposed Intervenors.

*and*

Subpoenas and Notices of Deposition with respect to:

- 1332156 B.C. LTD;
- GWGOPNZ Limited;
- Japan Himalaya League, Inc.;
- Kalixun Trading Limited; and
- Xuebing Wang.

Patrick R. Linsey

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