

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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APR 14 2003

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

PLAINTIFFS A, B, C, D, E, F, and OTHERS )  
SIMILARLY SITUATED, WEI YE, and HAO )  
WANG, )

Civil Action No. 02 C 7530

Plaintiffs, )

v. )

**PROOF OF SERVICE;**  
**DECLARATION OF**  
**TERRI E. MARSH**

JIANG ZEMIN and FALUN GONG )  
CONTROL OFFICE (A.K.A. OFFICE 6/10), )

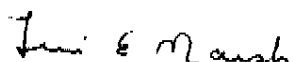
Defendants. )

Plaintiffs respectfully submit this Proof of Service to advise the Court that, pursuant to the directions of this Court's January 13, 2003 Minute Order, four copies of the Application for Entry of Default, were delivered to Defendant Jiang Zemin pursuant to Rule 5(b)(2)(A) of the Fed.R.Civ.P. on February 14, 2003 at 1554, at Zhongnanhai in Beijing China, by Federal Express expedited delivery service. More particularly, Plaintiffs delivered two copies in the original English (a single copy attached as Exhibit 1 to Marsh Decl.) and two copies translated into Mandarin Chinese (a single copy attached as Exhibit 2 to Marsh Decl.) to Zhongnanhai, the leadership compound which houses the offices of the President and other high ranking officials of the government and the Communist Party. See, *President Jiang Meets American Guests*, the People's Daily, February 08, 2002 (attached as Exhibit 3 to Marsh Decl.) and *Zhongnanhai: Center of Power: Walled Heart of China's Kremlin*, Time Asia, September 27, 1999 (attached as Exhibit 4 to Marsh Decl.). More particularly, and pursuant to Rule 5(b)(2)(A)(ii), delivery of said documents was accomplished by personal delivery by a Federal Express agent with Mr. T. Huang, at the above describe address, who signed for said documents on behalf of Jiang Zemin on February 14, 2003, at fifteen hours 54 minutes. See, a copy of Written Proof of Delivery, produced by Federal Express (attached as Exhibit 5 to Marsh Decl.) as well as the Federal Express bill of lading (attached as Exhibit 6 to Marsh Decl.).

The above described service procedures satisfy the requirements for service set in Rule 5 of the Federal Rules of Civil Procedure.

Dated: April 15, 2003

Respectfully submitted,

  
\_\_\_\_\_  
One of Plaintiffs' Attorneys

Terri E. Marsh  
717 D Street NW  
Suite 300  
Washington DC 20002  
202-369-4977  
(pro hac vice)

## DECLARATION OF Terri E. Marsh

I, Terri E. Marsh, declare as follows:

1. I am counsel of record in this action for all Plaintiffs. I make this declaration in support of plaintiffs' proof of service of the Application for Entry of Default, filed with this court on December 3, 2002.

2. Attached to this declaration are two copies of the Application for Entry of Default, in both English and Mandarin Chinese, two reports from highly reputable and authoritative sources submitted in support of Plaintiffs' description of Zhongnanhai as the leadership compound and seat of the office of the President of the People's Republic of China, and a copy of Federal Express Proof of Service with accompanying bill of lading.

a. Exhibit 1 is a true and accurate copy of the Application for Entry of Default delivered by Federal Express, on February 14, 2003, to Defendant Jiang Zemin at Zhongnanhai.

b. Exhibit 2 is a true and accurate copy of said Application for Entry of Default, translated into Mandarin Chinese, and delivered by Federal Express, on February 14, 2003, to said Defendant.

c. Exhibit 3 is a true and accurate copy of *President Jiang Meets American Guests*, dated February 08, 2003, from the People's Daily, which was printed from the URL:  
[http://english.peopledaily.com.cn/200202/08//eng20020222\\_90155.shtml](http://english.peopledaily.com.cn/200202/08//eng20020222_90155.shtml).

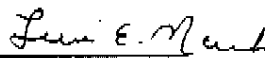
d. Exhibit 4 is a true and accurate copy of *Walled Heart of China's Kremlin*, dated September 27, 1999, from Time Asia, which was printed from the URL:  
<http://www.time.com/time/asia/magazine/99/0927/zhongnanhai.html>

e. Exhibit 5 is a true and accurate copy of the Federal Express Written Proof of Service, dated February 16, from Laura Garrison, Representative, International Customer Support, Federal Express.

f. Exhibit 6 is a true and accurate copy of the bill of lading, dated, February 10, 2003, from Parcel Plus, at 3509 Connecticut Avenue NW, Washington DC, 20008.

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

Executed on this 14 day of April 2003.

  
Terri E. Marsh

[Home](#)>>[China](#)


Last updated at: (Beijing Time) Friday, February 08, 2002

## President Jiang Meets American Guests



Chinese President Jiang Zemin met with Henry Paulson, chairman of the Asia Pacific Council of the Nature Conservancy of the United States on Thursday afternoon.

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Chinese President Jiang Zemin met with Henry Paulson, chairman of the Asia Pacific Council of the Nature Conservancy of the United States on Thursday afternoon.

Paulson is also chairman and chief executive officer of Goldman Sachs.

During his meeting with Paulson and his entourage in Zhongnanhai, the headquarters of the Chinese government, President Jiang expressed his appreciation of the Nature Conservancy's contribution to environmental protection in western China over the years.

...

Posted at, [http://fpeng.peopledaily.com.cn/200202/08/eng20020208\\_90155.shtml](http://fpeng.peopledaily.com.cn/200202/08/eng20020208_90155.shtml)



**SEPTEMBER 27, 1999 VOL. 154 NO. 12**

**ZHONGNANHAI: Center of Power, 1949**

## **Walled Heart of China's Kremlin**

By GÉREMIE R. BARMÉ

As the Communist Party leadership moved into Beijing, Mao Zedong quipped to his comrades: "Let's not rush things. We don't want to end up like Li Zicheng." Li had led a peasant rebellion that invaded Beijing and, in 1644, toppled the Ming Dynasty. The rebels' violent and chaotic rule was soon brought to an end, however, by another, more powerful invading force: the Manchu-Qing army, which crushed Li Zicheng's ragtag rebels to establish a new dynasty.

**Geremie R. Barmé, a scholar of Chinese culture and intellectual history at the Australian National University, is the author of In the Red**

<http://www.time.com/time/asia/magazine/99/0927/zhongnanhai.html>

**Exhibit 4**

TO 202-244-6610

FROM FEDERAL EXPRESS

16FEB03 00:40:00 EST 01903000 PAGE 1 OF 1

EASYLINK 01903000001 16FEB03 00:40:00:40 EST  
FROM: 62023509  
FEDERAL EXPRESS (CRN: WPODA)  
TO: 2022446610

FAX MESSAGE

FEDEX (FEDERAL EXPRESS, INC.)  
TEL. 1-800-247-4747

ATTN : DENNIS ACUNA

COMPANY :

FROM : GARRISON/LAURA@EMCZ

SUBJECT : Written Proof of Delivery

Dear : MR. ACUNA

This is in reply to your request for delivery information regarding  
air waybill number 830975433240.

Our records indicate that your shipment was delivered on  
02 / 14 / 02 at 1554 and signed for by T.HUANG

Should you need further assistance, please feel free to contact me  
in International Customer Support at our toll-free number,  
1-800-247-4747, extension 344 - 3044.

We value your patronage and look forward to serving your air  
express needs.

Sincerely,

LAURA GARRISON  
Representative  
International Customer Support  
FedEx

Exhibit 5

