

# **EXHIBIT A**

**DECLARATION OF KYUNG S. LEE REGARDING HANDLING AND DISPOSITION  
OF CERTAIN CONFIDENTIAL DISCOVERY**

I, Kyung S. Lee, declare under penalty of perjury under 28 U.S.C. § 1746:

1. I am a partner with the law firm of Shannon & Lee LLP ("S&L" or the "Firm"), located at 700 Milam, Pennzoil Place-13<sup>th</sup> Floor, Houston, Texas 77002. I make this Declaration in response to the letter sent to me on August 4, 2022 by Christopher M. Mattei, Esq. and Alinor C. Sterling, Esq. (the "Koskoff Letter"), a true and correct copy of which is attached hereto as Exhibit "A".

2. Except as otherwise noted, all facts set forth in this Declaration are based upon my personal knowledge, upon the client and matter records of Parkins Lee & Rubio LLP, Kyung S. Lee PLLC and Shannon & Lee LLP reviewed by me, which I believe to be true and correct.

3. I am over the age of 18 and am authorized to submit this Declaration. If called upon to testify, I could and would testify competently to the facts set forth in this Declaration.

**A. Background Information to My Involvement with Firms**

4. On or about August 1, 2020, I formed the law firm of Parkins Lee & Rubio LLP ("PLR") to practice corporate bankruptcy law in Houston, Texas.

5. While as a partner at PLR, I represented InfoW, LLC, IWHealth, LLC and Prison Planet tv LLC (collectively, "InfoWDebtors") as their bankruptcy counsel. On April 17, 2022, I represented the InfoWDebtors when they filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court, Southern District of Texas, Victoria Division (the "Bankruptcy Court").

6. On May 15, 2022, I departed PLR and practiced corporate bankruptcy law at the law firm of Kyung S. Lee PLLC with an office in Houston, Texas.

7. On June 1, 2022, R. J. Shannon and I formed Shannon & Lee LLP to practice corporate bankruptcy law with an office in Houston, Texas.

**B. Request from Koskoff Koskoff & Bieder PC**

8. On August 4, 2022, I received by email the Koskoff Letter. In summary, the Koskoff Letter states that Attorney Norm Pattis produced to me and my firm “materials that have been designated as “confidential” and “highly confidential – attorneys eyes only” under the protective order entered by Judge Barbara Bellis . . . (“Confidential Information”). The Koskoff Letter further alleges that Mr. Pattis providing the Confidential Information to me was in violation of the protective order and that I have provided such Confidential Information to Attorney F. Andino Reynal.

9. The Koskoff Letter requests that I confirm by way of sworn affidavit the following:

1. The date I received the Confidential Information;
2. The manner in which I received the Confidential Information;
3. The nature of the Confidential Information;
4. The identities of any individuals who had access to or to whom I transmitted the Confidential Information;
5. The disposition of any Confidential Information currently in my possession.

**C. Response to Request from Koskoff Koskoff & Bieder PC**

10. To the best of my knowledge, the only Confidential Information I received from Mr. Pattis or Pattis & Smith is a white external hard disk (the “External Disk”). In connection with preparing a defense to three (3) motions to dismiss the InfoWDebtors’ bankruptcy cases, I wanted to understand what data had been produced that might be used by the parties seeking dismissal of the InfoWDebtors’ cases in the Bankruptcy Court. Therefore, I sought to review discovery from the InfoWDebtors’ Texas and Connecticut state court counsel.

11. I received the External Disk (presumably containing the Confidential Information) from Pattis & Smith the week of May 2, 2022. The External Disk had been mailed to my downtown Houston office. The sender bubble wrapped the External Disk and enclosed it in a brown envelope.

12. To this day, I do not know the nature of the Confidential Information on the External Disk because I never reviewed or analyzed the External Disk. By May 6, 2022, counsel for both the Texas and Connecticut Plaintiffs announced that they were dismissing their claims against the InfoWDebtors from their respective lawsuits. I focused my attention on working with Plaintiffs' counsel to have their claims withdrawn with prejudice against the InfoWDebtors. When the Texas and Connecticut Plaintiffs dismissed or took steps to dismiss their claims against the InfoWDebtors with prejudice on or about May 19, 2022, their motions to dismiss the InfoWDebtors bankruptcy cases were resolved for all practical purposes. I therefore did not need to review the External Disk to prepare my case against the Plaintiffs' motions to dismiss.

13. While working on finalizing the Plaintiffs' dismissals of claims with prejudice, the U.S. Trustee's office and I, on behalf of the InfoWDebtors, also began discussions for the agreed dismissal of the bankruptcy cases. Upon finalizing the dismissals on May 19, I obtained the approval of the Chief Restructuring Officer to formally agree to dismissing the InfoWDebtors bankruptcy cases. I then immediately turned my attention to negotiating a Stipulation and Agreed Order Dismissing Debtors' Chapter 11 Cases, which was agreed and filed on the Bankruptcy Court docket on June 1, 2022. The Bankruptcy Court signed the Stipulation and Order of Dismissal on June 10, 2022. The agreement to dismiss the cases eliminated the need for the U.S. Trustee to proceed on his dismissal motion. I therefore did not need the External Disk and did not examine its contents.

14. Upon receipt of the External Disk, I did not share the contents of that disk with anyone until I was asked by Mr. Andino Reynal's law firm to provide them the disk. I cannot state with certainty which date I provided the External Disk to Mr. Reynal's firm, but I recall that I personally handed the External Disk to Mr. Reynal in Austin, Texas sometime in May or early June of 2022.

15. I know I turned the External Disk over to Mr. Reynal prior to June 15, 2022, because I received an email from Pattis & Smith on June 15 asking me to return the External Disk to them for logistical reasons. I replied I had handed the External Disk over to Mr. Reynal.


16. I work with 3 Macintosh computers: 1 laptop and 2 iMacs. I went and checked the internal and external drives on all 3 computers in connection with preparing this Declaration. I did not locate a copy of the External Disk on the hard or external drives of any of these computers.

17. From delivery of the External Disk to me the week of May 2 through the date of my handing it over to Mr. Andino Reynal, I never examined the contents of the External Disk.

*[Remainder of Page Intentionally Left Blank]*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated: August 6, 2022, in Houston, Texas

By:   
Kyung S. Lee

**EXHIBIT A**

**KOSKOFF KOSKOFF & BIEDER PC AUGUST 4, 2022**  
**LETTER**

KOSKOFF KOSKOFF & BIEDER PC

August 4, 2022

**VIA EMAIL & CERTIFIED MAIL**

Kyung S. Lee  
Parkins Lee & Rubio LLP  
700 Milam Street STE 1300  
klee@shannonleellp.com

**Re: Erica Lafferty et al. v. Alex Emric Jones, et al., and consolidated matters**

Attorney Lee:

I am advised by Attorney Norm Pattis that he produced to you and your firm materials that have been designated “confidential” and “highly confidential – attorneys eyes only” under the protective order entered by Judge Barbara Bellis in the above referenced matters (“Confidential Information”). He did so in violation of the protective order.

I understand that you have provided all such materials to Attorney F. Andino Reynal.

Today, please confirm by way of sworn affidavit the following:

1. The date you received the Confidential Information;
2. The manner in which you received the Confidential Information;
3. The nature of the Confidential Information;
4. The identities of any individuals who had access to or to whom you transmitted the Confidential Information;
5. The disposition of any Confidential Information currently in your possession.

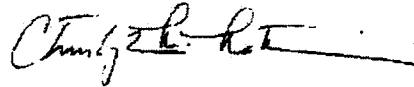
Absent reliable and comprehensive representations concerning the foregoing, we intend to seek all appropriate relief in the various courts that have jurisdiction over these matters.



KOSKOFF KOSKOFF & BIEDER PC

My clients reserve all rights and remedies available to them concerning your unauthorized possession and use of information designated confidential and/or attorneys eyes only confidential under the operative protective order in the *Lafferty* matters.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Christopher M. Mattei", with a long horizontal line extending to the right.

Christopher M. Mattei, Esq.  
Alinor C. Sterling, Esq.