

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

No. 3:14CV1790 (VLB)

JULY 7, 2015

NOTICE OF INTENT TO RAISE AN ISSUE OF FOREIGN LAW

Pursuant to Rule 44.1 of the Federal Rules of Civil Procedure, the defendants Beta Pharma, Inc. and Don Zhang (collectively "Defendants") hereby give notice that they intend to raise an issue about the law of the People's Republic of China in the brief that they will file in compliance with the Court's Order to Show Cause of June 6, 2015 [D.E. #82]. Specifically, Defendants will explain in that brief that under the corporate law of the P.R.C., Zhejiang Beta Pharma Co., Ltd. ("ZJBP"), a Chinese joint stock company, cannot provide the relief that Plaintiff seeks in the Ninth Count of his Complaint, and that ZJBP lacks the authority over the possession of and rights in its shares that Plaintiff alleges it possesses. Defendants will provide, along with that brief, declarations and documents sufficient to establish the content of the relevant P.R.C. law.

121

**DEFENDANTS BETA PHARMA, INC. AND
DON ZHANG,**

By: /s/

**Michael G. Caldwell (ct26561)
LeClairRyan, A Professional Corporation
545 Long Wharf Drive, Ninth Floor
New Haven, Connecticut 06511
Telephone: (203) 672-1636
Facsimile: (203) 672-1656
Email michael.caldwell@leclairryan.com**

**Jack L. Kolpen (NJ Bar No. 026411987)
Benjamin R. Kurtis (NJ Bar No. 029492010)
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Dr., Bldg. 3
Lawrenceville, New Jersey 08648-2311
Telephone: (609) 895-3304
Facsimile: (609) 896-1469
Email: JKolpen@foxrothschild.com
Email: bkurtis@foxrothschild.com
*Admitted as Visiting Attorneys***

**Glenn A. Duhl (ct03644)
Siegel, O'Connor, O'Donnell & Beck, P.C.
150 Trumbull Street
Hartford, Connecticut 06103
Telephone: (860) 280-1215
Facsimile: (860) 527-5131
Email: gduhl@siegelconnor.com**

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2015 a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/

Michael G. Caldwell (ct 26561)