

### **Declaration of Joseph Pavlov**

I, Joseph Pavlov, declare under penalty of perjury that I have personal knowledge of the following statements and that these statements are true and correct to the best of my knowledge and belief.

1. I am the President of Plaintiff, First Call International, Inc. (FCI).
2. All allegations and facts in Plaintiff's Fourth Amended Complaint and in Plaintiff's Response To Defendants' consolidated motion to dismiss are true and accurate.
3. I have experience litigating both in the U.S. and in Korea and found that litigating in Korea to be confusing, opaque, unresponsive, unfair to U.S. companies, and missing many of the safeguards of U.S. courts.
4. FCI buys and sells for export aircraft parts.
5. FCI's headquarters are in Fort Worth, Texas.
6. Defendant Sung Jae Hwang regularly visited me and my company in Fort Worth Texas throughout the relevant periods.
7. Our meetings lasted all day over several days.
8. Defendant Sung Jae Hwang and I often discussed business over lunch and/or dinner.
9. Defendant Sung Jae Hwang represented himself as FCI's brokering agent to FCI's existing and prospective Korean customers.
10. Defendant Sung Jae Hwang directed to FCI in Fort Worth, Texas business leads from Korean companies.
11. From FCI's Fort Worth headquarters, I directed Defendant Sung Jae Hwang's brokering efforts with Korean companies.

12. Defendant Sung Jae Hwang, through Defendant S&B Global, Inc., negotiated with Korean companies on FCI's behalf.

13. From FCI's headquarters in Fort Worth, Texas, I directed and coordinated Defendant Sung Jae Hwang's negotiating efforts with Korean companies.

14. Thanks to Defendant Sung Jae Hwang's brokering efforts, FCI placed bids on aircraft parts supply contracts with Korean companies from FCI's headquarters in Fort Worth, Texas.

15. Defendants provided business leads with Korean companies to FCI in Fort Worth, Texas.

16. From FCI's headquarters in Fort Worth, Texas, I placed FCI's bids with Korean companies.

17. As a result of Defendants' brokering efforts with Korean companies, Korean companies purchased aircraft parts from FCI in Fort Worth, Texas.

18. From its headquarters in Fort Worth, Texas, FCI supplied the aircraft parts that the Korean companies purchased from FCI.

19. Korean companies sent payments for their purchases to FCI in Fort Worth, Texas.

20. From its headquarters in Fort Worth, Texas, FCI paid brokerage commissions to Defendant.

21. I shared confidential and sensitive proprietary business information with Defendant Sung Jae Hwang during his regular business trips to Fort Worth, Texas and instructed him never to use the information with anyone without my express written approval.

22. Adept Fasteners has a branch in Arlington, Texas.

23. FCI is a corporation organized and existing under the law of the State of Texas.

24. FCI is not incorporated in Korea.

25. FCI does not have Korean owners or Korean investors.
26. FCI is 100% owned by US citizens.
27. FCI does not have affiliated companies in Korea.
28. FCI purchases nearly all of its aircraft parts from domestic/US suppliers.
29. FCI does not purchase aircraft parts in Korea or from Korean suppliers.
30. FCI exports most of the aircraft parts that it sells from its location in Fort Worth, Texas.
31. FCI also exports aircrafts parts from and through other suppliers in the USA.
32. FCI conducts and manages its export operations from its headquarters in Fort Worth, Texas.
33. From is Fort Worth, Texas headquarters, FCI secures from the relevant federal enforcement agencies all the licensing that is required to export its aircraft parts.
34. FCI's export licenses and export compliance filings list FCI's headquarters address in Fort Worth, Texas.
35. FCI retains its export licensing and sales records, including those for Korea, in its Fort Worth, Texas headquarters.

March 18, 2024

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Joseph Pavlov