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APR 19 2010

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U.S. DIST. COURT, WESTERN DIST. OF OKLA.
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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

U.S. COMMODITY FUTURES)
TRADING COMMISSION and)
OKLAHOMA DEPARTMENT OF)
SECURITIES ex rel. IRVING . L)
FAUGHT,)

Plaintiffs,)

v.)

PRESTIGE VENTURES CORP., a)
Panamanian corporation, FEDERATED)
MANAGEMENT GROUP, INC. A Texas)
corporation, KENNETH WAYNE LEE an)
individual, and SIMON YANG (a/k/a)
XIAO YANG a/k/a SIMON CHEN), an)
individual,)

Defendants, and)

SHEILA M. LEE, an individual, DAVID A.)
LEE, an individual, and DARREN A. LEE,)
an individual,)

Relief Defendants,)

Case No. 09-CV-1284 (DLR)

Relief Defendant Darren A. Lee's
Response to PLAINTIFF
COMMISSION'S OBJECTIONS
AND RESPONSES TO RELIEF
DEFENDANT DARREN LEE'S
REQUESTS FOR DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 34 and the Local Rules of this Court, Darren A. Lee hereby responds to Plaintiff U.S. Commodity futures Trading Commission ("Commission") **PLAINTIFF COMMISSION'S OBJECTIONS AND RESPONSES TO RELIEF DEFENDANT DARREN LEE'S REQUESTS FOR DOCUMENTS**, dated April 14th, 2010.

GENERAL OBJECTIONS

1. The Commission's claim that the Document Requests are overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence is absurd. To claim that the Document Requests are unduly burdensome is an illegitimate claim because the Commission stated in the Disclosure that those documents were in their possession. Unduly burdensome is having to answer to all of the Commissions menial objections. Two of the requested depositions of individuals that were requested in the Document Requests are very vital to the information process that will, in fact, lead to admissible evidence that will affect the outcome of all parties involved.

2. The Commission is required to disclose evidence. If the attorney-client privilege information is protected, then that protected information can be omitted. Darren A. Lee requested the depositions and those depositions should be disclosed by the Commission.

3. The objection by the Commission, on the grounds that they are untimely, are untrue. The Document Request was mailed out on March 31st, 2010, which is, in fact, on time, pursuant to rules 26(d) and 26(f) of the Federal Rules of Civil Procedure.

4. Darren A. Lee did not know that all Document Requests be signed with the address, email address, and telephone number of the party serving the requests. Darren A. Lee did, however, provide all of the information, minus the email address, in the header of the Document Request.

5. Darren A. Lee did not know how to make it any more particular with his request which follows, "As you are aware, I am a Relief Defendant in the above referenced matter. I am

writing to request copies of (1) every trading account record that you have pertaining to one or more Defendant, (2) the deposition of Bilin ("Cathy") Chen, (3) communications between Plaintiffs and Defendants' customers, (4) Declarations of Xihai Zhang, Dexiang "Edward" Luo, Jian Yue, Susie Southwell, Ming Yu, and Zhong Luo". The depositions of Ming Yu and Jian Yue

are of utmost importance. I admit that (1) is very broad. The rest of the requests are very clear and not unduly burdening as to what is being requested by Darren A. Lee.

6. The Commission does deserve the right to object, as well as, the Defendants and Relief Defendants deserve the right to object to their objections for the respected Court to declare what is admissible, or what is not.

7. The Commission stated in the Disclosure that those documents were in their possession.

8. Darren A. Lee does not know how to address that because the Commission stated in the Disclosure that those documents were in their possession, which, states that they are readily available.

CONCLUSION

The Objections by the Commission are not valid enough reasons for the information to not be turned over by the Commission. Darren A. Lee respectfully requests that the respected Court deny these Objections and grant the Defendants and Relief Defendants information that is needed to have a fair and just trial.

I thank the Court for its time and patience in this filing and realize it may not be correct in every legal respect.

Dated: April 14th, 2010

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'D. Lee', with a long horizontal flourish extending to the left.

Darren Alexander Lee
2676 Palmetto Hall Blvd
Mount Pleasant, SC 29466
Telephone - 843-814-3884

CERTIFICATE OF SERVICE

I hereby certify that, on April 12, 2010, I caused one copy of **Relief Defendant Darren A. Lee's Response to PLAINTIFF COMMISSION'S OBJECTIONS AND RESPONSES TO RELIEF DEFENDANT DARREN LEE'S REQUESTS FOR DOCUMENTS** to be served by U.S. Mail on the following:

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Clerk, US District Court
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