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Sung Jin Su

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SUNG JIN SU,

Plaintiff,

vs.

WORLD KUK SOOL ASSOCIATION,
INC., a Texas corporation;

WKSA, LLC a Texas limited liability
company; and

DOES 1 through 10, inclusive,

Defendants.

Case No. 3:23-CV-01570-JCS

**DECLARATION OF JANG JIN MI
SUPPORT OF PLAINTIFF’S OPPOSITION
TO DEFENDANTS’ MOTION TO (1)
DISMISS THE COMPLAINT FOR LACK
OF PERSONAL JURISDICTION [Fed. R.
Civ. P. 12(b)(2)]; (2) DISMISS THE
COMPLAINT FOR FAILURE TO STATE A
CLAIM [Fed. R. Civ. P. 12(b)(6)]; OR (3)
TRANSFER THE ACTION TO THE
SOUTHERN DISTRICT OF TEXAS [28
U.S.C. § 1404]**

Date: August 25, 2023
Time: 9:30 a.m.
Place: Videoconference only
Zoom ID: 161 926 0804
Password: 050855

Judge: Hon. Joseph C. Spero

1 I, Jang Jin Mi, hereby declare:

2 1. I have personal knowledge of each fact stated in this declaration, and if called as a
3 witness, I could and would testify competently thereto.

4 2. In 1964, I married In Hyuk Suh after the birth of our son, Sung Jin Su.

5 3. My father was working at the Social Security office at the time and when I gave
6 birth to my son, my father thought it was best to quickly file for marriage so a marriage
7 certificate was filed. In Hyuk Suh was not aware that a marriage certificate had been filed until
8 he tried to marry another woman. He then asked me for a divorce.

9 4. When our son was two years old, I separated from In Hyuk Suh and relocated to
10 Daegu, South Korea due to In Hyuk Suh's infidelities.

11 5. From the suspicious demeanor of Suh In Hyuk's friend's younger sister towards
12 Suh In Hyuk, Suh In Hyuk's mother and I realized their relationship was deep. She later married
13 Suh In Hyuk's younger brother.

14 6. I have no knowledge of In Hyuk Suh being instructed by monks, nor any
15 indication that his lineage involves "16 generations" of martial arts practitioners.

16 7. My son, Sung Jin Su, is the grandson of 서 윤근 (Suh, Yun Kun) and 김 우연
17 (Kim, Woo Yeon). In Hyuk Suh seldom mentioned his grandfather, 서명덕 (Suh, Myuk Duk).

18 8. In Hyuk Suh never mentioned that 서명덕 (Suh, Myuk Duk) was a martial artist
19 or even a significant influence in his life. I would have expected for In Hyuk Suh to talk more
20 about his grandfather if he were indeed a significant influence in his life.

21 9. To the best of my knowledge, In Hyuk Suh's parents managed a rice store, and
22 his father was not a practitioner of martial arts. His father, in fact, discouraged In Hyuk Suh's
23 interest in martial arts given the negative reputation it held in Korea during that time.


24 10. In Hyuk Suh's martial arts and family lineage narratives are a lie and it is possible
25 In Hyuk Suh believes his fabrications would not be challenged due to the geographical distance
26 between the United States and Korea.



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Certified Translation

Furnished on the **22nd** day of **June, 2023**

I, **Hyunji Lee** (), hereby certify that I translated the attached document from Korean into English or English into Korean and that this translation is an accurate and faithful translation of the original document. Furthermore, I certify that I am proficient in translating both Korean and English and that I hold the capacity to render and certify the validity of such a translation. This document has not been translated for a family member, friend, or business associate.

I, **Salvador G. Ordorica**, as a Quality Assurance Agent of The Spanish Group LLC, hereby attest that the aforementioned translator is a proficient Korean-English translator. Accordingly, as an authorized representative of The Spanish Group, I certify that this document has been proofread and that the attached document is a faithful and authentic translation of its original.

Respectfully,



Salvador G. Ordorica
The Spanish Group LLC
(ATA #267262)



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10 북부 캘리포니아 지구
11 샌프란시스코 부서

12 성진수,
13 원고,
14 상대
15 월드 국술원, 텍사스 법인
16 WKSA, LLC 유한 책임 회사; 및
17 DOES 1 에서 10, 포함,
18 피고.

사건 번호 3:23-CV-01570-JCS

(1)개인 관할권의 결여에 대한 고소
기각[Fed.R.Civ.P.12(b)(2)]; (2)
클레임을 진술하지 않은 것에 대한
고소기각[Fed. R. Civ. P. 12(b)(6)];
또는 (3) 소송을 남부 텍사스 지부로
이송[28 U.S.C. § 1404]의 피고의
소송에 대한
원고 반대 장진미의 지지 선언

날짜: 2023 년 8 월 25 일 25

시간: 오전 9:30

장소: Videoconference only

Zoom ID: 161 926 0804

패스워드: 050855

판사: Hon. Joseph C. Spero

1 피고의 기각과 이전 고소에 대한 원고의
2 반대 지지 장진미의 선언

3 사건 번호 3:23-CV-01570-JCS

4
5 나 장진미는 다음과 같이 선언합니다:

6 1. 나는 이 선언서에 언급된 각 사실을 개인적으로 알고 있고, 만일 내가
7 증인으로 소환될 경우, 그것에 대해 충분한 증언을 할 수 있고 할 것입니다.

8 2. 1964 년, 나는 우리 아들 성진수의 출생후 서인혁과 결혼했습니다.

9 3. 내 아버지가 당시 사회 보장국에서 일을 하였고 내가 내 아들을 낳았을 때,
10 내 아버지가 신속하게 혼인 신고를 하는 것이 최선이라고 생각하였기 때문에 혼인
11 신고를 하였습니다. 서인혁은 그가 다른 여성과 결혼하려 할 때까지 혼인신고가 된 것을
12 몰랐습니다. 그때 그는 나에게 이혼을 요구하였습니다.

13 4. 우리 아들 2 세때, 나는 서인혁의 불륜으로 서인혁과 별거하고 한국 대구로
14 이주하였습니다.

15 5. 서인혁의 여동생 친구의 서인혁에 대한 의심스러운 처신으로, 서인혁의
16 어머니와 나는 그들의 관계가 심각한 것을 깨달았습니다. 그녀는 나중에 서인혁의
17 남동생과 결혼하였습니다.

18 6. 나는 서인혁이 스님들로부터 가르침을 받았거나 그의 가계가 무술가 “16
19 세대”를 포함하는 것에 대해서는 아는 것이 없습니다.

20 7. 내 아들 성진수는 서윤근(Suh, Yun Kun)과 김우연(Kim, Woo Yeon)의
21 손자입니다. 서인혁은 그의 조부인 서명덕 (Suh, Myuk Duk)에 대해서는 거의 언급하지
22 않았습니다.

23 8. 서인혁은 서명덕 (Suh, Myuk Duk)이 무술가였거나 그의 인생에 큰 영향이
24 있었다는 등을 언급한 적이 없습니다. 나는 그가 진실로 그의 삶에 큰 영향을 중
25 사람이었다면 그의 조부에 대해 더 많이 얘기했으리라 예상했을 것입니다.

