

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

HO WAN KWOK,

*Defendant.*

**Submitted Partially Under Seal**

Case No. 1:23-CR-118-1 (AT)

**DECLARATION OF  
MATTHEW S. BARKAN IN  
SUPPORT OF DEFENDANT'S  
EX PARTE MOTION FOR EARLY  
RETURN OF RULE 17  
SUBPOENAS**

I, MATTHEW S. BARKAN, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at the law firm Pryor Cashman LLP and counsel for Defendant Ho Wan Kwok in the above-captioned matter.

2. I submit this declaration in support of Mr. Kwok's *Ex Parte* Motion for Early Return of Rule 17 Subpoenas.

3. A true and correct copy of Mr. Kwok's proposed Subpoena to Produce Documents, Information, or Objects in a Criminal Case to the United States Attorney's Office for the Eastern District of New York is attached hereto as **Exhibit A**.

4. [REDACTED]

5. [REDACTED]

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10. A true and correct copy of the criminal complaint from *United States v. Bai*, 23 Mag. 0334 (E.D.N.Y.), is attached hereto as **Exhibit H**.

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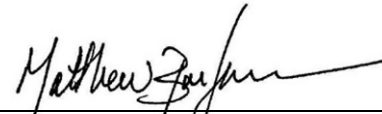
15.

16.

17. [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 5, 2024.



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Matthew S. Barkan  
*Counsel for Defendant*  
*Ho Wan Kwok*