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Attorneys for Plaintiffs
WHATSAPP LLC and META PLATFORMS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WHATSAPP LLC, a limited liability company organized under the laws of Delaware, and META PLATFORMS, INC. a Delaware corporation, Plaintiffs, v. ROCKEY TECH HK LTD., a private limited company organized under the laws of Hong Kong, China, BEIJING LUOKAI TECHNLOGY CO., LTD., a limited liability company organized under the laws of China, CHITCHAT TECHNOLOGY LTD., a limited liability company organized under the laws of Taiwan, collectively d/b/a "HeyMods," "Highlight Mobi," and "HeyWhatsApp," Defendants.	CASE NO.: 3:22-CV-05711 **COMPLAINT; DEMAND FOR JURY TRIAL**

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INTRODUCTION

1. Beginning no later than May 2022 and continuing until at least July 2022, the Defendants (collectively doing business as "HeyMods," "Highlight Mobi," and "HeyWhatsApp") misled over one million WhatsApp users into self-compromising their accounts as part of an account takeover attack. The self-compromised accounts were then used to send commercial spam messages. Defendants facilitated the attack by developing and distributing "unofficial" versions of the WhatsApp application on their website, heymods.com, and on third-party platforms, including the Google Play Store, APK Pure, APKSFree, iDescargar, and Malavida. Exhibits A-C.[1] Defendants developed and distributed multiple versions of at least two malicious applications, called "AppUpdater for WhatsPlus 2021 GB Yo FM HeyMods" and "Theme Store for Zap" (collectively, "**Malicious Applications**"), and misused and infringed WhatsApp's trademarks. Exhibits B-C. The Malicious Applications contained malware and, once installed, were designed to collect the victims' account authentication information, in order to take over the victims' WhatsApp accounts for unauthorized use, including sending commercial spam messages.

2. According to online sources, account takeover attacks have been on the rise across all industries and cost online businesses and consumers billions of dollars in losses annually. Recent reports show that account takeover fraud has increased by 148% in 2021. *See* https://www.globenewswire.com/en/news-release/2021/02/09/2172197/0/en/NewData-from-Arkose-Labs-Shows-Increased-Fraud-Across-All-Industries-Since-BlackFriday-with-Gift-Card-Fraud-and-Account-Takeover-Attacks-Surging.html; https://techwireasia.com/2022/05/bad-bots-bad-bots-whatcha-gonna-do/; https://www.forbes.com/sites/forbescommunicationscouncil/2022/07/18/the-account-takeover-epidemic-a-wake-up-call-for-chief-digital-officers/?sh=5a1bf0244196.

3. Plaintiffs WhatsApp LLC ("**WhatsApp**") and Meta Platforms, Inc. ("**Meta**") have previously disabled Defendants' accounts and reported the Malicious Applications to the Google Play Store and other third-party platforms. On July 11, 2022, WhatsApp issued a public announcement warning its users not to download "fake or modified version[s] of WhatsApp,"

[1] Exhibits A, D-K and Figure Nos. 1-2 reflect machine translations using open source tooling to convert Mandarin text to English.

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including Defendants' HeyWhatsApp application. *See* https://twitter.com/wcathcart/status/154656795567 1961600. Plaintiffs bring this action to protect users and hold Defendants accountable for violations of Meta's Terms of Service and Platform Terms, and WhatsApp's Terms of Service (collectively, the "**Terms**").

PARTIES

4. Meta is a Delaware corporation with its principal place of business in Menlo Park, San Mateo County, California. Meta acts as WhatsApp's service provider for security-related issues.

5. WhatsApp is a limited liability company organized under the laws of Delaware with its principal place of business in Menlo Park, San Mateo County, California.

6. Defendant Rockey Tech HK Ltd. ("**Rockey Tech**") is a private limited company organized under the laws of Hong Kong, China with its principal place of business in Hong Kong, China. Exhibits D-E.

7. Defendant Beijing Luokai Technology Co., Ltd. ("**Luokai Technology**") is a limited liability company organized under the laws of China with its principal place of business in Beijing, China. Exhibit F.

8. Defendant ChitChat Technology Ltd. ("**ChitChat Technology**") is a limited liability company organized under the laws of Taiwan with its principal place of business in Taipei City, Taiwan. Exhibit G. On information and belief, ChitChat Technology also does business under the name "LiveIn Technology" or "LiveIn Technology Co., Ltd." *Compare* Exhibit H (ChitChat Technology's LinkedIn Profile), *with* Exhibit I (LiveIn Technology's LinkedIn Profile). ChitChat Technology is the Taiwanese operation of Rockey Tech and Luokai Technology. Exhibit J.

9. According to Defendants' website highlight.mobi, Defendants Rockey Tech and Luokai Technology are an "internet company that specializes in overseas social networking" with "more than 200 million overseas users," and more than two billion daily active users. Exhibit J. According to its LinkedIn profile, ChitChat Technology is a developer of "social and communication products" and the "fastest growing overseas social application start-up company in the industry." Exhibit H.

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10. According to Defendants' website highlight.mobi, Yao Yao (姚峣) is Defendants Rockey Tech and Luokai Technology's Co-Founder and resides in Beijing, China. Exhibit J. Yao Yao created at least one Facebook Page on behalf of Defendant Rockey Tech and at least one business account on behalf of Defendant Luokai Technology. **Figure 1** is a screenshot of Yao Yao's image on Defendants' website, highlight.mobi, on September 13, 2022.

Figure 1: Yao Yao (姚峣)

Co-founder - Yao Yao

11. According to Defendants' website highlight.mobi and Brad Chang's LinkedIn profile, Brad Chang (張宴晟 or Zhang Yancheng) is Defendant ChitChat Technology's CEO and Defendants Rockey Tech and Luokai Technology's Taiwanese partner and resides in Taipei, Taiwan. Exhibits J-K. Brad Chang created at least three Facebook applications on behalf of Defendant Rockey Tech and at least two business accounts and one Facebook Page on behalf of Defendant ChitChat Technology. **Figure 2** is a screenshot of Brad Chang's image on Defendants' website, highlight.mobi, on September 13, 2022.

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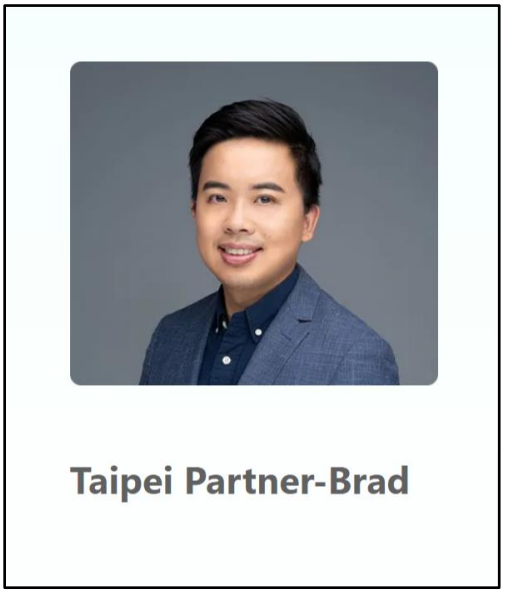
Figure 2: Brad Chang (張宴晟)



12. At all times material to this action, each Defendant was the agent, partner, alter ego, subsidiary, and/or co-conspirator of and with the other Defendant, and the acts of each Defendant were in the scope of that relationship. In doing the acts and failing to act as alleged in this Complaint, each Defendant acted with the knowledge, permission, and consent of each other; and each Defendant aided and abetted each other.

JURISDICTION AND VENUE

13. The Court has jurisdiction under 28 U.S.C. § 1332 over all causes of action alleged in this Complaint because complete diversity exists and the amount in controversy exceeds $75,000.

14. The Court has personal jurisdiction over Defendants because they knowingly directed and targeted their scheme at Meta and WhatsApp, which have their principal places of business in California. Defendants used Meta's developer and advertising platforms, and transacted business using Meta's services, and otherwise engaged in commerce in California. Defendants also distributed their Malicious Applications on California-based platforms.

15. The Court also has personal jurisdiction over Defendants because Defendants agreed to Plaintiffs' Terms by accessing and using Meta's and WhatsApp's services, respectively. By agreeing to the Terms, Defendants, in relevant part, agreed to submit to the personal jurisdiction of this Court, and that California law would govern.

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16. Venue is proper in this District under 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to the claims asserted in this lawsuit occurred here.

17. Pursuant to Civil L.R. 3-2(c), this case may be assigned to either the San Francisco or Oakland division because Plaintiffs are located in San Mateo County.

FACTUAL ALLEGATIONS

A. Background on WhatsApp

18. WhatsApp provides an encrypted communication service available on mobile devices and desktop computers (the "**WhatsApp Service**"). More than 2 billion people in 180 countries use the WhatsApp Service. Users must install the WhatsApp application to use the WhatsApp Service.

19. Every type of communication (calls, video calls, chats, group chats, images, videos, voice messages, and file transfers) on the WhatsApp Service is encrypted during its transmission between users. This encryption protocol was designed to ensure that no one other than the intended recipient could read any communication sent using the WhatsApp Service.

20. Use and access to the WhatsApp Service, and interactions with WhatsApp's computer systems, is governed by WhatsApp's Terms of Service ("**WhatsApp Terms**").

21. In October 2014, Meta acquired WhatsApp. At all times relevant to this action, Meta has served as WhatsApp's service provider, which entails providing both infrastructure and security for WhatsApp.

B. WhatsApp's Terms of Service

22. Every WhatsApp user must create an account and agree and consent to the WhatsApp Terms (available at https://www.whatsapp.com/legal/terms-of-service).

23. The WhatsApp Terms state that "You must use [the WhatsApp Service] according to our Terms and policies" and that users agree to "access and use [WhatsApp's] Services only for legal, authorized, and acceptable purposes."

24. WhatsApp Terms prohibit–whether directly, indirectly, through automated or other means–from, among other things:

a. "[E]xploiting [WhatsApp's] Services in impermissible or unauthorized manners, or in ways that burden, impair, or harm [WhatsApp], [its] Services, systems, [its] users, or others";

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b. "[R]everse engineer[ing], alter[ing], modify[ing], creative derivative works from, decompile[ing], or extract[ing] code from [WhatsApp] Services";

c. "[S]end[ing], stor[ing], or transmit[ting] viruses or other harmful computer code from or onto [WhatsApp] Services";

d. "[G]ain[ing] or attempt[ing] to gain unauthorized access to [WhatsApp] Services or systems";

e. "Interfere[ing] with or disrupt[ing] the safety, security, confidentiality, integrity, availability, or performance of [WhatsApp] Services";

f. "[C]ollect[ing] information of or about [WhatsApp] users in any impermissible or unauthorized manner";

g. "[S]ell[ing], resell[ing], rent[ing], or charg[ing] for [WhatsApp] Services or data obtained from [WhatsApp] or [WhatsApp] Services in an unauthorized manner";

h. "[C]reat[ing] software or APIs that function substantially the same as [WhatsApp] Services and offer them for use by third parties in an unauthorized manner";

i. Using the WhatsApp Services in ways that "violate, misappropriate, or infringe the rights of WhatsApp, or [its] users, or others, including privacy, publicity, intellectual property, or other proprietary rights"; and

j. Using WhatsApp for "any non-personal use of [WhatsApp's] Services unless otherwise authorized by [WhatsApp]."

25. The WhatsApp's Terms prohibit users not just from personally engaging in the conduct listed above, but also from assisting others in doing so.

C. <u>Background on Meta and Facebook</u>

26. Meta owns and operates Facebook, a social networking website and mobile application that enables its users to create their own personal profiles and connect with each other on mobile devices and personal computers. As of June 2022, Facebook daily active users averaged 1.97 billion and monthly active users averaged 2.93 billion.

27. A Facebook Page is a public profile on Facebook used to promote a business or other commercial, political, or charitable organization or endeavor.

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28. Meta's Audience Network is a product that Meta offers to enable advertisers to display their ads to people who use third-party (non-Meta) apps and websites. By integrating their apps with Audience Network, third-party mobile app developers can generate revenue by displaying ads to Meta users who use their apps. To implement Audience Network, a third-party mobile app developer adds code provided by Meta to their app, which will show and track the Audience Network ads (the "**Audience Network SDK**"). Meta pays the third-party mobile app developers a percentage of the net revenue generated from the ads delivered on their apps. Generally, the payment amounts depend on the number of clicks attributed to the ads displayed on a particular app through Audience Network.

29. Meta also operates a developer platform referred to as the "Meta Platform." This platform enables app developers ("**Developers**") to run apps that interact with Meta and Meta users.

30. Access to and interaction with Meta's computer systems is governed by Meta's Terms of Service ("**Meta Terms**") and other policies, including the Platform Terms and Developer Policies.

D. <u>Meta's Terms of Service and Platform Terms and Policies</u>

31. All Facebook users, including Developers, agree to comply with the Meta Terms when they create a Facebook account. Everyone who uses Facebook must agree to the Meta Terms (available at https://www.facebook.com/terms.php?ref=pf), and other rules that govern different types of access to, and use of, Facebook. These other rules include Meta's Platform Terms (available at https://developers.facebook.com/terms/dfc_platform_terms) and Developer Policies (available at https://developers.facebook.com/devpolicy/).

32. Section 3.2.1 of the Meta Terms prohibits using Facebook to do anything that "violates these Terms . . . and other terms and policies," "is unlawful, misleading, discriminatory or fraudulent," or "infringes or violates someone else's rights."

33. The relevant Meta Platform Terms include:

a. "[Meta] or Third-Party Auditors may conduct an Audit . . . to ensure that your and your App's Processing of Platform Data is and has been in compliance with these Terms and all other applicable terms and policies." Section 7.c.i.

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b. "You will cooperate with the audits, including by (1) providing all necessary physical and remote access to your IT Systems and Records, and (2) providing information and assistance as reasonably requested . . . ." Section 7.c.iii.

c. "From time to time, [Meta] may request . . . information, certifications, and attestations relating to your use of Platform or Processing of Platform Data, which you will provide to [Meta] in the requested timeframe and form." Section 7.d.

d. "You also must comply with all applicable laws and regulations . . .." Section 11.b.

E. <u>Defendants Agreed to the WhatsApp Terms</u>

34. At all times relevant to this Complaint, Defendants were bound by the WhatsApp Terms.

35. Between November 2018 and July 2022, Defendants created and caused to be created approximately ten WhatsApp accounts and agreed to the WhatsApp Terms. For example, on or about January 11, 2019, Defendants' principal, Brad Chang created a WhatsApp account and agreed to the WhatsApp Terms on their behalf. Likewise, on or about May 23, 2022, Defendants Rockey Tech and Luokai Technology's Co-Founder, Yao Yao, created a WhatsApp account and agreed to the WhatsApp Terms on their behalf.

F. <u>Defendants Agreed to the Meta Terms and Platform Terms</u>

36. At all relevant times, Defendants were Facebook users that agreed to and were bound by the Meta Terms. In total, Defendants owned and controlled more than five business accounts, five Facebook Pages, and thirty-five Facebook applications.

37. <u>Defendant Rockey Tech</u>: On or about March 24, 2020, Yao Yao created a Facebook Page named "Rockey Tech." Through creation and use of this Page, Yao Yao agreed to the Meta Terms on Defendant Rockey Tech's behalf. On or about October 23, 2019, January 13, 2020, and August 13, 2021, Brad Chang created three Facebook applications ("Status Saver - Audience Network," "Sticker - Audience Network," and "Status Keeper - Audience Network," respectively) that integrated with Meta's Audience Network on Defendant Rockey Tech's behalf. Through creation and use of these Audience Network integrations, Brad Chang agreed to the Meta Terms and Platform Terms on Defendant Rockey Tech's behalf.

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38. Defendant Luokai Technology: On or about June 1, 2020, Yao Yao created a business account in the name of "Beijing Luokai Technology Co., Ltd." Through creation and use of this and other accounts, Yao Yao agreed to the Meta Terms on Defendant Luokai Technology's behalf. On or about August 13, 2021, an agent of Defendant Luokai Technology created a business account and Facebook Page both named "Beijing Luokai Technology Co., Ltd." and a Facebook application named "Highlight" and agreed to the Meta Terms and Platform Terms on Defendant Luokai Technology's behalf.

39. Defendant ChitChat Technology: On or about September 28, 2022, Brad Chang created two business accounts in the names of "ChitChat" and "ChitChat Tech," respectively, and a Facebook Page named "ChitChat Technology" on Defendant ChitChat Technology's behalf. Through creation and use of these accounts and Page, Brad Chang agreed to the Meta Terms on Defendant ChitChat Technology's behalf. On or about October 7, 2020 and November 25, 2020, an agent of Defendant ChitChat Technology created two Facebook applications ("Status saver new - Audience Network" and "Status saver," respectively) that integrated with Meta's Audience Network on its behalf. Through creation and use of these Audience Network integrations, this Facebook user agreed to the Meta Terms and Platform Terms on Defendant ChitChat Technology's behalf.

G. Defendants' Account Takeover Attack

1. Overview

40. Beginning no later than May 2022 continuing until at least July 2022, Defendants facilitated an account takeover attack targeting WhatsApp and its users. Defendants' scheme proceeded as follows:

41. First, Defendants developed and distributed on various websites, including heymods.com and the Google Play Store, at least two Malicious Applications and multiple versions thereof, which contained malware and were designed to trick victims into self-compromising their WhatsApp accounts. Exhibits A-C. Defendants also promoted their Malicious Applications on Facebook.

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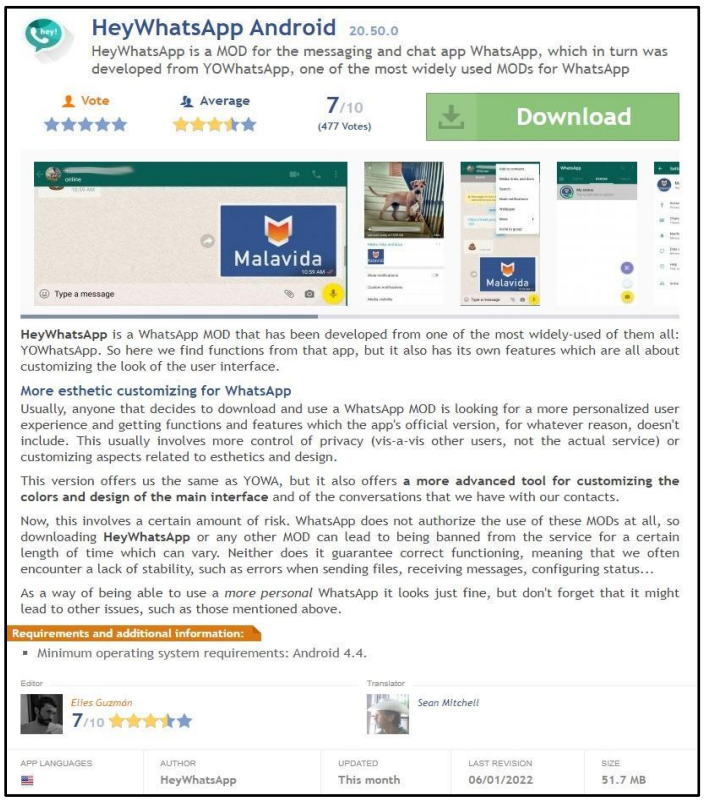
42. Second, through the Malicious Applications, Defendants facilitated the misappropriation of users' WhatsApp account keys, which include authentication information from the victim's device, and used them to access the victim's WhatsApp account without authorization.

43. Third, once Defendants gained unauthorized access to a victim's WhatsApp account, they caused the account to be used without authorization and for improper purposes, including to send commercial spam.

2. Defendants' Development and Distribution of the Malicious Applications

44. Between approximately June 2021 and July 2022, Defendants developed and distributed multiple unofficial versions of WhatsApp and at least two of these contained malware. *See, e.g.*, Exhibits A-C. For example, **Figure 3** is a screenshot of one of the unofficial versions of WhatsApp, which Defendants made available at malavida.com and called "HeyWhatsApp Android 20.50.0" on June 14, 2022. On the Google Play Store, Defendants listed the developer of these Malicious Applications as "HeyMods Yo Gb Plus WaMods," with the e-mail address gb.wamods@gmail.com. Exhibits B-C.

Figure 3: Defendants' "HeyWhatsApp Android 20.50.0" available on malavida.com on June 14, 2022



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45. Between at least June 7, 2021 and July 2022, one of the Malicious Applications made available by Defendants on the Google Play Store was called, "AppUpdater for WhatsPlus 2021 GB Yo FM HeyMods." Exhibit B. According to Defendants, this application was designed to automatically update any of Defendants' unofficial WhatsApp applications installed on the victims' device. *Id.* According to the Google Play Store, this application was installed by more than one million users. *Id.*

46. Between at least March 3, 2022 and July 2022, another Malicious Application Defendants made available on the Google Play Store was called "Theme Store for Zap." Exhibit C. According to Defendants, this application was designed to modify other versions of unofficial WhatsApp applications, including modifying the applications' colors. *Id.* According to the Google Play Store, this application was installed by more than 100,000 users. *Id.*

47. Defendants tricked victims into installing the Malicious Applications by misrepresenting them on the Google Play Store as legitimate alternatives to WhatsApp. For example, Defendants promoted the Malicious Application "AppUpdater for WhatsPlus 2021 GB Yo FM HeyMods" as a tool to "receive the latest update and latest new feature notification of [multiple unofficial WhatsApp applications] from HeyMods." Exhibit B. Defendants promoted the Malicious Application "Theme Store for Zap" as a tool to change the look-and-feel or "theme" of multiple unofficial WhatsApp applications developed by Defendants. Exhibit C. In fact, the Malicious Applications contained malware designed to facilitate an account takeover attack and were not affiliated with WhatsApp or Meta. Defendants did not disclose on the Google Play Store or in its Privacy Policies that this application contained malware designed to collect the users WhatsApp authentication information. *See* Exhibits L-M.

48. Defendants also promoted their website heymods.com on Facebook. For example, on or about July 14, 2020, Defendant Luokai Technology created the Facebook Page, "Animated Sticker Maker for WhatsApp - WAStickerApps," to promote Defendants' unofficial WhatsApp applications available on heymods.com.

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3. Defendants Gained Unauthorized Access to Victims' WhatsApp Accounts

49. After victims installed the Malicious Applications, they were prompted to enter their WhatsApp user credentials and authenticate their WhatsApp access on the Malicious Applications. The Defendants programmed the Malicious Applications to communicate the user's credentials to WhatsApp's computers and obtain the users' account keys and authentication information (collectively, "**access information**"). Defendants also programmed the Malicious Applications to send the victim's access information to computers controlled by Defendants using some of the following domains: hzdy.birxpk.com, cx48t3.khvi3w.com, uz1dtd.khvi3w.com, pdhegk.nxsoaa.com, and 96oh21.nxsoaa.com.

50. Defendants' privacy policies for the Malicious Applications misrepresented that Defendants collected only "Technical Data and Device information such as network connection type (e.g., WiFi, 3G, 4G), browser type, language, operating system, [] your provider, network and device performance, the unique device identifier assigned to that device by phone makers, carriers, or maker s [*sic*] of the operating system, application status, [] usage statistic[s], your usage." Exhibits L-M. Defendants further represented that "[t]he **only** purpose" of collecting such information "is to improve [their] service, to make the application run faster and use less storage and data." *Id.* (emphasis added). In fact, Defendants collected access information for improper purposes, including spam.

51. For example, on or about May 16, 2022, a WhatsApp user located in the United Kingdom installed one of the Malicious Applications. The user's WhatsApp account was then accessed using the access information collected through the Malicious Applications without WhatsApp's or the user's authorization.

4. The Compromised WhatsApp Accounts Were Used to Send Commercial Spam Messages

52. Defendants used or caused their unauthorized access to be used to send thousands of spam messages on WhatsApp.

53. Between approximately May 2022 and continuing to at least July 2022, Defendants used or caused the victims' WhatsApp Accounts to be used to send unauthorized spam messages.

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The unauthorized access and spam messages promoted third-party websites, including www.222atm.com, www.28.city, https://panda95.live/RF1817A311, https://panda95.live/RF, https://cutt.ly/oGlcJ0G, https://cutt.ly/FGlc8nZ. The spam messages were directed at WhatsApp users around the world, including users in Hong Kong, Indonesia, Malaysia, and Singapore.

H. Meta's Enforcement and Request for an Audit Pursuant to the Platform Terms

54. In July and August 2022, WhatsApp disabled Defendants' WhatsApp accounts and Meta disabled Defendants' Facebook user accounts, business accounts, ad accounts, applications, and Pages, and Instagram user accounts.

55. On or about July 7, 2022, Plaintiffs also sent each Defendant a cease and desist letter. Exhibit N. Meta further requested an audit of Defendants' systems pursuant to Facebook Platform Policy 7.c. *Id*. WhatsApp also notified Google that Malicious Applications in the Google Play Store contained malware designed to facilitate account takeovers.

56. Between July 21 and August 12, 2022, Plaintiff's counsel sent additional correspondence to Defendants requesting a response to the July 7 cease and desist letter and audit demand. To date, Defendants have not responded. However, on July 18, 2022, Defendants announced on Telegram that "[d]ue to some circumstances, the heymods team will stop updating apps in the heymods family." Exhibit O.

I. Defendants' Unlawful Acts Have Caused Damage and a Loss to Plaintiffs

57. Defendants' breaches of Plaintiffs' Terms and other misconduct described above have harmed Plaintiffs, including by negatively impacting Plaintiffs' services.

58. Defendants' misconduct has caused Plaintiffs to spend resources investigating and redressing Defendants' wrongful conduct. Plaintiffs have suffered damages attributable to the efforts and resources they have used to investigate, address, and mitigate the matters set forth in this Complaint.

FIRST CAUSE OF ACTION

(Breach of Contract)

by Plaintiff WhatsApp LLC against Defendants

59. WhatsApp incorporates all other paragraphs as if fully set forth herein.

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60. Defendants agreed and became bound by the WhatsApp Terms when they, through their principals and agents, created various WhatsApp accounts.

61. Defendants breached their agreement with WhatsApp by taking the actions described above in violation of the WhatsApp Terms.

62. WhatsApp has performed all conditions, covenants, and promises required of it in accordance with its agreement with Defendants.

63. Defendants' breaches have caused WhatsApp to incur damages, including the expenditure of resources to investigate and respond to Defendants' fraudulent scheme and unauthorized access.

SECOND CAUSE OF ACTION

(Breach of Contract)

by Plaintiff Meta Platforms, Inc. against Defendants

64. Meta incorporates all other paragraphs as if fully set forth herein.

65. Defendants agreed and became bound by the Meta Terms, Platform Terms, and Developer Policies when they created various Facebook Pages and applications.

66. Defendants breached these agreements with Meta by taking the actions described above in violation of the Meta Terms 3.2.1 and Platform Terms 7.c, 7.d, and 11.b. These include using Facebook to do anything "unlawful, misleading . . . or fraudulent" or "violat[ing] someone else's rights"; failing to comply with Meta's request for an audit and for proof of compliance with its Terms and policies; and failing to "comply with all applicable laws and regulations."

67. Meta has performed all conditions, covenants, and promises required of it in accordance with its agreements with Defendants.

68. Defendants' breaches have caused Meta to incur damages, including the expenditure of resources to investigate and respond to Defendants' fraudulent scheme.

69. The harms caused by Defendants' breach of Platform Terms 7.c and 7.d can only be adequately remedied by specific performance of the contract between Meta and Defendants.

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PRAYER FOR RELIEF

Plaintiffs seek judgment awarding the following relief:

1. That the Court enter judgment against Defendants that Defendants have breached their contracts with Plaintiffs, in violation of California law;

2. That the Court enter a permanent injunction:

   a. Ordering Defendants to comply with Platform Policy 7.c and respond, fully and accurately, to Meta's requests for information and proof of compliance with Plaintiffs' Terms, including a forensic data audit;

   b. Barring Defendants from accessing or attempting to access Plaintiffs' websites and computer systems;

   c. Barring Defendants from creating or maintaining any Meta or WhatsApp accounts in violation of Plaintiffs' Terms;

   d. Barring Defendants from engaging in any activity to defraud Plaintiffs or their users; and

   e. Barring Defendants from engaging in any activity, or facilitating others to do the same, that violates Plaintiffs' Terms.

3. That Plaintiffs be awarded damages, including compensatory damages, as permitted by law and in such amounts to be proven at trial.

4. That Plaintiffs be awarded their reasonable costs.

5. That Plaintiffs be awarded pre- and post-judgment interest as allowed by law.

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6. That the Court grant all such other and further relief as the Court may deem just and proper.

Dated: October 4, 2022

HUNTON ANDREWS KURTH LLP

By: /s/ Ann Marie Mortimer
Ann Marie Mortimer
Jason J. Kim
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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury on all issues triable to a jury.

Dated: October 4, 2022

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EXHIBIT A

WhatsApp Mods by Team HeyMods

GBWhatsApp, YoWhatsApp, WhatsApp Plus and all the other incredible mods you need.

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What's new in v20.50.0

Release Date : 1 / June / 2022

Size : 52.0 MB
- [Enabled] Feature-Pause and resume voice recordings
- [Added] Status Feed
- [Added] Copy/Forward Caption

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Package : com.gbwhatsapp, Unclone : com.whatsapp

Base : 2.22.6.72 (Google Play)

ANDROID APP ON IDESCARGAR — Average 8/10 (137150 Votes)

"2 WhatsApp accounts on the same device, as well as other extra functions."

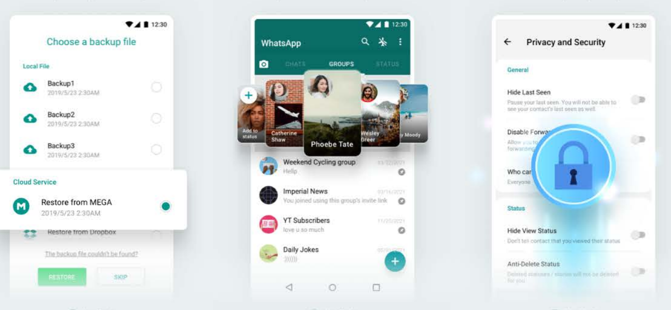
DETAILS | DOWNLOAD | Unclone

Start Download
View User Manuals. Free Manuals Search Extension
Manuals Directory
Download

Backup & Restore — Seamlessly backup/restore by Cloud

Chat — Multiple solutions to fit your need

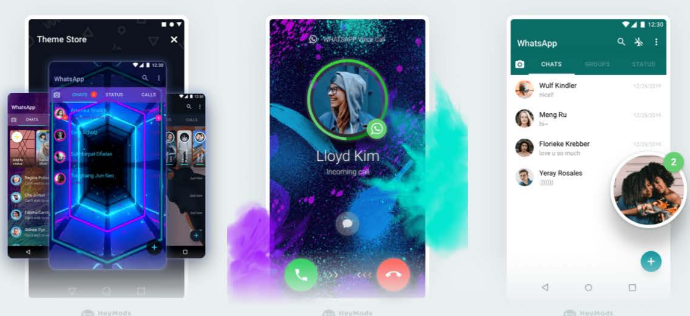
Privacy Settings — Protect your privacy



Dynamic Theme Store — Lots of fantastic themes to explore

Color Phone — Cool, animated dynamic effect

Chat Head Message — You can chat anywhere



Start Download
View User Manuals. Free Manuals Search Extension
Manuals Directory
Download

GBWhatsApp Pro by HeyMods V16.30 Caller ID

Package : com.gbwhatsapp, Unclone : com.whatsapp

Base : 2.22.6.72 (Google Play)

This mod has an exclusive and free feature called "Caller ID", which can minimize nuisance calls on WhatsApp.

DETAILS | DOWNLOAD | Unclone

#1 Mass Texting Service
Absolute Lowest Pricing
Easily integrate our programmable SMS API into your application & scale your business.
cdyne.com
OPEN

HeyWhatsApp 2022 v20.50.0 ANTI-BAN

Package : com.heywhatsapp, Unclone : com.whatsapp

Base : 2.22.6.72 (Google Play)

DETAILS | DOWNLOAD | Unclone

#1 Mass Texting Service
Absolute Lowest Pricing
Easily integrate our programmable SMS API into your application & scale your business.
cdyne.com
OPEN

WhatsApp Plus 2022 by HeyMods v20.50.0 ANTI-BAN

Package : com.whatsapp

Base : 2.22.6.72 (Google Play)

ANDROID APP ON IDESCARGAR — Average 8/10 (167826 Votes)

DETAILS | DOWNLOAD

#1 Mass Texting Service
Absolute Lowest Pricing
Easily integrate our programmable SMS API into your application & scale your business.
cdyne.com
OPEN

YoWhatsApp 2022 by HeyMods v20.50.0 ANTI-BAN

Package : com.yowhatsapp, Unclone : com.whatsapp

Base : 2.22.6.72 (Google Play)

ANDROID APP ON IDESCARGAR — Malavida — Average 9/10 (141385 Votes)

"Improve the control of your privacy and customize the aspect of the app."

DETAILS | DOWNLOAD | Unclone

HeyMods App Updater

HeyMods App Updater for GBWhatsApp, YoWhatsApp and WhatsApp Plus
Never miss the latest features of HeyMods

Google Play

DOWNLOAD

Feature

Feel bored with the WhatsApp appearance? Heymods provides a variety of themes for the chat room and phone call.

Zap Theme - All the themes are FREE!

Free DIY theme

Customized Privacy Settings

Multiple privacy settings allow you to see the deleted contents or hide your status from others!

Safety Backup

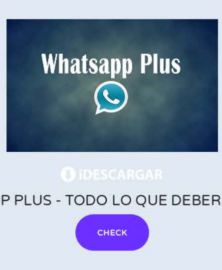
Multiple cloud services and local options for you to backup the chat history regularly. You can restore the data whenever you want!

Why Heymods

	Whatsapp	HeyMods
Various Themes	-	✓
Customized Privacy Settings	-	✓
Safety Backup	-	✓

GBWHATSAPP Blog - Introduction to Latest GB Features

CHECK LATEST FEATURES



WHATSAPP PLUS - TODO LO QUE DEBERÍAS SABER

CHECK

Descargar YoWhatsApp, el mod para enviar fotos en alta calidad y mucho más

CANAL apps — CHECK

Baixe Aqui o Whatsapp GB

Baixe Aqui o Whatsapp Plus

Baixe Aqui o YoWhatsapp

Baixe Aqui o HeyWhatsapp

GBWhatsApp HeyMods Terbaru

WhatsApp Plus Anti Blokir

RENMEDIA — CHECK

WhatsGB .com.br — CHECK

send FeedBack | Join bata user group

Follow Heymods to catch up the latest information!

(GBChannel)

© 2020-2022 HeyMods Team | Privacy Policy | Terms of Service

EXHIBIT B

2022-06-17 – AppUpdater for WhatsPlus 2021 GB Yo FM HeyMods
Available On the Google Play Store

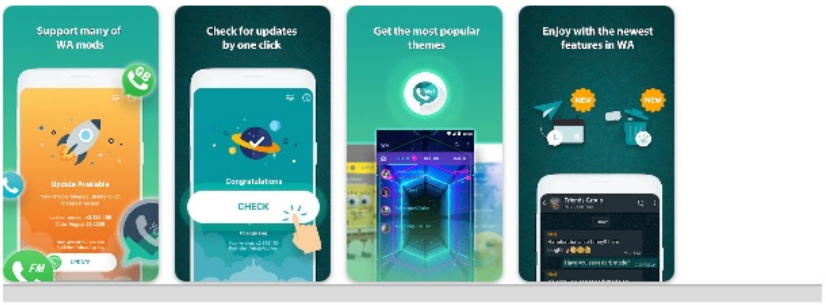
Google Play Games Apps Movies & TV Books Kids

AppUpdater for Whats Plus 2021 GB Yo FM HeyMods

HeyMods Yo Gb Plus WaMods

3.7★ 17K reviews | 1M+ Downloads | Everyone

Install



About this app

This app could let receive the latest update and latest new feature notification of Whats Plus 2021、GB、Yo、Fm、Plus、GBWA、YoWa、FmWa、WaPlus and Aero from HeyMods

Updated on
Jun 7, 2021

Data safety

Developers can show information here about how their app collects and uses your data. Learn more about data safety

No information available

Developer contact

Email
gb.wamods@gmail.com

Privacy policy
https://whatsappupdater.web.app/whatsapp-updater-privacy.html

URL: https://play.google.com/store/apps/details?id=com.heymods.gbwa.yowa.waplus.updater

2022-06-17 – AppUpdater for WhatsPlus 2021 GB Yo FM HeyMods
Available On the Google Play Store

Ratings and reviews →

Ratings and reviews are verified

3.7

5
4
3
2
1

17K reviews

STEVANK_GH

October 18, 2020

App keeps freezing after latest update. Incoming messages takes so long to load. The whole experience with this latest update is so so bad that you just don't want to waste your time. The first update after June was okay, tho it has limited features.. Until I updated to the latest one yesterday. It's been a horrible experience since then.

912 people found this review helpful

Did you find this helpful? Yes No

Jonathan Raymond

November 13, 2020

Whatsapp Web scanning for the desktop application doesn't work anymore since last update, I tried it with The regular whatsapp and everything works fine. Also when trying to do a backup the option doesn't let you pick and account to back up your session, which as for result that when you try to restore your messages on the regular whatsapp, there is no backup yo restore from, fix it please

2,849 people found this review helpful

Did you find this helpful? Yes No

f farah amirah

December 16, 2020

Hi this apps is great but pls fix the bug. I cannot open/see whatsapp stories. If I try to open it will automatically kick me out to phone home screen. Hopefully this can be fix in no time. I'll leave a good star rating after the issues has been solve 👋

988 people found this review helpful

Did you find this helpful? Yes No

URL: https://play.google.com/store/apps/details?id=com.heymods.gbwa.yowa.waplus.updater

2022-06-17 – AppUpdater for WhatsPlus 2021 GB Yo FM HeyMods
Available On the Google Play Store

See all reviews

What's new

* App Updater for Whats Plus 2020 Yo Gb Plus Fm Aero by HeyMods / iMods Team
* Improved Update Flow
* Fix crash

Flag as inappropriate

Google Play
Play Pass
Play Points
Gift cards
Redeem
Refund policy

Kids & family
Parent Guide
Family sharing

Terms of Service Privacy About Google Play Developers Google Store United States (English (United States))

URL: https://play.google.com/store/apps/details?id=com.heymods.gbwa.yowa.waplus.updater

EXHIBIT C

2022-06-17 – Theme Store for Zap Available On the Google Play Store

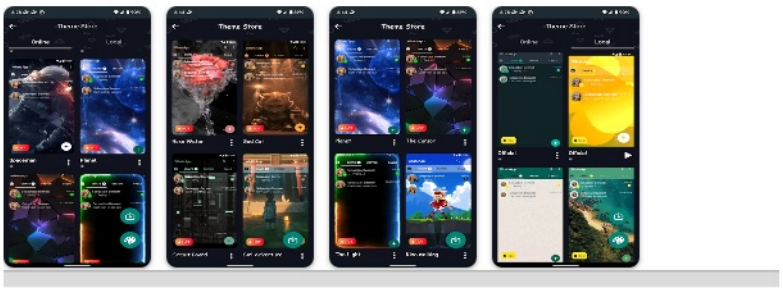
Google Play Games Apps Movies & TV Books Kids

Theme Store for Zap

HeyMods Yo Gb Plus WaMods

3.6★ 471 reviews | 100K+ Downloads | E Everyone

Install



Developer contact

Email
gb.wamods@gmail.com

Privacy policy
https://gbapps.com/2022/02/09/our-privacy-statement/

About this app →

Theme Store for Zap GB Plus Yo and Aero, Hey 2022

Updated on
Mar 3, 2022

Personalization

Data safety →

Safety starts with understanding how developers collect and share your data. Data privacy and security practices may vary based on your use, region, and age. The developer provided this information and may update it over time.

No data shared with third parties
Learn more about how developers declare sharing

No data collected
Learn more about how developers declare collection

See details

URL: https://play.google.com/store/apps/details?id=com.coocoo.themestore

2022-06-17 – Theme Store for Zap Available On the Google Play Store

Ratings and reviews

Ratings and reviews are verified

3.6

5
4
3
2
1

471 reviews

angel kazi

March 22, 2022

No single them available mention in templetes..

13 people found this review helpful

Did you find this helpful? Yes No

Peter Mary Adah

March 15, 2022

Why must I share before using it??

66 people found this review helpful

Did you find this helpful? Yes No

Msese Mtete

March 19, 2022

I not like

17 people found this review helpful

Did you find this helpful? Yes No

See all reviews

What's new

Dynamic theme store for WhatsApp 2022
1000+ Themes

Flag as inappropriate

URL: https://play.google.com/store/apps/details?id=com.coocoo.themestore

2022-06-17 – Theme Store for Zap Available On the Google Play Store

---

Google Play
Play Pass
Play Points
Gift cards
Redeem
Refund policy

Kids & family
Parent Guide
Family sharing

Terms of Service Privacy About Google Play Developers Google Store United States (English (United States))

URL: https://play.google.com/store/apps/details?id=com.coocoo.themestore

EXHIBIT D

Welcome **MRebol**! **System Clock:** 23-JUN-2022 10:18:23 GMT +0800

Account available balance: HK$208.60

Company Name Search

Your Search: LEFT PARTIAL match with 'Rockey Tech' , CR No.: = 2846935

CR No.:	2846935
Company Name:	Rockey Tech HK Limited
Company Type:	Private company limited by shares
Date of Incorporation:	02-JUL-2019
Active Status:	Live
Remarks:	-
Winding Up Mode:	-
Date of Dissolution / Ceasing to Exist:	-
Register of Charges:	Unavailable
Important Note:	-

Name History

Effective Date	Name Used
02-JUL-2019	Rockey Tech HK Limited

Please select if you want to perform other searches or order other products for this company:

Image Record (including Document Index) GO

Please select the Order Type:

Order certified screen print HK$140.00 plus additional handling charges for different delivery mode(*)

(*) Additional handling charges for different delivery mode will be shown when check out shopping cart.

Back

Back to top

ICRIS_Ver_1_0_6_Build_06_12

ICRIS CSC Companies Registry, The Government of the Hong Kong Special Administrative Region.

EXHIBIT E

存案 Filed

公司註冊處
Companies Registry

周年申報表
Annual Return

表格 Form **NAR1**

公司編號 Company Number
2846935

註 Note

1 公司名稱 Company Name

Rockey Tech HK Limited

7 2 商業名稱(如有的話) Business Name (If any)

3 公司類別 Type of Company

請在適用的空格內加上 ✓ 號 Please tick the relevant box

☑ 私人公司 Private company ☐ 公眾公司 Public company ☐ 擔保有限公司 Company limited by guarantee

3 4 本申報表的結算日期
Date to which this Return is Made Up

日 DD	月 MM	年 YYYY
02	07	2021

*(如屬私人公司，本申報表應列載截至公司成立為法團的周年日期的資料。
如屬公眾公司，申報表的結算日期應為該公司的會計參照期結束後的 6 個月屆滿之日。
如屬擔保有限公司，申報表的結算日期應為該公司的會計參照期結束後的 9 個月屆滿之日。*

*For a private company, the information in this return should be made up to the anniversary of the date of its incorporation.
For a public company, the return should be made up to the date that is 6 months after the end of its accounting reference period.
For a company limited by guarantee, the return should be made up to the date that is 9 months after the end of its accounting reference period.)*

9 5 隨本表格交付的財務報表所涵蓋的會計期
Period Covered by Financial Statements Delivered with this Form
(私人公司無需填報此項 A private company need not complete this section)

日 DD	月 MM	年 YYYY	至 To	日 DD	月 MM	年 YYYY
-	-	-		-	-	-

10 6 註冊辦事處地址 Address of Registered Office

Unit 507, 5/F., New East Ocean Centre
No. 9 Science Museum Road, Tsim Sha Tsui East, Kowloon
Hong Kong

3 提交人資料 **Presentor's Reference**

姓名 Name: BNA BUSINESS CONSULTANTS LIMITED

地址 Address: Unit 507, 5/F., New East Ocean Centre, No. 9 Science Museum Road, Tsim Sha Tsui East, Kowloon, Hong Kong

電話 Tel: 2838-9880 傳真 Fax: 2838-9938
電郵 Email:
檔號 Reference:

請勿填寫本欄 **For Official Use**

23202036708
NAR1L 2846935
05/07/2021

0110

表格 Form **NAR1**

公司編號 **Company Number**
2846935

11 **7 電郵地址 Email Address**

8 按揭及押記 Mortgages and Charges

截至本申報表的結算日期，所有根據《公司條例》須向公司註冊處處長登記的，或若於 1912 年 1 月 1 日後設定便須如此登記的按揭及押記的負債總額
Total amount of the indebtedness as at the date to which this return is made up in respect of all mortgages and charges which are required to be registered with the Registrar of Companies pursuant to the Companies Ordinance or would have been required to be so registered if created after 1 January 1912

-

9 無股本公司的成員人數 Number of Member(s) of a Company Not Having a Share Capital
(有股本的公司無需填報此項 Company having a share capital need not complete this section)

截至本申報表的結算日期的成員人數
Number of Member(s) as at the Date to which this Return is Made Up -

12 **10 股本 Share Capital**
(無股本的公司無需填報此項 Company not having a share capital need not complete this section)

截至本申報表的結算日期 As at the Date to which this Return is Made Up				
股份的類別 (如普通股／優先股等) Class of Shares (e.g. Ordinary／Preference etc.)	貨幣單位 Currency	已發行股份 Issued Shares		
		總數 Total Number	總款額 Total Amount	已繳或視作已繳的總款額 Total Amount Paid up or Regarded as Paid up
Ordinary	HKD	10,000	10,000.00	10,000.00
總數 Total	HKD	10,000	10,000.00	10,000.00

表格 Form **NAR1**

公司編號 Company Number: 2846935

11 公司秘書 Company Secretary

A. 公司秘書（自然人）Company Secretary (Natural Person)

(如超過一名公司秘書屬自然人，請用續頁 A 填報 Use Continuation Sheet A if more than 1 company secretary is a natural person)

中文姓名 Name in Chinese		-
英文姓名 Name in English	姓氏 Surname	-
	名字 Other Names	-
前用姓名 Previous Names	中文 Chinese	
	英文 English	
別名 Alias	中文 Chinese	
	英文 English	
13 香港通訊地址 Hong Kong Correspondence Address		
	地區 Region	
14 電郵地址 Email Address		-

15 身分證明 Identification

(a) 香港身分證號碼 Hong Kong Identity Card Number: - - - - - - - - - (-)

(b) 護照 Passport — 簽發國家 Issuing Country: -

號碼 Number: -

B. 公司秘書（法人團體）Company Secretary (Body Corporate)

(如超過一名公司秘書屬法人團體，請用續頁 A 填報 Use Continuation Sheet A if more than 1 company secretary is a body corporate)

16 中文名稱 Name in Chinese	博朗商業顧問有限公司
16 英文名稱 Name in English	BNA BUSINESS CONSULTANTS LIMITED
17 香港地址 Hong Kong Address	Unit 507, 5/F.,
	New East Ocean Centre
	No. 9 Science Museum Road, Tsim Sha Tsui East, Kowloon
地區 Region	Hong Kong
14 電郵地址 Email Address	-

公司編號 Company Number: 1725305

0112

表格 Form **NAR1**

公司編號 Company Number: 2846935

12 董事 Directors

A. 董事 (自然人) Director (Natural Person)

(如超過一名董事屬自然人，請用續頁 B 填報 Use Continuation Sheet B if more than 1 director is a natural person)

請在適用的空格內加上 ✓ 號 Please tick the relevant box(es)

18 身分 Capacity: ☑ 董事 Director ☐ 候補董事 Alternate Director

代替 Alternate to: -

中文姓名 Name in Chinese: 王大妹

英文姓名 Name in English — 姓氏 Surname: WANG

名字 Other Names: Damei

前用姓名 Previous Names — 中文 Chinese:

英文 English:

別名 Alias — 中文 Chinese:

英文 English:

19 住址 Residential Address:
Room 902, Yard 35
No. 801, Dongfeng East Street
Yuexiu District, Guangzhou City, Guangdong Province

國家／地區 Country／Region: China

20 電郵地址 Email Address:

21 身分證明 Identification

(a) 香港身分證號碼 Hong Kong Identity Card Number: - - - - - - - - - (-)

(b) 護照 Passport — 簽發國家 Issuing Country: China

號碼 Number: E20993087

表格 Form **NAR1**

公司編號 Company Number: 2846935

12 董事 Directors (續上頁 cont'd)

B. 董事 (法人團體) Director (Body Corporate)

(如超過兩名董事屬法人團體，請用續頁 C 填報 Use Continuation Sheet C if more than 2 directors are body corporate)

請在適用的空格內加上 ✓ 號 Please tick the relevant box(es)

18 **1 身分 Capacity** ☐ 董事 Director ☐ 候補董事 Alternate Director 代替 Alternate to: -

中文名稱 **Name in Chinese**

英文名稱 **Name in English**

22 地址 **Address**

國家／地區 Country／Region

20 電郵地址 **Email Address**

公司編號 **Company Number** -
(只適用於在香港註冊的法人團體)
(Only applicable to body corporate registered in Hong Kong)

請在適用的空格內加上 ✓ 號 Please tick the relevant box(es)

18 **2 身分 Capacity** ☐ 董事 Director ☐ 候補董事 Alternate Director 代替 Alternate to: -

中文名稱 **Name in Chinese**

英文名稱 **Name in English**

22 地址 **Address**

國家／地區 Country／Region

20 電郵地址 **Email Address** -

公司編號 **Company Number** -
(只適用於在香港註冊的法人團體)
(Only applicable to body corporate registered in Hong Kong)

0114

表格 Form **NAR1**

公司編號 Company Number: 2846935

12 董事 Directors (續上頁 cont'd)

C. 備任董事 Reserve Director

(只適用於只有一名成員而該成員同時亦是唯一董事的私人公司)
(Only applicable to a private company with only one member who is also the sole director of the company)

中文姓名 Name in Chinese		
英文姓名 Name in English	姓氏 Surname	
	名字 Other Names	
前用姓名 Previous Names	中文 Chinese	
	英文 English	
別名 Alias	中文 Chinese	
	英文 English	
19 住址 Residential Address		
	國家／地區 Country／Region	
20 電郵地址 Email Address		

21 身分證明 Identification

(a) 香港身分證號碼 Hong Kong Identity Card Number: - - - - - - - - - (-)

(b) 護照 Passport
- 簽發國家 Issuing Country: -
- 號碼 Number: -

表格 Form **NAR1**

公司編號 Company Number
2846935

23 **13 有股本公司的成員詳情 Particulars of Member(s) of a Company Having a Share Capital**
(有股本的公司必須填報此項 Company having a share capital must complete this section)

請在適用的空格內加上 ✓ 號 Please tick the relevant box

☑ 非上市公司的成員詳情列於附表一
Particulars of members of a non-listed company are listed in Schedule 1

☐ 上市公司的成員詳情列於附表二
Particulars of members of a listed company are listed in Schedule 2

24 **14 公司紀錄 Company Records**
(如空位不足，請用續頁 D 填報 Use Continuation Sheet D if the space provided is insufficient)

公司備存下列紀錄的地址(如並非備存於第 6 項所述的註冊辦事處內)
Address where the following company records are kept (if not kept at the registered office stated in Section 6)

公司紀錄 Company Records	地址 Address

15 陳述書 Statement

(如屬私人公司，請在空格內加上 ✓ 號以作出此項陳述 For a private company, please tick the box to make the Statement)

☑ 現述明公司自最近一份周年申報表的結算日期起(如屬首份周年申報表，則自公司成立為法團的日期起)，並沒有發出邀請，以邀請公眾人士認購公司的任何股份或債權證；同時如成員人數於本申報表的結算日期當日超過五十名，則超出五十名之數的成員，全屬根據《公司條例》第 11(2)條於計算公司成員人數時不包括在內的人。
The company has not, since the date of the last annual return (or since the date of incorporation in the case of the first annual return), issued any invitation to the public to subscribe for any shares or debentures of the company and that if the number of members of the company exceeds 50 as at the date of this return, the excess consists wholly of persons who, under section 11(2) of the Companies Ordinance, are excluded in the calculation of the number of members of the company.

25 **提示 Advisory Note**
所有公司董事均應閱讀公司註冊處編製的《董事責任指引》，並熟悉該指引所概述的董事一般責任。
All directors of the company are advised to read 'A Guide on Directors' Duties' published by the Companies Registry and acquaint themselves with the general duties of directors outlined in the Guide.

本申報表包括下列續頁 **This Return includes the following Continuation Sheet(s)**

續頁 Continuation Sheet(s)	A	B	C	D
頁數 Number of pages	0	0	0	0

For and on behalf of
BNA BUSINESS CONSULTANTS LIMITED
博朗商業顧問有限公司

6 簽署 Signed : .....
Authorized Signature(s)

姓名 Name : BNA BUSINESS CONSULTANTS LIMITED 日期 Date : 2 JUL 2021
~~董事 Director~~/公司秘書 Company Secretary * 日 DD / 月 MM / 年 YYYY

*請刪去不適用者 Delete whichever does not apply

指明編號 1/2014 (2014 年 3 月) Specification No. 1/2014 (March 2014)

表格 Form **NAR1**

附表一 **Schedule 1**
(非上市公司適用
FOR NON-LISTED COMPANY)

本申報表的結算日期
Date to which this Return is Made Up

日 DD	月 MM	年 YYYY
02	07	2021

公司編號 **Company Number**

2846935

26 非上市公司的成員詳情 (第 13 項)
Particulars of Member(s) of a Non-listed Company (Section 13)

(有股本的非上市公司必須填報此頁。如空位不足，或超過一類股份，可另加附表一。)
(Non-listed company having a share capital must complete this page. If the space provided is insufficient, or if there is more than one class of shares, please use additional Schedule 1.)

截至本申報表的結算日期的成員詳情 Particulars of Member(s) as at the Date to which this Return is Made Up

股份類別 **Class of Shares** Ordinary

此類別股份的已發行總數 **Total Number of Issued Shares in this Class** 10,000

姓名／名稱 Name	地址 Address	股份 Shares			備註 Remarks
		現時持有量 Current Holding	轉讓* Transferred *		
			數目 Number	日期 Date	
Rockey Tech Limited	Sertus Chambers, Governors Square, Suite #5-204, 23 Lime Tree Bay Avenue, P.O. Box 2547, Grand Cayman, KY1-1104, Cayman Islands	10,000			

* 如公司的股份自上一份周年申報表日期以來(如屬首份周年申報表，則自公司成立為法團以來)有任何轉讓，有關詳情亦請一併申報；股份受讓人的姓名／名稱請在「備註」一欄註明。
* If there have been any transfers of the company's shares since the date of the last annual return (or since incorporation if this is the first annual return), please also provide details of the transfers; the name of the transferee should be stated in the 'Remarks' column.

0117

EXHIBIT F

2022-09-28 – National Enterprise Credit Information Publicity System Record of Beijing Luokai Technology Co., Ltd.

09/28/2022 , 10:40:53 | front page | Fill in the company information | announcement | Enterprises in key areas | navigation | 17301...

国家企业信用信息公示系统
National Enterprise Credit Information Publicity System

Enterprise Credit Information | List of Abnormal Business Operations | List of Serious Illegal and Untrustworthy
Please enter the company name, unified social credit code or registratic

Beijing Luokai Technology Co., Ltd.

Existence (in business, opening, registered)

Unified social credit code: 91110108MA01JMDK86
Registration Number:
Legal representative: Xue Min
Registration Authority: Beijing Economic and Technological Development Zone Market Supervision Administration
Date of establishment: April 22, 2019

send report
information sharing
Information printing

basic information | Administrative Licensing Information | Administrative Penalty Information | Included in the list of abnormal business operations | Information on the List of Serious Violators and Untrustworthy (Blacklist) | official news

Business license information

- **Unified social credit code:** 91110108MA01JMDK86
- **Company Name:** Beijing Luokai Technology Co., Ltd.
- **Registration Number:**
- **Legal representative:** Xue Min
- **type:** Limited liability company (invested or controlled by natural persons)
- **Date of establishment:** April 22, 2019
- **Registered capital:** 100.0000000000 RMB
- **Approval Date:** April 9, 2020
- **Business period from:** April 22, 2019
- **Open until:** April 21, 2039
- **Registration Authority:** Beijing Economic and Technological Development Zone Market Supervision Administration
- **Registration Status:** Existence (in business, opening, registered)
- **residence:** No. 717, Unit 2, 7th Floor, Building 18, No. 7A, Tongji Middle Road, Beijing Economic and Technological Development Zone, Beijing
- **Business Scope:** Technology development, technology transfer, technical consultation, technical services; software development; arts and crafts design; computer animation design; design, production, agency, and advertising. (Enterprises shall independently select business projects and carry out business activities in accordance with the law; for projects subject to approval according to law, business activities shall be carried out according to the approved content after being approved by the relevant departments; they shall not engage in business activities of projects prohibited or restricted by the city' s industrial policies.)

Shareholders and capital contribution information

serial number	Shareholder name	Shareholder Type	Type of license/document	License/document number	Details
1	Yao Yao	naturehuman shareEast	non-public items	non-public items	Check
2	Sister Wang	natural person shareholder	non-public items	non-public items	Check

A total of 2 records were found, a total of 1 page

front page | previous page | 1 | next page | last page

Key Personnel Information

A total of 3 messages

Xue Min	Xue Min	YinVina
经理	执行董事	监事

2022-09-28 – National Enterprise Credit Information Publicity System Record of Beijing Luokai Technology Co., Ltd.

Branch Information

No branch information yet

"Multiple certificates in one" information announcement

Reminder: The following license matters of the enterprise have been integrated into the business license of the enterprise through "multi-certificate integration"

serial number	The name of the record item	Remark
1	Official seal engraving record	

A total of 1 records were found, a total of 1 pages

front page | previous page | 1 | next page | last page

liquidation information

No clearing information yet

Change information

serial number	Changes	Content before change	Content after change	change date
No change information				

A total of 0 records were found, a total of 0 pages

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Chattel mortgage registration information

Reminder: According to the "Decision of the State Council on Implementing Unified Registration of Movable Property and Rights Guarantees" (Guo Fa [2020] No. 18) and the "Announcement of the State Administration for Market Regulation of the People's Bank of China" ([2020] No. 23), from January 2021 From January 1st, the information in this module will no longer be updated. For detailed information, please log in to the unified registration and publicity system for movable property financing of the People's Bank of China Credit Information Center (https://www.zhongdengwang.org.cn).

serial number	registration number	Registration Date	registration authority	Amount of secured claims	Details
No real estate mortgage registration information					

A total of 0 records were found, a total of 0 pages

front page | previous page | next page | last page

Equity pledge registration information

serial number	registration number	Pledgor	License/document number	Amount of pledged shares	pledgee	License/document number	Equity pledge establishment registration date	state	Announcement date	Details
1	91110108MA01JMDK86_0001	Yao Yao	non-public items	3	Beijing Luokai Yunxiang Technology Co., Ltd.	91110108MA01M8JC9P	February 11, 2020	efficient		
2	91110108MA01JMDK86_0001	Sister Wang	non-public items	97	Beijing Luokai Yunxiang Technology Co., Ltd.	91110108MA01M8JC9P	February 11, 2020	efficient		

2022-09-28 – National Enterprise Credit Information Publicity System Record of Beijing Luokai Technology Co., Ltd.

A total of 2 records were found, a total of 1 page

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Intellectual Property Information

serial number	name	Application Number	Date of Application	Patentee	Details
No intellectual property information					

A total of 0 records were found, a total of 0 pages

front page | previous page | next page | last page

Intellectual Property Pledge Registration Information

serial number	Intellectual property registration certificate number	name	type	Pledgor's name	Pledgor's name	Pledge registration period	state	Announcement date	Details
No intellectual property rights pledge registration information									

A total of 0 records were found, a total of 0 pages

front page | previous page | next page | last page

Trademark registration information

No trademark registration information

Spot check inspection result information

serial number	Inspection implementing agency	type	date	result
There is no random inspection result information				

A total of 0 records were found, a total of 0 pages

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Product quality supervision and spot check result information

serial number	Results release time	product name	Specifications	Production date/lot number	Spot check results	Major ineligible items	Inspection agency
There is no information on the results of product quality supervision and random inspection							

A total of 0 records were found, a total of 0 pages

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Certification Regulatory Spot Check Information

serial number	Spot check year	Certificate number	Product Category	Product name (nominal)	Specifications	Non-conforming items found in random inspections	Certification body name	The result of the certificate processing that the certification body has taken	Certificate revocation date

2022-09-28 – National Enterprise Credit Information Publicity System Record of Beijing Luokai Technology Co., Ltd.

There is no information on certification supervision and random inspection

A total of 0 records were found, a total of 0 pages

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Food inspection information

serial number	sample name	Specifications	Production date/lot number	task source	Sampling results
No food inspection information					

A total of 0 records were found, a total of 0 pages

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Double random spot check result information

serial number	Spot check plan number	Spot check plan name	Spot check task number	Spot check task name	Spot check type	random inspection agency	Spot Check Completion Date	Spot check results
There is no information on the results of random random inspections								

A total of 0 records were found, a total of 0 pages

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Mutual legal assistance information

serial number	person to be executed	Amount of equity	enforcement court	Execution notice document number	type|state	Details
No legal assistance information yet						

A total of 0 records were found, a total of 0 pages

front page | previous page | next page | last page

false promises

serial number	False promises	verification time	process result
No promises are untrue			

A total of 0 records were found, a total of 0 pages

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The following information is provided by the enterprise, and the enterprise is responsible for the authenticity and legitimacy of the submitted information

Corporate annual report information

serial number	Reporting year	Announcement date	Details
1	2021 Annual Report	May 24, 2022	Check
2	2020 Annual Report	May 23, 2021	Check
3	2019 Annual Report	March 16, 2020	Check

2022-09-28 – National Enterprise Credit Information Publicity System Record of Beijing Luokai Technology Co., Ltd.

Shareholders and capital contribution information

shareholder	Subscription amount (ten thousand yuan)	Actual payment (ten thousand yuan)	Subscription details				Payment details			
			Subscription method of capital contribution	Amount of funds subscribed (ten thousand yuan)	Subscription date	Announcement date	way of paid-in capital	Paid-in capital contribution (ten thousand yuan)	Date of paid-in contribution	Announcement date
No shareholder and capital contribution information										

A total of 0 records were found, a total of 0 pages

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Equity change information

serial number	shareholder	Shareholding ratio before change	Shareholding ratio after change	Equity Change Date	Announcement date
No shareholding change information					

A total of 0 records were found, a total of 0 pages

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Administrative Licensing Information

serial number	License file number	License file name	Valid from	Valid until	Licensing Authority	Licensed Content	state	Details
No administrative license information								

A total of 0 records were found, a total of 0 pages

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Intellectual Property Pledge Registration Information

serial number	Intellectual property registration certificate number	name	type	Pledgor's name	Pledgor's name	Pledge registration period	state	Announcement date	Details
No intellectual property rights pledge registration information									

A total of 0 records were found, a total of 0 pages

front page previous page next page last page

focus on

subscriptio

objection

return

Administrative Penalty Information

serial number	Decision letter number	Type of offense	Contents of administrative punishment	Decide on the name of the agency	Penalty decision date	Announcement date	Remark
No administrative penalty information yet							

A total of 0 records were found, a total of 0 pages

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Group member information

2022-09-28 – National Enterprise Credit Information Publicity System Record of Beijing Luokai Technology Co., Ltd.

serial number	member name	Unified Social Credit Code	member type	Shareholding ratio of parent company
No group member information				

A total of 0 records were found, a total of 0 pages

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Implement standard self-declaration

Reminder: According to Article 27 of the Standardization Law of the People's Republic of China, if an enterprise implements its own enterprise standards, it shall also disclose the functional indicators of products and services and the performance indicators of products.

Please log in to the enterprise standard information public service platform (www.qybz.org.cn) to complete the registration and filling. View modification records>>

serial number	product or service	Product or service classification	Standard type	standard encdoing	standard name	Fill in time
There is no self-declaration information for the implementation of the standard						

A total of 0 records were found, a total of 0 pages

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Credit Commitment Information

serial number	Credit Commitment Matters	credit commitment time	Content of credit commitment
There is no information on the announcement of the market entity's termination of business closure.			

A total of 0 records were found, a total of 0 pages

front page previous page next page last page

https://www.gsxt.gov.cn/%7B94DA4182FCFBE0500FCC8681DE27621CDF0EE1BEB968915EC5C2BC7FAEBA08CB8150A966FDFA15A5047ACA6B84CE2126DE9D6132AA131C67DE227902BB0C7C6B7C577C577C32257C46577766E6BF2970F0700CBE71F5BB905F65AAD68F19D6C775F1DAF1D14E9

Sponsor: State Administration for Market Regulation
Address: No. 8, Sanlihe East Road, Xicheng District, Beijing Postal Code: 100820 Record Number: Beijing ICP No. 18022388-2
Business consulting and technical supportContact informationUse help

EXHIBIT G

2022-09-28 – Commercial and Industrial Registration Public Information Query Service Record of ChitChat Technology Ltd.

Company basic information | Information of directors and supervisors | Manager Profile | Branch information

cross-domain data | Historical data | self-disclosure | Legal person director and supervisor network trial version

print this page | LineCopy link

Company basic information

Uniform numbers	83189916 subscription
Company status	Approved the establishment of "For the latest business status, please visit the Ministry of Finance Tax Portal "
Company Name	Chit Chat Technology Ltd. Google search (English name of importer and exporter: Chit Chat Technology Ltd.) " Inquiry of the English name of the manufacturer in the International Trade Bureau (limited to those engaged in import, export or trading) "
The foreign language company name specified in the articles of association	
Total capital (yuan)	3,100,000
Representative name	Zhang Yansheng
company location	Electronic Map , 17th Floor, No. 97, Songren Road, Xinyi District, Taipei City
registration authority	Taipei City Government
Approved date of establishment	September 22, 109
Last Approved Change Date	
Business information	I301010 Information software service industry I301030 Electronic information supply service industry I301020 Data processing service industry F401010 International trade industry I199990 Other consulting service industry I103060 Management consulting industry ZZ99999 Except for the licensed business, it may operate the business that is not prohibited or restricted by the law

look up again

(Remark)

- If you need to check whether the company has completed the business registration or is still in business, because it is not the responsibility of the Ministry of Economic Affairs, please go to the Ministry of Finance's tax portal website " Business (tax status) registration information publicity query website " to check. thanks!
- If you need to inquire about the latest changes and records of the company's business projects registered under the Construction Industry Law, because it is not the responsibility of the Ministry of Economic Affairs, please go to the Construction Department of the Ministry of the Interior - National Construction Management Information System Portal " Construction Industry - Registration Information Check the website ". thanks!
- If you need to inquire about the latest changes and records of the company's business projects registered in accordance with the Apartment Building Management Regulations, because it is not the responsibility of the Ministry of Economic Affairs, please go to the Construction Department of the Ministry of the Interior - National Construction Management Information System Portal " Apartment Building - Manage and maintain company information inquiry website " inquiry. thanks!

Department of Commerce, Ministry of Economic Affairs of the Republic of China / Address: 10015, No. 15, Fuzhou Street, Zhongzheng Dist., Taipei City, Back to Commerce Department Portal
Service Hours: Monday~Friday 8:30~17:30 (except national holidays)
Consultation hotline: 412-1166, direct No need to dial the area code (6-code area, please dial 41-1166), mobile phone please dial 02
Version: v1.4.1 | Government Website Information Opening Notice | Privacy Policy | Website Security Policy

URL: https://findbiz.nat.gov.tw/fts/query/QueryCmpyDetail.do?objectId=SEM4MzE4OTkxNg==&banNo=83189916&disj=719FBA2193204EBAAD9790FF54D87242&fhl=zh_TW

EXHIBIT H

Home My Network Jobs

chitchat

ChitChat Technology

Quchao Technology is the fastest growing global social application start-up company in the industry, newly established in September 2020

Month, its goal is to become the next generation of social giants in the world.

Technology, Information and Internet · Taipei City · 205 followers

See all 19 employees on LinkedIn

Follow Visit website More

Home About Posts Jobs People

Overview

Quchao Technology is the fastest growing overseas social application start-up company in the industry. It was newly established in September 2020.

The goal is to replace Whatsapp and Facebook and become the next-generation social giant in the world.

Its core team comes from ByteDance (the parent company of Douyin), Wandoujia, Kikatech, Snow Leopard (Taipei), Hunting

Leopard Mobile, Grindr (Taipei) and other top companies in related industries.

The founder Zhou Li is a serial entrepreneur. He once co-founded Tiger Map, Pea Pod, Kika

Tech and other companies.

The company has completed the pre A round of financing, and the main investor is the top international investment institution SIG (ByteDance

Investors) and XVC, the company's user growth is the fastest in the industry, no one. The company currently has more than 50 people,

Mainly the product and R&D team, headquartered in Beijing, with offices in Taipei and Wuhan, and it is expected to expand in the short term.

As large as about 100 people.

As far as data is concerned, the company's products have exceeded 10 million in just six months since it was launched in May 2020.

of daily active users (acquaintance social products), with a daily increase of more than 400,000.

Starting in April 2021, we will start to build a new business of social protocols. On the basis of tens of millions of daily activities, Wormhole will create a new business.

A secure communication protocol across apps. The team's goal is to establish a cross-product Open standard, and build under this framework

Established a number of Open source projects (Client SDK and Chat server) to link social and communication products.

Website

https://imchitchat.com/

Industry

Technology, Information and Internet

URL: https://www.linkedin.com/company/chitchat-technology/about/

Company size

51-200 employees

19 is LinkedIn

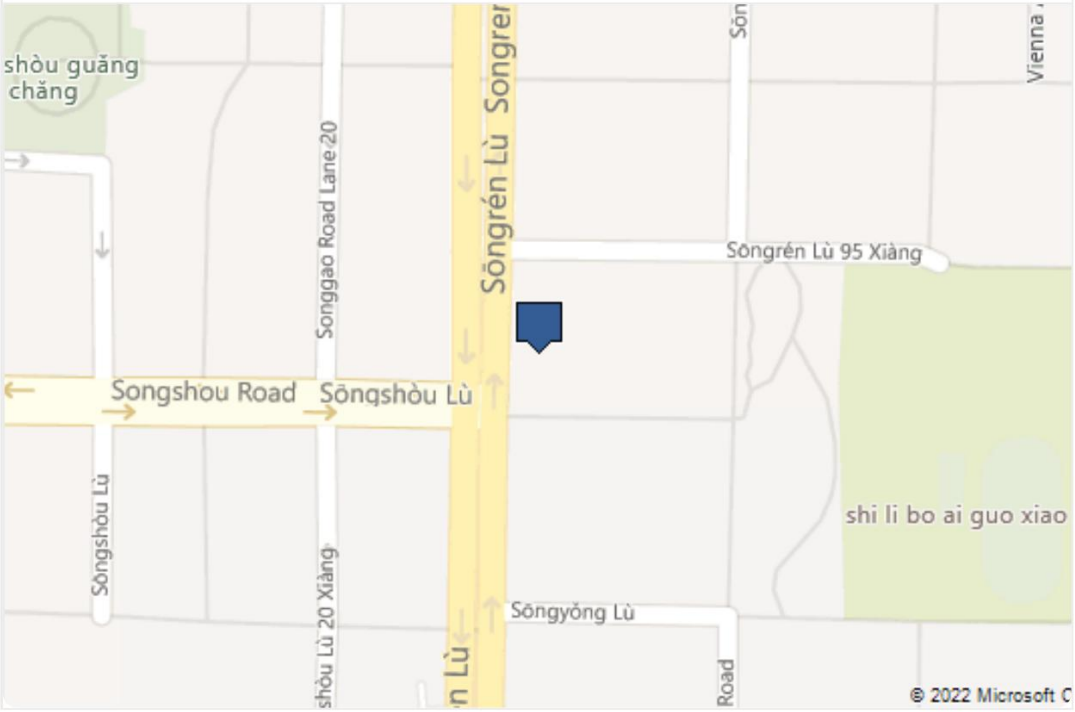
Locations (1)

Primary

Headquarters

17F., No. 97, Songren Rd., Xinyi Dist., Taipei City, 110, TW

Get directions



Ad
Follow and upgrade your business with Hitachi!
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Hitachi Social Innovation is POWERING GOOD
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Kika Tech, Inc.
Computer Software 1,860 followers
+ Follow

iKala
Internet
8,080 followers
+ Follow

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EXHIBIT I

2022-09-29 - Livein Technology's LinkedIn Profile

Search

Home | My Network | Jobs | Messaging | Notifications | Me | Work | Learning

MOMENTS FOR BEST FRIENDS

Show live pics on home screen from unlimited friends!

Livein Technology

Livein Technology is the fastest-growing global social application startup in the industry, newly established in 2022, with the goal of becoming the next-generation social giant in the world.

Technology, Information and Internet · Taipei City · 209 followers

See all 22 employees on LinkedIn

+ Follow | Visit website | More

Home | About | Posts | Jobs | People

Overview

Livein Technology is the fastest-growing overseas social application start-up company in the industry. It was newly established in 2022 and replaced Whatsapp and Facebook to become the next-generation social giant in the world. Its core team comes from ByteDance (the parent company of Douyin), Wandoujia, Kikatech, Snow Leopard (Taipei), Cheetah Mobile, Grindr (Taipei) and other top companies in related industries. The founder Zhou Li is a serial entrepreneur. He once co-founded companies such as Tiger Map, Pea Pod, Kika Tech, etc. The company has completed the pre A round of financing. The main investors are the top international investment institutions SIG (ByteDance investor) and XvC. The company's user growth is the fastest in the industry, no one. The company currently has more than 50 people, mainly product and R&D teams, headquartered in Beijing, with offices in Taipei and Wuhan, and it is expected to expand to about 100 people in the short term. In terms of data, since the company's products were launched in May 2020, there have been more than 10 million daily active users (acquaintance social products) in just six months, with a daily increase of more than 400,000. Starting in April 2021, it will start to build a new business of social protocols. Wormhole has created a cross-app secure communication protocol on the basis of tens of millions of daily activities. The team's goal is to establish a cross-product Open standard, and to build a number of Open source projects (Client SDK and Chat server) under this framework to link social and communication products.

Website
https://imchitchat.com/

Industry
Technology, Information and Internet

Company size
51-200 employees
22 on LinkedIn

Locations (1)

Primary

Headquarters
17F., No. 97, Songren Rd., Xinyi Dist., Taipei City, 110, TW

Get directions

Ad

[redacted]

Pages people also viewed

[redacted]

See all similar pages

People also follow

[redacted]

See all recommended pages

[redacted] Messaging

EXHIBIT J

2022-09-28 – Defendants' Website Highlight.Mobi

Rockey Tech
洛凯科技

about us
about us

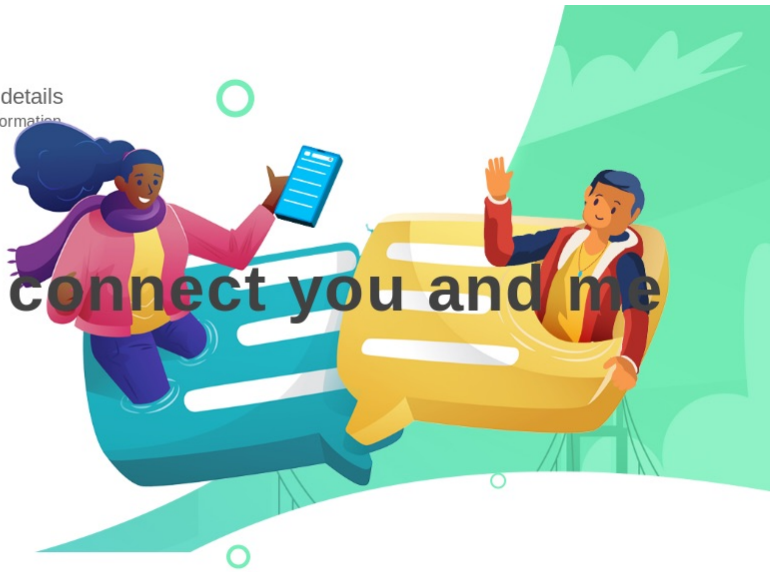
working environment
work environment

contact details
contact information

connect the world connect you and me

Connect the world connect you and me

join now



Company Profile

Company profile

Luokai Technology is a young Internet company specializing in overseas social networking.

At present, the company's products cover the fields of IM, acquaintance social, stranger social, live broadcast and commercialization. Its core team comes from industry leading companies such as ByteDance, Wandoujia, Kikatech, Snow Leopard (Taipei), and Grindr (Taipei). The founder Zhou Li is also a serial entrepreneur. As a co-founder, he founded Tiger Map, Pea Pod, Kikatech and other companies.

Luokai is deeply engaged in overseas markets, and the user growth is very fast. As of March 2022, the company has accumulated more than 200 million overseas users, and the DAU exceeds 2000W.

We are young and energetic, and we are expanding and growing rapidly in an optimistic and vigorous state. At present, the team has expanded to nearly 200 people, with offices in Beijing, Wuhan, Shenzhen, Taipei and other places. Our vision is to use China's technological advantages to promote products to the world and become the next-generation online social platform overseas!

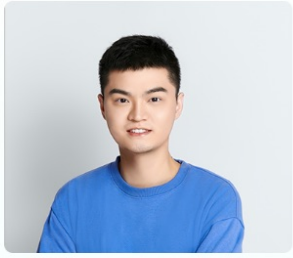
Partner introduction

Introduction to partners

URL: https://www.highlight.mobi/

2022-09-28 – Defendants' Website Highlight.Mobi

CEO-Zhou Li



Co-founder - Yao Yao

Technical Partner - Zhang Jun

Product Partner-Xu Wei Louis

Product Partner-Zhuang Lulu

Taipei Partner-Brad

Company Events

Company memorabilia

2019

4 month
Completed angel round investment, Beijing & Taipei offices were established

2020

5 month New social products go live

6 month
Rapid growth overseas, with daily active users exceeding 1 million

9 month Completed Pre-A round of financing

10 month Wuhan Office was established

URL: https://www.highlight.mobi/

2022-09-28 – Defendants' Website Highlight.Mobi

11
month
Accumulated 50 million users, and daily active users exceeded 10 million

2021

5
month Shenzhen office was established

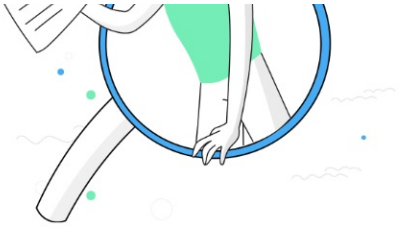
7
month
Stranger social product launched and completed A round of financing

11
month Game community products are online

2022

2
month New social line product launched

3
month
Accumulated over 200 million overseas users, with over 20 million daily active users

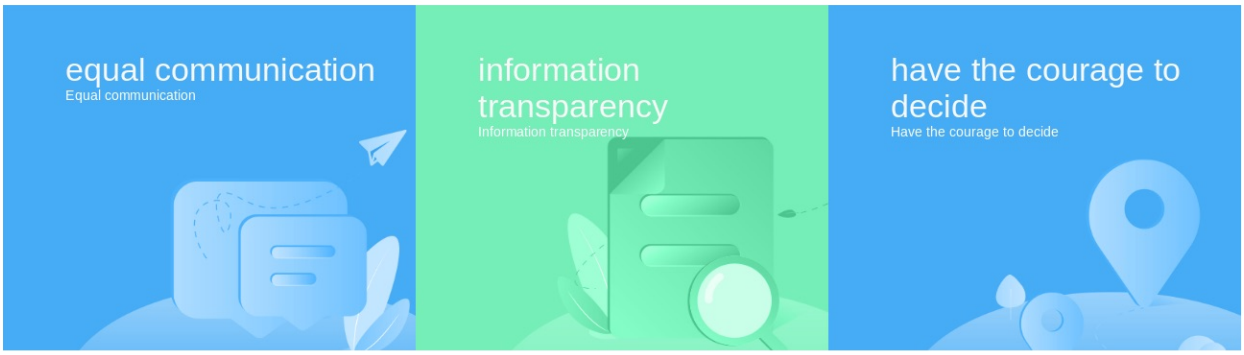


The future is promising, We will get better and better!

company culture

Enterprise culture

Our cultural foundation is rooted in the words "seeking truth from facts, rational decision-making", which is also the working principle that we jointly recognize and follow.



URL: https://www.highlight.mobi/

2022-09-28 – Defendants' Website Highlight.Mobi

working environment

Work environment

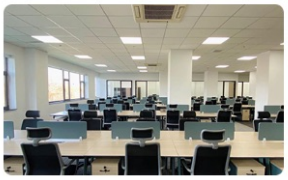
Beijing
BeiJing

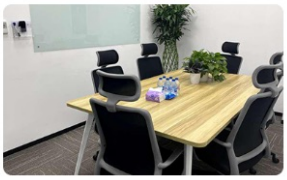
Wuhan
WuHan

Shenzhen
ShenZhen

Taipei
Taipei

The Beijing office is located in Yonghe Hangxing Science and Technology Park, Dongcheng District, backed by the Lama Temple, Ditan Park, Wudaoying Hu and other famous scenic spots. The park is equipped with a variety of facilities such as food court, cinema, basketball court, etc. The office environment is comfortable!





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Rockey Tech

Rocky Technology

Home Navigation

about us
working environment
contact details

Business contact email

business@highlight.mobi

Official public account

Scan the code to follow the official public account "Luokai Technology", Learn more about Lokai!

URL: https://www.highlight.mobi/

EXHIBIT K

Home My Network Jobs

Brad Chang

Chief Executive Officer at ChitChat Technology

- ChitChat Technology
- National Taiwan Normal University

Taipei City, Taipei City, Taiwan · Contact info

500+ connections

Connect Message More

About

Chief Executive Officer at ChitChat Technology

Activity

898 followers

+ Follow

Brad Chang reshared a post • 2mo

5

Show all activity →

Experience

Chief Executive Officer
ChitChat Technology · Full-time
Jan 2019 - Present · 3 yrs 6 mos
Taipei City, Taiwan

Senior Deep Learning Engineer
Kika Tech, Inc.
Nov 2017 - Jan 2019 · 1 yr 3 mos
Taipei City, Taiwan

Lead Software Engineer (Android Team & AI Team)
Cheetah Mobile · Full-time
Jun 2014 - Nov 2017 · 3 yrs 6 mos
Taipei City, Taiwan

● PhotoGrid 2016/10 - 2017/11
AI Team Lead ...see more

Senior Software Engineer
CyberLink
Jul 2010 - Apr 2014 · 3 yrs 10 mos

。Architecture design and development with design patterns : Viewer Widget system、Multi Monitor System、ImageCodec Module、 ...see more

Cyberlink PhotoDirector
I have been working on PhotoDirector from v2 to v6

Education

National Taiwan Normal University
Master's degree, Information and Computer Education
2006 - 2008
Activities and societies: Rock music band

National Taiwan Ocean University
Bachelor's degree, Computer Science
2002 - 2006

PyCon TW 2017

Science and Technology

PyCon TW 2017 Speaker
> How we use Deep Learning to classify more than 180,000 pho ...see more

Speaker

台灣人工智慧年會

Science and Technology

AICon TW 2017 (台灣人工智慧年會)
> Real Time Human Body Segmentation on Mobile Device with ...see more

Skills

Python

Endorsed by Kilik Kuo who is highly skilled at this

Endorsed by 5 colleagues at Cheetah Mobile

17 endorsements

C++

Endorsed by Wei-zhi Liao who is highly skilled at this

Endorsed by 3 colleagues at Cheetah Mobile

13 endorsements

Software Development

Endorsed by 4 colleagues at Cheetah Mobile

13 endorsements

Show all 10 skills →

Patents

Method and device for processing picture

Embodiments of the present disclosure provide a method and a device for processing a picture and an electronic device. The method includes scalin ...see more

Projects

CMS Privacy scan and protection

Jun 2014 - Present

Associated with Cheetah Mobile

Other creators

Languages

English

Professional working proficiency

Mandarin

Native or bilingual proficiency

Interests

Influencers Companies Groups Schools

Bill Gates

Co-chair, Bill & Melinda Gates Foundation

35,691,345 followers

+ Follow

EXHIBIT L

2022-08-09 – Privacy Policy of AppUpdater for Whats Plus 2021 GB Yo FM HeyMods

這是 Google 對 https://whatsappupdater.web.app/whatsapp-updater-privacy.html 的快取。 這是該網頁於 2022年7月1日 03:49:07 GMT 顯示時的快照。 在此期間，目前網頁可能已經變更。 瞭解更多資訊.

完整版 純文字版 檢視原始碼

提示：如要在這個網頁上快速尋找您所搜尋的字詞，請按下 Ctrl+F 鍵或 ⌘-F 鍵 (Mac)，然後使用尋找列進行搜尋。

Our Privacy Statement

AppUpdater for Whats Plus 2021 GB Yo FM HeyMods ("AppUpdater for Whats Plus 2021 GB Yo FM HeyMods","we," "us" or "our") provides tools for users to browse pictures and videos from online, also provides the function to edit those pictures and share to social medias.
By using the Application, you are agreeing to this Privacy Statement If you do not agree, then do not use the Application. We may change this Privacy Statement from time to time. We encourage you to review the Privacy Statement whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.
This Privacy Statement does not apply to the practices of third parties that we do not own or control, including those messaging and social media Applications you are using. We encourage you to carefully review the privacy policies of any third-party services you access.

What Information Do We Collect From You?
We may collect and store Technical Data and Device information such as network connection type (e.g., WiFi, 3G, 4G), browser type, language, operating system,your provider, network and device performance, the unique device identifier assigned to that device by phone makers, carriers, or maker s of the operating system, application status,usage statistic, your usage. The only purpose is to improve our service, to make the application run faster and use less storage and data.
To provide free service all the time, we may offer advertisement display. We may combine your Device ID or your Advertising ID with non-personally-identifiable information in order to allow us to uniquely identify your device for purposes of storing specific and aggregate usage preferences and data.

Who do we share information we collected with?
We have strong policy to protect our users privacy, so any tech data or usage status we collected will only be used for improving our service or display prefered advertisements. We only choose trustable advertisement providers such as Google Ad or third parties such as Instagram.
We encourage you to review their privacy policies on their websites.

Copyright Policy:
We suggest you don't edit or collect any unclear copyright images from unclear resource. All the images and videos are provided by certain social media accounts and all the credits belong to certain meme creators. We suggest users to make sure no infringement images are collected and used from online.
If any images has allegedly infringement please contact : gb.wamods@gmail.com , with signature of a person authorized to act on behalf of the owner of the copyright that has been allegedly infringed; Identification of the material that is claimed to be infringing including information regarding the location of the infringing materials that the copyright owner seeks to have removed, with sufficient detail so that Company is capable of finding and verifying its existence; We will remove the material cited in the notice.

URL: https://whatsappupdater.web.app/whatsapp-updater-privacy.html
&cd=1&hi=zh-TW&ct=clnk&gl=us

EXHIBIT M

GBAPPS.COM | GBWhatsApp APK

Português Dilsinho Nóbrega

Our Privacy Statement

1 Comentário / WhatsApp / Por GBWhatsApp

Theme Store for Zap ("Theme Store for Zap","we," "us" or "our") provides tools for users to browse pictures and videos from online, also provides the function to edit those pictures and share to social medias.

By using the Application, you are agreeing to this Privacy Statement If you do not agree, then do not use the Application. We may change this Privacy Statement from time to time. We encourage you to review the Privacy Statement whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

This Privacy Statement does not apply to the practices of third parties that we do not own or control, including those messaging and social media Applications you are using. We encourage you to carefully review the privacy policies of any third-party services you access.

What Information Do We Collect From You?

We may collect and store Technical Data and Device information such as network connection type (e.g., WiFi, 3G, 4G), browser type, language, operating system,your provider, network and device performance, the unique device identifier assigned to that device by phone makers, carriers, or maker s of the operating system, application status,usage statistic, your usage. The only purpose is to improve our service, to make the application run faster and use less storage and data.

To provide free service all the time, we may offer advertisement display. We may combine your Device ID or your Advertising ID with non-personally-identifiable information in order to allow us to uniquely identify your device for purposes of storing specific and aggregate usage preferences and data.

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We have strong policy to protect our users privacy, so any tech data or usage status we collected will only be used for improving our service or display prefered advertisements. We only choose trustable advertisement providers such as Google Ad or third parties such as Instagram.

We encourage you to review their privacy policies on their websites.

Copyright Policy:

We suggest you don't edit or collect any unclear copyright images from unclear resource. All the images and videos are provided by certain social media accounts and all the credits belong to certain meme creators. We suggest users to make sure no infringement images are collected and used from online.

If any images has allegedly infringement please contact : gb.wamods@gmail.com , with signature of a person authorized to act on behalf of the owner of the copyright that has been allegedly infringed; Identification of the material that is claimed to be infringing including information regarding the location of the infringing materials that the copyright owner seeks to have removed, with sufficient detail so that Company is capable of finding and verifying its existence; We will remove the material cited in the notice.

Post seguinte →

1 comentário em "Our Privacy Statement"

MARCO ANTONIO
MARÇO 11, 2022 EM 9:43 PM

Quiero unirme Enel whaWhats

Responder

Deixe um comentário

O seu endereço de e-mail não será publicado. Campos obrigatórios são marcados com *

Digite aqui...

Nome* E-mail* Website

☐ Salvar meus dados neste navegador para a próxima vez que eu comentar.

Publicar comentário »

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EXHIBIT N

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Andrea Traut
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July 7, 2022

VIA EMAIL AND INTERNATIONAL MAIL

Zhou Li (周立)
Wang Damei (王大妹)
Yao Yao (姚峣)
Xue Min (薛旻)
Brad Cheng (張宴晟)

d/b/a HeyMods

Beijing Luokai Technology Co., Ltd
No. 717, Unit 2, 7th Floor, Building 18, No. 7A, Tongji Middle Road, Beijing Economic and Technological Development Zone, Beijing

Rockey Tech HK Ltd
Unit 507, 5/F., New East Ocean Centre, No. 9 Science Museum Road, Tsim Sha Tsui East, Kowloon, Hong Kong, China

ChitChat Technology Ltd.
17 F., No. 97, Songren Rd., Xinyi Dist., Taipei City 11073, Taiwan (R.O.C.)

contact@heymods.com
support@highlight.mobi
business@highlight.mobi
hr@imchitchat.com

Re: CEASE AND DESIST ABUSE OF WHATSAPP AND META - HeyMods

Dear all:

We represent WhatsApp LLC ("**WhatsApp**") and Meta Platforms, Inc. ("**Meta**," previously known as Facebook Inc.), both based in Menlo Park, California. Meta acts as WhatsApp's service provider for security-related issues. WhatsApp and Meta have gathered evidence that you have developed and distributed–using the website heymods.com ("**Site**") and other third-party platforms, including Google Play Store, APKPure, APKSFree, iDescargar, and Malavida–multiple unofficial apps (including, by way of example only, HeyWhatsApp and GBWHATSAPP) that enable users to access, download, and use unauthorized versions of the WhatsApp Services (collectively, the "**Unofficial Clients**"). WhatsApp and Meta have further gathered evidence that apps you are hosting and distributing on heymods.com contain malware that collects self-compromised WhatsApp account keys, and exfiltrates and reuses the account keys to improperly access and use WhatsApp accounts without authorization and for improper use, including spam. You and your Unofficial Clients have also impermissibly and repeatedly infringed WhatsApp's trademarks. These activities violate WhatsApp and Meta terms and policies.

WhatsApp and Meta demand that you stop these activities immediately. Further, Meta demands that you submit to a review, inspection, and audit of your and your service providers' information technology systems (real and virtual), networks, technologies, and facilities (including physical and remote access to data centers and cloud facilities) that process data obtained from the Meta Platform. *See* Section7.c of the Meta Platform Terms, https://developers.facebook.com/terms/dfc_platform_terms/; Meta Developer Policies, https://developers.facebook.com/devpolicy/.

WhatsApp and Meta take the protection of the user experience very seriously and are committed to keeping their products safe for users to interact and share information. WhatsApp and Meta have developed terms and policies to protect the user experience and facilitate these goals.

WhatsApp Terms of Service prohibit–whether directly, indirectly, through automated or other means–from, among other things:

- Exploiting WhatsApp's Services ("**WhatsApp Services**") in impermissible or unauthorized manners, or in ways that burden, impair, or harm WhatsApp, its Services, systems, its users, or others;

- Reverse engineering, altering, modifying, creative derivative works from, decompiling, or extracting code from WhatsApp Services;

- Sending, storing, or transmitting viruses or other harmful computer code from or onto WhatsApp Systems;

- Gaining or attempting to gain unauthorized access to WhatsApp Services or systems;

- Interfering with or disrupting the safety, security, confidentiality, integrity, availability, or performance of WhatsApp Services;

- Collecting information of or about WhatsApp users in any impermissible or unauthorized manner;
- Selling, reselling, renting, or charging for WhatsApp Services or data obtained from us or our Services in an unauthorized manner;
- Creating software or APIs that function substantially the same as our Services and offer them for use by third parties in an unauthorized manner;
- Using the WhatsApp Services in ways that violate, misappropriate, or infringe the rights of WhatsApp or its users, including privacy, publicity, intellectual property, or other proprietary rights;
- Using WhatsApp for non-personal purposes without WhatsApp's authorization; and
- Assisting others in violating WhatsApp's Terms of Service.

See WhatsApp Terms of Service, https://www.whatsapp.com/legal/terms-of-service.

In addition to the aforementioned violations, your Unofficial Clients and promotion thereof infringe on WhatsApp's intellectual property rights protecting its trademarks and logos. Trademark infringement is the unauthorized use of a trademark or service mark on or in connection with goods and/or services in a manner that is likely to cause confusion, deception, or mistake about the source of the goods and/or services. By using WhatsApp trademarks, or any confusingly similar marks without WhatsApp's prior written permission, you are infringing on WhatsApp's legally protected intellectual property. You cannot use a name that is similar to or includes "WhatsApp," and/or logos that look like or mimic WhatsApp's logos or icons. *See* Copyright Act, 17 U.S.C. § 101 et seq.; Lanham Act, 15 U.S.C. Chapter 22; WhatsApp Terms of Service; Meta Terms of Service, https://www.facebook.com/terms.php; Instagram Terms of Use, https://help.instagram.com/581066165581870.

Accordingly, WhatsApp and Meta have taken technical steps to deactivate your accounts and hereby revoke your limited licenses to access or use WhatsApp's Services and Meta Products, including Facebook and Instagram. **This means that you, your agents, your employees, and/or anyone acting on your behalf (collectively "You" or "Your") are no longer authorized to access or use any of the WhatsApp Services or Meta Products, including the Facebook or Instagram websites, mobile applications, Platforms, services, or networks for any reason.** WhatsApp and Meta will treat any further activity by You on the WhatsApp Services or Meta Products as an intentional and unauthorized intrusion on the companies' networks.

WhatsApp and Meta demand that you respond to this letter in writing <u>within 48 hours</u>, confirming that You:

- Will submit to an audit by Meta as described in and required by Section 7.c of the Meta Platform Terms;
- Have preserved and will continue to preserve in the future all information related to the activities described herein;
- Have stopped all development, distribution, promotion, operation, sale, and offering of Your Unofficial WhatsApp Clients and any other WhatsApp-related services at all distribution points, including websites and social media accounts;
- Will not in the future develop, distribute, promote, operate, sell, and/or offer Your WhatsApp-related services or any like code, products, services, tools, or resources;
- Will account for and disgorge any and all revenue earned from Your unauthorized activities on the WhatsApp Services, including Your Unofficial WhatsApp Clients;
- Have stopped and will not in the future offer any services connected to WhatsApp via any means; and
- Will, following the accounting required below and only after my specific instruction, delete all data obtained from WhatsApp and Meta.

Along with Your written response, You must provide the following information:

- A list of each and every app you own, operate, or access to provide your services;
- A complete list of Your Unofficial Clients, including all applications and versions thereof;
- A complete list of Your Unofficial Clients through which you have obtained data from WhatsApp, Meta or any of their affiliate companies;
- A detailed description of the methods You used to obtain data from WhatsApp, Meta or any of their affiliate companies;
- A complete accounting of each sale of Your WhatsApp-related software, tools, and/or services, including the contact information for each purchaser, a description of what was included in each sale, and the revenue that You received for each sale;
- A complete accounting of all data that You obtained from WhatsApp, Meta, or any of their affiliate companies, including all parties with which such data was shared, and a certification that this information has been deleted and destroyed (only after I have instructed you to delete such information);

- A copy of each version of any software code that You have developed or used to interact with WhatsApp, Meta, or any of their affiliate companies—including any client-side code, server-side code, libraries, frameworks, or other code, and the source for that code if it is not of Your own development—and a description of whether you paid money or other consideration to acquire said code, and if so, the amount thereof;

- A list of each and every WhatsApp, Facebook, and Instagram account you hold, operate, or access to provide your services; and

- A list of each and every domain you own, operate, or access to provide your services.

If you ignore this letter and continue your current improper conduct, WhatsApp and Meta will take whatever measures it believes are necessary to enforce its rights, maintain the quality of its services, and protect its users' privacy and information.

This letter may not contain a complete list of all of WhatsApp's or Meta's rights or the terms you may have violated. This letter is not intended by WhatsApp or Meta, and should not be construed by You, as a waiver or relinquishment of any of WhatsApp's or Meta's rights or remedies in this matter. WhatsApp and Meta specifically reserve all such rights and remedies, whether at law or in equity. Finally, please note that you are legally required to preserve all documents, tangible things, and electronically stored information in any way connected to the issues addressed in this letter.

We look forward to hearing from you.

Sincerely,

Andrea Traut

cc:
heywateam@gmail.com
gb.wamods@gmail.com
cutebrady@gmail.com
787493263@qq.com
y.y@wuren.com
xinmeifb@163.com
zhoulisei@126.com
justxuemin@gmail.com

EXHIBIT O

YoWhatsApp 2022 Channel by HeyMods
19.4K subscribers

https://go.heymods.com/YoWhatsApp.apk

[Base] Update WhatsApp Base to 2.22.11.75
[Enabled] Feature-New Emojis

HeyMods Indonesian Group : https://t.me/heymodsindonesia
HeyMods Portuguese Group : https://t.me/HeyModsPt

Telegram
HeyMods Portuguese Official
HeyMods Portuguese Official Group

23.3K 22:31

July 18

YoWhatsApp 2022 Channel by HeyMods

Dear All,
Due to some circumstances, the heymods team will stop updating appsin the heymods family, including YOWhatsApp. All future support and service of the app and telegram groups will cease from today. Thank you for all the understanding and support during this period.

14.4K 01:55

YoWhatsApp 2022 Channel by HeyMods pinned «
Dear All, Due to some circumstances, ... »

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@heywhatsappschannel

19.4K	37	9	7	90
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https://heymods.com/#YoWhatsApp

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