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15 *Attorneys for Defendant Cree, Inc.*

16 **UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 Document Security Systems, Inc.,
19 Plaintiff,
20 v.
21 Cree, Inc.,
22 Defendant.

Case No. 2:17-cv-04263-JVS-JCG

**DECLARATION OF YURY
KALISH IN SUPPORT OF
DEFENDANT CREE, INC.’S
MOTION TO TRANSFER
VENUE PURSUANT TO 28
U.S.C. § 1404(a)**

23 I, Yury Kalish, declare as follows:

24 I am a lawyer in the law firm of Jones Day, counsel of record for
25 Defendant Cree, Inc. (“Cree”). I have personal knowledge of the facts set forth
26 herein and, if called and sworn as a witness, could and would competently testify
27 thereto. I submit this declaration in support of Defendant Cree, Inc.’s Motion to
Transfer Venue Pursuant to 28 U.S.C. § 1404(a).

1. Attached hereto as **Exhibit 1** is a true and correct copy of the
assignment records maintained at the USPTO for U.S. Pat. Nos. 6,949,771 (“the
'771 patent”); 7,256,486 (“the '486 patent”); 7,524,087 (“the '087 patent”) and
7,919,787 (“the '787 patent”).

2. Attached hereto as **Exhibit 2** is a true and correct copy of the

1 3. Attached hereto as **Exhibit 3** is a true and correct copy of the
2 recorded inventors' declaration from the file history of the '486 patent.

3 4. Attached hereto as **Exhibit 4** is a true and correct copy of the
4 recorded inventors' declaration from the file history of the '087 patent.

5 5. Attached hereto as **Exhibit 5** is a true and correct copy of the
6 recorded inventors' declaration from the file history of the '787 patent.

7 6. Attached hereto as **Exhibit 6** is a true and correct copy of the
8 "Corporate Overview" presentation maintained (as of August 9, 2017) on the
9 Document Security Systems, Inc. ("DSS") website (<http://www.dsssecure.com/>)
10 under the "Investors" heading.

11 7. Attached hereto as **Exhibit 7** is the DSS Form 10-K filed with the
12 Securities and Exchange Commission ("SEC"), dated March 28, 2017, and
13 maintained on the DSS website as of at least August 9, 2017.

14 8. Attached hereto as **Exhibit 8** is the original DSS complaint against
15 Cree filed in the Eastern District of Texas, numbered 2:17-CV-00309.

16 I declare under penalty of perjury under the laws of the United States of
17 America that the facts stated in this declaration are true and correct.

18 Executed on August 28th, 2017, at Washington, D.C.

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By: /s/ Yury Kalish
Yury Kalish