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12 ZTE (USA) Inc.

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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17
18 ZTE (USA) INC.,
19 Plaintiff,
20 v.
21 AGIS SOFTWARE DEVELOPMENT LLC,
22 Defendant.

CASE NO. 4:18-cv-06185-HSG
(Former Case No. 2:17-cv-00517-JRG)
(E.D. Tex.)

**DECLARATION OF BRADFORD C.
SCHULZ IN SUPPORT OF ZTE (USA)
INC.'s ADMINISTRATIVE MOTION
FOR FILING UNDER SEAL**

1 I, Bradford C. Schulz, declare as follows:

2 1. I am an associate with the law firm of Finnegan, Henderson, Farabow, Garrett &
3 Dunner, LLP, counsel of record for plaintiff ZTE (USA), Inc. (“ZTE”) in the above-captioned
4 matter. I submit this declaration in support of ZTE (USA) Inc.’s Administrative Motion for Filing
5 Under Seal. I have personal knowledge of the facts set forth in this declaration, and, if called to do
6 so, I could and would competently testify thereto.

7 2. Attached hereto is a true and correct copy of ZTE’s Response to Motion to Dismiss
8 Second Amended Complaint; Memorandum of Points and Authorities in Support (“Response”).

9 3. The highlighted portions of ZTE’s Response contain information that has been
10 designated “RESTRICTED – ATTORNEYS’ EYES ONLY” by Defendant AGIS Software
11 Development LLC in *AGIS Software Development LLC v. ZTE Corporation et al.*, 2:17-cv-00517-
12 JRG (E.D. Tex.). ZTE files herewith a redacted version of its Response for public filing.

13 4. Attached hereto is a true and correct copy of the Declaration of Bradford C. Schulz in
14 Support of ZTE’s Response.

15 5. The highlighted portions of the Declaration of Bradford C. Schulz in Support of
16 ZTE’s Response contain information that has been designated “RESTRICTED – ATTORNEYS’
17 EYES ONLY” by Defendant AGIS Software Development LLC in *AGIS Software Development*
18 *LLC v. ZTE Corporation et al.*, 2:17-cv-00517-JRG (E.D. Tex.). ZTE files herewith a redacted
19 version of the Declaration for public filing.

20 6. Attached hereto are true and correct copies of Exhibits 3, 4, 5, 6, 8, 10, 14, and 34 to
21 the Declaration of Bradford C. Schulz in Support of ZTE’s Response, submitted for filing under seal
22 in their entirety.

23 7. These Exhibits contain information that has been designated “RESTRICTED –
24 ATTORNEYS’ EYES ONLY” by Defendant AGIS Software Development LLC in *AGIS Software*
25 *Development LLC v. ZTE Corporation et al.*, 2:17-cv-00517-JRG (E.D. Tex.).

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