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12 ZTE (USA) Inc.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND 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 IN SUPPORT OF
RESPONSE TO MOTION FOR
SANCTIONS**

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. in the above-captioned matter. I
4 submit this declaration in support of plaintiff's opposition to defendant AGIS Software
5 Development, LLC's ("AGIS") Motion for Sanctions. I have personal knowledge of the facts set
6 forth in this declaration, and, if called to do so, I could and would competently testify thereto.

7 2. Attached as Ex. A is a copy of Advanced Ground Information Systems, Inc.'s
8 "About" page on LinkedIn available at "[http://www.linkedin.com/company/advanced-ground-
9 information-systems-inc-/about/](http://www.linkedin.com/company/advanced-ground-information-systems-inc-/about/)" and was captured on March 21, 2019. Ex. A further includes
10 captures of the "Jobs" and "See all jobs" pages on LinkedIn available at
11 "<http://www.linkedin.com/company/advanced-ground-information-systems-inc-/jobs/>". The
12 highlights were added to the Exhibit for illustrative purposes.

13 3. Attached as Ex. B is a copy of the Law360 article titled "Fed. Circ. Abandons
14 Jurisdiction Rule for IP Demand Letters," by Karen Boyd and Joshua Rayes published March 14,
15 2019 (3:08 PM EDT). The article was captured on March 15, 2019 from
16 "<https://www.law360.com/articles/1138786/print?section=ip>".

17 4. Attached as Ex. C is a copy of the Ars Technica article titled "How Life360 won its
18 patent war" by Joe Mullin published March 19, 2015 (4:50 PM). The article was captured on March
19 18, 2019 from "<https://arstechnica.com/tech-policy/2015/03/how-life360-won-its-patent-war/>".
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21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct, and that this declaration was executed on March 29, 2019 at Reston,
23 Virginia.
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Dated: March 29, 2019

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP

By: /s/ Bradford C. Schulz
Bradford C. Schulz
Attorney for Plaintiff
ZTE (USA) Inc.