

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

OMNIVISION TECHNOLOGIES, INC.,

Defendant.

Case No. 1:16-cv-00290-SLR

**DECLARATION OF RAY CISNEROS IN SUPPORT OF  
DEFENDANT OMNIVISION TECHNOLOGIES, INC.'S  
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Ray Cisneros, declare as follows:

1. I am a resident of San Jose, California. I am over the age of eighteen (18) years.
2. Based on my personal knowledge and investigation, I provide this declaration in support of OmniVision Technologies, Inc.'s ("OmniVision") motion to transfer this action to the United States District Court for the Northern District of California and could competently testify to the facts hereto.
3. I have been working at OmniVision in Santa Clara, California, since 2002, and I currently hold the position of Senior Vice President of Worldwide Sales and Sales Operations. My office is located at 4275 Burton Drive, Santa Clara, California. As the Senior Vice President of Worldwide Sales and Sales Operations, I am responsible for sales and for fulfillment of orders for OmniVision products.
4. OmniVision is incorporated in the State of Delaware, with its headquarters and principal place of business at 4275 Burton Drive, Santa Clara, California, which is in the Northern District of California. Since I joined the company in 2002, OmniVision has always

been located in the Northern District of California, now with over 400 employees in California. OmniVision's headquarters are the strategic center of OmniVision's business.

5. As one of the managers at OmniVision, I have personal knowledge of OmniVision's high level business plans and operations. The main operations of OmniVision involve designing and developing digital imaging products.

6. OmniVision engages Original Equipment Manufacturers in Taiwan and China for manufacturing its image sensor products.

7. Attached hereto as Exhibit 1, on information and belief, is OmniVision's 2015 Annual Report showing that OmniVision outsources wafer fabrication and packaging of its image sensor products to third parties Taiwan Semiconductor Manufacturing Company Ltd. ("TSMC") and Shanghai Huali Microelectronics Corporation ("HLMC").

8. According to information available at the online website [http://wwwv.tsmc.com/english/aboutTSMC/business\\_contacts.htm](http://wwwv.tsmc.com/english/aboutTSMC/business_contacts.htm), TSMC's American subsidiary, TSMC North America, is located in San Jose, California.

9. According to information available at the online websites <http://www.huahong.com.cn/2011/en/About/ContactUs.aspx> and <http://www.hlmc.cn/en/ContactUs.aspx>, on information and belief, the U.S. Office of HLMC is located in Fremont, California.

10. I understand that Plaintiff Godo Kaisha IP Bridge 1's ("IP Bridge") Complaint alleges infringement by OmniVision and certain OmniVision image sensors. I am knowledgeable about the location of persons with relevant technical knowledge about these products, as well as the location of persons with relevant business and financial information. I am knowledgeable about the location of documents and other evidence potentially relevant to this action. As discussed below, the Northern District of California is a significantly more convenient forum than this Court for OmniVision witnesses likely to testify in this action, and all relevant documents and evidence are accessible from OmniVision's headquarters in the Northern District of California.

11. The design, development, and engineering of the image sensor products accused by IP Bridge takes place at OmniVision's Santa Clara, California offices.

12. The creation and dissemination of promotional and instructional materials related to the image sensor products accused by IP Bridge takes place at OmniVision's Santa Clara, California offices.

13. The finance and sales operations related to the image sensor products accused by IP Bridge takes place at OmniVision's Santa Clara, California offices.

14. Where they exist, OmniVision's corporate documents likely to be relevant to this litigation, including any records pertaining to the research, development, design, manufacture, testing, support, and use of image sensor products, any records pertaining to its marketing and promotion of image sensor products, any records pertaining to any commercial relationships concerning image sensor products, and any records pertaining to the sale, offer for sale, and importation into the United States of and profits from image sensor products, are located at OmniVision's Santa Clara, California offices.

15. OmniVision witnesses likely to testify regarding OmniVision's knowledge of the information recorded in its documents work at OmniVision's Santa Clara, California offices. No known witnesses are located in Delaware.

16. OmniVision witnesses likely to testify regarding OmniVision's knowledge of any research, development, design, manufacture, testing, marketing, use, support, sale, offer for sale, and importation into the United States of any image sensor products work at OmniVision's Santa Clara, California offices. No known witnesses are located in Delaware.

17. Former OmniVision employees that worked at OmniVision's Santa Clara, California, offices may have relevant information because of their involvement in the development of the accused OmniVision image sensor products and prior art products.

18. Any OmniVision officers and managers responsible for any manufacture, use, sale, offer for sale, and importation into the United States of any image sensor products live outside the District of Delaware.

19. If this case proceeds in the District of Delaware, the travel time and costs for OmniVision witnesses traveling from the vicinity of Santa Clara, California, will be far more burdensome than if the case were to proceed in the Northern District of California. Numerous OmniVision employee-witnesses would be forced to incur major travel expenses and would suffer from lost productivity due to the extended travel required.

20. OmniVision's computers and servers are either located in, or can be most easily accessed from OmniVision's Santa Clara, California offices.

21. OmniVision does not have any offices or business locations in the District of Delaware.

22. OmniVision does not have any employees in the District of Delaware.

23. OmniVision does not own or lease property or otherwise own any assets in the District of Delaware.

24. OmniVision does not have any resellers or distributors located in the District of Delaware.

25. OmniVision maintains no documents in the District of Delaware.

26. No OmniVision image sensor products are designed or manufactured in the District of Delaware.

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

Executed at Santa Clara, California, on May 11, 2016.



A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right. Below the signature is a solid horizontal line.