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

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§	CIVIL ACTION NO. 1:16-cv-00290-SLR
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§	JURY TRIAL DEMANDED
NC., §	
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## **DECLARATION OF JENNIFER M. RYNELL**

- I, Jennifer M. Rynell, declare as follows:
- 1. I am a counsel of record for Godo Kaisha IP Bridge 1, L.P. ("IP Bridge"), the plaintiff in this lawsuit. The facts stated below are within my personal knowledge.
- 2. On June 15, 2016, IP Bridge served venue discovery upon defendant OmniVision Technologies, Inc. ("OmniVision").
- 3. On June 30, 2016, OmniVision served its responses to IP Bridge's venue discovery.
- 4. Attached hereto as Exhibit A is OmniVision's Objections and Responses to IP Bridge's Requests for Admission.
- Attached hereto as Exhibit B is OmniVision's Objections and Responses to IP
  Bridge's Interrogatories.
- 6. Attached hereto as Exhibit C is OmniVision's Objections and Responses to IP Bridge's Requests for Production.
- 7. Attached hereto as Exhibit D is OmniVision's 2015 Annual Report, which is available on the internet at



 $http://www.ovt.com/uploads/annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ and \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 20 Report.pdf \ annual report/Omni Vision \% 202015\% 20 Annual \% 2$ 

was last accessed August 9, 2016.

8. Attached hereto as Exhibit E is the PriceWaterhouseCooper 2016 Patent

Litigation Study, which is available on the internet at https://www.pwc.com/us/en/forensic-

services/publications/assets/2016-pwc-patent-litigation-study.pdf and was last accessed on

August 9, 2016.

9. Attached hereto as Exhibit F is the webpage http://ipbridge.co.jp/en/service,

which was last accessed on August 10, 2016.

10. Attached hereto as Exhibit G is the webpage http://ipbridge.co.jp/en/company,

which was last accessed on August 10, 2016.

11. Attached hereto as Exhibit H is the webpage www.xe.com, which provides real-

time updates on foreign exchange rates and was last accessed on August 10, 2016.

12. Attached here to as Exhibit I are pages from OmniVision's production Bates-

labeled OMNI VENUE 000146 – OMNI VENUE 000156.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct, and that this declaration was executed on this 10<sup>th</sup> day of August,

2016.

/s Jennifer M. Rynell

Jennifer M. Rynell

