

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

UNIVERSAL SECURE REGISTRY LLC,)
)
 Plaintiff,)
)
 v.) C.A. No. 17-585-JFB-SRF
)
 APPLE INC., VISA INC., and VISA U.S.A., INC.,)
)
 Defendants.)
)
)

**DEFENDANTS APPLE INC., VISA INC., AND
VISA U.S.A., INC.’S MOTION TO TRANSFER VENUE**

Defendants Apple Inc., Visa Inc., and Visa U.S.A., Inc. (collectively, “Defendants”) respectfully move the Court pursuant to 28 U.S.C. § 1404(a) for an order transferring this action to the United States District Court for the Northern District of California.

The grounds for this motion are set forth in the Opening Brief of Defendants Apple Inc., Visa Inc., and Visa U.S.A., Inc. in Support of Motion to Transfer Venue and the Declarations of Mark D. Selwyn, Michael Jaynes, and Andrew Carpenter in support of same, filed contemporaneously herewith.

Pursuant to Rule 7.1.1 of the Local Rules of the United States District Court for the District of Delaware, counsel for Defendants have consulted with counsel for Plaintiff Universal Secure Registry LLC regarding the subject matter of this motion and have been informed that Plaintiff opposes the relief sought.

/s/ Jason J. Rawnsley

Fredrick L. Cottrell, III (#2555)
Jason J. Rawnsley (#5379)
RICHARDS LAYTON, & FINGER, P.A.
920 North King Street
Wilmington, DE 19801
(302) 651-7700
cottrell@rlf.com
rawnsley@rlf.com

Attorneys for Defendant Apple Inc.

OF COUNSEL:

Mark D. Selwyn
WILMER CUTLER PICKERING
HALE & DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
(650) 858-6000

Monica Grewal
WILMER CUTLER PICKERING
HALE & DORR LLP
60 State Street
Boston, MA 02109
(202) 663-6000

Derek A. Gosma
WILMER CUTLER PICKERING
HALE & DORR LLP
350 South Grand Avenue, Suite 2100
Los Angeles, CA 90071
(213) 443-5300

Dated: September 19, 2017

/s/ Bindu Palapura

David E. Moore (#3983)
Bindu Palapura (#5370)
POTTER ANDERSON CORROON LLP
1313 North Market Street 6th Floor
Wilmington, DE 19801
(302) 984-6147
dmoore@potteranderson.com
bpalapura@potteranderson.com

*Attorneys for Defendants Visa Inc. and
Visa U.S.A., Inc.*

OF COUNSEL:

James Yoon
Jamie Y. Otto
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto CA 94304
(650) 320-4726