

**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.	)	
	)	
	)	

**REPLY BRIEF OF DEFENDANTS APPLE INC., VISA INC., AND  
VISA U.S.A., INC. IN SUPPORT OF MOTION TO TRANSFER VENUE**

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Dated: October 23, 2017

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Defendants Apple Inc. (“Apple”), Visa Inc., and Visa U.S.A., Inc. (“Visa”) (collectively, “Defendants”) respectfully submit this reply brief in further support of their Motion to Transfer to the Northern District of California.

## **I. Introduction**

Defendants’ opening brief demonstrated that the Northern District of California is the locus of this case and a far more convenient forum. Nothing in Universal Secure Registry’s (“USR’s”) Opposition (“Opp.”) calls that conclusion into question. Indeed, USR fails to dispute that there is no meaningful connection between this case and Delaware, including that: (1) USR does not have *any presence or employees* in Delaware; (2) there is not *a single party or non-party witness* who resides in Delaware; (3) *none* of the accused products was designed or manufactured in Delaware; and (4) *none* of the technical documents for the accused products is maintained in Delaware.

USR also fails to create a real dispute over the Northern District of California’s substantial connection to this case. The undisputed facts show that: (1) Apple and Visa are headquartered in and have their principal place of business *in the Northern District of California*; (2) Apple is incorporated *in California*; (3) the Apple and Visa employees who are knowledgeable about the design and development, functionality, and marketing of the accused products and the Apple and Visa relationship are located primarily *in the Northern District of California*; and (4) prior art witnesses are located *in the Northern District of California*.

Other than USR’s choice of forum, which USR concedes is “not determinative” (Opp. at 5), all factors support transfer. Accordingly, Defendants respectfully request that their motion be granted and this case transferred to the Northern District of California.

## **II. Argument**

USR’s brief confirms that the transfer would best serve the convenience of the parties and

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