# Exhibit A



### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

#### CASE NO. 14-22134-CIV-MIDDLEBROOKS

ROTHSCHILD DIGITAL MEDIA INNOVATIONS, LLC,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT AMERICA LLC,

JURY TRIAL DEMANDED

Defendant.

# DECLARATION OF NIKIA L. GRAY IN SUPPORT OF DEFENDANT'S MOTION TO TRANSFER VENUE

I, Nikia L. Gray, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following statements are true and correct:

- I am an attorney with Quarles & Brady LLP and counsel for Sony Computer
   Entertainment America LLC in the above-captioned lawsuit.
- 2. A true and accurate copy of the Articles of Organization for Rothschild Digital Media Innovations, LLC, is attached hereto as Appendix 1.
- 3. As can be seen in Appendix 1, the Articles of Organization for Rothschild Digital Media Innovations, LLC, includes a stamp in the top right corner reciting "L13000106984 FILED 8:00 AM July 29, 2013 Sec. Of State." See Appendix 1 at 1. The Articles of Organization further list the address of the principal office of Rothschild Digital Media Innovations, LLC, as 1108 Kane Concourse, Suite 310,



- Bay Harbor Islands, FL 33154. *Id.* The Articles of Organization further include the electronic signature of Leigh M. Rothschild as the "member or an authorized representative of a member" of Rothschild Digital Media Innovations, LLC. *Id.*
- A true and accurate copy of the recorded assignment records for U.S. Patent No.
   6,101,534 listed in the United States Patent and Trademark Office's online Patent
   Assignment Database is attached hereto as Appendix 2.
- As can be seen in Appendix 2, U.S. Patent No. 6,101,534 was assigned from SRR Patent Holdings, LLC, to Rothschild Digital Media Innovations, LLC, on August 7, 2013. *See* Appendix 2 at 2.
- A true and accurate copy of the Complaint filed on April 7, 2014, in the Southern District of California in the case captioned *Rothschild GPS Sharing Innovations*, *LLC*, v. Nissan North America Inc., No. 3:14-CV-00819-GPC-NLS, is attached hereto as Appendix 3.
- 7. A true and accurate copy of the Articles of Organization for Icheson, LLC, is attached hereto as Appendix 4.
- 8. An Amendment to the Articles of Organization for Icheson, LLC, dated July 31, 2013, changed the name of Icheson, LLC, to Rothschild GPS Sharing Innovations, LLC. A true an accurate copy of said Articles of Amendment is attached hereto as Appendix 5.
- 9. As can be seen in Appendix 4, the Articles of Organization for Icheson, LLC (now Rothschild GPS Sharing Innovations, LLC) lists the address of the principal office of the company as 1108 Kane Concourse, Suite 310, Bay Harbor Islands,



- FL 33154 and includes the electronic signature of Leigh M. Rothschild as the "member or an authorized representative of a member" of the company. *Id*.
- 10. A true and accurate copy of the Complaint filed on May 16, 2014, in the District of Delaware in the case captioned *Rothschild Mobile Imaging Innovations, LLC v. Mitek Systems, Inc.*, No. 1:14-CV-00617-SLR, is attached hereto as Appendix 6.
- 11. A true and accurate copy of the Articles of Organization for Shockadoman, LLC, is attached hereto as Appendix 7.
- 12. An Amendment to the Articles of Organization for Shockadoman, LLC, dated July 31, 2013, changed the name of Shockadoman, LLC, to Rothschild Mobile Imaging Innovations, LLC. A true and accurate copy of said Articles of Amendment is attached hereto as Appendix 8.
- 13. As can be seen in Appendix 7, the Articles of Organization for Shockadoman, LLC (now Rothschild Mobile Imaging Innovations, LLC) lists the address of the principal office of the company as 1108 Kane Concourse, Suite 310, Bay Harbor Islands, FL 33154 and includes the electronic signature of Leigh M. Rothschild as the "member or an authorized representative of a member" of the company. *Id.*
- 14. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies*, *LLC v. Actsoft Inc.*, No. 1:14-CV-00630-RGA, is attached hereto as Appendix 9.
- 15. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies*, *LLC v.*AGCO Corp., No. 1:14-CV-00631-RGA, is attached hereto as Appendix 10.



- 16. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies, LLC v. Calamp Corp.*, No. 1:14-CV-00632-RGA, is attached hereto as Appendix 11.
- 17. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies*, *LLC v*.

  Deere & Company, No. 1:14-CV-00633-RGA, is attached hereto as Appendix 12.
- 18. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies*, *LLC v*. *Fleetcor Technologies*, *Inc.*, No. 1:14-CV-00634-RGA, is attached hereto as Appendix 13.
- 19. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies*, *LLC v. Fleetmatics USA*, *LLC*, No. 1:14-CV-00635-RGA, is attached hereto as Appendix 14.
- 20. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies, LLC v. GPS Insight, LLC*, No. 1:14-CV-00636-RGA, is attached hereto as Appendix 15.
- 21. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies, LLC v. Mix Telematics North America, Inc.*, No. 1:14-CV-00637-RGA, is attached hereto as Appendix 16.
- 22. A true and accurate copy of the Complaint filed on May 19, 2014, in the District of Delaware in the case captioned *Rothschild Location Technologies*, *LLC v*.



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