

# Exhibit B

**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.

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**DECLARATION OF JOHN KOLLER  
IN SUPPORT OF DEFENDANT'S MOTION TO TRANSFER VENUE**

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I, John Koller, hereby declare under penalty of perjury that, to the best of my knowledge, the following statements are true and correct:

1. I am employed as Vice President, Product Marketing, at Sony Computer Entertainment America LLC ("SCEA"), which is headquartered in San Mateo, California. I have been employed by SCEA since 1998. In this capacity, I have personal knowledge of the facts set forth herein.
2. I understand that Plaintiff Rothschild Digital Media Innovations, LLC ("Rothschild"), has filed the above-captioned patent infringement lawsuit against SCEA in the Southern District of Florida, asserting U.S. Patent No. 6,101,534, entitled "Interactive, Remote, Computer Interface System."

3. I understand that Rothschild's patent suit against SCEA has accused a system that allegedly includes the PlayStation Network, PlayStation consoles, and PlayStation game discs (collectively the "Accused System"). I further understand that the specific PlayStation consoles accused are the PlayStation 3, PlayStation 4, PlayStation Vita, and PlayStation Portable.
4. I earned a B.S. from Saint Mary's College of California in 1995, and an MBA from Santa Clara University, located in Santa Clara, California, in 2005. I currently reside in Dublin, California, and work as SCEA's offices in San Mateo, California.
5. In my work at SCEA, I have been responsible for the management of marketing in the United States of several PlayStation hardware devices, including the PlayStation 3, PlayStation 4, PlayStation Vita, and PlayStation Portable. In my current role, I am tasked with all aspects of PlayStation hardware platforms, including brand management, product features, strategic initiatives, licensing, peripheral launches, and more. I have more than 19 years of consumer product marketing experience, including 18 years directly in the video game industry.
6. If this case advances to trial, I expect to testify live. Based on my understanding of the issues in this litigation, my expectation is that my testimony will be related to the marketing of the accused PlayStation consoles and PlayStation game discs. My expectation is that I will provide testimony related to the marketing, if any, of specific features of the accused PlayStation consoles and game discs that are relevant to this litigation.

7. I am unaware of any employee of SCEA that would have a better understanding of the marketing of the PlayStation consoles, or would be able to provide more comprehensive testimony thereto.
8. To the extent trial testimony from other members of my marketing team is necessary, I note that my entire team works in SCEA's San Mateo offices. Generally, other than SCEA's various studios (located in California or on the West Coast), SCEA's entire business is based in San Mateo, California, and therefore trial testimony from SCEA concerning any aspect of its business would likely need to come from various witnesses that work in SCEA's San Mateo offices.
9. Additionally, SCEA is the exclusive party in the United States responsible for the importation, distribution, and marketing of the PlayStation 3, PlayStation 4, PlayStation Vita, and PlayStation Portable consoles, and any research, design, or development of PlayStation products that occurs in the United States generally is performed in San Mateo, California. To the extent testimony is needed concerning these other areas, such as the operation of these game consoles, the SCEA employees who could give such testimony would work out of SCEA's headquarters in San Mateo, California.
10. Further, I understand that Rothschild has identified PlayStation game discs as part of the Accused System. Many popular PlayStation games are developed by SCEA in its studios in Santa Monica, California and San Diego, California. There are other PlayStation games that are developed by SCEA in its studio in Bend, Oregon. To the extent testimony is needed concerning the games

developed by these studios, the SCEA employees who could give such testimony would work in Santa Monica, California, San Diego, California, or Bend, Oregon, or else would work in SCEA's San Mateo, California headquarters. SCEA does not have any game studio located in Florida, since all of its studios are located in California or Oregon.

11. Many other popular PlayStation games are developed in California outside of SCEA's Santa Monica and San Diego studios. For example, the game "Uncharted 3 – Drake's Deception" (like other games in the popular Uncharted franchise) was developed by Naughty Dog, Inc. in Santa Monica, California. To the extent testimony is needed concerning development of the Uncharted games, the Naughty Dog employees who could give such testimony would work in Santa Monica, California.
12. In addition, there are many other companies that have developed popular PlayStation games, and a large number of such companies are based in California, including Activision (based in Santa Monica, California), Electronic Arts (based in Redwood Shores, California), Insomniac Games (based in Burbank, California), and many others.
13. I understand that Rothschild has also identified the PlayStation Network as part of the Accused System. The PlayStation Network is part of the Sony Entertainment Network, which is operated by a third party, Sony Network Entertainment International LLC ("SNEI"). SNEI is headquartered in California, and it has several offices in California including San Mateo, California, Los Angeles, California, and San Francisco, California.

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