

# Exhibit C

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,

Defendant.

JURY TRIAL DEMANDED

**DECLARATION OF SALLY BUCHANAN  
IN SUPPORT OF DEFENDANT'S MOTION TO TRANSFER VENUE**

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

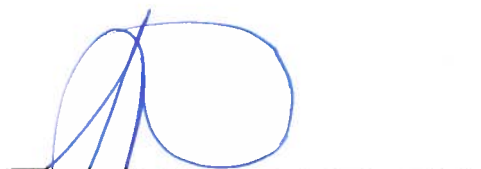
1. I am employed as Senior Vice President, Human Resources, at Sony Computer Entertainment America LLC ("SCEA"), which is headquartered in San Mateo, California. I have been employed by SCEA or its predecessor-in-interest companies since 1994. In this capacity, I have personal knowledge of the facts set forth herein.
2. SCEA is a limited liability company with its headquarters located at 2207 Bridgepointe Parkway, San Mateo, California 94404, which is in the Northern District of California. SCEA has approximately 937 employees working in its San Mateo offices.

3. SCEA does not have any office or other facility located within the Southern District of Florida.
4. SCEA is the exclusive importer and distributor of all PlayStation products in the United States. SCEA's principal place of business and headquarters is in San Mateo, California. Therefore, to the extent that testimony from SCEA witnesses is required in connection with any of the company's activities, it is very likely that such witnesses would work in San Mateo, California. Similarly, to the extent that documents relating to SCEA's activities needs to be produced, it is very likely that such documents would be produced from San Mateo, California.
5. For example, to the extent that testimony is required pertaining to SCEA's marketing activities, John Koller of SCEA's Marketing group would be expected to provide such testimony. Mr. Koller works in San Mateo, California, and lives within the Northern District of California. To the extent that testimony is required pertaining to SCEA's financial information, Aaron Wong of the Finance group would be expected to provide such testimony. Mr. Wong works in San Mateo, California, and lives within the Northern District of California.
6. Generally, SCEA's engineering, marketing, finance, sales, human resources, and quality assurance teams (as well as other aspects of SCEA's business) are based in San Mateo, California, and therefore one or more employees that work in San Mateo, California would be expected to provide any testimony from SCEA relating to the engineering, marketing, finance, sales, or quality assurance of PlayStation-related products. Documents from these departments would also be located in San Mateo, California. With respect to SCEA's development of

PlayStation games, there are also employees involved in such development in studios located elsewhere in California and Oregon.

7. I am unaware of any potential SCEA witness for this litigation who lives in, works in, or is otherwise based in Florida.

Executed on July 14, 2014



Sally Buchanan