

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00616-ADA

JURY TRIAL DEMANDED


REDACTED DOCUMENT

**GOOGLE LLC'S OPPOSED MOTION TO TRANSFER VENUE TO THE
NORTHERN DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

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I. INTRODUCTION

This Court should transfer this action against Google LLC (“Google”) brought by an Irish non-practicing entity and related to technology with no relevant ties to this District. Google respectfully requests the transfer of this case under 28 U.S.C. § 1404(a) to the Northern District of California (“N.D. Cal.”). The N.D. Cal. is clearly more convenient than the Western District of Texas (“W.D. Tex.”) and is the proper venue for this action.

- First, Plaintiff Scramoge Technology Limited (“Plaintiff” or “Scramoge”) alleges infringement by Google because of the custom wireless charging components found in Google’s Pixel 3, 3XL, 4, 4XL, and 5 smartphones (collectively, the “Pixel Products”). The Pixel Products’ custom wireless charging components and functionality are designed and developed in the N.D. Cal. Two of the three third-party suppliers who provide the charging components at issue to Google maintain their United States offices in the N.D. Cal. The remaining third-party supplier is in Southern California.
- Second, Plaintiff has no relevant ties to the W.D. Tex. Plaintiff does not have any places of business in Texas. Plaintiff is incorporated in and operates out of Dublin, Ireland. Plaintiff is a patent assertion entity that does not make, use, sell, or offer to sell any products. Plaintiff acquired the patents-in-suit from a third party with no connection to the W.D. Tex. The original assignee of the patents-in-suit is in Seoul, Korea.

The only relevant ties that Google or any third parties have are in California. Google’s headquarters are in the N.D. Cal., along with all identified relevant witnesses and sources of proof, including physical sources of proof. Additionally, the majority of the relevant third parties (two out of the three foreign suppliers of the component parts at issue), have locations in N.D. Cal.

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