

v.

HUAWEI DEVICE USA INC., HUAWEI
DEVICE CO., LTD. AND HUAWEI DEVICE
(DONGGUAN) CO., LTD.

Defendants.

JURY TRIAL DEMANDED

**DECLARATION OF ANDREW OPLINGER REGARDING HUAWEI DEVICE USA
INC., HUAWEI DEVICE CO., LTD. AND HUAWEI DEVICE (DONGGUAN) CO.,
LTD.'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA**

I, Andrew Oplinger, state and declare as follows:

1. I am a Technical Lead Manager for Google Product Infrastructure and work out of Google LLC's ("Google") Mountain View, California office. I submit this declaration based upon my knowledge of the corporate structure of Google, and my investigation of the location of witnesses and evidence related to the Google Maps for Mobile application ("GMM"). If called as a witness, I could and would testify competently to the information contained herein.

2. Google's Mountain View headquarters, which includes offices in neighboring Sunnyvale (collectively referred to as Mountain View herein), is where engineers, product managers, executives, and staff perform work related to GMM. The most significant design and release decisions that impact Android and GMM are made in Mountain View, California or San Francisco, California, by product leads as well as managers and engineering teams there.

including those responsible for Location Sharing. There are also engineers responsible for GMM's Location Sharing feature located in Google's office in Sydney, Australia.

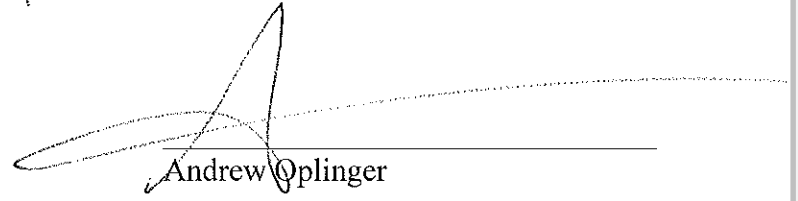
4. Based on my knowledge and investigation to date, at least the following individuals have knowledge regarding the design, development, and operation of Location Sharing used on Android mobile devices:

- Myself and a team of engineers working in the Mountain View office responsible for Google Location Sharing functionality.
- Daniel Resnick, Technical Lead Manager, is located in Google's Sydney, Australia Office. I understand that Mr. Resnick works with engineers and project leads related to GMM and its Location Sharing functionality in California, and is able to perform his work functions when traveling to Google's headquarters in California.
- Tom Green, Technical Program Manager, is located in Google's San Francisco, California office. Mr. Green is responsible for GMM releases.

5. I am currently aware of no Google employees with relevant knowledge regarding GMM or Location Sharing features residing or working in the Eastern District of Texas.

6. Nearly all the documents relating to GMM, including highly proprietary information and source code, are either physically present in or electronically accessible from San Francisco, California; Mountain View, California; or Sydney, Australia, as that is where the

Mountain View, California on November 14th, 2017



Andrew Oplinger

