

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

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

Defendants.

CIVIL ACTION NO. 2:17-cv-513-JRG

**JURY TRIAL DEMANDED**

**DECLARATION OF WILLIAM LUH 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, William Luh, state and declare as follows:

1. I am the Technical Lead Manager and Software Engineer for the Find My Device application on Android. I work out of Google LLC's ("Google") Mountain View, California office. I submit this declaration based upon my best and current knowledge of the corporate structure of Google, and my investigation of the location of witnesses and evidence related to the Find My Device application, which I understand was previously branded as Android Device Manager. If called as a witness, I could and would testify competently to the information contained herein.

2. Google's Mountain View headquarters is where engineers, product managers, executives, and staff perform work related to the Find My Device application. The most significant design and release decisions that impact Android and the Find My Device application



are made in Mountain View, California, by product leads as well as managers and engineering teams there.

3. Google provides the Find My Device application to various Android mobile device providers, including Huawei, LG, HTC, and ZTE. The Find My Device application was initially developed in Google's Mountain View headquarters, and its ongoing design, development, and other technical activities take place there and is where the engineering team is located.


4. Based on my knowledge and investigation to date, at least the following individuals have knowledge regarding the current design, development, and operation of the Find My Device application on Android mobile devices:

- Myself and the engineers on my team.

5. I am currently aware of no Google employees with relevant knowledge regarding the Find My Device application residing or working in the Eastern District of Texas.

6. Nearly all the documents relating to the Find My Device application, including highly proprietary information and source code, are either physically present in or electronically accessible from Mountain View, California, as that is where the persons most qualified to identify and locate such documents reside. I am aware of no documents described in this paragraph being located in the Eastern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Mountain View, California on November 14, 2017

  
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William Luh