

v.

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

Defendants.

JURY TRIAL DEMANDED

**DECLARATION OF ABEER DUBEY 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, Abeer Dubey, state and declare as follows:

1. My title is Director, People Analytics. I 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 certain Google products. If called as a witness, I could and would testify competently to the information contained herein.

2. I understand that some of the applications that may be at issue in the above-captioned case are Google Hangouts, Google Plus, Android Messenger, and Google Messages. I am aware of no Google product named Android Messenger, but I am aware of a Google product named Android Messages. I am also aware of no Google product named Google Messages, but I am aware of a Google product named Messenger. I further understand that

It has been headquartered in Mountain View, California since 2003. In 2007, Google opened its first office in San Francisco, California.

4. Google's Mountain View headquarters, which includes offices in neighboring Sunnyvale (collectively referred to as Mountain View herein), is the strategic center of Google's business. Google's Mountain View headquarters houses thousands of employees making up approximately 35% of Google's total worldwide employees, including engineers, product managers, executives, and staff, particularly those performing work related to Android Messages, Google Hangouts and Google Plus. Google also employs several thousand employees in its San Francisco, California office.

5. Many decisions related to Google's overall business, including the most significant design and engineering decisions related to the Android Messages, Google Hangouts, Google Plus, involve managers and leads who work in Mountain View, California.

6. According to Google's investigation, most engineers and managers with relevant knowledge regarding the Android Messages application are based in or around Mountain View, California. In particular, I have been informed and understand that Drew Rowny, who is the Project Manager for Android Messages, is located in San Francisco, California, and several engineers responsible for various features related to Android Messages are located in Google's Mountain View, California office. I have also been informed and understand that there are some

relevant knowledge regarding the Google Hangouts application are based in Mountain View, California. In particular, I have been informed and understand that Andrew Lee, who is the Technical Lead for Google Hangouts on Android, his direct reports, and the majority of the engineering team for Google Hangouts are all located in Google's Sunnyvale, California office.

8. Additionally, according to Google's investigation, engineers and managers with relevant knowledge regarding the Google Plus application are based in Mountain View, California. In particular, I have been informed and understand that the team for Google Plus for Android, including Brian Johnson, who is the Technical Lead for that application, is located in Google's Mountain View, California office.

9. I am currently aware of no Google employees with relevant knowledge regarding the Android Messages, Google Hangouts, and Google Plus applications residing or working in the Eastern District of Texas. Moreover, Google has no offices or facilities within the Eastern District of Texas.

10. Nearly all the documents relating to Android Messages, Google Hangouts, and Google Plus, including highly proprietary information and source code, are either physically present in or electronically accessible from Mountain View, California, as that is where many of the personnel 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.

Abeer Dubey

Abeer Dubey