

**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.

LEAD CASE NO. 2:17-cv-513-JRG

**JURY TRIAL DEMANDED**

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

LG ELECTRONICS, INC.

Defendant.

MEMBER CASE NO. 2:17-cv-515-JRG

**JURY TRIAL DEMANDED**

**DECLARATION OF NICHOLAS H. LEE IN SUPPORT OF DEFENDANT LG  
ELECTRONICS, INC.'S MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION OR, IN THE ALTERNATIVE, TO TRANSFER VENUE TO THE  
NORTHERN DISTRICT OF CALIFORNIA**

I, Nicholas H. Lee, state and declare as follows:

1. I am a member of Arnold & Porter Kaye Scholer, LLP (“APKS”), counsel of record for Defendant LG Electronics, Inc. (“LGEKR”). I am a member of the Bar of the State of California and have been admitted to practice in the United States District Court for the Eastern District of Texas (“EDTX”). I provide this declaration in support of Defendant LG Electronics, Inc.’s motion to dismiss for lack of personal jurisdiction or, in the alternative, to transfer the above-captioned action to the United States District Court for the Northern District of California

(“NDCA”). I have personal knowledge of the matters stated in this declaration and would testify competently and truthfully to them if called upon to do so.

2. Attached hereto as Exhibit 1 is a true and correct copy of the declaration of Cecilia Son in support of LG Electronics MobileComm U.S.A., Inc.’s (“LGEMU”) Motion to Transfer Venue to the Northern District of California, filed in *Porto Technology Co., Ltd. v. LG Electronics MobileComm U.S.A., Inc.*, D.I. 15-2, Case No. 2:15-cv-00458-JRG-RSP (E.D. Tex.) (“Porto Declaration”).

3. Attached hereto as Exhibit 2 is a true and correct copy of the declaration of Hongsun Yoon on behalf of LG Electronics, Inc., LG Electronics MobileComm U.S.A., Inc., and LG Electronics U.S.A., Inc., filed in *Ryujin Fujinomaki v. Google Inc. et al.*, D.I. 80-1, Case No. 2:15-cv-01381-JRG-RSP (E.D. Tex.) (“Fujinomaki Declaration”).

4. An online search of Expedia reveals that there are numerous flights from Incheon International Airport (“ICN”) to San Francisco International Airport (“SFO”) with a non-stop flight time of 10 hours and 25 minutes. ICN is the most convenient international airport to LGEKR’s principal place of business as it offers the most non-stop flights and shortest flight times to the United States. Attached hereto as Exhibit 3 is a true and correct copy of the search results on Expedia for flights from ICN to SFO, with the results sorted by shortest duration. By contrast, an online search of Expedia reveals that flights from ICN to Shreveport, Louisiana require at least 1 stop and has as its shortest flight time 16 hours and 55 minutes. Flying to Shreveport is the most convenient destination to get to EDTX from ICN as there are more flights and Shreveport is roughly equidistant to the EDTX courthouse when compared with Longview East Texas Regional Airport. Attached hereto as Exhibit 4 is a true and correct copy of the

search results on Expedia for flights from ICN to Shreveport, with the results sorted by shortest duration.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles, California on November 27, 2017.

*/s/ Nicholas H. Lee*

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Nicholas H. Lee

Attorney for Defendant LG Electronics, Inc.