EXHIBIT 2

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

RYUJIN FUJINOMAKI,
 	
            Plaintiff,
 	
v.
 	
GOOGLE INC., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., MOTOROLA MOBILITY LLC, LG ELECTRONICS INC., LG ELECTRONICS MOBILECOMM U.S.A., INC., LG ELECTRONICS U.S.A., INC., ASUSTEK COMPUTER INC., ASUS COMPUTER INTERNATIONAL, INC., and HUAWEI TECHNOLOGIES CO., LTD.
 	
            Defendants.
	Civil Action No. 2:15-cv-01381-JRG-RSP
	
	JURY TRIAL DEMANDED

DECLARATION OF HONGSUN YOON

I, Hongsun Yoon, make the following declaration based on my personal knowledge and investigation, or on information received from someone with knowledge. If called as a witness, I could and would testify competently to the following facts:

1.   I am currently employed as Senior IP Counsel at LG Electronics U.S.A., Inc. ("LGEUS"). I am responsible in intellectual property matters for the US-based LG Electronics entities. These entities include LGEUS, LG Electronics MobileComm U.S.A., Inc. ("LGEMU"), and LG Electronics MobileResearch U.S.A., LLC ("LGEMR").

2.   I understand that Ryujin Fujinomaki ("Plaintiff") has brought a patent infringement action against LGEMU, LG Electronics, Inc. ("LGE"), and LGEUS (collectively "LG").

3.   LGE is a Korean corporation with its principal place of business in Seoul, Republic of Korea. LGE's employees in Korea are responsible for the design, research and engineering, sourcing of components, and manufacture and assembly of the LG-branded devices sold in the United States, including products using the Android operating system ("Android OS") of issue in this action ("LG-branded Android Products").

4.   LGEUS is a wholly owned subsidiary of LGE and it is a Delaware corporation with its principal place of business in Englewood Cliffs, New Jersey. LGEUS is registered to do business in California. In fact, LGEUS has offices in Santa Clara and San Francisco, California ("Silicon Valley Lab"), with approximately one hundred employees.

5.   LGEUS is responsible for importing, marketing, offering for sale, and selling non-mobile LG devices such as televisions, Blu-ray players, home theater systems, washers and dryers, refrigerators, microwaves, and air conditioners. LGEUS also sells Wi-Fi only tablets and wearable products. All of the products sold by LGEUS are sold to retailers and distributors, who in turn sell the products nationwide, including into the Northern District of California. LGEUS sells many products that do not operate on the Android operating system.

6.   LGEMU is a wholly owned subsidiary of LGEUS. LGEMU is a California company. It has large offices in San Diego and San Jose, California. LGEMR is a wholly-owned subsidiary of LGEMU. Like LGEMU, LGEMR is also a California company. LGEMU (including its wholly-owned subsidiary LGEMR) is responsible for importing, testing, quality management, marketing, offer for sale, and selling LG-branded mobile products (*e.g.*, smartphones, feature phones, and carrier-network tablets) in the United States. The products sold by LGEMU include those that run on the Android operating system and those that do not run on the Android operating system. LGEMU sells products to national carriers, retailers, and

distributors, who in turn sell those products to end users throughout the country, including the Northern District of California.

7.   The Android OS is an open-source operating system for communication devices that was developed and is provided by Google Inc. ("Google"). I understand that in this litigation plaintiff has particularly targeted the Smart Lock function of Android OS version 5.0. This function is developed, maintained and supported by Google.

8.   As noted above, LGE manufactures the LG-branded Android products. These products are manufactured outside the United States. This also means that products installation of the Android OS also occurs outside of the United States. During the manufacturing process, LGE obtains the Android OS from the Android Open Source Project ("AOSP"), which is led by Google. Any modification made to the standard operating procedure set out by the Google Android OS is performed in the Republic of Korea. All technical information retained by LGE is located outside the United States, and primarily in South Korea.

9.   LGEMR employees in LGEMU's San Jose office are responsible for Android OS certification for the LG-branded Android products. This team, called the Partner Engineering team, is led by Cecilia Son, Director. Her team includes Steven Howard, Bum Suk Bae, Joonhyun Baek, Jae Wook Cho, Dong Ho Han, Jeong Rae Kim, Kush Shrivastava and Namrata Suryavanshi. Android OS certification is a process by which Google and LGEMR ensure that LG-branded Android Products marketed and sold by LGEMU and LGEUS adhere to Google's Android OS compatibility requirements.

10.   As of the filing of the complaint in this action, the San Jose Office employed approximately 175 employees. The office space occupied by these employees is approximately 25,000 square feet, and is leased by LGEMU. Employees in the San Jose Office, including the

individuals in the Partner Engineering team, communicate and interact with Google personnel, including Mr. Jongyeong Lee, Mr. Lance Chang, and Mr. Jey Lee, in connection with LG-branded Android Products.   Mr. Jongyeong Lee, Mr. Lance Chang and Mr. Jey Lee are all three located in Mountain View, CA.

11.   Documents and records relating to LG-branded Android Products and Android OS certification are either physically present or electronically accessible at the San Jose Office.

12.   Documents and records relating to LGE's activities described above are located outside the United States, and primarily in Korea.

13.   LGEMU (including its LGEMR subsidiary) have approximately 108 employees in the San Diego Office. The San Diego Office, which is owned (not leased) by LGEMU, is over 71,000 square feet. The San Diego Office oversees the product testing and quality management of LG-branded Android Products sold by LGEMU in the United States. Michael Henson is responsible for testing and quality management for the LG-branded mobile products sold in the United States. He and his team are responsible for ensuring pre-launch and post-launch quality assurance of these products. For example, pre-launch quality assurance includes user-level testing, such as Bluetooth accessory testing, call feature testing, messaging, and browsing.

14.   Documents and records relating to LGEMU products, such as testing, quality management, and other technical documentation, are maintained in the San Diego office. Sales agreements, marketing and market strategy documents are located in San Diego and/or Englewood Cliffs. Documents and records relating to Android OS certification of LGEMU products are maintained in the San Jose office. Many of the documents described above exist on local computers and servers that are not accessible outside of their respective offices.

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