

**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 NICHOLAS H. LEE IN SUPPORT OF
DEFENDANTS' MOTION TO TRANSFER VENUE**

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 Defendants Huawei Device USA Inc. (“Huawei USA”), Huawei Device Co., Ltd. (“Huawei Device”), and Huawei Device (Dongguan) Co., Ltd. (“Huawei Dongguan”) (collectively, the “Huawei Defendants”). 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. I provide this declaration in support of Defendants’ motion to transfer the above-captioned action to the United States District Court for the Northern District of California (“N.D. Cal.”). 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 Plaintiff’s Infringement Contentions against Huawei Defendants pursuant to Patent Local Rule 3-1, served on November 28, 2017.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff's Initial Disclosures to Huawei Defendants pursuant to Federal Rule of Civil Procedure 26(a)(1), served on December 22, 2017.

4. Plaintiff's predecessor, Advanced Ground Information Systems, Inc., brought a patent infringement action against Life360, Inc. in 2014 in the Southern District of Florida, captioned *Advanced Ground Information Sys., Inc. v. Life360, Inc.*, No. 9:14-cv-80651 (S.D. Fl. May 16, 2014) (the "Florida Action"). Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of Malcolm K. Beyer, Jr., submitted in the Florida Action (D.I. 32-1).

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles, California on January 5, 2018.

/s/ Nicholas H. Lee

Nicholas H. Lee

Attorney for Huawei Defendants