

**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 JING ZENG IN SUPPORT OF  
DEFENDANTS' MOTION TO TRANSFER VENUE**

I, Jing Zeng, state and declare as follows:

1. I am a HR Business Partner at Huawei Device USA, Inc. ("Huawei Device USA") and work out of Huawei Device USA's Plano, Texas, office. I have been employed by Huawei Device USA since 2012. I work in the HR Department of Huawei Device USA.
2. I provide this supplemental declaration in support of Defendants' motion to transfer the above-captioned action to the United States District Court for the Northern District of California. I submit this declaration based upon my personal knowledge and investigation. If called as a witness, I would and could testify competently as to the same.
3. Huawei Device USA has five business locations in the United States, only one of which is in Texas and three of which are in California. The current headcount for employees at each location is as follows: Plano, Texas — 46; Santa Clara, California — 32, San Diego, California — 60; Mountain View, California — 29; and Bellevue, Washington — 37. The headcounts at each location were approximately the same in June of last year.

4. I have reviewed a job posting by Huawei Device USA for a Test Engineer position at Huawei Device USA's business location in Plano, Texas. I have been informed that AGIS attached this job posting as Exhibit 11 to the Declaration of Vincent J. Rubino, III, in support of AGIS's opposition to Defendants' motion to transfer. I have confirmed with my colleagues at Huawei Device USA that the job posting is for a test engineer who will be responsible for testing standard requirements of mobile carriers. That job posting was published on or about October 25, 2017. If filled, the position does not involve any responsibility for research and development of the accused devices in this action, or testing of the accused Google software on those devices.

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

JZ



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Jing Zeng