

**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’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 Plaintiff's Infringement Contentions against LGEKR 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 LGEKR pursuant to Federal Rule of Civil Procedure 26(a)(1), served on December 22, 2017.

4. Attached hereto as Exhibit 3 is a true and correct copy of BMW Manufacturing Co. LLC's Motion to Dismiss for Lack of Personal Jurisdiction and Memorandum in Support, filed in *MHL Tek, LLC v. Nissan Motor Co.*, Case No. 2:07-cv-289-TJW (E.D. Tex. Sept. 7, 2007), D.I. 48.

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 Defendant LG Electronics, Inc.