

# EXHIBIT 14

## Exhibit 9

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

CONTENTGUARD HOLDINGS, INC.

Plaintiff;

v.

AMAZON.COM, INC.; APPLE INC.;  
BLACKBERRY LIMITED (F/K/A  
RESEARCH IN MOTION LIMITED);  
BLACKBERRY CORPORATION (F/K/A  
RESEARCH IN MOTION  
CORPORATION; HTC CORPORATION;  
HTC AMERICA, INC.; HUAWEI  
TECHNOLOGIES CO., LTD.; HUAWEI  
DEVICE USA, INC.; MOTOROLA  
MOBILITY, LLC; SAMSUNG  
ELECTRONICS CO., LTD.; SAMSUNG  
ELECTRONICS AMERICA, INC.; AND  
SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC,

Defendants.

CIVIL ACTION NO. 2:13-CV-1112-JRG

JURY TRIAL DEMANDED

**DECLARATION OF JAMES JIANG**

I, James Jiang, declare as follows:

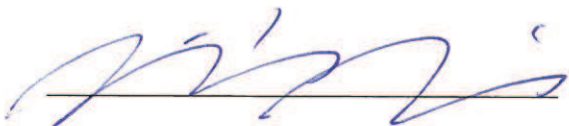
1. I am Executive Vice President, Products and Solution, for Huawei Device USA. My responsibilities include product management and technical sales for Huawei smartphones in the United States. My business address is at 10180 Telesis Court, Suite 220, San Diego, California, 92121, and I reside in the San Diego metro area.
2. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, could and would testify competently to such facts under oath.

3. Huawei Device USA has been fully responsible for sales and marketing of Huawei smartphones in the United States since December 2011.
4. Huawei Device Co., Ltd. has been fully responsible for the design and manufacture of the Huawei smartphones that Huawei Device USA sells and markets in the United States since December 2011.
5. Huawei Device USA has its headquarters in Plano, Texas. None of the Plano-based employees are involved in the research and development for smartphone technology. Huawei Device USA does not conduct any research or development for smartphone technology in Texas. Instead, any and all research and development for smartphone technology that Huawei Device USA conducts in the United States is performed either in California or Washington state. In particular, Huawei Device USA employs over 50 people at the Huawei facility in San Diego who are responsible for research and development for smartphone technology. The Huawei Device USA facility in San Diego includes a laboratory for testing smartphone technology. Huawei Device USA additionally employs one person in Washington state who is involved in research and development for smartphone technology, and over ten people in Cupertino, California, who are responsible for sales and marketing of Huawei smartphones in the United States, as well as some smartphone technology research and development.
6. Huawei Device USA's records and documents relating to development, sales, and marketing of its smartphones are equally accessible in Huawei Device USA's Plano and California facilities.
7. Prior to September 2011, Futurewei was responsible for sales and marketing of Huawei smartphones in the United States. Futurewei has had a facility in Santa Clara, California

since before Futurewei transferred responsibility for smartphone marketing and sales in the United States to Huawei Device USA.

8. I, or a member of my team, anticipate testifying at deposition and at trial on behalf of Huawei Device USA regarding sales and marketing of Huawei smartphones in the United States.
9. It is easier for me to travel to San Francisco, California or San Jose, California from San Diego, where I work and live, to provide trial testimony than it is for me to travel to Marshall, Texas. Southwest Airlines provides frequent flights from San Diego to either San Francisco or San Jose, and the flight time is typically less than two hours. I do travel to the Huawei Device USA offices in Plano, Texas for work, but I do not travel to Marshall, Texas. To travel to Marshall, Texas, I would need to take a four-hour flight to Dallas and then drive another two and a half hours. This trip would be far less convenient to me than traveling within my home state of California.

Dated: April 14, 2014



James Jiang