

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

AGIS Software Development, LLC,

Plaintiff,

v.

**ZTE CORPORATION,
ZTE (USA) INC.,
ZTE (TX) INC.**

Defendants.

Case No. 2:17-CV-00517-JRG

**DECLARATION OF LIONEL LAVENUE IN SUPPORT OF DEFENDANTS ZTE (TX)
INC.’S AND ZTE (USA) INC.’S MOTION TO DISMISS PLAINTIFF’S AMENDED
COMPLAINT FOR IMPROPER VENUE OR IN THE ALTERNATIVE TO TRANSFER**

I, Lionel Lavenue, declare and testify as follows:

1. I am an attorney with the law firm Finnegan, Henderson, Farabow, Garrett, & Dunner, LLP, counsel of record for defendants ZTE (USA) Inc. and ZTE (TX) Inc. I am knowledgeable about the facts set forth in this declaration and could and would testify competently to them if called as a witness, unless otherwise stated.
2. Attached as Exhibit A is a true and correct copy of a webpage located at <https://mycpa.cpa.state.tx.us/coa/coaSearch.do>. The webpage includes “Franchise Tax Account Status” and a “Public Information Report” for “Agis Software Development LLC.”
3. Attached as Exhibit B is a true and correct copy of webpages located at <https://www.google.com/maps/>. The webpages include directions and distances from the corporate headquarters complex of Google, Inc. in Mountain View, California to the Sam B. Hall Jr. Federal Building in Marshall, Texas, and to the Robert F. Peckham Federal Building in San Jose, California; and directions and distances from the corporate headquarters complex of Boost Mobile in Irvine, California, to the Sam B. Hall Jr.

Federal Building in Marshall, Texas, and to the Robert F. Peckham Federal Building in San Jose, California.

4. Attached as Exhibit C is a true and correct copy of a portion of a Lex Machina Custom Report for Northern District of California and Eastern District of Texas Patent Cases Filed 2016 to June 2017.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 21, 2017.

/s/ Lionel M. Lavenue

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