

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

AGIS Software Development, LLC,
Plaintiff

v.

Case No. 2:17-cv-517

ZTE Corporation et al.,
Defendants

AFFIDAVIT OF CHAO (GEORGE) SHAN


I, Chao (George) Shan, declare under penalty of perjury as follows:

1. I am over the age of eighteen years and competent to make this declaration.
2. The facts stated in this Declaration are true and correct to the best of my knowledge and belief.
3. I am employed in the role of Vice President of Human Resources and Administration at ZTE (TX) Inc. ("ZTX"). I have held this position for 3 years and, as such, I have personal knowledge of ZTX's personnel, operations, and locations worldwide, including the United States.
4. I understand that, in the opposition brief filed by AGIS Software Development, LLC ("AGIS") (dkt. #46), AGIS asserts that "ZTX further concedes that this District (the Eastern District of Texas) is convenient for at least its 14 employees in this District." However, this misconstrues my earlier declaration (dkt. #38). The fourteen employees living in the Eastern District of Texas are not relevant to this matter, and they are unlikely to testify at all in this case. As I previously declared:

- a. ZTX does not manufacture or make any products in the Eastern District of Texas at all;
- b. ZTX does not sell or offer to sell any products in the Eastern District of Texas at all;
- c. ZTX does not import any products in the Eastern District of Texas at all;
- d. ZTX does not use any products in the Eastern District of Texas at all; and
- e. None of ZTX's employees in Texas are expected to have unique knowledge relevant to this case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on:

1/11/2018
Date



By: Chao (George) Shan
Vice Prseident of Human Resources and Administration, ZTE
(TX) Inc.