

# Exhibit A

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

AGIS SOFTWARE DEVELOPMENT LLC	§	
	§	CASE NO. 2:21-cv-00072-JRG
v.	§	(Lead Case)
	§	
T-MOBILE USA, INC., and T-MOBILE US, INC.	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	
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AGIS SOFTWARE DEVELOPMENT LLC	§	
	§	CASE NO. 2:21-cv-00024-JRG
v.	§	(Member Case)
	§	
LYFT, INC.	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	

**DECLARATION OF BETHANY SALPIETRA IN SUPPORT OF  
LYFT, INC.'S RESPONSE TO PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC'S  
MOTION FOR RECONSIDERATION AND OBJECTIONS TO THE ORDER  
RECOMMENDING GRANT OF LYFT, INC.'S MOTION TO DISMISS FOR  
IMPROPER VENUE (DKT. 212)**

I, Bethany Salpietra, hereby declare as follows:

1. I am over the age of 21 and am fully competent to make this declaration. I have personal knowledge of all facts recited herein and state that such facts are true and correct to my knowledge or information and belief, and, if called upon to do so, I would testify competently about them.

2. I am a member in good standing of the State Bar of Texas. I am counsel at the law firm of Baker Botts L.L.P., 2001 Ross Ave., Ste. 900, Dallas, TX 75201, and I represent Lyft, Inc. in the above-captioned action. I submit this declaration in support of Lyft's Response to Plaintiff

Agis Software Development LLC'S Motion for Reconsideration and Objections to the Order Recommending Grant of Lyft, Inc.'s Motion to Dismiss for Improper Venue (Dkt. 212).

3. Attached hereto as Exhibit 1 is a true and correct copy of selected pages from the transcript of the Court's September 29, 2021 hearing on Lyft, Inc.'s Motion to Dismiss for Improper Venue, dated April 27, 2021.

4. Attached hereto as Exhibit 2 is a true and correct copy of selected pages from the transcript of deposition of Max Loosen, dated September 23, 2021.

5. Attached hereto as Exhibit 3 a true and correct copy of selected pages from the transcript of deposition of Jeff Tran, dated November 5, 2021.

6. Attached hereto as Exhibit 4 a true and correct copy of selected pages from the transcript of deposition of Malcolm K. Beyer, Jr. dated October 20, 2021.

7. Attached hereto as Exhibit 5 a true and correct copy of selected pages from the transcript of deposition of David Sietsema, dated November 19, 2021.

8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's Initial Disclosures to Defendant Lyft, Inc. dated June 2, 2021.

9. Attached hereto as Exhibit 7 is a true and correct copy of selected pages from the transcript of deposition of Margaret R. T. Beyer, dated October 19, 2021.

10. Attached hereto as Exhibit 8 a true and correct copy of selected pages from the transcript of deposition of Ronald Wisneski, dated November 2, 2021.

11. Max Loosen, Lyft's Regional Director of Operations for Texas and Oklahoma submitted a declaration and provided sworn testimony in support of Lyft, Inc.'s Motion to Dismiss for Improper Venue, dated April 27, 2021. Mr. Loosen does not have knowledge pertinent to AGIS's claims of patent infringement.

I certify under penalty of perjury that the forgoing is true and correct.

Executed on this 12th day of January, 2022 at Dallas, Texas.

Respectfully submitted,

*/s/ Bethany Salpietra*

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Bethany Salpietra