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

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendant.

CIVIL ACTION NO. 2:22-cv-263-JRG

JURY TRIAL DEMANDED

DECLARATION OF SHAMBAVI KRISHNAMMURTHI

I, Shambavi Krishnamurthi, hereby declare as follows:

1. I am a Product Manager at Google LLC (“Google”). I have been a Google employee since 2020. I live and work in the San Francisco Bay Area. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to the information contained herein.

2. I am a product manager for Find My Device (“FMD”) and have been in that role since November 2021. In this role, I regularly work with and communicate with other team members responsible for FMD and provide overall product development and strategy. Members of the FMD team are based in the San Francisco Bay Area, London, United Kingdom, and Tel Aviv, Israel. Based on my discussions with the individuals identified in paragraph 3 below and my experience with the FMD team, no members of the team are based in Texas.

3. Based on my discussions with the below individuals and my experience with the FMD team, I have identified the following Google employees with knowledge of FMD:

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- a. Ronald Ho is a Group Product Manager at Google for teams working on multi-device products, since November 2021. In that role, Mr. Ho oversaw product development and strategy for FMD from November 2021 through July 2023. Mr. Ho is based in the San Francisco Bay Area.
- b. Jonathan Brunsman is a Distinguished Engineer at Google who worked on FMD until and including 2020. Mr. Brunsman was based in the San Francisco Bay Area during the time he worked on FMD. Since April 2022, he has been based in Boulder, Colorado.
- c. William Luh is a Software Engineer Manager at Google who worked on FMD until and including 2019. Mr. Luh is based in the San Francisco Bay Area.
- d. Sorin Dinu is a Software Engineer at Google responsible for the development and maintenance of FMD. Mr. Dinu is based in London, United Kingdom. Mr. Dinu is part of a London-based team that works on FMD. The team currently [REDACTED]
[REDACTED] Responsibilities for certain technical aspects of FMD transitioned from engineers based in the San Francisco Bay Area to the London-based team starting in the second quarter of 2019. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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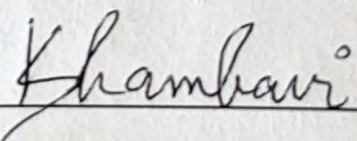
e. David Lazarov is a Software Engineer at Google who is part of an engineering team based in Tel Aviv, Israel, that has been [REDACTED]

[REDACTED] After November 2021, Mr. Lazarov and the rest of the team in Tel Aviv began taking on more engineering responsibilities with respect to FMD. [REDACTED]

[REDACTED] This work was started in 2021 by Google engineers based in the San Francisco Bay Area, before being transitioned to the Israel-based team. None of the Israel team's work has changed the functionality of FMD.

4. As a matter of Google practice, documents in Google's possession about its products and services are normally created and maintained by the employees working on those products and services. I follow that practice, and the individuals identified above do as well. Accordingly, documents regarding the research, design, and development of FMD would be primarily created and maintained in the San Francisco Bay Area, London, and Israel.

I declare under the laws of the United States of America that the foregoing is true and correct. Executed in San Francisco, California on August 31, 2023.



Shambavi Krishnamurthi