

EXHIBIT A

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

SLYDE ANALYTICS, LLC.,

Plaintiff,

v.

ZEPP HEALTH CORPORATION,

Defendant.

Case No. 2:23-cv-00172-RWS-RSP

JURY TRIAL DEMANDED

**DECLARATION OF MIKE YAN YEUNG IN SUPPORT OF
DEFENDANT'S MOTION TO TRANSFER**

I, Mike Yan Yeung, declare as follows:

1. I am the Chief Operating Officer (“COO”) of Defendant Zepp Health Corporation (“ZHC”). I am over twenty-one (21) years of age and reside in Fremont, CA. The statements herein reflect my personal knowledge and belief based on information already known to me and/or information learned from the investigation I conducted in connection with the preparation of this declaration. If called to testify as a witness, I could testify competently thereto.

2. I have acted as COO of ZHC since 2015. Through my work as COO of ZHC, I have developed familiarity and acquired knowledge regarding ZHC’s activities, as well as the activities of ZHC’s various subsidiaries and their respective employees. In addition, in connection with the preparation of this declaration, I reviewed documents and records of ZHC and interviewed some employees of certain ZHC subsidiaries.

3. ZHC is incorporated in the Cayman Islands and has a registered address of P.O. Box 309, Ugland House, Grand Cayman, KY1-1104, Cayman Islands. ZHC is a holding company and does not itself engage in any commercial activities.

4. ZHC does not have a place of business in Texas.

5. ZHC does not have any employees in Texas.

6. ZHC has two direct subsidiaries that are incorporated in the State of Delaware: Zepp, Inc.; and Zepp North America, Inc. (“ZNA”). ZNA is responsible for distribution, marketing, and sales in the United States of the smartwatch products accused of infringement by Slyde Analytics, LLC. Zepp, Inc. is involved in the design of the smartwatch products accused of infringement by Slyde Analytics, LLC.

7. Neither Zepp, Inc. nor ZNA has a place of business in Texas. Zepp, Inc. and ZNA each have offices in California: Zepp Inc. has its office in Milpitas, CA; and ZNA has its office in Newport Beach, CA.

8. ZNA does not have any employees in Texas. All of ZNA’s employees reside in California.

9. Zepp, Inc. has a single employee in Texas: Maher Sarraj. Mr. Sarraj resides in Dallas, Texas. Mr. Sarraj is a member of the Chip Division of Zepp, Inc. and he works on analog chip design. Mr. Sarraj has not been, and is not currently, involved in any work related to any of the smartwatch products accused of infringement by Slyde Analytics, LLC. All of Zepp, Inc.’s remaining employees reside in California.

10. Zepp, Inc. has also employed an independent contractor in Texas for work on IC layouts: Thomas Moore. Mr. Moore has not been, and is not currently, involved in any work related to any of the smartwatch products accused of infringement by Slyde Analytics, LLC.

11. Most of the documents and records of ZHC are stored and maintained on the cloud. The individuals responsible for maintaining those documents and records are located in the People’s Republic of China. ZHC has no documents or records stored or maintained anywhere in

the United States. The physical documents and records of ZHC, to the extent they exist, are stored and maintained in the Cayman Islands or the People's Republic of China.


12. Most of the documents and records of both ZNA and Zepp, Inc. are stored and maintained on the cloud. The individuals responsible for maintaining those documents and records are located in the People's Republic of China. The physical documents and records of both ZNA and Zepp, Inc., to the extent they exist, are stored and maintained in California.

13. All of the smartwatch products accused of infringement by Slyde Analytics, LLC were designed and developed in the People's Republic of China and/or in California.

14. All of the smartwatch products accused of infringement by Slyde Analytics, LLC were manufactured in the People's Republic of China. No manufacturing was conducted in the United States.

15. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under the laws of perjury of the United States, including Section 1001 of Title 18 of the United States Code.

17. Executed this 10th day of December 2023, in Fremont, California.


Mike Yan Yeung