**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

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**PLAINTIFF SLYDE ANALYTICS LLC'S RESPONSE IN OPPOSITION
TO DEFENDANT ZEPP HEALTH CORPORATION'S MOTION
TRANSFER VENUE TO THE CENTRAL DISTRICT OF CALIFORNIA
PURSUANT TO 28 U.S.C. § 1404(a) (DKT. 11)**

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I.   INTRODUCTION

Slyde Analytics LLC ("Slyde" or "Plaintiff") files this response to Defendant Zepp Health Corporation's ("ZHC" or "Defendant") motion to transfer venue to the Central District of California ("CDCA") pursuant to 28 U.S.C. § 1404(a) (Dkt. 11) (the "Motion"). The Motion should be denied because ZHC has failed to meet its burden to show that the CDCA is clearly more convenient for all parties and witnesses. Plaintiff Slyde is based in the Eastern District of Texas ("EDTX"), and has a significant presence in the EDTX, and therefore a strong local interest in having this case remain in this District. As set forth below, Slyde has identified sources of proof, as well as the convenience of its witnesses in the EDTX. Moreover, Slyde has identified numerous third parties with relevant information who may be subpoenaed in the EDTX and not the CDCA. The CDCA has no legitimate connection to this case. By its own admission, ZHC is a company whose business activities, personnel, and documents are almost entirely located *in China*. *See* Motion at 2. In the Motion, ZHC does not rely on its own activities in support of transfer, but rather relies on two speculative non-parties: Zepp, Inc. and Zepp North America, Inc. ("ZNA") (collectively, "Zepp Entities"). Contrary to ZHC's limited proofs in its Motion, ZHC does not have a strong presence in the CDCA, let alone a presence that could make it "clearly more convenient" than the EDTX. ZHC's Motion is premised on incorrect and unsupported conclusions regarding Slyde's presence in the EDTX. All the transfer factors either weigh against transfer or are neutral, and therefore the motion should be denied.

II.   RESPONSE TO STATEMENT OF ISSUES TO BE DECIDED

1.   Whether ZHC has met its burden to establish that the CDCA is clearly more convenient, where it has failed to sufficiently identify witnesses and documents in the CDCA that would warrant transfer, and where Slyde has shown relative ease to sources of proof in this District and has demonstrated a presence in this District with several witnesses (both compulsory and non-

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