

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

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

**DECLARATION OF GEOFF CULBERTSON IN SUPPORT OF
PLAINTIFF MAXELL, LTD.'S OPPOSITION TO APPLE INC.'S
AMENDED MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C.
§ 1404(a)**

I, Geoff Culbertson, declare as follows.

1. I am an attorney with the law firm of Patton Tidwell & Culbertson, LLP. I am admitted to the bar of the State of Texas. I represent Plaintiff Maxell, Ltd. in the above-captioned action.

2. I am submitting this declaration on behalf of Maxell in support of its Opposition to Apple Inc.'s Amended Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404 (Dkt. No. 57).

3. I also represented Plaintiff Maxell, Ltd. in the matter of *Maxell Ltd. v. ZTE (USA) Inc.*, No. 5:16-cv-00179-RWS (E.D. Tex.), including as trial counsel. In my representative capacity in that case, I was entrusted with possession of numerous documents relating to Maxell and Maxell's patent licensing practice, including documents related to ownership of the patents, damages, Maxell's licensing history, prosecution history, and inventorship.

4. Those documents are still in my possession, stored physically and electronically at my offices in Texarkana.

5. I hereby declare under penalty of perjury that the foregoing statements are true and accurate to the best of my knowledge, information, and belief.

Executed on August 23, 2019



Geoff Culbertson