

Exhibit A

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

Cypress Lake Software, Inc.,
Plaintiff

v.

ZTE (USA) Inc., Defendant

Case No. 6:17-cv-300-RWS

AFFIDAVIT OF JAMES RAY WOOD

I, James Ray Wood, declare under penalty of perjury as follows:

1. I am over the age of eighteen years and competent to make this declaration.
2. The facts stated in this Declaration are true and correct to the best of my knowledge and belief.
3. I am employed in the role of Chief Patent Counsel for ZTE (USA) Inc.
4. ZTE (USA) Inc. is a New Jersey Corporation.
5. ZTE (USA) Inc.'s principal place of business is located in the Northern District of Texas, at 2425 North Central Expressway, Suite 800, Richardson, Texas.
6. ZTE (USA) Inc. has no regular and established place of business in the Eastern District of Texas.
7. ZTE (USA) Inc. has no physical presence, such as a storefront, physical facility, or owned, leased, or rented office space, in the Eastern District of Texas.
8. ZTE (USA) Inc. has no bank accounts in the Eastern District of Texas.

9. ZTE (USA) Inc. does not have a registered agent within the Eastern District of Texas.
10. Independent customer service representatives work on ZTE (USA) Inc.'s behalf out of a call center located in the Eastern District of Texas. These independent customer service representatives are not employees of ZTE (USA) Inc., they are employees of iQor, an independent company which is a vendor to ZTE (USA) Inc. iQor services multiple other customers out of the call center, and ZTE is not the largest customer iQor services out of the call center.
11. ZTE USA does not own, lease, or rent the office space at the call center. ZTE (USA) Inc. does not own the equipment, computers, furniture, or office supplies for the call center. ZTE (USA) Inc. does not store products at the call center.
12. iQor owns, operates, and controls the call center. ZTE employees may visit the call center, but are not stationed there full time.
13. ZTE (USA) Inc. has no employee salespeople who operate out of their homes within the Eastern District of Texas.
14. ZTE (USA) Inc. does have employee(s) who live in the Eastern District of Texas, and one or more of those employee(s) may sometimes work from home, but those homes are not ZTE (USA) Inc. "places of business" or "offices," and ZTE (USA) Inc. does not represent them, internally or externally, as places of business of ZTE (USA) Inc. ZTE (USA) Inc. does not store company products

in the homes of its employees and customers cannot obtain products from ZTE (USA) Inc.'s employee home offices.

15. ZTE (USA) Inc. does not employ a secretarial service within the Eastern District of Texas to assist employees working from their homes in the Eastern District of Texas.

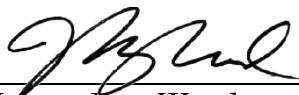
16. ZTE (USA) Inc. realizes no significant amount of direct revenue, nor significant numbers of direct sales, to customers in the Eastern District of Texas.

17. ZTE (USA) Inc. does not target the Eastern District of Texas with any non-charitable marketing or promotional efforts. ZTE (USA) Inc. does engage in generalized marketing and promotional efforts, but they are not targeted at the Eastern District.

I declare under penalty of perjury that the foregoing is true and correct. Executed on:

18 Sep 2017

Date



By: James Ray Wood

In House Counsel, ZTE (USA) Inc.