

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JAWBONE INNOVATIONS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-CV-00984-ADA

PATENT CASE

JURY TRIAL DEMANDED

DECLARATION OF QIUYI WU IN SUPPORT OF DEFENDANT
APPLE INC.'S MOTION TO TRANSFER VENUE TO
THE NORTHERN DISTRICT OF CALIFORNIA

I, Qiuyi Wu, am an associate at the firm of Fish & Richardson P.C., counsel of record for Apple Inc. I make this declaration in support of Apple Inc.'s Motion to Transfer Venue to the Northern District of California. I state that the following is true and correct to the best of my knowledge and belief.

1. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Disclosure of Asserted Claims and Infringement Contentions.

2. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Mark Rollins. **(FILED UNDER SEAL)**

3. Attached hereto as Exhibit C is a true and correct copy of the LinkedIn Profile webpage of Nicolas Petit, retrieved from <https://www.linkedin.com/in/nicolas-petit-348b2a4/> on April 28, 2022.

4. Attached hereto as Exhibit D is a true and correct copy of the LinkedIn Profile webpage of Eric Zhinian Jing, retrieved from <https://www.linkedin.com/in/eric-zhinian-jing-940a8012/> on April 28, 2022.

5. Attached hereto as Exhibit E is a true and correct copy the LinkedIn Profile webpage of Andrew Einaudi, retrieved from <https://www.linkedin.com/in/andreweinaudi/> on April 28, 2022.

6. Attached hereto as Exhibit F is a true and correct copy of the LexisNexis People Search Record for Eric F Breitfeller.

7. Attached hereto as Exhibit G is a true and correct copy of the LinkedIn Profile webpage of Gregory Burnett, retrieved from <https://www.linkedin.com/in/gregory-burnett-b05a474/> on April 28, 2022.

8. Attached hereto as Exhibit H is a true and correct copy of the LinkedIn Profile webpage of Alexander Asseily, retrieved from <https://www.linkedin.com/in/alexander-asseily-305a4994/> on April 28, 2022.

9. Attached hereto as Exhibit I is a true and correct copy of the entity details of AliphCom, Inc., retrieved from the California Secretary of State website.

10. Attached hereto as Exhibit J is a true and correct copy of the LinkedIn profile webpage of Hosain Rahman, retrieved from <https://www.linkedin.com/in/hosainrahman/> on April 28, 2022.

11. Attached hereto as Exhibit K is a true and correct copy of the LinkedIn profile webpage of Michael Luna, retrieved from <https://www.linkedin.com/in/michaeleluna/> on April 28, 2022.

12. Attached hereto as Exhibit L is a true and correct copy of Amended and Restated Patent Security Agreement covering one or more of the Asserted Patents (produced as JAWBONE0000019-49 in this matter).

13. Attached hereto as Exhibit M is a true and correct copy of the January 15, 2021 Affidavit of Michael Luna submitted to the United States Patent and Trademark Office during the prosecution of U.S. Patent Application No. 13/959,708.

14. Attached hereto as Exhibit N is a true and correct copy of the LinkedIn profile webpage of Richard (Rick) Gregory, retrieved from <https://www.linkedin.com/in/rick-gregory-3a67b92b/> on April 28, 2022.

15. Attached hereto as Exhibit O is a true and correct copy of the LinkedIn profile webpage of Barbara Courtney, retrieved from <https://www.linkedin.com/in/barbara-courtney-b905418/> on April 28, 2022.

16. Attached hereto as Exhibit P is a true and correct copy of AliphCom, Inc.'s Power of Attorney submitted to the United States Patent and Trademark Office during the prosecution of U.S. Patent Application No. 10/159,770, dated November 21, 2011.

17. Attached hereto as Exhibit Q is a true and correct copy of the LinkedIn profile webpage of Scott Kokka, retrieved from <https://www.linkedin.com/in/scottkokka/> on April 28, 2022.

18. Attached hereto as Exhibit R is a true and correct copy of the LinkedIn profile webpage of Trueman Denny, retrieved from <https://www.linkedin.com/in/truemanhdennyiii/> on April 28, 2022.

19. Attached hereto as Exhibit S is a true and correct copy of the LinkedIn profile webpage of Howard Yuan, retrieved from <https://www.linkedin.com/in/hjyuan/> on April 28, 2022.

20. Attached hereto as Exhibit T is a true and correct copy of the EnvisionIP "Contact" website page, retrieved from <http://envisionip.com/contact> on April 27, 2022.

21. Attached hereto as Exhibit U is a true and correct copy of the Texas Secretary of State Certificate of Formation for Jawbone Innovations, LLC, filed on February 1, 2021.

22. Attached hereto as Exhibit V is a true and correct copy of flight information from Los Angeles, California (LAX) to San Francisco, California (SFO), accessed on March 22, 2022.

23. Attached hereto as Exhibit W is a true and correct copy of flight information from Los Angeles, California (LAX) to Waco, Texas (ACT), accessed on March 22, 2022.

24. Attached hereto as Exhibit X is a true and correct copy of photos of Jawbone Innovations, LLC's alleged office at 2226 Washington Avenue, Suite Number 1, Waco, Texas 76701.

25. Attached hereto as Exhibit Y is a true and correct copy of the Lex Machina Western District of Texas Report for District Judge Alan D. Albright.

26. Attached hereto as Exhibit Z is a true and correct copy of the Lex Machina Northern District of California Report.

27. Attached hereto as Exhibit AA is a true and correct copy of the Northern District of California notice that "All Jury Trials Suspended Through January 26, 2022," retrieved from <https://cand.uscourts.gov/announcements/all-jury-trials-suspended-through-january-26-2022/> on February 23, 2022.

28. Attached hereto as Exhibit AB is a true and correct copy of a February 23, 2022 Law360 article by Bonnie Eslinger entitled "Sutter's Market Dominance Hiked Premiums \$411M, Jury Told."

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 2, 2022 in Needham, MA.

/s/ Qiuyi Wu
Qiuyi Wu