

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

AIRE TECHNOLOGY, LTD.)	
)	
Plaintiff,)	
)	Case No. 6:21-cv-01101-ADA
v.)	
)	
APPLE INC.,)	
)	
Defendant.)	
)	
)	
)	

**DECLARATION OF CASSANDRA ROTH IN SUPPORT OF
DEFENDANT’S MOTION TO TRANSFER VENUE**

I, Cassandra Roth, declare as follows:

1. I am admitted to this Court *pro hac vice*, and I am an associate of the law firm of Ropes and Gray LLP, counsel of record for Defendant Apple Inc. in this action.
2. Attached as Exhibit A is a true and correct copy of the results of a search for “Aire Technology” as a taxable entity in Texas using the search functionality on the Texas’ Secretary of State website at <https://mycpa.cpa.state.tx.us/coa/coaSearchBtn>, accessed on March 23, 2022.
3. Attached as Exhibit B is a true and correct copy of the patent assignment of the Asserted Patents from Giesecke+Devrient Mobile Security GmbH to Aire Technology Limited executed on September 13, 2021, which was obtained from the U.S.P.T.O’s Patent Assignment database.

4. Attached as Exhibit C is a true and correct copy of NXP's "NXP in the United States" website, available at <https://www.nxp.com/company/about-nxp/worldwide-locations/united-states:USA>, last accessed on March 23, 2022.

5. Attached as Exhibit D is a true and correct copy of U.S. Patent No. 7,827,115, entitled "Online Payer Authentication Service," issued on November 2, 2010, which was obtained from the USPTO's Public Patent Application Information Retrieval ("Public PAIR") system.

6. Attached as Exhibit E is a true and correct copy of U.S. Patent Publication No. 2006/0229998, entitled "Payment Via Financial Service Provider Using Network-Based Device," which was obtained from the USPTO's Public Patent Application Information Retrieval ("Public PAIR") system.

7. Attached as Exhibit F is a true and correct copy of an assignment agreement assigning the application published as U.S. Patent Publication No. 2006/0229998 from eBay, Inc. to Paypal, Inc, executed on July 17, 2015, which was obtained from the U.S.P.T.O's Patent Assignment database.

8. Attached as Exhibit G is a true and correct copy of a Visa Inc.'s Form 10-K Annual Report for the year ending September 30, 2021, which was obtained from the Security and Exchange Commission's EDGAR database.

9. Attached as Exhibit H is a true and correct copy of eBay Inc.'s "Contact Us" webpage, available at <https://www.ebayinc.com/company/contact-us/>, last accessed on March 23, 2022.

10. Attached as Exhibit I is a true and correct copy of Kevin Weller's LinkedIn page, available at <https://www.linkedin.com/in/kevin-weller>, last accessed on March 23, 2022.

11. Attached as Exhibit J is a true and correct copy of Tony Lewis's LinkedIn page available at <https://www.linkedin.com/in/tdlewis/>, last accessed on March 23, 2022.

12. Attached as Exhibit K is a true and correct copy of Ben Dominguez's LinkedIn page, available at <https://www.linkedin.com/in/ben-dominguez-6bb48a6/>, last accessed on March 23, 2022.

13. Attached as Exhibit L is a true and correct copy of Mark Harrison's LinkedIn page, available at <https://www.linkedin.com/in/markharrison4/>, last accessed on March 23, 2022.

14. Attached as Exhibit M is a true and correct copy of Mauria Finley's LinkedIn page, available at <https://www.linkedin.com/in/mauriafinley/>, last accessed on March 23, 2022.

15. Attached as Exhibit N is a true and correct copy of U.S. Patent No. 6,150,948, entitled "Low-Power Radio Frequency Identification Reader," which was obtained from the USPTO's Public Patent Application Information Retrieval ("Public PAIR") system.

16. Attached as Exhibit O is a true and correct copy of WIPO PCT Publication No. WO 00/52866, entitled "Portable Electronic Charge and Authorization Devices and Methods therefor," which was obtained from WIPO's PATENTSCOPE system.

17. Attached as Exhibit P is a true and correct copy of Mohammad Anwar Khan's LinkedIn page, available at <https://www.linkedin.com/in/khanmx99/>, last accessed on March 23, 2022.

18. Attached as Exhibit Q is a true and correct copy of Gisela Meister's LinkedIn page, available at <https://www.linkedin.com/in/dr-gisela-meister-b0710350/?originalSubdomain=de>, last accessed on March 22, 2022.

19. Attached as Exhibit R is a true and correct copy of Klaus Finkenzeller's LinkedIn page, available at <https://www.linkedin.com/in/klaus-finkenzeller-a66448103/?originalSubdomain=de>, last accessed on March 22, 2022.

20. Attached as Exhibit S is a true and correct copy of Nigol Martin's LinkedIn page, available at <https://www.linkedin.com/in/nigolmartin/?originalSubdomain=de>, last accessed on March 22, 2022.

21. Attached as Exhibit T is a true and correct copy of Denny Brandl's LinkedIn page, available at <https://www.linkedin.com/in/denny-brandl-2257aa22/?originalSubdomain=de>, last accessed on March 22, 2022.

22. Attached as Exhibit U is a true and correct copy of German Patent No. DE 10 2018 001 565 A1, which was obtained from Espacenet.

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

Executed on April 13, 2022.

/s/ Cassandra Roth
CASSANDRA ROTH