

THE HONORABLE JAMES L. ROBART

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION**

CYWEE GROUP LTD.,

*Plaintiff,*

v.

HTC CORPORATION  
and  
HTC AMERICA, INC.,

*Defendants.*

CASE NO. 2:17-cv-00932-JLR

JURY TRIAL DEMANDED

**DECLARATION OF ARI B. RAFILSON**

**NOTE ON MOTION CALENDAR:  
MAY 4, 2018**

DECLARATION OF ARI B. RAFILSON  
CASE NO. 2:17-cv-932-JLR- 1

SHORE CHAN DEPUMPO LLP  
901 MAIN STREET, SUITE 3300  
DALLAS, TX 75202  
TELEPHONE: 214-593-9110

1 I, Ari B. Rafilson, declare as follows:

2 1. I am an attorney at Shore Chan DePumpo LLP and counsel of record for Plaintiff  
3 CyWee Group Ltd. (“CyWee”) in the above-captioned matter. I am over the age of 21 and  
4 competent to make this declaration. All the statements set forth herein are true and correct and  
5 are based upon my personal knowledge.  
6

7 2. CyWee has asserted the patents at issue in this case in seven other cases against the  
8 following parties: Apple Inc. (“Apple”) (Case No. 4-14-cv-01853, N.D. Cal.); Samsung  
9 Electronics Co. Ltd. et al (“Samsung”) (Case No. 2-17-cv-00140, E.D. Tex.); LG Electronics,  
10 Inc. et al (“LG”) (Case No. 3-17-cv-01102, S.D. Cal.); Huawei Technologies, Co., Inc.  
11 (“Huawei”) (Case No. 2:17-cv-00495, E.D. Tex.); Motorola Mobility LLC (“Motorola”) (Case  
12 No. 1-17-cv-00780, D. Del.); ZTE Corporation (“ZTE”) (Case No. 3-17-cv-02130, S.D. Cal.);  
13 and Google Inc (Case No. 1:18-cv-00571, D. Del.).  
14

15 3. So far, Apple has served 3,126 pages of invalidity contentions, including 140 alleged  
16 prior art references and twenty-four charts. Samsung has served 4,105 pages of invalidity  
17 contentions, including 83 alleged prior art references and 56 charts. Huawei has served 2,948  
18 pages of invalidity contentions, including 177 alleged prior art references and 64 charts.  
19 Motorola has served 4,216 pages of invalidity contentions, including 83 alleged prior art  
20 references and 56 charts. LG and ZTE have not yet served invalidity contentions and the case  
21 against Google was only filed on April 16, 2018. Further, the Defendants in the above-  
22 referenced case (collectively “HTC”) have served 2,536 pages of invalidity contentions.  
23  
24  
25  
26

DECLARATION OF ARI B. RAFILSON  
CASE NO. 2:17-CV-932-JLR-2

SHORE CHAN DEPUMPO LLP  
901 MAIN STREET, SUITE 3300  
DALLAS, TX 75202  
TELEPHONE: 214-593-9110

1 4. I declare under penalty of perjury under the laws of the United States that the foregoing  
2 is true and correct to the best of my knowledge.  
3

4 Dated: May 4, 2018

/s/ Ari B. Rafilson

Ari B. Rafilson

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  

---

DECLARATION OF ARI B. RAFILSON  
CASE NO. 2:17-cv-932-JLR- 3

SHORE CHAN DEPUMPO LLP  
901 MAIN STREET, SUITE 3300  
DALLAS, TX 75202  
TELEPHONE: 214-593-9110