

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CYWEE GROUP LTD.,

Plaintiffs,

v.

HTC CORPORATION, and HTC AMERICA,  
INC.,

Defendants.

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

**DECLARATION OF ALBERT SHIH IN  
SUPPORT OF HTC'S MOTION  
TO FILE UNDER SEAL**

**NOTE ON MOTION CALENDAR:  
JUNE 1, 2018**

HTC CORPORATION, and HTC AMERICA,  
INC.,

Third-Party Plaintiffs,

v.

STMICROELECTRONICS N.V.,  
STMICROELECTRONICS, INC., and CYWEE  
MOTION GROUP LTD.,

Third-Party Defendants.

JURY TRIAL DEMANDED

1 I, Albert Shih, declare as follows:

2 1. I am an attorney at Wilson Sonsini Goodrich & Rosati P.C., counsel of record for  
3 Defendants HTC Corporation (“HTC Corp.”) and HTC America, Inc. (“HTC America”)  
4 (collectively, “HTC”) in the above-referenced matter.

5 2. I submit this declaration in support of HTC’s Motion to File Under Seal. The  
6 matters set forth herein are based upon my personal knowledge, and if called as a witness, I  
7 could and would competently testify thereto.

8 3. The parties are still negotiating a stipulated protective order in this case.

9 4. I met and conferred with counsel for Plaintiff CyWee Group Ltd. Ari Rafilson on  
10 May 15, 2018, by phone regarding HTC’s motion to file under seal.

11 5. Attached hereto as Exhibit A is a true and correct unredacted copy of HTC’s  
12 proposed First Amended Complaint with information designated as highly confidential  
13 highlighted.

14 6. Attached hereto as Exhibit B is a true and correct copy of HTC’s proposed First  
15 Amended Complaint with proposed changes shown in redline with information designated as  
16 highly confidential highlighted.

17 7. Attached hereto as Exhibit C is a true and correct unredacted copy of an email  
18 chain between HTC and STM Asia regarding CyWee and its allegations of patent infringement  
19 against HTC.

20 8. Attached hereto as Exhibit D is a true and correct unredacted copy of HTC’s letter  
21 to STM Asia regarding indemnification for the Accused Products.

22 9. Attached hereto as Exhibit E is a true and correct unredacted copy of STM Inc.’s  
23 October 6, 2017 letter responding to HTC regarding indemnification for the Accused Products.

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1 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
2 and correct. Executed May 15, 2018, in Palo Alto, California.

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4 *s/ Albert Shih*

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5 Albert Shih  
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