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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

ANCORA TECHNOLOGIES, INC.

Plaintiff,

v.

APPLE, INC.,

Defendant.

APPLE, INC.

Counterclaimant,

ANCORA TECHNOLOGIES, INC.

Counterdefendant.

Case No. 2:10-cv-10045-AG-MLGx

DECLARATION OF JOHN P. RONDINI IN SUPPORT OF ANCORA'S OPPOSITION TO APPLE'S MOTION TO TRANSFER VENUE

Hearing Date: December 12, 2011
Time: 10:00 AM
Place: Courtroom 10D, Santa Ana
Judge: Hon. Guilford

I, JOHN RONDINI, declare as follows:

1. I am an associate at the law firm of Brooks Kushman PC. I am one of the attorneys representing Ancora Technologies, Inc. ("Ancora") in the above captioned litigation. I make this declaration in Opposition to Apple's Motion to Transfer.
2. Attached as Exhibit A is a true and correct copy of the February 2, 2009 Order Granting Microsoft's Motion to Transfer Venue in the previous Microsoft action.
3. Attached as Exhibit B is true and correct copy of a Declaration of Albert Saavedra.
4. Attached as Exhibit C is true and correct copy of a Declaration of Miki Mullor.
5. Attached as Exhibit D is a true and correct copy of the Apple's Initial Disclosures.
6. Apple has electronically produced over 10,000 pages of documents responsive to Ancora's document requests, including many technical documents and specifications detailing the design and operation of the accused devices.
7. Apple has also made the relevant source code of the accused devices available to Ancora for inspection at the offices of Apple's litigation counsel.
8. On November 16, 2011, I took the deposition of Michael Brouwer on behalf of Ancora.
9. Attached as Exhibit E is a true and correct copy of an email conversation and PowerPoint presentation between Ancora and the LA Times pertaining to the technology of the '941 Patent.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this 21st day of November, 2011 in Southfield, Michigan.



JOHN P. RONDINI