IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WACOH COMPANY, Plaintiff, v. ANALOG DEVICES, INC., ROBERT BOSCH LLC, KIONIX, INC., VTI TECHNOLOGIES, INC. and INVENSENSE, INC., Defendants.	)	C.A. No. 10-617-PD

SUPPLEMENTAL STATEMENT REGARDING DEFENDANTS' MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)

Pursuant to Local Rule 7.1.2(b), Defendants VTI Technologies, Inc. ("VTI") and InvenSense, Inc. ("InvenSense") respectfully submit this supplemental statement concerning their pending Motion to Transfer Venue Pursuant to 28 U.S.C. §1404(a) ("Motion") (D.I. 41) to notify the Court of recent activity that is relevant to the Motion.

On August 8, 2011, Defendant Robert Bosch ("Bosch") was dismissed from this action (D.I. 54). The Motion filed by VTI, InvenSense, and Bosch is still pending, and Bosch's dismissal further supports transferring this action to the Northern District of California. Wacoh has strenuously argued that Bosch's presence in this litigation supports a denial of the motion. In particular, Wacoh claimed that Bosch had a "long history of incorporation and litigation in Delaware" (D.I. 49 at 11), is headquartered in Illinois (*id.* at 2), and is "part of a huge, foreign conglomerate with offices around the world" (*id.* at 8). Wacoh's opposition also relies heavily on Bosch's alleged "admission" that "most of [Bosch's] employees, witnesses, documents and products relevant to the litigation are in Michigan." Putting aside that fact that many of Wacoh's

allegations are not based in fact, there can be no doubt that Wacoh's arguments concerning Bosch are irrelevant now that Bosch is no longer a party to this action.

Instead, the facts show that VTI and InvenSense have their operations and personnel entirely in California, which would make litigating thousands of miles away a burden on their respective business operations. Additionally, all of VTI's and InvenSense's potentially relevant documents, and nearly all of their witnesses are located in California. Thus, the convenience of the parties, which is among the most important factors in transfer analysis, greatly favors a transfer to California. *See Illumina, Inc. v. Complete Genomics*, C.A. No. 10-649, 2010 WL 4818083, at *3 (D. Del. Nov. 9, 2010). With no moving party having any presence outside of California, the Northern District of California is the more convenient forum for this action.

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September 2, 2011
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CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to:

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I further certify that I caused copies of the foregoing document to be served on September 2, 2011, upon the following in the manner indicated:

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