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 (RGA) **REDACTED – PUBLIC VERSION**

SECOND DECLARATION OF SCOTT SMYSER IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)

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Originally Filed: December 22, 2011
Redacted Version Filed: December 28, 2011

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SECOND DECLARATION OF SCOTT SMYSER IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)

I, Scott Smyser, declare as follows:

1. I am the Vice President and General Manager at VTI Technologies, Inc. ("VTI") and I submit this declaration based on personal knowledge. If called upon as a witness, I could and would competently testify to the truth of each statement herein.

2. I have been employed at VTI since February 2008 and have held my current position since that time.

3. VTI has conducted business in the Northern District of California since approximately 2008, shortly after I began working there. As I stated in my prior declarations, VTI has customers mainly in the western part of the United States, with many of those customers located within or near the Northern District of California and this has been the case since at least 2008.

4. I understand that Wacoh has accused VTI's SCC1300 and similar parts of infringing, and that VTI has denied infringement. The SCC1300 is a Combined

Gyroscope and 3-Axis Accelerometer. Prior to Wacoh's complaint being filed on July 20, 2010, VTI had offered for sale large quantities of the VTI SCC1300 within the Northern District of California.

5. Specifically, [redacted]

6. VTI's sales team also offered the SCC1300 and similar products to other companies in Northern California, including [redacted]

[redacted]

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: December 22, 2011

Scott Smyser

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 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 all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 28, 2011, upon the following in the manner indicated:

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