# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF DELAWARE**

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| WHERE 2 GET IT, INC. | § | |
| | § | |
| v. | § | C.A. No. 11-cv-175 GMS |
| | § | |
| GEOTAG, INC. | § | |
| | § | |

**DECLARATION OF LAWRENCE P. HOWORTH**

I, **Lawrence P. Howorth**, declare under penalty of perjury as follows:

1. My name is Lawrence P. Howorth. I am over the age of twenty-one (21) years, am competent to testify on the matters stated herein, have personal knowledge of the facts and statements in this declaration and declare that each of the facts is true and correct.

2. I am a resident of Plano, Texas.

3. I am the President and Chief Financial Officer of GeoTag, Inc.

4. Mr. John Veenstra is the primary named inventor of U.S. Patent No.5,930,474 (the "'474 patent"). He is also the Chief Executive Officer of GeoTag, and he resides in Plano, Texas. Mr. Veenstra has resided in Plano since December of 2007.

5. The other named inventors for the '474 patent are Joan Nagelkirk of Chicago, Illinois and Peter Dunworth of Pleasanton, California.

6. GeoTag is a Delaware corporation that is registered to do business in the State of Texas.

7. GeoTag's headquarters and sole office is located at 2591 Dallas Parkway, Ste 505, Frisco, Collin County, Texas 75034.

8. Substantially all of GeoTag's business activities, including meetings of GeoTag's Board of Directors, take place in the Eastern District of Texas.

9. GeoTag has no business activities, offices or employees in Delaware.

10. The totality of GeoTag's electronic documents that concern the '474 patent or that could possibly be construed as relevant to this action, reside in GeoTag's office in Frisco, Texas.

11. GeoTag's hardcopy documents that concern the '474 patent or that could possibly be construed as relevant to this action, reside in GeoTag's office in Frisco, Texas and/or in the offices of GeoTag's counsel in Houston, Texas and Longview, Texas.

12. GeoTag has no documents that concern '474 patent, or that could possibly be construed as relevant to this action in Delaware.

13. On November 15, 2006, Geomas (International) Limited ("Geomas UK") filed a patent infringement suit in this Court alleging infringement of the '474 Patent. The case was styled Geomas (International) Limited, v. Idearc Media Services-West Inc., No. 2:06-cv-00475-CE. After approximately three years of litigation (which included a *Markman* order) and less than a month before trial, the case was settled.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in PLANO, TX on this 17th day of May, 2011.

Lawrence P. Howorth