IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MAZ ENCRYPTION TECHNOLOGIES LLC,	
	REDACTED PUBLIC VERSION
Plaintiff,	
	C.A. No. 13-306 (LPS)
v.	
	JURY TRIAL DEMANDED
HEWLETT-PACKARD COMPANY,	
Defendant.	

DECLARATION OF STUART D. ALLEN IN SUPPORT OF HEWLETT-PACKARD COMPANY'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA

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Attorneys for Defendant Hewlett-Packard Company

Dated: September 30, 2013

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FOR THE DISTRICT OF DELAWARE

MAZ ENCRYPTION TECHNOLOGIES LLC,	)	
	)	REDACTED PUBLIC VERSION
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-306 (LPS)
	)	
HEWLETT-PACKARD COMPANY,	)	**JURY TRIAL DEMANDED**
	)	
Defendant.	)	

DECLARATION OF STUART D. ALLEN IN SUPPORT OF HEWLETT-PACKARD COMPANY'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA

I, Stuart D. Allen, hereby declare:

1. I have personal knowledge of the facts set forth in this Declaration and, if called to testify as a witness, could and would do so under oath.

2. I am an attorney with the law firm Wilmer Cutler Pickering Hale and Dorr LLP, counsel to defendant Hewlett-Packard Company ("HP") in this matter. I provide this declaration in support of HP's Motion to Transfer Venue to the Northern District of California. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge or public records.

3. Attached as Exhibit A is a true and correct copy of MAZ Encryption Technologies LLC's certificate of formation.

4. In paragraph 1 of its first amended complaint, Plaintiff MAZ Encryption Technologies LLC states that Chris Mahne was the President of MAZ Technologies, Inc. and Stephen Zizzi was the Chief Technology Officer. According to the California Secretary of State's records, MAZ Technologies, Inc. was a California corporation with its principal place of business in Southern California (Marina del Rey). Attached as Exhibit B is a true and correct

copy of the business record for MAZ Technologies, Inc. from the California Secretary of State's website.

5. Attached as Exhibit C is a true and correct copy of the website of MAZ Technologies, Inc. as it appeared on September 5, 2013.

6. Attached as Exhibit D are public records that suggest that Zizzi resides in New York.

7. Attached as Exhibit E are public records that suggest that Mahne resides in Florida.

8. Attached as Exhibit F are websites indicating that attorney Steve C. Sereboff is located in Los Angeles (http://www.socalip.com/sereboff.html) and attorney John R. Kasha is located in Maryland (http://www.kashalaw.com/johnkasha). According to the patents-in-suit, it appears that these attorneys prosecuted the patents-in-suit. Roy L. Anderson is an additional prosecuting attorney for United States Patent No. 6,185,681, but HP has been unable to locate him.

9. Attached as Exhibit G are excerpted statistics from the 2007-2012 *Judicial Business of the United States Courts* annual reports.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on September 18, 2013 in Washington, D.C.

Stuart D. Allen