IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

DECLARATION OF DAVID C. YANG IN SUPPORT OF HEWLETT-PACKARD COMPANY'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA

I, David C. Yang, hereby declare:

1. I am a member of the State Bar of California and an attorney at the firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel to defendant Hewlett-Packard Company ("HP") in this matter. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. HP has not retained Mehmet Musa or Hemant Mittal in this matter.

3. Attached as **Exhibit A** is a true and correct copy of a patent assignment record dated October 29, 2012, retrieved from the website of the U.S. Patent and Trademark Office.

4. Attached as **Exhibit B** is a true and correct copy of a patent assignment record dated February 15, 2013, retrieved from the website of the U.S. Patent and Trademark Office.

5. Attached as **Exhibit C** is a true and correct copy of the Certificate of Formation of Empire IP LLC from the Secretary of State of Texas.

6. Attached as **Exhibit D** is a true and correct copy of a screenshot taken of the web page located at http://www.empireipllc.com/ (last visited October 24, 2013).

7. Attached as **Exhibit E** are true and correct copies of business entity records from the Secretary of State of Texas for DietGoal Innovations LLC; E-Contact Technologies LLC; LBS Innovations, LLC; Lennon Image Technologies LLC; Rotatable Technologies LLC; and SmartFit Solutions LLC. These records reflect that Timothy Salmon and Daniel Mitry are the members of each entity.

8. Attached as **Exhibit F** is a true and correct copy of results from PACER listing cases involving DietGoal Innovations, LLC.

9. Attached as **Exhibit G** is a true and correct copy of results from PACER listing cases involving E-Contact Technologies LLC.

10. Attached as **Exhibit H** is a true and correct copy of results from PACER listing cases involving LBS Innovations LLC.

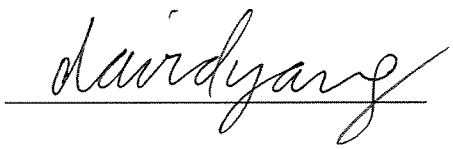
11. Attached as **Exhibit I** is a true and correct copy of results from PACER listing cases involving Lennon Image Technologies LLC.

12. Attached as **Exhibit J** is a true and correct copy of results from PACER listing cases involving Rotatable Technologies LLC.

13. Attached as **Exhibit K** is a true and correct copy of results from PACER listing cases involving SmartFit Solutions LLC.

14. Attached as **Exhibit L** is a true and correct copy of U.S. Patent No. 6,981,141.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on October 28, 2013 in Los Angeles, California.

By: 

David C. Yang

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2013, I caused to be served by electronic mail copies of the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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