IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. DOUBLE POWER TECHNOLOGY, INC., ZOWEE MARKETING CO., LTD., SHENZHEN ZOWEE TECHNOLOGY CO., LTD., Defendants.	)	C.A. No. 15-1130 (GMS)

DOUBLEPOWER TECHNOLOGY, INC.'S, ZOWEE MARKETING CO., LTD.'S, AND SHENZHEN ZOWEE TECHNOLOGY CO., LTD.'S
JOINDER IN THE JOINT MOTION TO DISMISS FOR IMPROPER VENUE

Pursuant to Fed. R. Civ. P. 12(b)(3), Defendants Double Power Technology, Inc., Zowee Marketing Co., Ltd., and Shenzhen Zowee Technology Co., Ltd. ("Defendants") hereby respectfully join in the Joint Motion to Dismiss for Improper for Inappropriate Venue filed in the related cases (e.g., D.I. 12 in C.A. No. 15-1125), on March 8, 2016. Due to slight differences in the parties, however, we will elaborate briefly on that issue.

Double Power is a California corporation with its principal place of business in Ontario, California. (Decl., of Rachel Leung ("DP Decl."), ¶ 2). All of its employees are in Ontario, California, which is within the Central District of California. (DP Decl., ¶ 14). Double Power purchases its products and receives them, indirectly, from Shenzhen Zowee. (DP Decl., ¶ 9). Double Power generally receives the products at ports or airports in San Francisco, Oakland, or Los Angeles, California, not Delaware. (DP Decl., ¶ 10). Double Power stores its products in Ontario, California. (DP Decl., ¶ 10). Double Power has received no revenues from sales—

including sales of the accused products in this action—or other operations within the State of Delaware between 2010 and 2016. (DP Decl., ¶15).

Zowee Marketing is a Hong Kong corporation with its principal place of business in Hong Kong. (Decl., of Wei Chen ("ZM Decl."), ¶ 2). Zowee Marketing does not sell or solicit business for the accused products in Delaware. (ZM Decl., ¶ 9). In fact, Zowee Marketing does not have any involvement whatsoever with the accused products. (ZM Decl., ¶ 8).

Shenzhen Zowee is a Chinese company with its principal place of business in Shenzhen. (Decl., of Eric Wu ("SZ Decl."), ¶ 2). Shenzhen Zowee designs and manufactures the products accused in this litigation, which are designed and manufactured in China, not Delaware. (SZ Decl., ¶¶ 8-9). Shenzhen Zowee does not sell or solicit business for the accused products in Delaware. (SZ Decl., ¶ 9).

For the foregoing reasons, Defendants respectfully request that the Court dismiss the Amended Complaint for improper venue.

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April 28, 2016

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2016, 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 April 28, 2016, upon the following in the manner indicated:

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