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

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

**DECLARATION OF RACHEL LEUNG IN SUPPORT OF DEFENDANT DOUBLE POWER TECHNOLOGY, INC.'S, MOTION TO DISMISS**

I, Rachel Leung, hereby declare that the following is true and correct:

1. I am an employee of Double Power Technology, Inc. ("Double Power"). I have been employed by Double Power for the last two years and my current title is accountant.

2. Double Power is a corporation organized and existing under the laws of the state of California, with its headquarters located in Ontario, California.

3. Double Power has no place of business and no employees in Delaware.

4. Double Power owns no real estate and maintains no bank accounts in Delaware.

5. Double Power is not registered to do business in Delaware.

6. Double Power has not appointed a registered agent for service of process in Delaware.

7. Double Power does not own or control any subsidiaries located in Delaware.

8. Double Power does not design or manufacture the products accused of infringement in this action (the "Accused Products") in Delaware. In fact, the Accused Products are neither designed nor manufactured in the United States.

9. Double Power purchases the Accused Products, indirectly, from Shenzhen Zowee Technology Co., Ltd ("Shenzhen Zowee").

10. Double Power generally receives the Accused Products at ports or airports in San Francisco, Oakland, and Los Angeles in California, not in Delaware.

11. Double Power does not store any of the Accused Products in Delaware. Double Power stores its products in one warehouse in Ontario, California.

12. Double Power does not advertise directly in Delaware.

13. After investigation, I am not aware of any employee of Double Power traveling to Delaware on behalf of Double Power.

14. None of the Double Power witnesses or documents relevant to this case are located in Delaware. Since Plaintiffs have served initial disclosures, infringement contentions, or discovery requests, it is difficult to identify particular witnesses at this stage. Nevertheless, the Double Power witnesses and documents relevant to this case will likely all be located in Ontario, California, because about 100% of Double Power's employees (including myself) are based in Ontario, California.

15. Double Power has received no revenues from sales or other operations within the state of Delaware between 2010 and 2016.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 27, 2016, in Ontario, California.

Rachel Leung