IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

DECLARATION OF WEI CHEN IN SUPPORT OF DEFENDANT ZOWEE MARKETING, CO., LTD.'S, MOTION TO DISMISS

I, Wei Chen, hereby declare that the following is true and correct:

1. I am an employee of Zowee Marketing Co., Ltd. ("Zowee Marketing") and my current title is Director.

2. Zowee Marketing is a company organized and existing under the laws of Hong Kong, with its headquarters located in Hong Kong.

3. Zowee Marketing has no place of business and no employees in Delaware.

4. Zowee Marketing owns no real estate and maintains no bank accounts in Delaware.

5. Zowee Marketing is not registered to do business in Delaware.

6. Zowee Marketing has not appointed a registered agent for service of process in Delaware.

7. Zowee Marketing does not own or control any subsidiaries located in Delaware.

8. Zowee Marketing has no involvement whatsoever with the products accused of

infringement in this action (the "Accused Products").

9. Zowee Marketing does not design, manufacture, sell, or deliver the Accused Products within the United States.

10. Zowee Marketing does not advertise directly in Delaware.

11. After investigation, I am not aware of any employee of Zowee Marketing traveling to Delaware on behalf of Zowee Marketing.

12. None of the Zowee Marketing witnesses or documents relevant to this case are located in Delaware. Since Plaintiffs have not served initial disclosures, infringement contentions, or discovery requests, it is difficult to identify particular witnesses at this stage. Nevertheless, the Zowee Marketing witnesses and documents relevant to this case will likely all be located in Hong Kong because 100% of Zowee Marketing's employees (including myself) are based in Hong Kong.

13. Zowee Marketing has derived no revenue from the sale of products in Delaware. Moreover, Zowee Marketing has not sold or shipped to customers in Delaware any of the Accused Products for at least the past six years (2010 to 2016).

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

