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

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

**DECLARATION OF ERIN WU IN SUPPORT OF DEFENDANT**
**SHENZHEN ZOWEE TECHNOLOGY, CO., LTD.'S, MOTION TO DISMISS**

I, Erin Wu, hereby declare that the following is true and correct:

1. I am an employee of Shenzhen Zowee Technology Co., Ltd. ("Shenzhen Zowee") I have been employed by Shenzhen Zowee for the last 3 years and my current title is Sales.

2. Shenzhen Zowee is a company organized and existing under the laws of China, with its headquarters located in Shenzhen.

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

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

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

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

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

8. Shenzhen Zowee 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. Shenzhen Zowee designs and manufactures the Accused Products in Shenzhen, China.

10. Shenzhen Zowee receives orders for the Accused Products, indirectly, from Double Power Technology Technology Inc., and, indirectly, coordinates delivery of those products to Double Power or third parties at its direction.

11. Shenzhen Zowee does not deliver any of the Accused to Delaware.

12. Shenzhen Zowee does not advertise directly in Delaware.

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

14. None of the Shenzhen Zowee 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 Shenzhen Zowee witnesses and documents relevant to this case will likely all be located in Shenzhen, China because 100% of Shenzhen Zowee 's employees (including myself) are based in Shenzhen.

15. Shenzhen Zowee has derived no revenue from the sale of products in Delaware. Moreover, Shenzhen Zowee 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 Shenzhen, China.

