

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JENAM TECH, LLC,

Plaintiff,

v.

LG ELECTRONICS, INC. and LG
ELECTRONICS MOBILCOMM U.S.A., INC.

Defendants.

Case No. 4:19-cv-00249-ALM-KPJ

**DECLARATION OF JUSEONG RYU IN SUPPORT OF DEFENDANT LG
ELECTRONICS INC. and LG ELECTRONICS MOBILCOMM U.S.A., INC.'S MOTION
TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, JuSeong Ryu, hereby declare as follows:

1. I am over 18 years of age and competent to make this declaration. If called to testify as a witness in this matter, I could and would testify truthfully to each of the statements in this declaration.

2. I am employed as a Senior Manager at LG Electronics Inc. I have been employed by LG Electronics Inc. since 1999.

3. LG Electronics MobileComm U.S.A., Inc. ("LGEMU") merged into LG Electronics U.S.A., Inc. ("LGEUS") effective August 1, 2018. Until the merger, LGEMU was a wholly-owned subsidiary of LGEUS. LG Electronics MobileResearch U.S.A., LLC ("LGEMR") is a wholly-owned subsidiary of LGEUS. LGEMR is a California company. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. I understand that Jenam Tech LLC ("Jenam") filed the above captioned patent infringement lawsuit against LG Electronics Inc. ("LGEKR") and LGEMU (collectively, "LG") in the United States District Court for the Eastern District of Texas ("EDTX"). I provide this declaration in support of LG's Motion to Transfer Venue to the Northern District of California ("Northern District"). Unless otherwise indicated below, the statements in this declaration are based on my personal knowledge, my review of corporate records maintained by LG in the ordinary course of business, and/or my discussions with employees.

5. I have reviewed a copy of the Complaint filed in this lawsuit. I understand that Jenam accuses LG of infringing two patents: U.S. Patent Nos. 9,923,995 (the “’995 patent”) and 9,923,996 (the “’996 patent”) (collectively, the “Asserted Patents”).

6. I understand that Jenam’s Complaint identifies the following products as allegedly infringing one or more of the Asserted Patents: (a) smartphones and tablets (e.g., LG V40 series, V35 series, G7 series, LG Gpad, G Pad X, G Pad II) (collectively, the “Accused Products”).

7. LG Electronics Inc. is a Korean corporation with a principal place of business in Seoul, Republic of Korea. LGEKR is responsible for designing, engineering, sourcing components, and manufacturing the Accused Devices. All of this work is done outside the United States, mostly in South Korea.

8. LGEMU was a California corporation with a principal place of business in New Jersey and offices in San Jose, California.

9. LGEKR makes consumer electronics products such as smartphones, tablets, and other devices.

10. [REDACTED]

[REDACTED]

[REDACTED]

11. I understand from the Complaint that Jenam alleges that certain Accused Products infringe the ’995 and ’996 patents. Complaint ¶¶ 19-20; 25-26. I also reviewed Exhibits C and D to the Complaint, which purport to show how the Accused Products infringe the Asserted Patents. It appears that Jenam alleges infringement based on technology relating to transmission control protocol (“TCP”) generally and Google’s implementation of the QUIC protocol (hereinafter “Google’s QUIC protocol”) and Google Chrome specifically.

12. It is my understanding that the primary design, development, and implementation of Google's QUIC protocol and Google Chrome was done by Google.

13. [REDACTED]

14. [REDACTED]

15. [REDACTED]

16. [REDACTED]

17. [REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. [REDACTED]

[REDACTED]

20. [REDACTED]

21. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on November 14, 2019, in Seoul, Republic of Korea.

JuSeong Ryu

JuSeong Ryu