

CHRISTOPHER L. EVANS
chris@offorevans.com
OFFOR EVANS PLLC
1122 Jackson Street, Ste 901
Dallas, TX 75202
Telephone: 1(214) 394-6779

MICHAEL W SHORE
mshore@shorefirm.com
THE SHORE FIRM LLP
5646 Milton Street, Ste 423
Dallas, TX 75206
Telephone: 1(214) 593-9140
Facsimile: 1(214) 593-9111

Attorneys for Defendants
CM HK, Ltd. and CyWee Group Ltd.

JAMES L. JACOBS
jjacobs@gcalaw.com
VALERIE MARGO WAGNER
vwagner@gcalaw.com
GCA LAW PARTNERS LLP
2570 W. El Camino Real, Suite 400
Mountain View, CA 94040
Telephone: 1(650) 428-3900
Facsimile: 1(650) 428-3901

Attorneys for Defendants
CM HK, Ltd. and CyWee Group Ltd.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

SAMSUNG ELECTRONICS CO. LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,
Plaintiffs,
v.
CM HK, LTD. AND CYWEE GROUP
LTD.,
Defendants.

Case No. 4:24-CV-06567-JST

**DECLARATION OF DR. SHUN-NAN
LIOU IN SUPPORT OF CM HK
LTD.'S REPLY IN SUPPORT OF ITS
MOTION TO DISMISS**

1 I, Shun-Nan Liou, declare as follows:

2 1. I am over the age of 21 and competent to make this declaration.

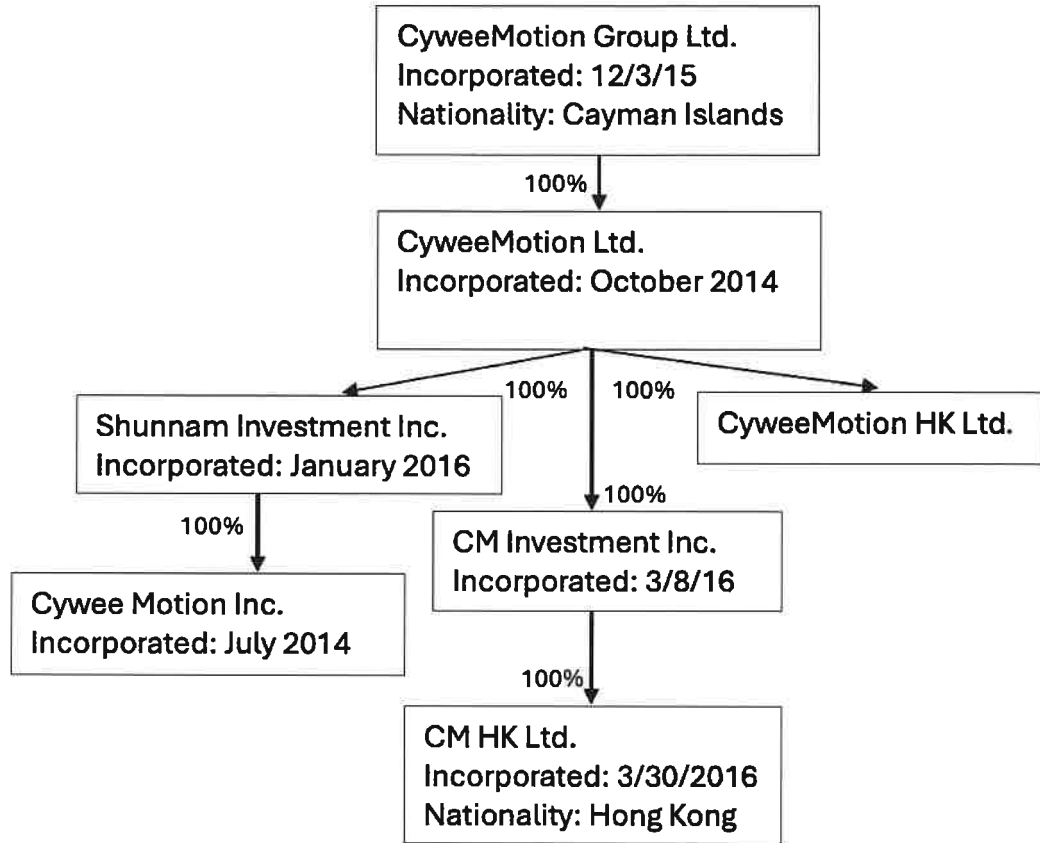
3 2. All the statements set forth herein are true and correct and are based upon my
4 personal knowledge.

5 3. CyweeMotion HK Limited and CM HK have never had joint ownership of any
6 patents, that phrase was included by mistake in the assignment dated 3/29/2017 that was
7 filed at the USPTO. This mistake was corrected in the assignment dated 3/31/2017 and
8 attached as **Exhibit 2** to my declaration dated 1/26/25.

9 4. The Form of Recordable Patent Assignment and Reservation dated 3/1/2016
10 between CyWee Group Ltd. and CyweeMotion HK Ltd. states that "ASSIGNOR(S) hereby
11 reserve(s) and retain(s), for the benefit of himself/themselves and his/their subsidiaries and
12 their successors and assigns, the rights and licenses set forth in the Patent Assignment
13 Agreement." The Patent Assignment Agreement referenced in that document was not
14 executed until 3/28/2016 and is the agreement attached as **Exhibit 1** to my declaration
15 dated 1/26/25.

16 5. There are no additional assignments or other agreements that convey any rights to the
17 U.S. Patents Nos. 10,275,038 ("the '038 Patent"), 10,817,072 ("the '072 Patent"),
18 10,852,846 ("the '846 Patent"), and 11,698,687 ("the '687 Patent") (collectively, "Patents-
19 at-Issue") other than those presented in this briefing.

20 6. CyweeMotion Group Ltd. is the umbrella company for the entire CyweeMotion
21 business group which includes all the following companies:
22
23
24
25
26
27
28



7. I am the CEO of the entire CyweeMotion group, so I am also CEO of each of these entities.

8. CyWee Group Ltd. is not a part of the CyweeMotion group and has not been since it spun the business unit off in 2014, other than as a minority owner.

9. CM HK Ltd. does not share any employees with CyWee Group Ltd.

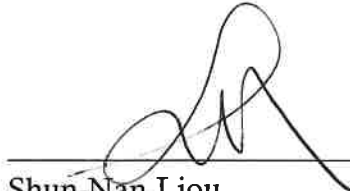
10. CM HK Ltd. does not share offices with CyWee Group Ltd.

11. None of the companies in the Cyweemotion group share any employees or offices with CyWee Group Ltd.

12. CM HK Ltd. and all the other companies in the CyweeMotion group operate independently of CyWee Group Ltd.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

1
2 Dated: February 17, 2025

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Shun-Nan Liou