

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

RAFQA STAR, LLC,
Plaintiff,

v.

GOOGLE LLC,
Defendant.

Case No. 6:22-cv-1207-ADA

JURY TRIAL DEMANDED

**DECLARATION OF PETER TAN IN SUPPORT OF GOOGLE'S MOTION TO
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

PUBLIC VERSION

GOOGLE EXHIBIT 1013
Google LLC v. Valtrus Innovations Limited
IPR2026-00262

[REDACTED]

I, Peter Tan, declare and state as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to the information contained herein.

2. I am a Senior Staff Software Engineer at Google LLC ("Google") and Technical Lead and Manager of the AR Experiences team. I have been a Google employee working on location-based AR technology since 2016. My office is at Google's headquarters, which is located in Mountain View, California.

3. My team and I are currently responsible for the research, design, development, and implementation of the Augmented Reality ("AR") Walking Navigation feature of Google Maps Live View, which is also called Navigate with Live View. My team comprises [REDACTED] who directly report to me, of which [REDACTED] report to one of Google's Northern California offices (in Mountain View and San Francisco). [REDACTED] works remotely in California, and [REDACTED] reports to Google's Tokyo, Japan office.

4. Of the [REDACTED] (Seung Woo Shin and Iker Jamardo) [REDACTED] Mr. Shin and his team work on the AR Walking Navigation feature of Google Maps Live View. Mr. Jamardo and his team do not.

5. Mr. Shin reports to Google's Mountain View office. His team comprises 6 employees who directly report to him, of which 5 report to one of Google's Northern California offices and 1 reports to Google's Austin, Texas office.

6. The team members on Mr. Shin's team with history with and knowledge about the AR Walking Navigation feature of Google Maps Live View include:

- a. Mr. Shin, who is the Team Lead for the AR Walking Navigation feature of Google Maps Live View and works on the research, design, development,

[REDACTED]

and implementation of both consumer-side and data-side features of AR Walking Navigation. Mr. Shin reports to Google's Mountain View office.

- b. Sam McDonald, who is a Senior Software Engineer and works on the research, design, development, and implementation of the AR Walking Navigation feature of Google Maps Live View on iOS. Mr. McDonald reports to Google's San Francisco office.
- c. Ellie Li, who is a Software Engineer and works on the research, design, development, and implementation of the AR Walking Navigation feature of Google Maps Live View on Android. Ms. Li reports to Google's Mountain View office.

7. Ningyuan Wang is the member of Mr. Shin's team who reports to Google's Austin, Texas office. Prior to July 2022, he reported to Google's Mountain View office. Mr. Wang does not have any unique knowledge of the research, design, development, and implementation of the AR Walking Navigation feature of Google Maps Live View that I, or the other members of Mr. Shin's team, do not have.

8. I am familiar with Mr. Shin, Mr. McDonald, Ms. Li, and Mr. Wang's work responsibilities because I [REDACTED] Mr. Shin and [REDACTED] [REDACTED] Mr. McDonald, Ms. Li, and Mr. Wang.

9. As part of my work, I also regularly work and communicate with individuals [REDACTED] [REDACTED] who are involved with, or have been involved with, the research, design, development, and implementation of the AR Walking Navigation feature of Google Maps Live View. These individuals are identified below.

- a. I work with Marek Gorecki, who is an Engineering Lead of Live View, Maps, and Street View. Mr. Gorecki was one of the employees responsible

[REDACTED]

for the research, design, development, and implementation of the AR Walking Navigation feature of Google Maps Live View. Mr. Gorecki reports to Google's Mountain View office.

- b. I also work with Eric Lai, who is a Group Product Manager of the AR Walking Navigation feature of Google Maps Live View. Mr. Lai reports to Google's Mountain View office.
- c. I also work with Justin Quimby, who is a Group Product Manager of Google Maps Live View and was a Product Manager of the AR Walking Navigation feature of Google Maps Live View. Mr. Quimby reports to Google's Mountain View office.
- d. I also work with Steven Toh, who is a UX Lead on the AR/VR team. Mr. Toh is responsible for the User Experience ("UX") design of the AR Walking Navigation feature of Google Maps Live View. Mr. Toh reports to Google's San Francisco office.
- e. I also work with Andre Le, who is a UX Lead on the Views team. Mr. Le was responsible for the UX design of the AR Walking Navigation feature of Google Maps Live View. Mr. Le currently reports to Google's New York office. [REDACTED] Mr. Le reported to Google's Mountain View office.
- f. I am also aware of Rachel Inman, who is a prior UX Lead on the Live View team. Ms. Inman was responsible for the UX design of the AR Walking Navigation feature of Google Maps Live View. Ms. Inman currently reports to Google's New York office, [REDACTED] Prior to that, Ms. Inman reported to Google's Mountain View office, where she did

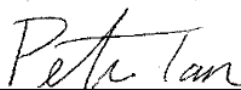
[REDACTED]

the majority of her UX design work for the AR Walking Navigation feature of Google Maps Live View.

10. As a matter of Google practice, documents about its products and services are normally created and maintained by the employees working on those products and services.

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

Executed on March 10, 2023, at Mountain View, California.

A handwritten signature in cursive script, appearing to read "Peter Tan", is written over a horizontal line.

Peter Tan