IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

Valtrus Innovations Ltd.	§	
Plaintiff	§	
v.	§	CIVIL ACTION NO. 2:24cv21
SAP America, Inc. and SAP, SE.	§	JURY TRIAL DEMANDED
Defendants.	§	

DECLARATION OF ANGELA QUINLAN IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER

I, Angela Quinlan, declare as follows:

1. I make this declaration based upon my personal knowledge and my investigation of the facts below. If called as a witness, I could and would testify competently to the matters set forth herein. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motion for Intra-District Transfer.

2. I have been the Managing Member of Valtrus Innovations, Ltd. ("Valtrus") since October 23, 2020. I am also Managing Director of Key Patent Innovations, Ltd. ("KPI"), which is Valtrus's parent entity. I reside in Wicklow, Ireland.

3. Valtrus is an Irish entity duly organized and existing under the laws of the Republic of Ireland. Valtrus's principal place of business is at The Glasshouses GH2, 92 Georges Street Lower, Dun Laoghaire, Dublin A96 VR66, Ireland.

4. Valtrus is a wholly-owned subsidiary of KPI (another Irish entity having a principal place of business at The Glasshouses GH2, 92 Georges Street Lower, Dun Laoghaire, Dublin 6 A96 VR66, Ireland). KPI does not have employees in the United States.

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5. KPI contracts with Patent Platform Services LLC ("PPS")—a Delaware-organized entity with a principal place of business in Frisco, Texas-to provide patent licensing and consulting services to Valtrus.

6. Valtrus is the successor-in-interest to a substantial portfolio of patents that it acquired in early 2021 from Hewlett-Packard Enterprise ("HPE"), which includes the patents-in-suit.

7. Valtrus has no employees in the United States.

8. Valtrus operates a secure, invitation-only Sharepoint space to store all of its documents. I set up the Valtrus Sharepoint and manage all aspects of the space, including the provision of access to the various folders and documents. As part of my management of the Valtrus Sharepont, I have provided various PPS employees access to certain documents and folders on the Valtrus Sharepoint as needed to facilitate PPS's ability to represent Valtrus's licensing interests.

9. Valtrus's documents are not available in the Sherman Division.

10. I have knowledge regarding Valtrus's business, acquisition of the HPE patent portfolio, licensing of the HPE portfolio and pre-suit negotiations with SAP.

11. Should I be required to travel to attend trial in the United States I would likely be flying from my home in Dublin, Ireland. I would not find it more inconvenient to travel to the Marshall Division than the Sherman Division in connection with this litigation.

12. Future productions of Valtrus documents would likely be collected and produced to Valtrus's outside counsel from Ireland.

13. All of Valtrus's patents were acquired from HPE and all of the asserted patents in the above-captioned action are from the HPE portfolio.

* * *

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

Executed on May 30, 2024

Angela Quinlan