

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

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

SAGEMCOM BROADBAND SAS,

Defendant.

C.A. NO. 2:25-CV-00379-RWS-RSP

DECLARATION OF THIBAUT DECOUDUN (SAGEMCOM)

I, Thibault Decoudun, hereby declare as follows:

1. I am over the age of 18 and am competent to make this Declaration. Except as otherwise indicated, all facts set forth in this Declaration are based on my personal knowledge, information provided to me by Sagemcom Broadband SAS (“Sagemcom France”), or my personal review of the books and records of Sagemcom France that are kept in the ordinary course of business.

2. Sagemcom France is a technology company that offers products and solutions across a range of industries, including energy, broadband, and audio-video. It is a corporation organized under the laws of France, with its principal place of business at 4 Allée des Messageries, 92270 Bois-Colombes, France.

3. I am employed as Group Chief Operations Officer at Sagemcom France. I first began working for Sagemcom France in approximately April 2009.

4. I understand that the plaintiff in this case has accused Sagemcom France of infringement based on sales in the United States of a product known as DGCI384.

THE FRENCH SAGEMCOM PARENT COMPANY

5. Most Sagemcom France employees, including the engineers responsible for the design of the Sagemcom DGCI384 product, reside in France. Sagemcom France has no active employees in the United States.

6. Sagemcom France does not own or lease any property in the United States and does not have any offices in the United States. Sagemcom France does not sell or distribute its products to customers in the United States.

7. This means that Sagemcom France does not have any place of business in the Eastern District of Texas, much less a regular and established one. In fact, Sagemcom France does not have any active employees or agents or any facilities located in the Eastern District of Texas or elsewhere in Texas. Likewise, none of Sagemcom France's officers, directors, or employees reside in Texas. On the very rare occasion when an employee of Sagemcom France moves to the United States, their employment with Sagemcom France is suspended and they become an employee of Sagemcom USA, LLC, a subsidiary discussed in more detail below.

8. Sagemcom France does not have any physical presence, operations, or assets in the Eastern District of Texas. Sagemcom France does not regularly conduct research or product development activities in Texas generally, much less with respect to the DGCI384 product specifically.

9. Sagemcom France does not sell or offer to sell its DGCI384 product in the Eastern District of Texas.

10. All manufacturing of the DGCI384 product occurs outside of the United States, in China, Indonesia, and Tunisia.

11. The relevant documents, records, and witnesses pertaining to the design, development, manufacturing, and operation of the accused products—including technical specifications, schematics, correspondence, and agreements—are maintained at Sagemcom France’s headquarters in France. Sagemcom France does not maintain any such documents in the Eastern District of Texas.

SAGEMCOM’S UNITED STATES SUBSIDIARY

12. Sagemcom USA, LLC (“Sagemcom USA”) is a wholly-owned subsidiary of Sagemcom Broadband SAS. Sagemcom USA is an independent and separate corporate entity from Sagemcom France. While Sagemcom France does not operate in the United States, Sagemcom USA has historically functioned as a sales office for certain Sagemcom products for USA-based customers.

13. Sagemcom USA, amongst other United States activities, is responsible for all sales, marketing, and distribution of Sagemcom products in the United States, employing sales representatives and other United States staff to do so.

14. I am aware of the operations of Sagemcom USA because, as a subsidiary of Sagemcom France, Sagemcom USA provides monthly financial reports to Sagemcom France. Also, my operations team in France sometimes interacts with Sagemcom USA teams for various business reasons. Additionally, I have educated myself on some of the facts for the purpose of this declaration.

15. Sagemcom USA is a limited liability company organized under the laws of Delaware, with its principal United States office located at 1301 West President George Bush Highway, Suite 300, Richardson, Texas 75080. I have never personally visited this office.

16. I have reviewed a map of the Eastern District of Texas, and Sagemcom USA's office is not in that District. Sagemcom USA has no operations, offices, or ownership interest in any property in the Eastern District of Texas.

17. In addition to its office in Richardson, Sagemcom USA also has an office in Denver, Colorado and has sales personnel who work remotely from Massachusetts, New York, Washington, Alabama, Pennsylvania, and Texas (specifically, in Austin and San Antonio).

18. In total, Sagemcom USA employs approximately forty people in the United States, none of whom are based in the Eastern Texas.

19. The sales team is overwhelmingly located outside the state of Texas, with only a small number of sales representatives in Texas (and most outside of Texas), and with four of five sales directors working in other states (and the fifth located in San Antonio).

20. In 2019 and 2020, Sagemcom USA made a small number of sales of the DGCI384 product to a customer in the United States. I have confirmed that no products were shipped by Sagemcom into the Eastern District of Texas as part of these sales.

21. That customer is not Comcast, and it is not Cox. Sagemcom USA does not sell its cable set-top box and DOCSIS gateway products to either Comcast or Cox.

22. To the best of my knowledge, Sagemcom USA imports the products that it sells through ports of entry in Los Angeles, California; Savannah, Georgia; and New York, New York.

23. Sagemcom USA was not involved in the design, development, or manufacturing of the DGCI384 product, nor does it employ the design engineers that support that product.

SAGEMCOM TRAVEL TO THE UNITED STATES

24. To the extent that Sagemcom France personnel must travel to the United States for hearings or trial in this matter, it is more convenient for myself and my colleagues to fly to Los

Angeles and drive to Orange County than to fly to Dallas and drive to Marshall or Texarkana. In my experience, flights to Los Angeles are generally more frequent (and often cheaper) than flights to Dallas, and the drive between the Los Angeles airport and Orange County is shorter than the drive from Dallas to Marshall or Texarkana.

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

Executed on August 8, 2025 in Bois-Colombes, France.

A handwritten signature in black ink, appearing to be 'Thibault Decoudun', written over a horizontal line.

Thibault Decoudun