

# EXHIBIT B

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

ROCKSTAR CONSORTIUM US LP,  
AND MOBILESTAR TECHNOLOGIES  
LLC,

Plaintiffs,

vs.

ASUSTEK COMPUTER, INC. AND  
ASUS COMPUTER INTERNATIONAL,

Defendants.

Civil Action No. 2:13-cv-894

**DECLARATION OF HAROLD H. DAVIS IN SUPPORT OF ASUSTEK COMPUTER  
INC. AND ASUS COMPUTER INTERNATIONAL'S  
MOTION TO TRANSFER, OR IN THE ALTERNATIVE, TO STAY**

I, Harold Davis, declare as follows:

1. I am a partner at K&L Gates LLP. I submit this declaration in support of Defendants' Motion to Transfer, or in the Alternative to Stay. I have personal knowledge as to the facts set forth in this Declaration, and would competently testify to them if called upon to do so.

2. Attached as Exhibit 1 to this declaration is a true and correct copy of the Seventy-First Report of the Monitor Dated July 6, 2011 filed in the Ontario Superior Court of Justice in the Bankruptcy matter of Nortel, Court File No. 09-CL-7950.

3. Attached as Exhibit 2 to this declaration is a true and correct copy of the Declaration of Kristin J. Madigan in support of (Google and Samsung) Defendants' Motion to Stay or, in the alternative, to transfer to the Northern District of California, filed on March 21,

2014 in case number 2:13-cv-00900-JRG (E.D. Tex), Dkt. No. 52-1, as well as the exhibits cited in that declaration.

4. Attached as Exhibit 3 to this declaration is a true and correct copy of a record from the Delaware Department of State, Division of Corporations, showing Rockstar Bidco GP LLC's incorporation in Delaware as of June 7, 2011.

5. Attached as Exhibit 4 to this declaration is a true and correct copy of the Texas Office of the Comptroller Franchise Tax Account Status record, as of March 25, 2014, showing Rockstar Consortium US LP's mailing address as 515 Legget Dr., Suite 300, Ottawa, Ontario, Canada.

6. Attached as Exhibit 5 to this declaration is a true and correct copy of a correspondence from Rockstar Consortium Inc. and Rockstar Consortium US LP showing an Ontario, Canada address and Canadian contact numbers. Also included in Exhibit 5 is a press release that was included in the original correspondence.

7. Attached as Exhibit 6 to this declaration is a true and correct copy of a website page from Weil Gotshal's website showing Mr. Kyle Krpata's connection with Apple's purchase of the Nortel patent portfolio.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed on March 25, 2014, at San Francisco, California.

/s/ *Harold H. Davis*  
Harold H. Davis