

EXHIBIT B

WIRELESS RECOGNITION
TECHNOLOGIES LLC,

Plaintiff,

vs.

A9.COM, INC., AMAZON.COM, INC.,
GOOGLE INC., NOKIA, INC., and
RICOH INNOVATIONS, INC.,

Defendants.

WIRELESS RECOGNITION
TECHNOLOGIES LLC,

Plaintiff,

vs.

A9.COM, INC., AMAZON.COM, INC.,
GOOGLE INC., NOKIA, INC., and
RICOH INNOVATIONS, INC.,

Defendants.

I, David Petrou, declare:

1. I am currently employed at Google Inc., where I have been employed continuously since 2006. I provide this declaration in support of Defendants' joint motion to transfer this case from the Eastern District of Texas to the Northern District of California. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge and investigation or upon corporate records maintained by Google in the ordinary course of business. I am over 18 years of age and if called upon to testify in this matter, would affirm the truthfulness of each statement.

2. I understand that Wireless Recognition Technologies, LLC has accused two Google applications, Google Goggles and Google Shopper, of patent infringement.

3. Google is a Delaware corporation with its headquarters and principal place of business in Mountain View, California, which is located in the Northern District of California.

4. My position at Google is Staff Engineer, and I am the Technical Lead Manager for the Google Goggles application, which is one of the two Google applications accused of infringement in this action.

5. Google Goggles is an application that was developed at Google. The Google employees responsible for the development of the software for that application include: Matt Casey and Ashkot Popat, who are employed in and reside near Google's Mountain View, California office; Neven Hartnut, who is employed in and resides near Google's Santa Monica, California office; and myself. I am employed in and reside near Google's New York, New York office. These same employees are also responsible for the continued development of the Google Goggles product.

6. I am unaware of any individuals that reside or work in Texas that were responsible for the development of the Google Goggles application or that are knowledgeable about the development of that application.

7. The records, source code, and other materials concerning the Google Goggles application are located in Mountain View, California; Santa Monica, California; or New York, New York. I am unaware of any such materials that are located in Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17 day of March, 2011 at New York, New York.

A handwritten signature in blue ink, appearing to read "David Petrou", is written over a horizontal line.

David Petrou