

EXHIBIT D

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

WIRELESS RECOGNITION)	
TECHNOLOGIES LLC,)	
)	CIVIL NO. 2:10-CV-00364-TJW-CE
Plaintiff,)	
)	
vs.)	JURY TRIAL DEMAND
)	
A9.COM, INC., AMAZON.COM, INC.,)	
GOOGLE INC., NOKIA, INC., and)	
RICOH INNOVATIONS, INC.,)	
)	
Defendants.)	
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**DECLARATION OF G.D. RAMKUMAR
IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER**

I, G.D. Ramkumar, declare:

1. I am the Chief of Architecture, Visual Search, at A9.com, Inc. I submit this declaration based on my personal knowledge and on information provided to me in the course of my employment.

2. A9.com, Inc. ("A9") is headquartered and maintains its principal place of business in Palo Alto, California. The majority of A9's employees are located in Palo Alto. A9 is a wholly owned and operated subsidiary of Amazon.com, Inc.

3. I understand that Wireless Recognition Technologies, LLC has accused A9's SnapTell application of patent infringement. I also understand that the Amazon Remembers and Price Check features of Amazon's mobile applications have also been accused of infringement.

4. The SnapTell application was originally developed by SnapTell, Inc. ("Snaptell"). I co-founded SnapTell along with Gautam Bhargava in April 2006. I served as the Chief Technology Officer (CTO), and Gautam served as the Chief Executive Officer (CEO). SnapTell's headquarters and employees (including those responsible for software development) were located in Palo Alto, California.

5. SnapTell was acquired by A9 in 2009. In connection with the acquisition, the core development team for the SnapTell application joined A9. The employees responsible for the continued development of the SnapTell application work in A9's Palo Alto office.

6. Some of the A9 employees knowledgeable about the development and functionality of the SnapTell application include: Gautam Bhargava (Vice President of Visual Search); Keshav Menon (Software Development Engineer); and Arnab Dhua (Software Development Engineer). These individuals all work at A9.com's Palo Alto office and live in Northern California.

7. Nearly all of the records, source code, and other materials concerning the SnapTell application (and the former SnapTell corporation) are located in Palo Alto, California.

8. The accused Amazon Remembers and Price Check features of Amazon's mobile applications use the same underlying visual search engine as the accused SnapTell application. Therefore, the records, source code, and other materials discussed in paragraph 8 above and located in Palo Alto, California, also relate to the accused Amazon features, and the A9 employees familiar with those features are also located in Palo Alto, California. The Amazon.com employees familiar with the other features of the Amazon mobile applications are located in the Seattle, Washington area.

9. I am not aware of any A9 or Amazon.com facilities or employees within the Eastern District of Texas that are responsible for or knowledgeable about the development of accused SnapTell or Amazon features.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9 day of March, 2011 at Palo Alto, California.



G.D. Ramkumar