

# EXHIBIT E

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

\_\_\_\_\_  
WIRELESS RECOGNITION  
TECHNOLOGIES LLC,

Plaintiff,

v.

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

Defendants.  
\_\_\_\_\_

)  
)  
)  
) Civil Action No. 2:10-CV-364 TJW-CE  
)  
)

**JURY TRIAL DEMANDED**

**DECLARATION OF KEVIN RIDOUT IN SUPPORT OF DEFENDANTS MOTION TO  
TRANSFER TO THE U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA PURSUANT TO 28 U.S.C. §1404(A)**

I, Kevin Ridout, hereby declare and state as follows:

1. I am employed as Chief Financial Officer for Ricoh Innovations, Inc. (“RII”), a defendant in the above-captioned litigation. I have personal knowledge of the facts set forth below and am competent to testify on the matters stated herein.

2. I have been employed with RII since April 1, 1997.

3. RII is incorporated in California, and its principal place of business is at 2882 Sand Hill Road, Suite 115, Menlo Park, California 94025. Menlo Park is located within the jurisdiction of the U.S. District Court for the Northern District of California.

4. RII has three facilities, all of which are located within the jurisdiction of the U.S. District Court for the Northern District of California – in Menlo Park, Cupertino, and San Jose, California.

5. I understand that Plaintiff Wireless Recognition Technologies LLC’s complaint in this case, which was filed in the U.S. District Court for the Eastern District of Texas, alleges that RII’s French Rev and DriveTube beta applications infringe a patent that Plaintiff allegedly owns.

6. All of the individuals involved in the design or development of one or both of RII’s accused applications are located either in the Northern District of California or outside the U.S. The individuals located in the Northern District of California are identified below. The individuals outside the U.S. are programming consultants resident in Costa Rica or Peru who help develop iPhone applications. None of the individuals that have been involved in the design or development of either of the accused applications are located in the Eastern District of Texas.

Name	Relationship with RII	Title	Role in Design/Development	Location
Jonathan Hull	Employee	Research Manager	Managed project until May 2010	N.D. Cal.
Jamey Graham	Employee	Distinguished Research Engineer	Designed and developed FrenchRev and DriveTube	N.D. Cal.
Jorge Moraleda	Employee	Senior Research Scientist	Developed recognition system	N.D. Cal.
Timothee Bailloeuil	Employee	Research Scientist	Helped develop recognition system	N.D. Cal.
Xu Liu	Former Employee	Research Scientist	Recognition system research	N.D. Cal.
Michael Hill	Consultant	Programmer	Helped develop web back end	N.D. Cal.
Michael Simbirsky	Consultant	Programmer	Helped develop recognition system	N.D. Cal.

7. The documents relevant to the development, functionality, operation, and maintenance of the French Rev and DriveTube applications are located in the Northern District of California or outside the U.S.

8. The source code for the French Rev and DriveTube applications is located in Menlo Park, California.

9. Marketing and financial information relating to the French Rev and DriveTube applications is located in Menlo Park, California.

10. RII does not have any offices or other facilities within the Eastern District of Texas.

11. On January 18, 2011, RII hired a salesperson who is located in the Eastern District of Texas, but his activities do not relate to the French Rev and DriveTube applications. Before RII hired this person, RII did not have any employees located in the Eastern District of Texas.

12. RII has not developed any products in the Eastern District of Texas.

13. RII is a subsidiary of Ricoh Company, Ltd. As a subsidiary, RII is a legal entity separate and distinct from Ricoh Company, Ltd.

14. Ricoh Company, Ltd. does not have any offices or other facilities within the Eastern District of Texas.

15. Ricoh Company, Ltd. has no employees who reside in the Eastern District of Texas.

16. Ricoh Company, Ltd. does business in the United States only through its U.S. subsidiaries.

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

Executed on: March 14, 2011

Respectfully submitted,

By:



Kevin Ridout