

in this action, and all relevant documents and evidence are accessible from Google's headquarters in the Northern District.

4. Google has been headquartered in Northern California since its founding in 1998. It has been headquartered in Mountain View, California (located in the Northern District of California) since 2003.

5. Google's Mountain View headquarters is the strategic center of Google's business. Google's Chief Executive Officer and President are based in Mountain View, California. Decisions related to Google's overall business are made in Mountain View, California, including the most significant engineering, sales, and marketing decisions related to Google's search engine and Google AdWords.

6. In April 2012, Google opened a small office to temporarily house a handful of employees in Frisco, Texas. None of the employees at this location work on any of the accused instrumentalities identified in the Complaint. Google has no other offices or facilities in the Eastern District of Texas. Google does maintain a small office in Austin, Texas (located in the Western District of Texas). The Google employees in the Austin office are not involved with the development or management of Google's search engine or AdWords, and are instead predominantly involved with Google's enterprise sales group.

7. The majority of the development work for Google's search engine and AdWords took place at Google's Mountain View headquarters. Google's ongoing development efforts, operations, and records regarding Google's search engine and AdWords are also predominantly based at the Mountain View headquarters. Google engineers with relevant technical knowledge of the search engine or AdWords are also predominantly located at these headquarters, as are Google employees familiar with relevant business and financial aspects of these products.

8. In addition, Graham Spencer, Ben Lutch, and Michael Burrows all currently work for Google at our Mountain View headquarters.

9. I am currently aware of no Google employees with relevant knowledge regarding Google's search engine or Google AdWords working in Google's facilities in Texas or in the Eastern District of Texas.

10. All or nearly all of the documents related to Google's search engine and Google AdWords are available in Mountain View, California, or are stored on Google's various secure servers, which are accessible and ultimately managed from Mountain View. These documents include technical documents related to Google's search engine and Google AdWords, as well as documents related to Google's operations, marketing, financials, and customer-service concerning these products. .

I declare under penalty of perjury that the foregoing is true and correct. Executed in Mountain View, California on Jan 9th, 2014.


