

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

Eolas Technologies Incorporated,

Plaintiff,

v.

Adobe Systems Inc., Amazon.com, Inc.,
Apple Inc., Blockbuster Inc., CDW Corp.,
Citigroup Inc., eBay Inc., Frito-Lay, Inc.,
The Go Daddy Group, Inc., Google Inc.,
J.C. Penney Company, Inc., JPMorgan
Chase & Co., New Frontier Media, Inc.,
Office Depot, Inc., Perot Systems Corp.,
Playboy Enterprises International, Inc.,
Rent-A-Center, Inc., Staples, Inc., Sun
Microsystems Inc., Texas Instruments Inc.,
Yahoo! Inc., and YouTube, LLC

Defendants.

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Civil Action No. 6:09-CV-00446-LED

JURY TRIAL

**DECLARATION OF PAUL VAN CAMP, VICE PRESIDENT,
PROPERTY MANAGEMENT OF DEFENDANT STAPLES, INC.**

I, Paul Van Camp, provide this declaration on behalf of Defendant Staples, Inc., and declare as follows on its behalf:

1. I have personal knowledge of the facts set forth herein. If called to do so, I could and would testify competently thereto.

2. I am employed by Staples, Inc. (hereinafter “Staples”). I make this declaration on behalf of Staples in support of the Joinder by Defendant Staples, Inc. in Motion to Transfer to the U.S. District Court for the Northern District of California Pursuant to 28 U.S.C. § 1404(a).

3. I joined Staples in 1998, and my current job title is Vice President, Property Management.

4. Staples is incorporated in the State of Delaware.
5. Staples is headquartered in the Commonwealth of Massachusetts with an address of 500 Staples Drive, Framingham, Massachusetts.
6. As of January 30, 2010, Staples operated a total of 2,243 retail stores in 48 states and the District of Columbia in the United States, in 10 provinces and 2 territories in Canada, and in 12 other foreign countries. Of the 2,243 retail stores, 1,555 were located in the United States.
7. As of May 19, 2010, Staples also had 325 non-retail facilities in the United States.
8. As of January 30, 2010, Staples operated 55 retail stores in the State of Texas. As of May 19, 2010, Staples also had 18 non-retail facilities in the State of Texas. As of the latter date, Staples had 11 retail stores and one non-retail facility in the Eastern District of Texas.
9. As of January 30, 2010, Staples operated 216 retail stores in the State of California. As of May 19, 2010, Staples also had 29 non-retail facilities in the State of California. As of the latter date, Staples had 39 retail stores and six non-retail facilities in the Northern District of California.

I declare the foregoing to be a true and correct statement and do so under the penalty of perjury on this 14th day of JUNE, 2010.


Paul Van Camp