

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

INNOVATIVE SONIC LIMITED,

Plaintiff,

v.

RESEARCH IN MOTION LTD. and
RESEARCH IN MOTION
CORPORATION,

Defendants.

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Civil Action No. 6:10-CV-455

Jury Trial Demanded

**DECLARATION OF LI CHEN IN SUPPORT OF DEFENDANTS' UNOPPOSED
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, Li Chen, hereby declare as follows:

1. I am a member in good standing of the bar of the State of Texas. I have been admitted to practice before this Court. I am a partner in the law firm of Sidley Austin LLP and have been retained as counsel for Defendants Research In Motion Limited ("RIM Limited") and Research In Motion Corporation ("RIM Corporation"). The following declaration is based on my personal knowledge. If called upon to testify, I could testify competently as to the matters set forth herein.

2. Attached as Exhibit 1 is a true and correct copy of a map and driving directions from RIM Corporation's headquarters in Irving, Texas to the courthouse for the United States District Court for the Northern District of Texas, Dallas Division, indicating that the driving

distance is approximately 12 miles. This document was retrieved from Mapquest.com on February 25, 2011.

3. Attached as Exhibit 2 is a true and correct copy of a map and driving directions from RIM Corporation's headquarters in Irving, Texas to the courthouse for the United States District Court for the Eastern District of Texas, Tyler Division, indicating that the driving distance is approximately 110 miles. This document was retrieved from Mapquest.com on February 25, 2011.

4. Attached as Exhibit 3 is a true and correct copy of a record from the American Airlines website (www.aa.com) showing that on a given day there are at least three different direct flight options airline from Ontario, Canada (Toronto International Airport, YYZ), the location of RIM Limited, to Dallas, Texas (Dallas/Forth Worth Airport, DFW). This document was retrieved from the American Airlines website on February 25, 2011.

5. Attached as Exhibit 4 is a true and correct copy of a record from the American Airlines website (www.aa.com) showing that on a given day there are several flight options from Taiwan (Taiwan Taoyuan International Airport, TPE), the location of Innovative Sonic Limited, to Dallas, Texas (Dallas/Forth Worth Airport, DFW). For travel on March 16, 2011, the quickest flight option has a travel time of about 17 hours (see highlighted option on Exhibit 4). This document was retrieved from the American Airlines website on February 25, 2011.

6. Attached as Exhibit 5 is a true and correct copy of a record from the American Airlines website (www.aa.com) showing that the quickest flight option for travel on March 16, 2011, from Taiwan (Taiwan Taoyuan International Airport, TPE) to Tyler, Texas (Tyler Pounds Field, TYR), has a total travel time of about 21 hours (see highlighted option on Exhibit 5).

7. Attached as Exhibit 6 is a true and correct copy of a record from the U.S. District Court's Judicial Caseload Profile Report for the 12-month period ending September 2010, available at <http://www.uscourts.gov/viewer.aspx?doc=/cgi-bin/cmsd2010Sep.pl>. This document was retrieved from the website above on March 11, 2011.

I declare under the penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

Dated this 16th day of March, 2011, at Dallas, Texas.

A handwritten signature in black ink, appearing to be 'Li Chen', written over a horizontal line.

Li Chen