

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AT&T INTELLECTUAL)	
PROPERTY I, L.P. and AT&T)	
INTELLECTUAL PROPERTY II,)	C.A. No.: 14-1106-GMS
L.P.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
COX COMMUNICATIONS, INC.,)	
<i>et al.</i> ,)	
)	
Defendants.)	

**DECLARATION OF STEPHANIE ALLEN-WANG IN SUPPORT OF COX'S
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, Stephanie Allen-Wang, hereby declare and state as follows:

1. I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated. I am competent to testify as to all matters stated, and if called upon to do so, I would testify to the facts set forth in this Declaration.
2. I am Intellectual Property counsel for the 32 Cox entities (collectively, "Cox" or the "Cox defendants") named as defendants in this action.¹

¹ The named defendants are Cox Communications, Inc., CoxCom, LLC, Cox Arkansas Telcom, LLC, Cox Communications Arizona, LLC, Cox Arizona Telcom, LLC, Cox California Telcom, LLC, Cox Communications California, LLC, Cox Colorado Telcom, LLC, Cox Connecticut Telcom, LLC, Cox District of Columbia Telcom, LP, Cox Florida Telcom, LP, Cox Communications Georgia, LLC, Cox Georgia Telcom, LLC, Cox Iowa Telcom, LLC, Cox Idaho Telcom, LLC, Cox Communications Kansas, LLC, Cox Kansas Telcom, LLC, Cox Communications Gulf Coast, LLC, Cox Communications Louisiana, LLC, Cox Louisiana Telcom, LLC, Cox Maryland Telcom, LLC, Cox Missouri Telcom, LLC, Cox Nebraska Telcom, LLC, Cox Communications Omaha, LLC, Cox Communications Las Vegas, Inc., Cox Nevada Telcom, LLC, Cox North Carolina Telcom, LLC, Cox Ohio Telcom, LLC, Cox Oklahoma Telcom, LLC, Cox Rhode Island Telcom, LLC, Cox Communications Hampton Roads, LLC, and Cox Virginia Telcom, LLC.

3. My current responsibilities include managing IP litigations involving Cox, negotiating licenses and settlements in IP cases, and intellectual property portfolio development.

4. Cox is a privately-owned telecommunications company providing digital cable television, data, digital telephony, and wireless services to millions of residential and business customers throughout the United States.

5. With the exception of Cox Virginia Telcom, LLC which is incorporated in Virginia, all of the other Cox defendants are incorporated in Delaware.

6. The principal place of business of all of the Cox defendants is Cox's headquarters in Atlanta. The technical teams and individuals responsible for implementing and maintaining Cox's accused cable modem system, cable television system, and digital voice system are based at Cox headquarters. For example, Steve Calzone (Director at Cox), Bruce Mcleod (Executive Director), and Jeff Finkelstein (Executive Director) are all likely to have technical information regarding the development, implementation, and/or operation of Cox's systems and components. Similarly, Sandy Mencher (Vice President) is likely to have relevant financial information.

7. Furthermore, Cox's documents relevant to this case are located in Atlanta, Georgia. Those documents include those concerning the functionality and structure of Cox's cable television, cable modem, and digital voice networks, as well as the components connected to those systems; and financial documents that may be relevant to Cox's revenue and profits derived from the accused systems.

8. All design and development work carried out by Cox on the accused systems was also carried out at Cox headquarters. For example, Cox's DOCSIS 3.0 network was designed and developed in Atlanta, and is controlled and maintained by technicians based in Atlanta.

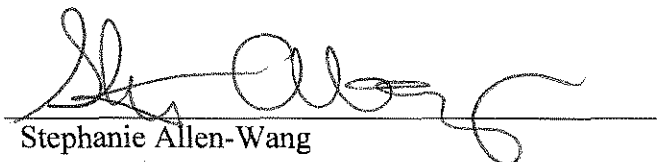
Similarly, updates to Cox's set-top box software are deployed from Atlanta to user equipment across the country.

9. In 2009 through 2013, Cox and AT&T met at Cox's headquarters in Atlanta multiple times to discuss a number of the Patents-in-Suit. I understand these to be the meetings that AT&T refers to in its Complaint (*see, e.g.*, D.I. 1, ¶¶ 58, 63, 68, 73, 78, 83, 88.)

10. Cox considers the source code used in its accused products and services to be highly proprietary, and maintains very tight controls on its disclosure and dissemination. Cox will request that the Court enter a protective order in this case that would prohibit copying or transmission of the source code except in very limited situations.

I declare under the penalties of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: January 12, 2015


Stephanie Allen-Wang