UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CODE-TO-LEARN FOUNDATION D/B/A SCRATCH FOUNDATION 7315 Wisconsin Avenue, 4th Floor West Bethesda, MD 20814 Plaintiff vs. SCRATCH.ORG, an Internet domain name. Defendant.	Case No. 1:19-cv-00067-LO-MSN

MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT'S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. 1404(a)

Pursuant to 28 U.S.C. § 1404(a), Defendant Scratch.org moves for an order transferring this *in rem* action to the Central District of California, Southern Division, for the convenience of the parties and witnesses, and in the interest of justice. Defendant recognizes that it bears the burden of convincing the Court that such a transfer should be granted and, in order to do so, it "must demonstrate that prosecution of the case in the district where the count was properly filed would 'result in a substantial balance of inconvenience' to the defendant." *United States v. Ferguson*, 432 F.Supp.2d 559, 561-561 (E.D. Va. 2006).

In *Ferguson*, Judge Lee noted that the Eastern District of Virginia is known as the "Rocket Docket," a designation that must not be abused by forum shoppers:

> "[T]he only reason this court's docket can remain current is if the Court continues to be vigilant in maintaining the docket and attentive to forum shopping by litigants. . . . **While bringing a case in this court is welcome, this court cannot and will not be able to remain current if the litigants can bring cases into this court that have only a scant connection with Virginia. We must be wary that the 'locusts' do not descend upon us**." *Id*. at 569-570 (emphasis added).

As detailed below, this case has only a scant connection to Virginia. The factors under consideration here suggesting trial in the Central District of California outweigh the factors suggesting trial in the Eastern District of Virginia. The principal factor favoring the Eastern District of Virginia, while adequate for venue, is the somewhat arbitrary and incidental location of an .ORG domain name registry operator. Consideration of all the other relevant factors establishes a balance of inconvenience weighing against the Defendant, and supports the requested transfer of the case.

This case centers on the issue of whether an internet domain name, Scratch.org, violates the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Defendant Scartch.org is an internet domain name that was first registered in 1998 by a registrant that, at that time, and to the present, resides and works in Orange County, California. This case should be transferred to the Southern Division of the Central District of California because:

- The internet domain name at issues here, Scratch.org, was conceived of and registered by the registrant of the domain name in California;
- A crucial witness, the registrant of Scratch.org is, and has always been, a resident of California;
- The relevant computers, documents, and witnesses for Scartch.org are all located in California;
- Plaintiff is not located in the Eastern District of Virginia, and has no other relevant business in the Eastern District of Virginia;
- Other than the fact that the .ORG domain name registry operator is located in Virginia, and Defendant is a .ORG domain name, Scratch.org has no personal, business, or physical ties to the Eastern District of Virginia; and

- The Southern Division of the Central District of California is the more practical and convenient venue for the prosecution of this action.

Taken together, these facts demonstrate that the interests of justice would be served by a transfer to the Central District of California. These same facts also demonstrate that the Plaintiff has little cognizable interest in having this action litigated in the Eastern District of Virginia, and it would in fact also benefit from the convenience resulting from a transfer to the Central District of California. Thus, because the relevant factors weigh heavily in favor of transferring this action to the Central District of California, Defendant respectfully requests that the Court exercise its discretion under 28 U.S.C. § 1404(a) and transfer the action to that forum.

I. PARTIES AND BACKGROUND

Plaintiff Code-to-Learn D/B/A Scratch Foundation ("Code-to-Learn") is a Delaware non-profit corporation with its principle place of business in West Bethesda, Maryland. Complaint, p.1, ¶ 2. Code-to-Learn alleges that it first initiated its program in 2002, and that it launched its public online community in 2007. Complaint, p.2, ¶ 3. The Scratch mark was registered by Massachusetts Institute of Technology with the United States Patent and Trademark Office on October 4, 2016. Complaint, pp. 5-6, ¶22, and Ex. "B" thereto. Code-to-Learn alleges that it filed a memorandum of its assignment of the Scratch mark with the Patent and Trademark Office shortly before this lawsuit was filed, on December 13, 2018. Complaint, p.6, ¶ 22.

The internet domain name Scratch.org was first registered by Ravi Lahoti ("Lahoti") in 1998. Declaration of Ravi Lahoti ("Lahoti Decl."), p. 1, ¶ 6, attached hereto as Ex. A. Lahoti is an individual who has been a resident of California his entire life. Lahoti Decl., p. 1, ¶ 2. He has never resided or worked in Virginia, and he has never conducted any business in Virginia.

Lahoti Decl., p. 1, ¶ 4. Similarly, Scratch.org has no personal, business, or physical ties to Virginia. Lahoti Decl., p. 2, ¶ 8.

Lahoti first registered the internet domain name Scratch.org through the registrar Network Solutions from 1998 through 2000. Lahoti Decl., p. 1, ¶ 6. He then transferred the registration from Network Solutions to Tucows/Open SRS in 2000. Lahoti Decl., p. 1, ¶ 6 and Exhibit "1" thereto. The registration for Scratch.org stayed with Tucows/Open SRS until 2015, when Lahoti transferred the registration to Dynadot, LLC. Lahoti Decl., p. 1, ¶ 6, and Exhibit "2" thereto.

Code-to-Learn filed this lawsuit on January 17, 2019. It thereafter published notice of the action with the Washington Times on February 13, 2019 pursuant to order of the Court. Scratch.org obtained permission from the Court to file its responsive pleading on March 20, 2019. See Dkt. 13.

II. ARGUMENT

A. Legal Authority

"For the convenience of the parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought or to any district or division to which all parties have consented." 28 U.S.C. § 1404(a). Section 1404(a) "is intended to place discretion in the district court to adjudicate motions for transfer according an 'individualized, case-by-case consideration of convenience and fairness.'" *Stewart Org., Inc. v. Ricoh Corp.*, 487 U.S. 22, 29, 108 S. Ct. 2239, 101 L. Ed. 2d 22 (1988) (citing *Van Dusen v. Barrack*, 376 U.S. 612, 622, 84 S. Ct. 805, 11 L. Ed. 2d 945 (1964) (superseded by statute on other grounds)); *see also Cognitronics Imaging Sys., Inc. v. Recognition Research Inc.*, 83 F. Supp. 2d 689, 696 (E.D. Va. 2000) (recognizing the discretion the district court has to

transfer to a more convenient forum). The burden is on the movant to show that transfer pursuant to § 1404(a) is proper. *Cognitronics*, 83 F. Supp 2d at 696.

By enacting § 1404(a), Congress intended to authorize the easy transfer of actions to a more convenient forum, often as a simple housekeeping measure. *See Van Dusen*, 376 U.S. at 636-637 (statute was designed as a "federal judicial housekeeping measure," to allow for easy change of venue). The underlying premise of § 1404(a) is that "courts should prevent plaintiffs from abusing their privilege under § 1391 by subjecting defendants to venues that are inconvenient under the terms of § 1404(a)." *In re Volkswagen of AM, Inc*., 545 F.3d 304, 313 (5th Cir. 2008) (citing *Norwood v. Kirkpatrick*, 349 U.S. 29, 31-32, 75 S. Ct. 544, 99 L. Ed. 789 (1955)). To cure such problems, district courts have broad discretion on deciding whether to transfer an action to another better suited district under § 1404(a). *Id*. at 311.

B. The Two-Part Test to Transfer under 28 U.S.C. § 1404(a)

In order to determine whether a transfer of venue is appropriate, "a district court must make two inquires: (1) whether the claims might have been brought in the transferee forum, and (2) whether the interest of justice and convenience of the parties and witnesses justify transfer to that forum." *Koh v. Microtek Intern., Inc*., 250 F. Supp. 2d 627, 630 (E.D. Va. 2003). As detailed below, the facts of this case satisfy both of these criteria. Accordingly, the Court should exercise its discretion to transfer this action to the Central District of California in order "to prevent the waste of time, energy, and money and to protect litigants, witnesses and the public against unnecessary inconvenience and expense." *Original Creatine Patent Co., Ltd. V. MET-RX USA, Inc*., 387 F. Supp.2d 564, 566 (E.D. Va. 2005) (internal quotations omitted).

C. This Action "Might Have Been Brought" in the Transferee District Because Personal Jurisdiction and Venue are Proper in the Central District of California

In order to determine whether the transferee court is a district where the cause of action "might have been brought," the Court must determine whether Plaintiff's claims could have been brought in the transferee court initially. *Agilent Techs., Inc. v. Micromuse, Inc*., 316 F. Supp. 2d 322, 325 (E.D. Va. 2004). The phrase "might have been brought" has been interpreted to mean that "when a suit is commenced, plaintiff has a right to sue in that district, independently of the wishes of defendant." *Hoffman v. Blaski*, 363 U.S. 335, 344, 80 S. Ct. 1084, 4 L. Ed. 1254 (1960) (superseded in part by statute as discussed in *Guzzetti v. Citrix Online Holdings GmbH*, No. 12-01152-GMS, 2013 U.S. Dist. LEXIS 514, 2013 WL 124127, at n.2 (D. Del. 2013); *see also Agilent*, 316 F. Supp. 2d at 324 (noting that a court must first determine whether claims could be brought in the transferee court before considering whether to transfer venue). If the claims could have been brought in the transferee court initially, the subsequent decision to transfer venue is within the discretion of the court. *One Beacon Ins. Co. v. JNB Storage Trailer Rental Corp*., 312 F. Supp. 2d 824, 828 (E.D. Va. 2004) (citing *Verosol B.V. v. Hunter Douglas, Inc*., 806 F. Supp. 582, 591 (E.D. Va. 1992)).

In connection with claims brought pursuant to the Federal Anti-Cybersquatting Consumer Protection Act, a plaintiff may challenge the registration of a domain name under Title 15, U.S.C., § 1125(d), which provides for two types of proceedings. *Heathmount A.E. Corp. v. Technodome.com*, 106 F.Supp.2d 860, 862 (E.D. Va. 2000). Section 1125(d)(1) creates a federal cause of action by the owner of a mark, against the individual registrant of a domain name where the court has personal jurisdiction over the registrant. Section 1125(d)(2) permits the owner of a mark to file an *in rem* proceeding against the domain name itself where the domain name is registered, if the owner is unable to obtain personal jurisdiction over the current owner of the

domain name. Here, the registrant of Scratch.org, Lahoti, has resided and worked in California his entire life, including in 1998 when he registered the Scratch.org domain name from his computer in California. Thus, Plaintiff could have filed this Anti-Cybersquatting action against the registrant in the Central District of California pursuant to Section 1125(d)(1). Therefore, it is undisputable that this civil action "might have been brought" in the Central District of California. *See* 28 U.S.C. § 1404(a); 28 U.S.C. § 1391(c).

D. Both Convenience and Justice Would be Served by Transferring This Action to the Central District of California

Under the second prong of the 1404(a) analysis – that a transfer is "for the convenience of parties and witnesses, in the interest of justice" – the Court has discretion to consider several factors to determine whether a venue transfer is appropriate. 28 U.S.C. § 1404(a). These factors include: "'(1) ease of access to sources of proof; (2) the convenience of the parties and witnesses; (3) the cost of obtaining the attendance of witnesses; (4) the availability of compulsory process; (5) the interest in having local controversies decided at home; (6) in diversity cases, the court's familiarity with the applicable law; and (7) the interest of justice.'" *One Beacon Ins. Co.*, 312 F. Supp. 2d at 828 (quoting *BHP Int'l Inv., Inc. v. Online Exch., Inc.*, 105 F. Supp. 2d 493, 498 (E.D. Va. 2000)). The principal factors to consider, however, are Plaintiff's choice of forum, witness convenience, access to sources of proof, party convenience, and the interest of justice. *Koh*, 250 F. Supp. 2d at 633.

1. Plaintiff's Choice of Forum

Although the Court may give considerable weight to a plaintiff's choice of forum (*Heinz Kettler GmbH & Co. v. Razor USA, LLC*, 750 F. Supp. 2d 660, 667 (E.D. Va. 2010); *Koh*, 250 F. Supp. 2d at 633), the weight accorded to this choice varies in proportion to the actual connection between the chosen forum and the cause of action. "The greater the connection between a

plaintiff's chosen forum and the plaintiff's cause of action, the more weight a court will give to the plaintiff's choice." *Agilent Techs., Inc*., 316 F. Supp. 2d at 327; *see also GTE Wireless, Inc. v. Qualcomm, Inc.*, 71 F. Supp. 2d 517, 519 (E.D. Va. 1999). The Supreme Court has made clear that district courts have broad discretion to order transfer, notwithstanding a plaintiff's choice of forum. *See Norwood*, 349 U.S. at 32; *Piper Aircraft Co. v. Reyno*, 454 U.S. 235, 256 n.23, 102 S. Ct. 252, 70 L. Ed. 419 (1981) (a plaintiff's "forum choice should not be given dispositive weight" and the "balance of conveniences" should be weighed). A plaintiff's choice of forum should be entitled to particularly little weight where it is not the home forum of the plaintiff, and bears no substantive connection to the cause of action.

Here, the only connection that Plaintiff has to the Eastern District of Virginia is the alleged and incidental location of a .ORG domain name registry operator in this district. Though the location of the .ORG domain name registry operator is sufficient to confer venue in the first instance, it does not – by itself – overcome the impermissible and substantial balance of inconvenience to Defendant and virtually all of its witnesses. Plaintiff Code-to-Learn has no connections to Virginia. It is admittedly a corporation organized and existing under the laws of Delaware, and with its principal place of business in Maryland. Complaint, ¶ 3. Similarly, Lahoti, the registrant of the domain name, resides in California, and has no personal or professional ties to Virginia. The domain name, itself, was created by Lahoti on his computer in California, and was registered and maintained at his computer in California.

Thus, other than the fact that the .ORG internet domain name registry operator happens to be located in Virginia, this cause of action, and Plaintiff and Defendant, have no real meaningful connection to Virginia. Plaintiff's choice of the Eastern District of Virginia as the forum court should therefore be given minimal weight by the Court in determining Defendant's transfer

request. *See Pragmatus AV, LLC v. Facebook, Inc.*, 769 F. Supp. 2d 991, 995 (E.D. Va. 2011) (noting that Plaintiff's choice of forum would be given "minimal weight" where Plaintiff is a non-practicing entity and its "only employee in this district is a co-owner who has owned a home in Alexandria since 2007 and works here part-time"); *see also Acterna, L.L.C. v. Adtech, Inc.*, 129 F. Supp. 2d 936, 938 (E.D. Va. 2001)(noting that "federal courts are not solicitous of plaintiffs claiming 'substantial weight' for their forum choice where the connection with the forum is limited to sales activity without more").

2. Witness Convenience

The Court must next weigh the convenience to the parties and witnesses in litigating in either venue. Assessment of this factor requires courts to consider the "ease of access to sources of proof, the costs of obtaining witnesses, and the availability of compulsory process." *Lycos, Inc. v. TiVo, Inc.*, 499 F. Supp. 2d 685, 693 (E.D. Va. 2007) (quoting *Samsung Elecs. Co v. Rambus, Inc.*, 386 F. Supp. 2d 708, 717 n.13 (E.D. Va. 2005)). The party asserting witness inconvenience "has the burden to proffer, by affidavit or otherwise, sufficient details respecting the witnesses and their potential testimony to enable the court to assess the materiality of evidence and the degree of inconvenience." *Koh*, 250 F. Supp. 2d at 636. Additionally, "the convenience of non-party witnesses should be afforded greater weight [than the convenience of party witnesses] in deciding a motion to transfer." *Samsung*, 386 F. Supp 2d. at 718.

In this case, the registrant of Scratch.org is, and has always been, a California resident. Lahoti Decl., p. 1, ¶ 2. He was a California resident when he first registered the domain name in 1998, and he remains a Californian today. Lahoti Decl., p. 1, ¶¶ 2 and 5. Thus, the events that gave rise to this claim occurred in California. Lahoti has no business operations in Virginia, and he has never had any business operations in Virginia. Lahoti Decl., p. 1 ¶ 4. He conducts all of

his business from California, and has all of his personal ties and relationships in California. Lahoti Decl., p. 1, ¶ 2. Moreover, Scratch.org's primary attorney of choice is also located in California. Lahoti Decl., p. 2, ¶ 9. In addition, all of the computers, documents, and witnesses relating to Lahoti's registration and use of the Scartch.org domain name are located in California. Lahoti Decl., p. 2 ¶ 7. As the registrant of Scratch.org, Lahoti's deposition and trial testimony will be crucial to the prosecution of this case. Any other witnesses presented by Scratch.org will also be located in California, as that is the location where the alleged events occurred. Lahoti and the other defense witnesses may have to travel the over 2,200 miles from California to Virginia multiple times over the course of this litigation. Not only will this be expensive, but it will also take significant time away from their personal and professional lives. On balance, the inconvenience, expense and disruption to Scartch.org, Lahoti, and other defense witnesses favor transferring this matter to the Central District of California.

3. Ease of Access to Sources of Proof

As set forth above, all of the documents and evidence likely to be at issue in this case, including electronically stored data contained on computers, are located in California. Such evidence might consist of emails, letters, memorandum, summaries of personal conversations, notes or conferences and meetings, registry communications, business and marketing reports, and financial data. Presumably, Plaintiff will also have documentary evidence of its own – also not located in Virginia. Defendant and its witnesses, all residents of California, will need to review those documents and records with Defendant's counsel and explain the evidence to counsel in order to prepare Defendant's defense.

The fact that the evidence and witnesses in this case are all located in California, and are more readily accessible in California, establishes that there is a substantial balance of

inconvenience to Defendant in having this matter adjudicated in the Eastern District of Virginia. Accordingly, this factor favors transfer to the Central District of California.

4. Party Convenience

For the reasons articulated above, it is far more convenient for Defendant to litigate this action in the Central District of California. All of Defendant's evidence and witnesses are located in California, and it would be prohibitively expensive, disruptive and burdensome for Scratch.org to have to defend the action in Virginia where neither Plaintiff nor Defendant have any ties. Moreover, Plaintiff, itself, is located in a state other than Virginia. Given its self-professed large-scale popularity and alleged world-wide success (Complaint, pp. 3-5, ¶¶ 10-19), on balance, Plaintiff is in a much better relative position to withstand the day-to-day litigation disruption and financial burden than Defendant. Thus, this factor tilts in favor of the requested venue transfer.

5. Interest of Justice

Section 1404(a) requires that a court consider the "interest of justice," a consideration of factors unrelated to witness and party convenience. The interest of justice factor "encompasses public interest factors aimed at 'systemic integrity and fairness,'" with the most prominent considerations being "judicial economy and the avoidance of inconsistent judgments." *Byerson v. Equifax Info. Servs, LLC*, 467 F. Supp. 2d 627, 635 (E.D. Va. 2006) (quoting *Samsung*, 386 F. Supp. 2d at 721). In analyzing this factor courts should consider circumstances such as "the pendency of a related action, the court's familiarity with the applicable law, docket conditions, access to premises that might have to be viewed, the possibility of an unfair trial, the ability to join other parties, and the possibility of harassment." *Bd. Of Trustees v. Baylor Heating and Air Conditioning*, 702 F. Supp. 1253, 1260 (E.D. Va. 1988).

Defendant submits that many of these factors are not relevant in the case at bar. Defendant is not aware of any pending action in any district. Because this case arises under federal anti-cybersquatting law, the court's familiarity with the applicable law is not at issue, as this Court may be no better or worse equipped to handle this subject matter than any other United States district court. *Acterna*, 129 F.Supp 2d at 940. Moreover, it seems unlikely that physical structures will need to be viewed in this case. Similarly, the possibility of unfair trial or the ability to join other parties do not seem to be at issue here.

The only "interest of justice" factors which may be relevant here is relate to this forum's reputation (and reality) as the "rocket docket." First, there exists the very real 'possibility of harassment' that is represented not by this Court, but by Plaintiff's choice of this forum across the country from Defendant, to litigate the merits of this dispute. Simply put, Plaintiff should not be allowed to bully the Defendant to give up a registration he had long before Plaintiff ever registered the mark or came into existence with expensive cross-country litigation. Conversely, whilet Plaintiff may contend that suit in this forum will effect a more speedy resolution of this case because of this Court's 'docket condition' (its "rocket docket" reputation), that fact alone should not be controlling. As courts in this district have previously explained, "docket conditions, although relevant, are a minor consideration when all other reasonable and logical factors would result in a transfer of venue." *GTE Wireless, Inc.*, 71 F. Supp.2d at 519. "This Court cannot stand as a willing repository for cases which have no real nexus to this district. The 'rocket docket' certainly attracts plaintiffs, but the Court must ensure that this attraction does not dull the ability of the Court to continue to act in an expeditious manner." *Cognitronics Imaging Systems, Inc.*, 83 F. Supp.2d at 699 (citing *Schlegel U.K. Holdings Ltd. v. Cooper Tire & Rubber Co., Inc.*, no. 970522- A, slip op. at 18 (E.D.Va. June 10, 1997)).

IV. CONCLUSION

The facts of this case establish that the Central District of California is a much more logical and convenient venue than is the Eastern District of Virginia. Accordingly, for the reasons set forth herein, Defendant respectfully request that this Court exercise its discretion and transfer the action to the Central District of California, Southern Division.

Dated: March 20, 2019

Respectfully submitted,

/s/ Jay M. McDannell

Lee E. Berlik (VSB #39609)
Jay M. McDannell, Of Counsel (VSB #45630)
BERLIKLAW, LLC
1818 Library Street, Suite 500
Reston, Virginia 20190
Tel: (703) 722-0588
LBerlik@berliklaw.com
JMcDannell@berliklaw.com
Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that today, March 20, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send a notification of such filing (NEF) to the following:

Attison L. Barnes, III (VSB #30458)
David E. Weslow
Adrienne J. Kosak (VSB #78631)
Wiley Rein LLP
1776 K St. NW
Washington, DC 20006
abarnes@wileyrein.com
Counsel for Plaintiff

/s/ Jay M. McDannell

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CODE-TO-LEARN FOUNDATION D/B/A SCRATCH FOUNDATION
7315 Wisconsin Avenue, 4th Floor
West Bethesda, MD 20814

Plaintiff

vs.

SCRATCH.ORG, an Internet domain name.

Defendant.

Case No. 1:19-cv-00067-LO-MSN

DECLARATION OF RAVI LAHOTI
IN SUPPORT OF MOTION TO TRANSFER VENUE

I, Ravi Lahoti, declare as follows:

1. I am the individual registrant of the internet domain name Scratch.org, which I understand to be the named Defendant in this action.

2. I have resided in Orange County, California my entire life. My current address is 1340 Reynolds Avenue, Suite 116-191, Irvine, California. All of my personal ties and relationships are in California.

3. In addition, I have only worked in the state of California.

4. I have never resided or worked in the state of Virginia, and I have never had business dealings in Virginia.

5. I first conceived of and registered the internet domain name Scratch.org on my computer while I was in California in 1998.

6. I initially registered the domain name with Network Solutions in 1998. I thereafter transferred the domain to Tucows/Open SRS in 2000. In 2015, I transferred the domain from Tucows/Open SRS to Dynadot. Attached hereto as Exhibits 1 and 2,

respectively, are true and correct copies of printouts that I obtained from Tucows/Open SRS and Dynadot establishing the registration status of Scratch.org.

7. Because I am a resident of California, my computer, all documents relating to Scratch.org, and all witnesses that Scratch.org may call to testify in this matter are located in California. Specifically, all of the documents and witnesses necessary for Scratch.org to prove that it did not have a bad faith intent to profit from Plaintiff's mark are located in California.

8. To my knowledge, Scratch.org has never had any personal, business, or physical ties to the state of Virginia.

9. Scratch.org's attorney of choice to handle this dispute is Jacob C. Gonzales, an attorney that practices with the law firm of Weintraub Tobin in Newport Beach, California. Attorney Gonzales has represented me and my other business interests in connection with prior legal matters in California, and I have retained him, along with local Virginia counsel, to represent Scratch.org in this case.

10. For the reasons set forth above, the time and expense associated with having to travel back and forth and litigate in a forum that is over 2,200 miles away will impose a significant financial and time burden on me, as the registrant of Scratch.org.

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

Executed on March 15, 2019 in Irvine, California.

Dated: March 15, 2019

RAVI LAHOTI