

Exhibit 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Bot M8 LLC,

Plaintiff,

v.

SONY CORPORATION OF AMERICA, SONY
CORPORATION, and SONY INTERACTIVE
ENTERTAINMENT AMERICA LLC,

Defendants.

Civil Action No. 1:19-cv-07529-DLC

DECLARATION OF JESSE CLEMENS

I, Jesse Clemens, declare as follows:

1. I work at Sony Interactive Entertainment LLC ("SIE"). My job title is Technical Supervisor, Software Engineering. I have been employed by SIE or its predecessors-in-interest since 2011. I am familiar with the facts set forth herein and could testify competently thereto.
2. I submit this Declaration in support of SIE's motion to transfer this case due to improper venue.
3. The facts set forth in this Declaration were true as of August 12, 2019 and remain true at present.

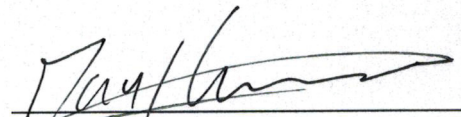
4. I have been informed that the plaintiff in this case has made the following allegation in a brief filed in this case:

SIE employs personnel in this District and requires or strongly encourages them to reside within the District. For example, one of SIE's senior software engineers resides in New York. Ex. H (Jesse_Clemens_LinkedIn. Pdf.).

5. I live in New York solely for personal and familial reasons, not because SIE requires or encourages me to do so. I grew up in New Jersey and have always loved New York City. In addition, I have two aging parents residing in New Jersey and I prefer living close to them. SIE sought to hire me multiple times between 2006 and 2010, with the condition that I had to move to California, but I refused each time. SIE was only successful in hiring me in 2011 after allowing me to work remotely. To perform my job, I telecommute into SIE's offices in California and routinely fly to California to be in the office. I am a senior engineer on the Visual Arts Service Group (VASG) engineering team at SIE in California, and I mentor and lead less experienced engineers on my team.

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

Executed on October 16, 2019



Jesse Clemens