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Attorneys for Defendants,
SAMSUNG ELECTRONICS CO., LTD.
and SAMSUNG ELECTRONICS AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TECHNOLOGY PROPERTIES LIMITED
LLC, et al.,

Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO., LTD., et al.,

Defendants.

Case No. 3:12-cv-03865-VC (PSG)

**SUPPLEMENTAL DECLARATION OF
AARON WAINSCOAT IN SUPPORT
OF DEFENDANTS' RESPONSIVE
CLAIM CONSTRUCTION BRIEF**

DATE: September 18, 2015
TIME: 10:00 AM
PLACE: Courtroom 5, 4th Floor
JUDGE: Hon. Paul S. Grewal

TECHNOLOGY PROPERTIES LIMITED
LLC, et al.,

Plaintiffs,

v.

GARMIN LTD., et al.,

Defendants.

Case No. 3:12-cv-03870-VC (PSG)

1 TECHNOLOGY PROPERTIES LIMITED
2 LLC, et al.,
3
4 Plaintiffs
5
6 v.
7
8 ZTE CORPORATION, et al.,
9
10 Defendants.
11

Case No. 3:12-cv-03876-VC (PSG)

12
13 TECHNOLOGY PROPERTIES LIMITED
14 LLC, et al.,
15
16 Plaintiffs
17
18 v.
19
20 SAMSUNG ELECTRONICS CO., LTD., et al.,
21
22 Defendants.
23

Case No. 3:12-cv-03877-VC (PSG)

24
25 TECHNOLOGY PROPERTIES LIMITED
26 LLC, et al.,
27
28 Plaintiffs
29
30 v.
31
32 LG ELECTRONICS, INC., et al.,
33
34 Defendants.
35

Case No. 3:12-cv-03880-VC (PSG)

36
37 TECHNOLOGY PROPERTIES LIMITED
38 LLC, et al.,
39
40 Plaintiffs
41
42 v.
43
44 NINTENDO CO., LTD, et al.
45
46 Defendants.
47

Case No. 3:12-cv-03881-VC (PSG)

1 I, Aaron Wainscoat, submit this declaration in support of Defendants' Responsive Claim
2 Construction Brief, filed by Defendants Garmin International, Inc., Garmin USA, Inc., Huawei
3 Technologies Co., Ltd., Huawei Device Co., Ltd., Huawei Device USA, Inc., Futurewei
4 Technologies, Inc., Huawei Technologies USA, Inc., LG Electronics, Inc., LG Electronics U.S.A.,
5 Inc., Nintendo Co., Ltd., Nintendo of America Inc., Samsung Electronics Co., Ltd., Samsung
6 Electronics America, Inc., ZTE Corporation and ZTE (USA) Inc. (collectively, "Defendants").

7 1. I am a partner at the law firm of DLA Piper LLP (US), attorneys of record for
8 Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in Case No.
9 3:12-cv-03877-VC (PSG). If called as a witness, I could and would testify competently to the
10 information set forth in this declaration.

11 2. Attached hereto as Exhibit R is a true and correct copy of an excerpt from THE
12 RANDOM HOUSE DICTIONARY OF THE ENGLISH LANGUAGE (2d ed. 1987) containing the definition
13 of the word "generate."

14 3. Attached hereto as Exhibit S is a true and correct copy of excerpts from the
15 transcript of the *Markman* hearing conducted in ITC Investigation No. 337-TA-853 ("853
16 Investigation") on March 5, 2013, including pages 141-156 and 205-216.

17 4. Attached hereto as Exhibit T is a true and correct copy of the Public Version of
18 "Complainants' Petition for Review of Initial Determination," filed on September 23, 2013 in the
19 853 Investigation.

20 5. Attached hereto as Exhibit U is a true and correct copy of the Public Version of
21 "Respondents' Joint Response and Opposition to Complainants' Petition for Review of the Final
22 Initial Determination," filed on October 17, 2013 in the 853 Investigation.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Executed: August 18, 2015



Aaron Wainscoat