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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Philips North America, LLC,	)	Case No. 2:19-cv-06301-AB (KSx)
	)	
Plaintiff,	)	<b>LAMKIN DECL ISO</b>
	)	
v.	)	
	)	
	)	
Garmin International, Inc., Garmin LTD	)	
	)	
Defendants.	)	
	)	
	)	

**DECLARATION OF RACHAEL D. LAMKIN IN SUPPORT OF GARMIN’S  
RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Rachael D. Lamkin, declare as follows:

1. I am lead counsel of record for Defendants Garmin International, Inc. and Garmin Ltd. (“Garmin”).
2. I am an attorney licensed to practice law in all state and federal courts

1 in California, the Eastern District of Texas, Colorado District Court, the Court of  
2 International Trade, the International Trade Commission, the Federal Circuit Court  
3 of Appeals, and this Honorable Court.  
4

5 3. I have personal knowledge of all facts attested to herein.

6 4. Attached as Exhibit A is a true and correct copy of pages from chapters  
7 1 and 2 from Michael Ferguson's book, GPS Land Navigation, published in 1997.  
8

9 5. Attached as Exhibit B is a true and correct copy of Exhibit A to Philips'  
10 NDCA LPR 4-2 disclosure.

11 6. Attached as Exhibit C is a true and correct copy of the deposition  
12 transcript of Dr. Martin.  
13

14 7. Attached as Exhibit D is a true and correct copy of sections of the  
15 complaint filed against Fitbit by Philips in the District Court of Massachusetts.  
16

17 8. Attached as Exhibit E is a true and correct copy of pages from  
18 WO2001047597A, cited in the prosecution history of the '233 Patent.

19 9. Attached as Exhibit F is a true and correct copy of page 6 of Philips'  
20 Responsive Claim Construction Brief in the Philips v. Fitbit matter.  
21

22  
23 Signed under penalty of perjury on this date, July 9, 2020, in Sausalito,  
24 California.  
25

26 *Rachael D. Lamkin*  
27 Rachael D. Lamkin  
28