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15 *Attorneys for Plaintiff*
16 *Philips North America LLC*

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20
21 Philips North America LLC,

22 *Plaintiff,*

23 vs.

24 Garmin International, Inc.
25 Garmin USA, Inc. and Garmin Ltd.,

26 *Defendants.*
27
28

Case No. 2:19-cv-06301-AB-KS

**DECLARATION OF RUBEN J.
RODRIGUES IN SUPPORT OF
PHILIPS NORTH AMERICA LLC's
RESPONSIVE CLAIM
CONSTRUCTION BRIEF**

1 I, Ruben J. Rodrigues, declare as follows:

2 1. I am an attorney at Foley & Lardner LLP, counsel to plaintiff Philips North
3 America LLC (“Philips”) in this case.

4 2. Attached as **Exhibit 14** is a true and accurate copy of the deposition transcript of
5 Dr. Martin, Ph.D. taken June 18, 2020 in the co-pending litigation with Fitbit, Inc. *Philips North*
6 *America LLC v. Fitbit, Inc.*, Case No. 1:19-cv-11586-IT (D. Mass.).

7 3. Attached as **Exhibit 15** is a true and accurate copy of U.S. Patent No. 8,712,510.

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

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10 Dated: July 9, 2020

/s/ Ruben J. Rodrigues

11 Ruben J. Rodrigues
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