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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 Philips North America LLC,

21 *Plaintiff,*

22 vs.

23
24 Garmin International, Inc. and
Garmin Ltd.,

25 *Defendants.*
26
27
28

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

**DECLARATION OF
JEAN-PAUL CIARDULLO
IN SUPPORT OF**

**PHILIPS NORTH AMERICA LLC's
OPPOSITION TO DEFENDANTS'
MOTION TO AMEND; MOTION TO
DISMISS IN THE ALTERNATIVE**

1 I, Jean-Paul Ciardullo, declare as follows:

2 1. I am an attorney with Foley & Lardner LLP, counsel to Plaintiff Philips North
3 America, LLC in this action.

4 2. Attached hereto as **Exhibit 1** is a copy of the May 6, 2020 ruling in *Certain*
5 *Wearable Monitoring Devices, Systems, and Components Thereof*, ITC Investigation No.
6 337-TA-1190.

7 3. Attached hereto as **Exhibit 2** is a copy of the European file history as issue on
8 the present Motion. A group of irrelevant pages with a long listing of numbers was
9 removed to help decrease file size. This file history was provided to me by patent
10 professionals within my firm at my request.

11 4. Attached hereto as **Exhibit 3** is a copy of the file history for the '192 Patent
12 at issue in the present Motion. This file history was provided to me by patent professionals
13 within my firm at my request.

14
15 I declare under penalty of perjury that the foregoing is true and correct to the best of
16 my knowledge.

17
18 Dated: July 31, 2020

/s/ Jean-Paul Ciardullo

Jean-Paul Ciardullo