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18 Attorneys for Defendant  
 19 **APPLE INC.**

20 **UNITED STATES DISTRICT COURT**  
 21 **NORTHERN DISTRICT OF CALIFORNIA**  
 22 **SAN JOSE**

23 OpenTV, Inc., Nagravision, SA, and Nagra  
 24 France S.A.S.,

25 Plaintiffs,

26 v.

27 Apple Inc.,

28 Defendant.

Case No. 5:15-CV-02008-EJD

**DECLARATION OF LUANN L.  
 SIMMONS IN SUPPORT OF  
 DEFENDANT APPLE, INC.'S REPLY  
 IN SUPPORT OF ITS MOTION TO  
 STAY**

Date: September 15, 2016

Time: 9:00 a.m.

Judge: Honorable Edward J. Davila

Courtroom: 4

1 I, Luann L. Simmons, declare:

2 1. I am a partner with the law firm of O’Melveny & Myers LLP, counsel for  
3 defendant Apple Inc. (“Apple”) in the above-captioned litigation.

4 2. I submit this declaration in support of Apple’s Reply in support of its Motion to  
5 Stay. I have personal knowledge of the facts set forth in this declaration and, if called to testify as  
6 a witness, could and would do so competently.

7 3. Attached as **Exhibit 1** is a true and correct copy of Plaintiffs’ Disclosure of  
8 Asserted Claims and Infringement Contentions Relating to U.S. Patent Nos. 6,148,081,  
9 6,233,736, 7,055,169, 7,644,429, and 7,725,740, including Appendices A-E, received by Apple  
10 on October 15, 2015.

11 I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct. Executed this 24th day of May, 2016, in Wilmington, Delaware.

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/s/ Luann L. Simmons

Luann L. Simmons