

EXHIBIT 6

DECLARATION OF MELODY DRUMMOND HANSEN IN SUPPORT OF DEFENDANT'S
RESPONSIVE CLAIM CONSTRUCTION BRIEF

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

THE
NEW LEXICON
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DELUXE EDITION

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India ink

80° in the south, (May) 80° in the northeast, 85° along the west coast and Ganges delta, 90° in the south, east and north, 95° in the center. Rainfall: 426 ins on the Shillong plateau, 75-150 ins along the Malabar coast, the lower slopes of the Himalayas and the lower Brahmaputra, over 60 ins along the Himalayas and lower Ganges, 50 ins in Madras, 45 ins in Visakhapatnam, over 30 ins in the river valleys of N. India, 15-30 ins along the S. Coromandel coast, in the Punjab, in Delhi, Agra and the interior of S. India, under 10 ins in the Thar. Livestock: cattle, water buffaloes, goats, sheep, poultry, horses. Crops: cereals, rice, sugarcane, jute, cotton, peanuts, rape and mustard, tobacco, spices, vegetables, fruit, tea, coffee, rubber, opium, wool. Woods: teak, sal, deodar. Minerals: coal, manganese ore, petroleum (Assam), iron ore, mica, copper, ilmenite, gypsum, bauxite, chromite, marble, sandstone, granite. Industries: cotton, jute and silk textiles, engineering, iron and steel, sugar, chemicals, pottery, shipbuilding, hydroelectricity. Exports: tea, jute, cotton, leather, iron ore, peanuts, manganese ore, mica, coffee, sugar. Imports: machinery, wheat, cotton, oil, vehicles, chemicals, rice, metals. Main ports: Bombay, Calcutta, Madras, Cochin, Visakhapatnam. There are 62 universities, the three oldest being Calcutta, Bombay and Madras. Monetary unit: Indian rupee (100 paise). HISTORY. The earliest known Indian civilization is that of the Indus valley (c. third millennium B.C.), centered on Mohenjo-Daro and Harappa. The Aryans invaded the Punjab (c. 1500 B.C.) and spread through N. India to Bengal (c. 800 B.C.), displacing the Dravidian inhabitants. The Aryan religion, based on the Vedas, became incorporated in Brahmanism (c. 1000 B.C.), Jainism and Buddhism (6th c. B.C.). Alexander the Great invaded the Punjab (327 B.C.), but the Greeks were driven out by Chandragupta, the founder of the Maurya Empire (325-184 B.C.). Hinduism was the state religion until the reign (c. 273 B.C.-c. 232 B.C.) of Asoka, who replaced it by Buddhism. On his death, the Maurya Empire, which now included most of the subcontinent, began to disintegrate. N. India was invaded and ruled by the Greeks (2nd c. B.C.), and the Parthians (1st c. B.C.-1st c. A.D.). The Gupta dynasty (c. 320-c. 544) created a new empire in N. India, but failed to gain control of the south. Hindu art and culture reached their zenith in this period. The Hun invasion (6th c.) and the internecine warfare of the Rajputs weakened N. India in the face of invasions from the northwest by Turks and Persians (1001-26) under Mahmud of Ghazni. The Delhi sultanate (1206-1526) conquered most of the Hindu states except Kashmir, but was weakened when Timur captured Delhi (1398). It was replaced in the north by separate Moslem kingdoms, which were subdued (1526) by Babur, the founder of the Mogul Empire (1526-1707). During the reign (1556-1605) of Akbar, Mogul power was extended to most of northern and central India and the administration of the empire was reformed. Mogul architecture reached its height under the rule (1627-58) of Shah Jahan, but the empire began to disintegrate after the reign (1658-1707) of Aurangzeb.

European interest in India began with Vasco da Gama's arrival (1498) at Calicut. The British East India Company established trading posts at Surat (1612), Bombay (1661) and Calcutta (1690), driving off Portuguese and Dutch opposition. With the decline of the Mogul empire, and the emergence of the Marathas, the British and French tried to extend their influence over the native states (18th c.). The ensuing Anglo-French conflict (1746-63) resulted in the expulsion of the French by the military victories of Clive. The British raj was extended by Warren Hastings, and by 1850 covered the whole of India. After the Indian Mutiny (1857), the control of India passed to the British Crown (1858), and Queen Victoria became empress of India (1877). Indian desire for self-government led to the formation of the Indian National Congress (1885) and the Moslem League (1906). After the 1st world war, the Government of India Act (1919) failed to transfer real power to elected officials. Gandhi led a policy of passive resistance to British rule. Provincial legislatures were set up by the Government of India Act (1935), but the rift between Hindus and Moslems continued to widen. A mission (1942) led by Sir Stafford Cripps failed to unify Indian

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leaders on a formula for a transfer of power, and at the end of the 2nd world war a policy of partition was agreed on. On Aug. 15, 1947, the country was partitioned to form the two new states of India and Pakistan. The princely states (more than 500 in number) which had political agreements with British India, were allowed to join either India or Pakistan. The partition was marked by great bloodshed and there was a huge refugee problem. Hyderabad, the largest of the princely states, joined India (1949) but Kashmir, having borders with both India and Pakistan, presented a problem. In the end the maharaja opted to join India, but Pakistan contested the decision and a bitter dispute followed, leading to U.N. intervention. Kashmir was formally admitted to the Indian Union (1957), but parts of its western mountainous regions continued to be controlled by Pakistan.

Under the constitution of the Republic of India (Jan. 26, 1950), India is a union of states, each with its own governor and legislative assembly. The Congress party under Nehru created (1949-56) a strong central government. By 1956, the former French territories had been incorporated in the republic. The Portuguese possession of Goa was invaded (1961) and annexed (1962). Overpopulation and frontier disputes with China on the northwest and northeast borders have strained India's economy. The long-standing dispute with Pakistan over Kashmir broke briefly into open war (1965). Shortly after signing an agreement at Tashkent with Pakistan to restore normal relations between the two countries, Shastri, the prime minister, died, and was succeeded by Indira Gandhi in 1966. Her first 11 years in office saw many improvements in agriculture, irrigation, and power production; sources of natural gas and oil were discovered; and many industries were nationalized. In 1974, India entered the nuclear age with the explosion of its first nuclear device. India helped establish Bangladesh as an independent state in 1971, and in 1975 Sikkim became an Indian state. Economic and social problems continued, however, and mounting political opposition along with a rash of strikes and riots persuaded Gandhi to declare a state of emergency in 1975, during which time many political opponents were jailed and constitutional rights suspended. In March 1977 the emergency was lifted, and after elections were held Gandhi resigned in favor of an opposition coalition. This coalition did not hold together, however, and Gandhi returned to office in a caretaker government; she was reelected in 1980. Sikh opposition forces became violently active in the early 1980s and in October 1984 Gandhi was assassinated by Sikh security guards. She was succeeded by her son Rajiv Gandhi, who won an overwhelming victory later that year, but opposition to his government grew in the late 1980s. Settlements in the Punjab and Assam (1985), and with Sri Lanka (1987) were negotiated. However, due to continued violence, some civil liberties were suspended in the Punjab (1988).

India ink (*Am.-Br.* Indian ink) a black pigment, consisting of lampblack mixed with a binder, used in painting, lettering etc. || the liquid ink made from this pigment

in-dian (in-di-ən) *I. n.* a citizen of the republic of India || one of the original inhabitants of America || any of the American Indian languages *2. adj.* of or pertaining to the subcontinent or the republic of India || of or pertaining to the citizens of the republic of India, or to their culture etc. || of or pertaining to the original inhabitants of America, their languages, culture etc. (*LATIN AMERICAN INDIANS, *NORTH AMERICAN INDIANS)

In-di-an-a (in-di-ə-nə) (*abbr.* Ind.) a state (area 36,291 sq. miles, pop. 5,479,000) on midwestern plains of the U.S.A. Capital: Indianapolis. Agriculture (80% is farmed): corn and other cereals, tomatoes, soybeans, pigs. Resources: coal, building limestone, oil. Industries: iron and steel, motor vehicles, aircraft and rail equipment, oil refining, machinery. Chief universities: Indiana University (1824) at Bloomington, Purdue (1869) at Lafayette and Notre Dame (1842) at South Bend. Indiana was settled (18th c.) by French fur traders, was ceded (1763) to Britain, and with the Revolution passed (1779) under the control of the U.S.A., of which it became (1816) the 19th state

indication

Indian Affairs, Bureau of (BIA), U.S. federal agency that handles Indian matters such as education, mineral and water rights, land leasing, social services, law enforcement and job training on Indian reservations. Originally a part of the War Department from 1824, it became part of the Department of the Interior in 1849 and is directed by the department's assistant secretary of Indian affairs

in-dian-ə-pō-lis (in-di-ən-ə-pō-lis) the capital (pop. 700,807, with agglom. 698,000) of Indiana, center of the corn belt; agricultural trade, meat packing, metallurgy, pharmaceuticals

Indian club a bottle-shaped wood or metal club, used in exercises to strengthen the muscles

Indian corn *CORN (maize)

Indian Desert *THAR

Indian file single file [after the American Indian way of moving along trails]

Indian giver (*pop.*) a person who gives a present and then asks for it back

Indian hemp *Apocynum cannabinum*, fam. Apocynaceae, a North American dogbane from which a fiber for cordage was formerly made || hemp || sunn hemp

Indian ink (*Br.*) India ink

in-dian-is-mo (in-djūn-i-s-mō) *n.* a cultural movement in Latin America, esp. (and originally) in Mexico, which draws national pride from native folklore and the native race. In Mexico it owes much to Emiliano Zapata and to the mural painters Diego Rivera, José Clemente Orozco, and David Alfaro Siqueiros [Span.]

Indian meal cormeal

Indian millet durra

Indian Mutiny a rebellion (1857-8) of the Bengal Sepoys against British rule in India. It was largely caused by Hindu opposition to British attempts to impose social reforms. The revolt spread quickly through central India, causing much bloodshed, and was repressed with great severity. It resulted in the Government of India Act (1858), by which the rule of India passed from the East India Company to the Crown

Indian National Congress a political organization founded in 1885 in India to promote constitutional progress. Under Gandhi and Nehru it campaigned for independence after the 1st world war. After 1947 the Congress party remained dominant in India

In-di-an-ness (in-di-ən-nis) *n.* the quality of being Indian (Native American or Eastern)

Indian Ocean the ocean (area incl. seas, gulfs and Antarctic waters, 29,000,000 sq. miles) between Africa, Asia, and Australia. Length (Pakistan-Antarctica): 6,000 miles. Width (South Africa to Australia): 6,500 miles. The Great Indian Ridge (the Maldives and Mauritius are summits) running to Antarctica divides it into an eastern valley, relatively unaccented, and a western valley broken by smaller ridges culminating in many islands. Average valley depth: 2,700 fathoms. Deeps reach 4,100 fathoms (Sundas trench). The monsoons, changing direction with the seasons, reverse its currents: Oct.-Apr. generally north, May-Sept. south and west

Indians, North American *NORTH AMERICAN INDIANS

Indian summer a period of warm, dry weather in late autumn, esp. in North America

Indian Territory country set aside under the Indian Intercourse Act (1834) for Indians || the eastern part of present Oklahoma, where Indians were gradually forced to settle

India paper a very thin, soft but strong paper originally made in China and Japan, used for making prints of engravings || a thin, tough printing paper, used esp. for Bibles, prayer books etc.

India rubber natural rubber || a rubber eraser

Indic *INDIC LANGUAGES

indic indicative

in-di-ean (in-dik-ēn) *n.* a natural glucoside found in plants of genus *Indigofera*, the decomposition of which makes indigo dye || a normal constituent of urine which yields indigo upon oxidation [fr. *L. indicum*, indigo]

in-di-cate (in-dik-ēt) *pres. part.* **in-di-cating** *past and past part.* **in-di-cated** *v.t.* to direct attention to || to point out, show, a signpost *indicates the road* || to denote the probability of, his symptoms *indicate mumps* || to state in brief, *indicate what you think about this* [fr. *L. indicare* (indicatus), to make known]

in-di-ca-tion (in-dik-ē-shən) *n.* something that indicates || an indicating or being indicated [F.]