

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MOBILEMEDIA IDEAS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 10-258-SLR-MPT

PUBLIC - REDACTED VERSION

**DECLARATION OF LUANN L. SIMMONS IN SUPPORT OF
OPENING BRIEF IN SUPPORT OF APPLE INC.'S MOTION FOR
SUMMARY JUDGMENT OF INVALIDITY AND NON-INFRINGEMENT
OF U.S. PATENT NO. RE 39,231**

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Dated: October 20, 2015

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I, Luann L. Simmons, declare:

1. I am an attorney with O'Melveny & Myers LLP, counsel of record for Defendant Apple Inc. ("Apple") in the above-captioned litigation. I submit this declaration in support of Apple's Opening Brief In Support Of Apple Inc.'s Motion For Summary Judgment Of Invalidity And Non-Infringement Of U.S. Patent No. RE 39,231. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would do so competently.

2. Attached hereto are true and correct copies of the following documents:

Exhibit	Description
A	U.S. Patent No. RE 39,231
B	'231 Reexam Certificate

Exhibit	Description
C	Webster's Third New International Dictionary of the English Language Unabridged (1993) (excerpt); Webster's New World College Dictionary, 4th Ed (2004) (excerpt); Cambridge International Dictionary of English (1995) (excerpt); Webster's II New College Dictionary (2001) (excerpt)
D	Expert Report of Dr. Ravin Balakrishnan on Invalidity (Jan. 13, 2012) (excerpt)
E	Expert Report of Dr. Ravin Balakrishnan on Non-Infringement (Mar. 5, 2012) (excerpt)
F	Claim Construction Hearing Transcript (July 27, 2012) (excerpt)
G	Sigurd Meldal Deposition Transcript (April 23, 2012) (excerpts)
H	First Expert Report of Dr. Sigurd Meldal (Jan. 13, 2012) (excerpts)

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 20th day of October, 2015 at San Francisco, California.

/s/ Luann L. Simmons
Luann L. Simmons

EXHIBIT A

DECLARATION OF LUANN L. SIMMONS IN SUPPORT OF
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SUMMARY JUDGMENT OF INVALIDITY AND NON-INFRINGEMENT
OF U.S. PATENT NO. RE 39,231

Civil Action No. 10-258-SLR



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 (12) **Reissued Patent**
Yasuda et al.

(10) **Patent Number:** **US RE39,231 E**
 (45) **Date of Reissued Patent:** **Aug. 8, 2006**

(54) **COMMUNICATION TERMINAL
 EQUIPMENT AND CALL INCOMING
 CONTROL METHOD**

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(73) Assignee: **Sony Corporation**, Tokyo (JP)

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(21) Appl. No.: **09/998,426**

(22) Filed: **Nov. 30, 2001**

Related U.S. Patent Documents

Reissue of:

(64) Patent No.: **5,995,852**
 Issued: **Nov. 30, 1999**
 Appl. No.: **08/571,650**
 Filed: **Dec. 13, 1995**

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(30) **Foreign Application Priority Data**

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(51) **Int. Cl.**

H04Q 7/20 (2006.01)

H04Q 7/32 (2006.01)

H04Q 7/38 (2006.01)

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Primary Examiner—Keith Ferguson

(74) *Attorney, Agent, or Firm*—Jay H. Maioli

(57) **ABSTRACT**

(52) **U.S. Cl.** **455/567**; 455/564; 455/550.1;
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 455/343.1; 379/418; 379/355.01; 379/373;
 379/373.01; 379/373.02; 340/7.58; 340/7.57;
 340/7.6

(58) **Field of Classification Search** 455/403,
 455/550.1, 567, 340, 355, 500, 517, 572,
 455/427.1, 73, 78, 79; 340/7.62, 7.58, 7.57,
 340/5.39

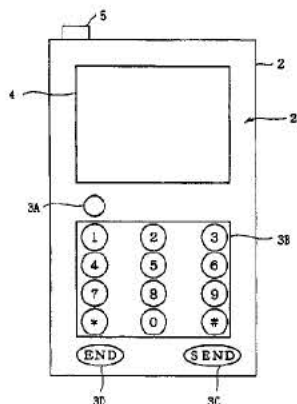
See application file for complete search history.

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23 Claims, 5 Drawing Sheets



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