

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SIPCO, LLC, *et al.*,

Plaintiffs,

v.

EMERSON ELECTRIC CO., *et al.*,

Defendants.

Civil Action No: 1:16-cv-02690-AT

**DECLARATION OF JAMES C. HALL IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO SERVE
AMENDED SUPPLEMENTAL INVALIDITY CONTENTIONS**

I, James C. Hall, state as follows:

1. I am a competent adult over 18 years of age able to testify as to personal knowledge. The facts in this declaration are true and correct to the best of my knowledge, information, and belief, and I am competent to testify to them if called upon to do so.

2. Attached hereto as Exhibit A is a true and correct copy of a Complaint for Declaratory Judgment of Patent Non Infringement and Invalidity, dated July 31, 2013.

3. Attached hereto as Exhibit B is a true and correct copy of a Complaint for Declaratory Judgment of Patent Non Infringement and Invalidity, dated January 30, 2015.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' First Set of Joint Invalidity Contentions, dated October 26, 2015.

5. Attached hereto as Exhibit D is a true and correct copy of Plaintiffs' Joint Invalidity Contentions, dated December 23, 2015.

6. Attached hereto as Exhibit E is a true and correct copy of Defendants' Joint Invalidity Contentions, dated May 16, 2016.

7. Attached hereto as Exhibit F is a true and correct copy of Defendants' Supplemental Joint Invalidity Contentions, dated June 13, 2016.

8. Attached hereto as Exhibit G is a true and correct copy of a Memorandum Opinion and Order dated March 28, 2016 in the case of *Imperium IP Holdings (Cayman), Ltd. v. Samsung Electronics Co., Ltd.*, No. 4:14-cv-371, 2016 WL 3854700 (E.D. Texas March 28, 2016).

9. Attached hereto as Exhibit H is a true and correct copy of a Memorandum Opinion and Order dated March 30, 2012 in the case of *Patent Harbor, LLC v. Audiovox Corp.*, No. 6:10-cv-00361 LED-JDL, No. 6:10-cv-00436

LED-JDL, No. 6:10-cv-00607 LED JDL, 2012 WL 12840341 (E.D. Texas, March 30, 2012).

10. Attached hereto as Exhibit I is a true and correct copy of an Order dated August 11, 2011 in the case of *LML Patent Corp. v. JPMorgan Chase & Co.*, No. 2:08-cv-448, 2011 WL 5158285 (E.D. Texas, August 11, 2011).

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

DATED: August 5, 2016

/s/ James C. Hall
James C. Hall

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