

Exhibit L

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

EMERSON ELECTRIC CO., FISHER-
ROSEMOUNT SYSTEMS, INC., and
ROSEMOUNT INC.,

Plaintiffs,

v.

SIPCO LLC, and
IP CO., LLC (d/b/a INTUS IQ)

Defendants.

Civil Action No. 1:15-cv-00319-AT

SIPCO LLC, and
IP CO., LLC (d/b/a INTUS IQ)

Plaintiffs,

v.

EMERSON ELECTRIC CO., EMERSON
PROCESS MANAGEMENT LLLP, FISHER-
ROSEMOUNT SYSTEMS, INC.,
ROSEMOUNT INC., BP, p.l.c., BP AMERICA,
INC., and BP AMERICA PRODUCTION
COMPANY,

Defendants.

Civil Action No. 6:15-cv-907

DECLARATION OF DAVID LAFFERTY

I, David Lafferty, do hereby declare as follows:

1. I am a competent adult over 18 years of age. I make the following statements based upon my personal knowledge.

2. I was an employee of BP Corporation North America Inc. until 2013. I worked for BP's Central Technology Office ("CTO"). In that capacity, I was responsible for evaluating new technologies for use within BP.

3. Since leaving BP in 2013, I have operated a consulting firm called Scientific Technical Services, a sole proprietorship. I have contracted with, among others, BP's Alaska operations. I also serve as an advisor to Emerson Electric's Leadership Team.

4. In 2005 I was involved in evaluating the applicability of wireless process management products for use by BP.

5. At that time, BP canvassed the market for an available wireless product but Emerson's Rosemount subsidiary was the only company we identified as having a product to be tested.

6. BP decided that it would allow Emerson to test the use of their early prototype products at the BP refinery at Cherry Point in Washington. I was personally involved in that process and Robert Karschnia was my primary contact with Emerson.

7. Only two product types were tested at the Cherry Point facility in 2005/06, Emerson's wireless pressure sensors and Emerson's temperature sensors. The products tested were brought to BP's facility by Emerson and they remained Emerson's property. BP was never charged for those products and no payment was ever made for those products.

8. Although BP identified where Emerson was to place its sensors for testing, and BP identified extremely challenging locations to test radio communications equipment, it was Emerson's employees who installed those products, monitored and recorded their performance, and removed those products when the testing was complete. BP monitored Emerson's testing

but no BP employee was involved in designing the products tested, installing those products, or running the evaluation.

9. Emerson tested a first prototype product and determined that product modifications were required. BP engineers had no involvement in re-designing the product other than advising that the initial prototypes did not meet BP's standards for reliability. Emerson returned to their lab in Minnesota, worked on the product some more, and returned to Cherry Point with new product to be tested.

10. Emerson again brought their own product, installed that product, operated it, and monitored the results. Emerson made all of the engineering changes on their own. The Emerson employees compiled all testing data on their own devices and the testing that was done was beta-like in nature. BP did provide some specification guidance, for example specifying that it wanted product that would work in both the United States and world-wide, but responsibility for designing and manufacturing the product was entirely in Emerson's hands.

11. The Cherry Point facility is owned and operated by BP Products North America Inc., not BP p.l.c., BP America Production Company or BP America Inc.

12. My involvement in the project ended upon completion of the testing at the Cherry Point facility. BP asked for exclusive use of the products tested at the Cherry Point facility but all we received in exchange for providing the test location was favorable commercial terms on future purchases of the Emerson wireless products tested. BP turned over the project to its in-house procurement groups at the conclusion of the successful testing at Cherry Point and it is my understanding that various BP entities have purchased additional Emerson Smart Wireless products since that time, but I have not been involved in those transactions.

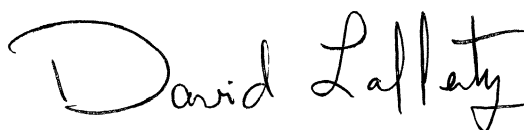
13. I understand that an assertion has been made that BP jointly developed Emerson's Smart Wireless products. I strongly disagree with the assertion that BP jointly developed Emerson's Smart Wireless products. I also strongly disagree with any suggestion that BP directed or controlled Emerson's development of those products.

14. In addition to facilitating testing of the Smart Wireless products Emerson supplied and evaluated within their plant, BP was an early adopter of Emerson's Smart Wireless technology. I commonly refer to creating a "partnership" with our vendors, but I use that term in contrast with the conventional, adversarial relationship between a supplier and a buyer. BP will not, and has not, endorsed a product or vendor and we did not do so with Emerson.

15. I am presently headquartered in the Houston, Texas area, but my work in the last several years has been in Asia and Alaska. I do not know if my testimony will be relevant or necessary at any trial in this matter, but if necessary, I agree to make myself available for trial in Atlanta.

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

Dated: August 5, 2016

A handwritten signature in black ink that reads "David Lafferty". The signature is written in a cursive, flowing style.

David Lafferty