

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

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
File No. 1:16-cv-02690-AT

DECLARATION OF PAUL J. CRONIN, ESQ.

I, Paul J. Cronin, Esq., state as follows:

1. I am a competent adult over 18 years of age without any criminal convictions. I submit this declaration in support of Plaintiffs' Sur-Reply in Support of their Opposition to Defendant BP p.l.c.'s Motion to Dismiss for Failure to State a Claim and Misjoinder.

2. 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.

3. I am a partner at the law firm Nutter McClennen & Fish, LLP in Boston, Massachusetts, which represents Plaintiffs' SIPCO, LLC and IP CO, LLC (together "Plaintiffs") in the above-captioned matter.

4. The First Amended Complaint was served on the U.S. BP entities shortly after it was filed.

5. Emerson's attorneys appeared on behalf of the U.S. BP entities. Plaintiffs inquired whether BP p.l.c. would accept service of the First Amended Complaint. BP and Emerson's counsel indicated that they did not represent BP p.l.c. and thus could not accept service on behalf of BP p.l.c. But BP and Emerson's counsel indicated that BP p.l.c. wanted to explore the possibility of allowing BP p.l.c. to exit the case without the need for service of the First Amended Complaint.

6. Plaintiffs inquired about the substance of BP p.l.c.'s proposal. When BP p.l.c. finally provided a proposal, Plaintiffs determined that it was unacceptable.

7. Plaintiffs paid more than \$2,000 to serve BP p.l.c. through the Hague Convention.

8. Attached hereto as Exhibit A is a true and correct copy of an email I sent to opposing counsel on March 4, 2016.

Signed under the penalties of perjury this 9th day of August, 2016.

/s/ Paul J. Cronin

Paul J. Cronin, Esq.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

The undersigned hereby certifies that this filing was prepared using one of the font and point selections approved by this Court in Local Rule 5.1C.

Specifically, Times New Roman font was used in 14 point.

J. Christopher Fox, II

J. Christopher Fox, II

CERTIFICATE OF SERVICE

This is to certify that I have this day served all counsel of record with a copy of the within and foregoing *DECLARATION OF PAUL J. CRONIN, ESQ.* using the Court's ECF filing system which will automatically send a copy to all counsel of record registered to receive service thereby, and also by U.S. Mail, postage prepaid, upon the following:

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