

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

UNILOC 2017 LLC,

Plaintiff,

v.

PAYCHEX, INC.,

Defendant.

Civil Action No. 1:19-cv-11272-RGS

UNILOC 2017 LLC,

Plaintiff,

v.

ATHENAHEALTH, INC.,

Defendant.

Civil Action No. 1:19-cv-11278-RGS

**DECLARATION OF MICHAEL J. ERCOLINI IN SUPPORT OF CLAIM
CONSTRUCTION MEMORANDUM OF UNILOC 2017**

I, Michael J. Ercolini, make this Declaration on the basis of personal knowledge and under the penalty of perjury.

1. I am an associate at the law firm of Prince Lobel & Tye, LLP and a member of the New York Bar in good standing.

2. I represent the plaintiff, Uniloc 2017 LLC, and make this declaration in support of Uniloc 2017's Claim Construction Memorandum.

3. Attached as Exhibit 1 is a true and correct copy of the applicant's October 23, 2001 response to the August 13, 2001 Office Action from the prosecution history of U.S. Patent No. 6,510,466.

Dated: January 23, 2020

/s/ Michael J. Ercolini