

**UNITED STATES DISTRICT COURT
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

**UNOPPOSED MOTION OF PLAINTIFF TO SUBSTITUTE CORRECTED
DECLARATION**

Plaintiff Uniloc 2017, LLC had previously filed a Declaration of Dr. Michael Shamos, Dkt. No. 26-1.¹ After the filing, Dr. Shamos discovered a “cut and paste error” in a section of the Declaration, at paragraph numbers 75-86. He then prepared the Corrected Declaration attached to the Gannon Declaration as Exhibit A, which is identical to the original Declaration, except that paragraphs 75-86 have been rewritten to correct the error.

A copy of this Corrected Declaration was provided to Defendants on February 9, the day before the deposition of Dr. Shamos. At his deposition, Dr. Shamos described how the error occurred and what he did to correct it. *See* Ex. B to Gannon Declaration.

¹ Citation is to the docket in 1:19-cv-11272-RGS.

Defendants have informed Plaintiff they do not oppose substitution of the attached Corrected Declaration for the original.

Dated: February 19, 2020.

/s/ Kevin Gannon

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ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Kevin Gannon