

**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

**DECLARATION OF KEVIN GANNON IN SUPPORT OF UNILOC'S RESPONDING
BRIEF ON CLAIM CONSTRUCTION AND INDEFINITENESS**

I, Kevin Gannon, hereby declare under penalty of perjury:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff in this action, Uniloc 2017 LLC ("Uniloc"). I submit this declaration in support of the Uniloc's Responding Brief on Claim Construction and Indefiniteness.

2. Attached as Exhibit 1 are copies of excerpts from the official transcript of the deposition of Dr. Michael Shamos.

3. Attached as Exhibit 2 is a copy of United States Patent No. 6,510,466.

4. Attached as Exhibit 3 is a copy of the February 5, 2020 Order of Judge Robert W. Schroeder III of the United States District Court for the Eastern District of Texas.

Dated: February 20, 2020

/s/ Kevin Gannon