

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PHILIPS NORTH AMERICA LLC,)	
)	
Plaintiff,)	
)	C.A. No. 1:19-cv-11586-IT
v.)	
)	
FITBIT, INC.)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	
)	

**AFFIDAVIT OF RUBEN J. RODRIGUES IN SUPPORT OF
MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE***

I, Ruben J. Rodrigues, do hereby depose and state under oath as follows:

1. I am a resident of the State of Massachusetts and am a member in good standing of the Bar of this Court.
2. I am a member of the law firm Foley & Lardner LLP, at 111 Huntington Avenue, Boston, Massachusetts 02199.
3. I represent Philips North America LLC, (“Philips”) in connection with the above-captioned litigation.
4. The appearance and active participation of Andrew M. Gross on behalf of Philips will facilitate the representation of Philips in this Court.
5. Andrew M. Gross is also an associate with Foley & Lardner LLP, who practices out of the firm’s office located at 321 N. Clark Street, Suite 3000, Chicago, Illinois 60654. Andrew M. Gross is a member of good standing of the Bar of the State of Illinois (Bar No. 6299917) and there are no disciplinary proceedings pending against Andrew M. Gross as a member of the Bar in any jurisdiction. Andrew M. Gross is familiar with the Local Rules of the

United States District Court of Massachusetts.

WHEREFORE, the undersigned respectfully requests that this Court enter an Order admitting Andrew M. Gross, *pro hac vice*, as counsel of record for the Plaintiff Philips for all purposes relating to the proceedings in the above-styled matter.

Dated: November 17, 2020

Respectfully submitted,

/s/ Ruben J. Rodrigues

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above document was served on November 17, 2020 on counsel for Defendant via electronic mail.

/s/ Ruben J. Rodrigues

Ruben J. Rodrigues