

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

B.E. TECHNOLOGY, L.L.C.,

Plaintiff,

v.

SAMSUNG TELECOMMUNICATIONS

AMERICA, LLC,

Defendant.

Civil Action No. 12-cv-02824-JPM-tmp

JURY TRIAL DEMANDED

B.E. TECHNOLOGY, L.L.C.,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA

INC.,

Defendant.

Civil Action No. 12-cv-02825-JPM-tmp

JURY TRIAL DEMANDED

DECLARATION OF RICHARD C. PETTUS IN SUPPORT OF DEFENDANTS
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC AND SAMSUNG
ELECTRONICS AMERICA INC.'S MOTION TO (A) COMPEL SUPPLEMENTAL
INFRINGEMENT CONTENTIONS THAT COMPLY WITH LOCAL PATENT RULE
3.1, AND (B) RELIEVE DEFENDANTS OF CERTAIN RESPONSIVE DISCOVERY
OBLIGATIONS PENDING SERVICE OF COMPLIANT CONTENTIONS

I, Richard C. Pettus, declare as follows:

I am an attorney duly licensed to practice in the state of New York and admitted pro hac vice before this Court. I am an attorney at Greenberg Traurig LLP, counsel of record for Defendant Samsung Telecommunications America, LLC and Samsung Electronics America, Inc. (collectively, "Samsung"). I have personal knowledge of the facts stated in this declaration, and

if called upon to do so, could and would competently testify thereto. I make this declaration in support of Samsung's Motion to (a) Compel Supplemental Infringement Contentions that Comply with Local Patent Rule 3.1 and (b) Relieve Defendants of Certain Responsive Discovery Obligations Pending Service of Compliant Contentions ("Motion").

Attached hereto are true and correct copies of material referenced in Samsung's Motion:

1. Exhibit A is a true and correct copy of an excerpt from of Plaintiff's Preliminary Infringement Contentions ("ICs") relating to the Samsung "Acclaim" product (dated January 7, 2013). The complete ICs accused 177 products and comprised 10,363 pages.
2. Exhibit B is a true and correct copy of Samsung's correspondence to B.E. Technology ("Plaintiff") regarding Plaintiff's Preliminary Infringement Contentions ("ICs") (sent January 18, 2013).
3. Exhibit C is a true and correct copy of Plaintiff's correspondence to Samsung in response to Samsung's January 18, 2013 correspondence regarding Plaintiff's ICs (received January 30, 2013).
4. Exhibit D is a true and correct copy of Samsung's correspondence with Plaintiff regarding supplementing Plaintiff's ICs (dated July 17, 2013 through July 23, 2013).

I declare under the penalty of perjury that the foregoing is true and correct.

DATE: July 23, 2013



Richard C. Pettus