IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

B.E. TECHNOLOGY, L.L.C.,
 	
          Plaintiff,
 	
       v.
 	
SAMSUNG TELECOMMUNICATIONS AMERICA LLC.,
 	
          Defendants.
	CIVIL ACTION NO.
	2:12-CV-02824-JPM-tmp
	
	JURY TRIAL DEMANDED

B.E. TECHNOLOGY, L.L.C.,
 	
          Plaintiff,
 	
       v.
 	
SAMSUNG ELECTRONICS AMERICA, INC.,
 	
          Defendants.
	CIVIL ACTION NO.
	2:12-CV-02825-JPM-tmp
	
	JURY TRIAL DEMANDED

DECLARATION OF JUSTIN A. MACLEAN IN SUPPORT OF THE SAMSUNG DEFENDANTS' REPLY IN SUPPORT OF THEIR MOTION TO COMPEL SUPPLEMENTAL INFRINGEMENT CONTENTIONS

I, Justin A. MacLean, hereby declare and state as follows:

1.   I am an associate in the New York office of Greenberg Traurig, LLP ("GT"), located at 200 Park Avenue, New York, NY 10166. I submit this declaration in support of Defendants Samsung Telecommunications America LLC ("STA") and Samsung Electronics America, Inc.'s ("SEA") (collectively, "Samsung") Motion to Compel Supplemental

Infringement Contentions ("Motion"). This declaration is based upon facts of which I have personal knowledge.
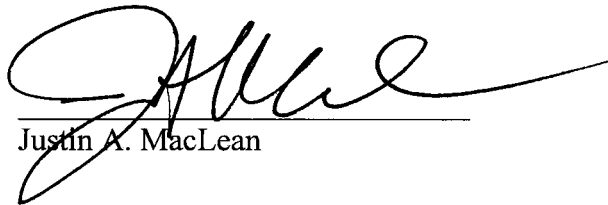
2.   Attached hereto as **Exhibit 1** is a true and correct copy of Docket Entry No. 90 in the matter styled *Multilayer Stretch Cling Film Holdings, Inc. v. MSC Mktg. & Tech., Inc.*, No. 2:12-cv-02112-JPM-tmp (W.D. Tenn. July 23, 2013), Order Denying Defendant's Motion to Compel.

3.   Attached hereto as **Exhibit 2** is a true and correct copy of Docket Entry No. 76 in the matter styled *Multilayer Stretch Cling Film Holdings, Inc. v. MSC Mktg. & Tech., Inc.*, No. 2:12-cv-02112-JPM-tmp (W.D. Tenn. June 17, 2013), Response in Opposition to Sigma's Motion to Compel Supplementation of Multilayer's Infringement Contentions.

4.   Attached hereto as **Exhibit 3** is a true and correct copy of an excerpt from Plaintiff's Preliminary Infringement Contentions ("ICs") relating to the "Samsung Galaxy Cameras" product.

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

Executed in New York, New York on August 19, 2013.

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Justin A. MacLean

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