

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

B.E. TECHNOLOGY, L.L.C.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:12-cv-02824 JPM tmp
v.	)	
	)	JURY DEMAND
SAMSUNG	)	
TELECOMMUNICATIONS	)	
AMERICA, LLC,	)	
	)	
Defendant.	)	
	)	
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B.E. TECHNOLOGY, L.L.C.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:12-cv-02825 JPM tmp
v.	)	
	)	JURY DEMAND
SAMSUNG ELECTRONICS	)	
AMERICA, INC.,	)	
	)	
Defendant.	)	
	)	
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DECLARATION OF QUDUS B. OLANIRAN IN SUPPORT OF MEMORANDUM IN  
OPPOSITION TO DEFENDANT’S MOTION TO COMPEL SUPPLEMENTAL  
INFRINGEMENT CONTENTIONS AND STAY CERTAIN DISCOVERY  
OBLIGATIONS

I, Qudus B. Olaniran, declare as follows:

1. I am an attorney with the law firm of Freitas Tseng & Kaufman LLP, counsel for B.E. Technology, L.L.C. I have personal knowledge of the facts stated in this Declaration and could testify competently to them if asked to do so.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter to C. Kaufman from J. Nelson dated January 18, 2013.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a letter to J. Nelson from J. Lin dated January 30, 2013.

4. Attached hereto as **Exhibit 3** is a true and correct copy of an email to J. Lin from J. MacLean dated July 13, 2013.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an email to R. Pettus from D. Weinberg dated July 17, 2013.

6. Attached hereto as **Exhibit 5** is a true and correct copy of *Multilayer Stretch Cling Film Holdings, Inc. v. MSC Marketing and Tech., Inc.*, 2:12-cv-02112-JPM-tmp (W.D. Tenn. July 23, 2013), Order Denying Defendant's Motion to Compel.

7. Attached hereto as **Exhibit 6** is a true and correct copy of an excerpt of B.E. Technology L.L.C.'s Initial Infringement Contentions and Document Production Accompanying Initial Infringement Contentions dated July 1, 2013.

8. Attached hereto as **Exhibit 7** is a true and correct copy of an email to J. Raskin from D. Weinberg dated July 23, 2013.

9. Attached hereto as **Exhibit 8** is a true and correct copy of an email to D. Weinberg from J. Raskin dated July 23, 2013.

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

Executed this 9th day of August, 2013, at Redwood Shores, California.



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Qudus B. Olaniran