IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION



DECLARATION OF MICHAEL A. BERTA IN SUPPORT OF LG ELECTRONICS INC.'S SUR-REPLY IN OPPOSITION TO AGIS'S DAUBERT MOTION TO EXCLUDE THE OPINIONS OF W. CHRISTOPHER BAKEWELL RELATING TO DAMAGES

- I, Michael A. Berta, state and declare as follows:
- 1. I am a partner of Arnold & Porter Kaye Scholer LLP ("Arnold & Porter"), counsel of record for Defendant LG Electronics Inc. ("LG Korea"). I am a member of the Bar of the State of California and have been admitted to practice in the United States District Court for the Eastern District of Texas ("EDTX"). I provide this declaration in support of Defendant LG Korea's Sur-Reply In Opposition to AGIS's *Daubert* Motion to Exclude the Opinions of W. Christopher Bakewell Relating to Damages. I have personal knowledge of the matters stated in this declaration and would testify competently and truthfully to them if called upon to do so.



- 2. Attached hereto as Exhibit 1 is a true and correct highlighted copy of excerpts of the deposition transcript of W. Christopher Bakewell, taken on February 12, 2019.
 - 3. Attached hereto as Exhibit 2 is a true and correct highlighted copy of the



I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on February 27, 2019.

/s/ Michael A. Berta

Michael A. Berta Attorney for Defendant LG Electronics Inc.

