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

GESTURE TECHNOLOGY	§
PARTNERS, LLC,	§
Plaintiff	§ §
V.	§ CASE NO. 2:21-cv-00040-JRG
HUAWEI DEVICE CO., LTD.,	§ (Lead Case)
HUAWEI DEVICE USA, INC.,	$^{\S}_{\S}$ JURY TRIAL DEMANDED
Defendants.	§ §
GESTURE TECHNOLOGY PARTNERS, LLC,  Plaintiff  v.  SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,	<pre> § § § § S S CASE NO. 2:21-cv-00041-JRG § (Member Case) § JURY TRIAL DEMANDED § § § § § § § § § § § § § § § § § §</pre>
Defendants.	§

## DECLARATION OF RADHESH DEVENDRAN IN SUPPORT OF SAMSUNG DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OF INVALIDITY UNDER § 101

I, Radhesh Devendran, hereby declare as follows:

I am an attorney at the law firm of Paul Hastings LLP, counsel for Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") in the above-entitled consolidated action. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.



- 1. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from Exhibit SAMSUNG-079 to the Expert Report of Benedict Occhiogrosso Regarding Infringement, dated October 20, 2021.
  - 2. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 8,553,079.
- 3. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the deposition of Benedict Occhiogrosso, taken November 23, 2021.
  - 4. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No. 8,878,949.
- 5. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the Corrected Expert Report of Dr. Robert Stevenson Regarding Invalidity, dated October 27, 2021.
- 6. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from Exhibit SAMSUNG-949 to the Expert Report of Benedict Occhiogrosso Regarding Infringement, dated October 20, 2021.
- 7. Attached hereto as Exhibit 7 is a true and correct copy of the July 20, 2009 Applicant Remarks from the file history of U.S. Patent No. 7,756,297.
- 8. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from Exhibit SAMSUNG-431 to the Expert Report of Benedict Occhiogrosso Regarding Infringement, dated October 20, 2021.
- 9. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the claim chart for U.S. Patent No. 7,933,431 from Plaintiff's Final Infringement Contentions, dated September 20, 2021.
- 10. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the deposition of Benedict Occhiogrosso, taken November 19, 2021.



- 11. Attached hereto as Exhibit 11 is a true and correct copy of U.S. Patent No. 7,933,431.
- 12. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the deposition of Timothy Pryor, taken October 8, 2021.
- 13. Attached hereto as Exhibit 13 is a true and correct copy of U.S. Patent No. 8,194,924.
- 14. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from Exhibit SAMSUNG-924 to the Expert Report of Benedict Occhiogrosso Regarding Infringement, dated October 20, 2021.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 1st day of December, 2021 in Palo Alto, California.

/s/ Radhesh Devendran
Radhesh Devendran

