

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

GESTURE TECHNOLOGY PARTNERS,
LLC,

Plaintiff

v.

HUAWEI DEVICE CO., LTD., AND
HUAWEI DEVICE USA, INC.,

Defendants.

JURY TRIAL DEMANDED

C.A. NO. 2:21-cv-00040-JRG

LEAD CONSOLIDATED CASE

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

C.A. NO. 2:21-cv-00041-JRG

**DECLARATION OF FRED I. WILLIAMS IN SUPPORT OF PLAINTIFF'S OPPOSED
MOTIONS IN LIMINE**

I, Fred I. Williams, state and declare as follows:

1. I am a partner of Williams Simons & Landis PLLC and counsel to Plaintiff Gesture Technology Partners, LLC ("GTP"). I make this declaration in support of Plaintiff's Opposed Motions *in Limine*. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached hereto as Exhibit A is a true and correct copy of Order on Motions *in Limine* as filed in *Estech Sys. v. Target Corp.*, No. 2:20-cv-00123-JRG-RSP, Dkt. No. 304, (E.D. Tex. July 21, 2021) (Payne, J.);

3. Attached hereto as Exhibit B is a true and correct copy of Order Regarding Motions *in Limine*, Motions for Summary Judgment, and Daubert Motions as filed in *MV3 Partners LLC v. Roku, Inc.*, No. 6:18-cv-308-ADA, ECF No. 332, (W.D. Tex. Sept. 29, 2020) (Albright, J.);

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Travis County, Texas, on this 10th day of January, 2022.

Dated: January 10, 2022

/s/ Fred I. Williams
Fred I. Williams