

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

GESTURE TECHNOLOGY
PARTNERS, LLC,

Plaintiff

v.

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

Defendants.

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CASE NO. 2:21-cv-00040-JRG
(Lead Case)

JURY TRIAL DEMANDED

GESTURE TECHNOLOGY
PARTNERS, LLC,

Plaintiff

v.

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

Defendants.

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CASE NO. 2:21-cv-00041-JRG
(Member Case)

JURY TRIAL DEMANDED

**DECLARATION OF DAVID M. FOX IN SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF MOTION FOR LEAVE TO AMEND INVALIDITY CONTENTIONS**

I, David M. Fox, hereby declare as follows:

1. I am an attorney at the law firm Paul Hastings LLP, counsel of record for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") in this action. I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently as to their truth.
2. Attached hereto as Exhibit C is a true and correct version of the video file produced by Mitsubishi Electric Research Laboratories, Inc. in response to Samsung's subpoena.

3. Attached hereto as Exhibit D are true and correct copies of five publications produced by the Beckman Institute, University of Illinois at Urbana-Champaign, in response to Samsung's subpoena.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 12th day of October, 2021 in Palo Alto, California.

/s/ David M. Fox

David M. Fox