

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

MAXELL, LTD.,

Plaintiff,

v.

ZTE CORPORATION and
ZTE USA INC.,

Defendants.

Case No. 5:16-cv-00179-RWS

JURY TRIAL DEMANDED

**DECLARATION OF TIFFANY A. MILLER IN SUPPORT OF MAXELL, LTD.'S
OPPOSITION TO ZTE (USA) INC.'S MOTION TO EXCLUDE PORTIONS OF
EXPERT OPINION TESTIMONY**

I, Tiffany A. Miller, hereby declare and state as follows:

1. I am an attorney at Mayer Brown LLP, counsel for Plaintiff Maxell, Ltd. ("Maxell") in the above-captioned lawsuits. I submit this declaration in support of Maxell's Opposition to ZTE (USA) Inc.'s Motion to Exclude Portions of Expert Opinion Testimony. I have personal knowledge of the statements herein, and, if called to do so, I could and would testify competently as to the same.

2. Attached as Exhibit A are true and accurate excerpts of the Expert Report of Carla S. Mulhern dated January 12, 2018, including certain Revised Exhibits dated February 20, 2018.

3. Attached as Exhibit B are true and accurate excerpts of the Videotaped Deposition of Carla S. Mulhern dated February 21, 2018.


4. Attached as Exhibit C are true and accurate excerpts of the Videotaped Deposition of Kenji Nakamura dated December 15, 2017.

5. Attached as Exhibit D are true and accurate excerpts of the Videotaped Deposition of Patrick Kennedy dated February 28, 2018.

6. Attached as Exhibit E are true and accurate excerpts of the Expert Report of Tulin Erdem dated January 5, 2018.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct and that this Declaration was executed on March 19, 2018 in Washington, D.C.

Dated: March 19, 2018

By: 
Tiffany A. Miller