

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

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

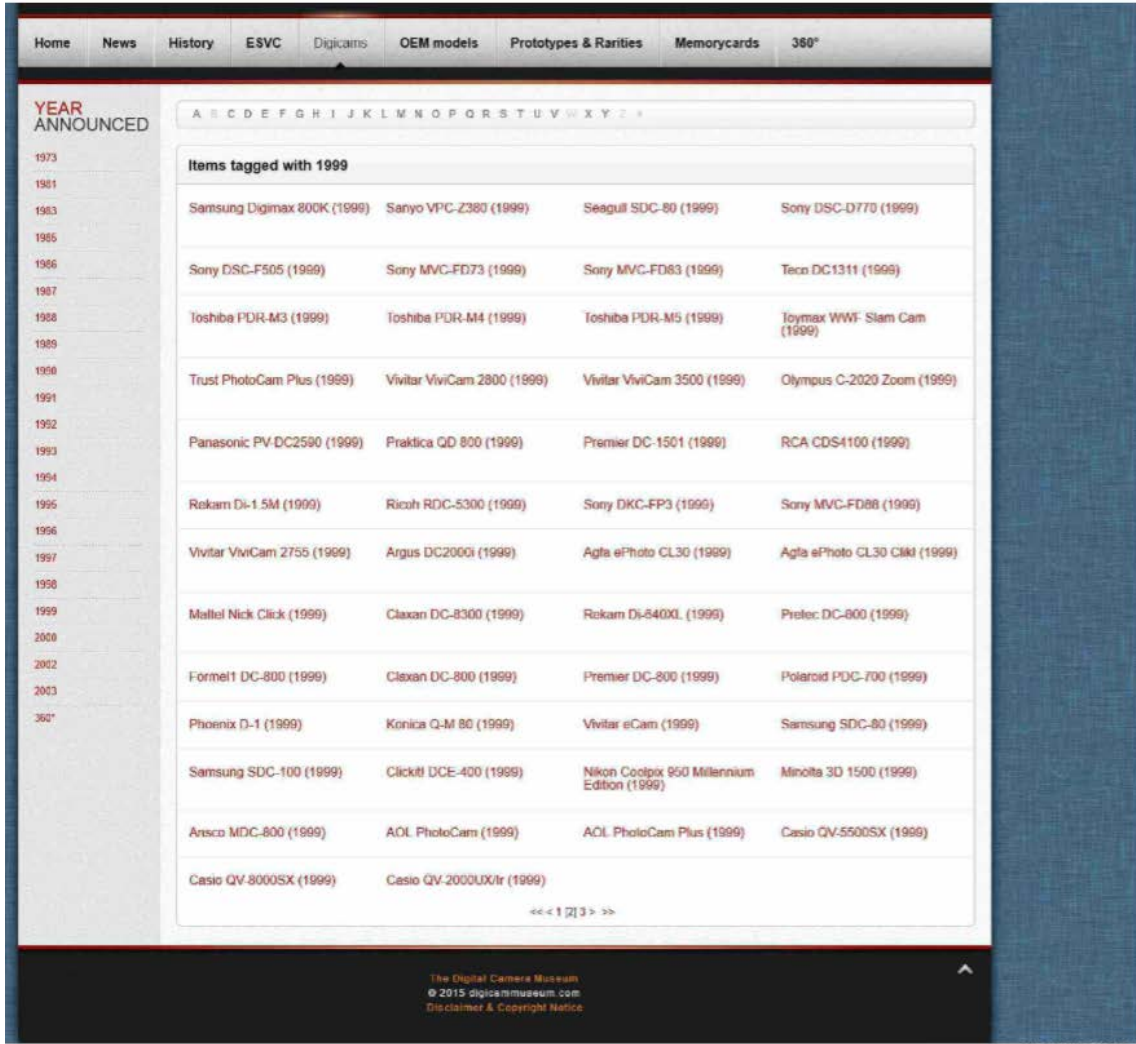
**DECLARATION OF TIFFANY A. MILLER IN SUPPORT OF
MAXELL, LTD.'S OPPOSITION TO APPLE'S MOTION FOR LEAVE TO
SUPPLEMENT INVALIDITY CONTENTIONS**

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 lawsuit. I submit this declaration in support of Maxell's Opposition to Apple Inc.'s ("Apple") Motion for Leave to Supplement Invalidation Contentions. 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. On July 10, 2019, Maxell produced a document bearing bates number MAXELL_APPLE0190983 – MAXELL_APPLE0190999. The document contains screenshots from The Digital Camera Museum website that were taken in March 2018.

3. The below is a true and accurate excerpt of the document bearing bates number MAXELL_APPLE0190983 – MAXELL_APPLE0190999 that was produced on July 10, 2019:

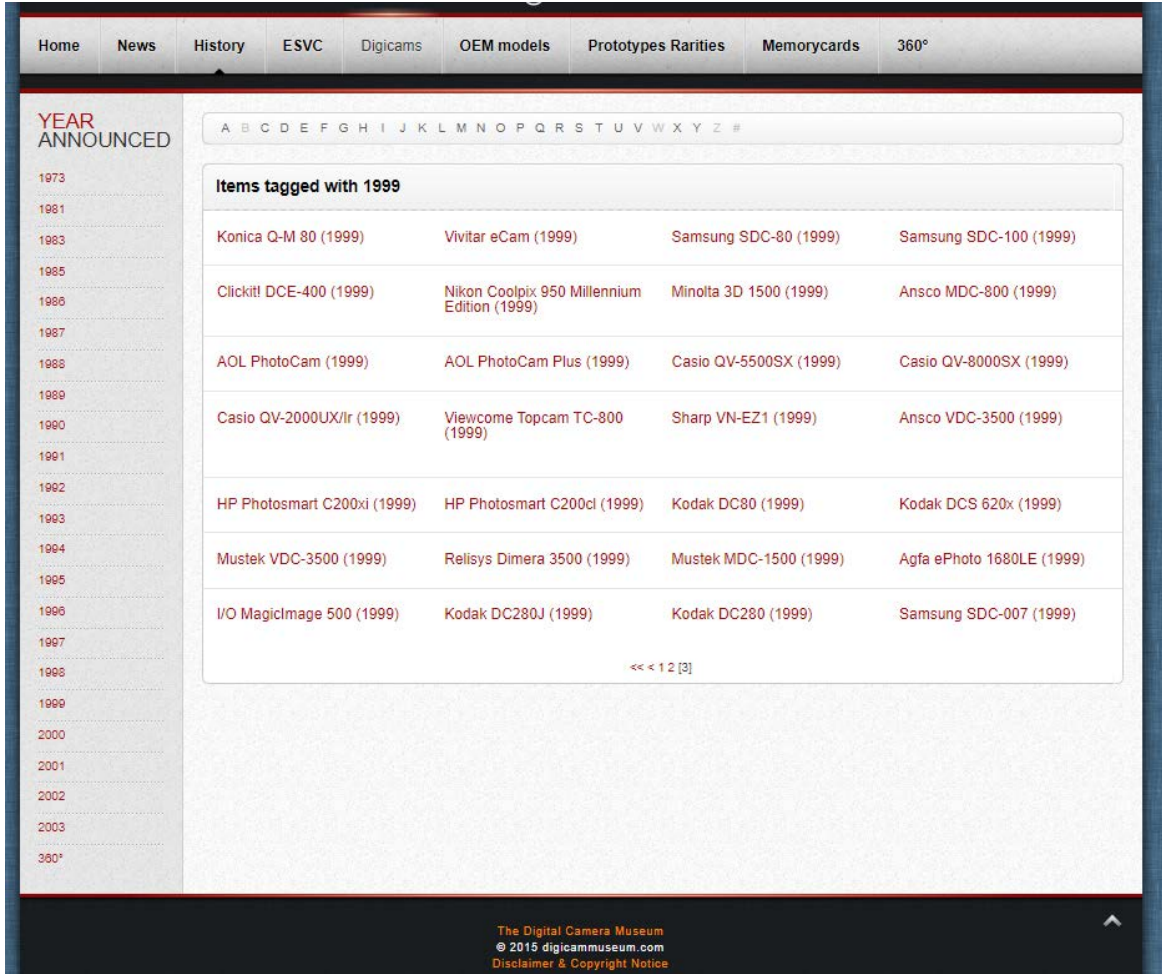


ASUS-MAX00019070

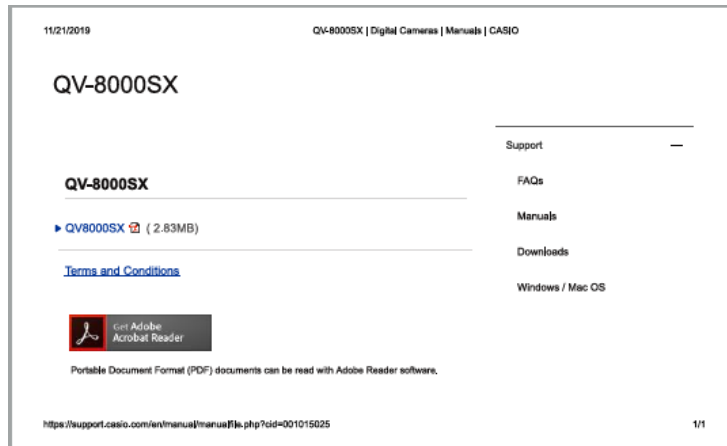
MAXELL_APPLE0190995

4. On the page marked MAXELL_APPLE0190995, the produced website identifies Casio QV-8000SX (1999) in the lower left-hand corner.

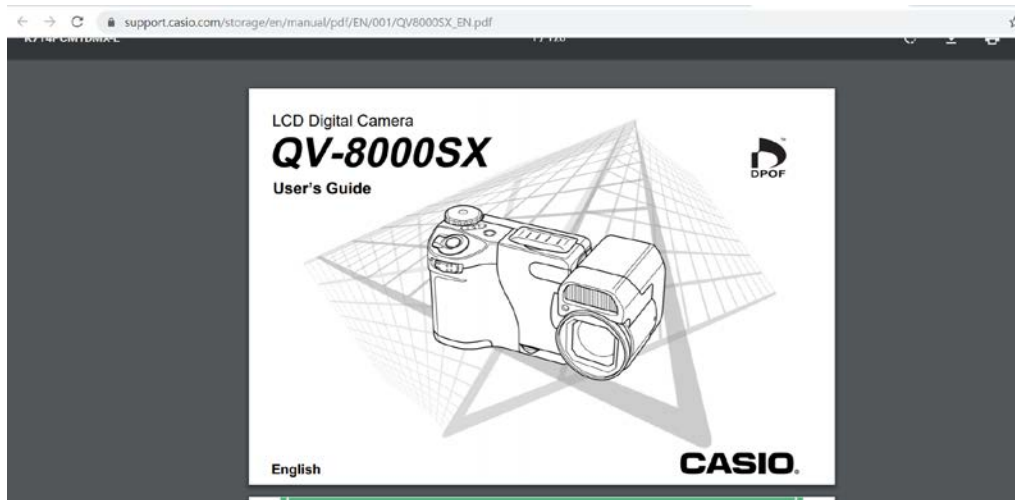
5. The below is a screenshot taken from the website <http://digitalkameramuseum.de> on November 21, 2019:



6. On November 21, 2019, I searched the manuals at support.casio.com and located the User's Guide for the QV-8000SX. The below is a screenshot of the support.casio.com website that was taken on November 21, 2019:



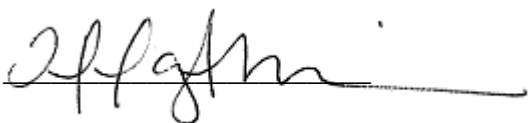
7. The below is a screenshot of the User's Guide available at the support.casio.com website that was taken on November 21, 2019:



8. Apple Inc. served its Invalidation Contentions Pursuant to Patent Local Rules 3-3 and 3-4 on August 14, 2019. In those contentions, for the '493 Patent, Apple identified 28 Prior Art Patents and Publications and 5 Prior Art Systems.

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 November 29, 2019 in Washington, D.C.

Dated: November 29, 2019

By: 
—Tiffany A. Miller—