Exhibit A

**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** PUBLIC VERSION

**DECLARATION OF SAQIB J. SIDDIQUI IN SUPPORT OF
MAXELL, LTD.'S OPPOSITION TO APPLE INC.'S MOTION TO COMPEL
INFRINGEMENT CONTENTIONS COMPLIANT WITH PATENT RULE 3-1(G)
OR, IN THE ALTERNATIVE, TO PRECLUDE MAXELL'S RELIANCE ON
<u>SOURCE CODE FOR INFRINGEMENT</u>**

I, Saqib J. Siddiqui, 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 to Compel Infringement Contentions Compliant with Patent Rule 3-1(g) or, in the Alternative, to Preclude Maxell's Reliance on Source Code for Infringement. 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.　　　I am familiar with Apple's source code production because I personally reviewed the production at the offices of O'Melveny & Myers LLP in San Francisco, California.

3.　　　Below is a table showing the relevant directories and source code percentages produced by Apple for each Asserted Patent. This table was compiled with the assistance of Maxell's source code review experts and based on Apple's representation that they produced
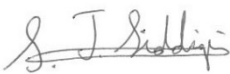
approximately 900,000 files of source code at the time Maxell served the Supplemental Infringement Contentions.

Asserted Patent	Citations Directories	**Approximate percentage of files cited including duplicate files across numerous versions**
'193	Only cited to directories including ███████ ███████████████████ ██████████ .	████████████ % of the produced source code
'317/'999/'498 Patents (walking navigation claims)	Only cited source code files within ████████ ███████████████████ directories. Specifically, citing to files describing ██████████ ███████████████████████	██████████ % of the produced source code
'317/'999/'498 Patents (friend finder claims)	Only cited source code files within ████████████████████████ ███████████████████ directories. Specifically, citing to files describing ███████████████████████ ███████████████████████ ██████████████████████	██████████ % of the produced source code
'438 Patent (AirDrop chart)	Only cited source code files within ████ directories. Specifically, citing to files describing ████████████	████████████ % of the produced source code
'438 Patent (pairing)	Only cited source code files within ████████ ████ directories. Specifically, citing to files describing ████████████████	████████████ % of the produced source code
'586 Patent	Only cited source code files within ███████████████████████ ███████████████████████ ██████████	████████████ % of the produced source code
'794 Patent	███████████████████ ███████████ ███████████████████ directories. Specifically, citing to files describing	████████████ % of the produced source code

Asserted Patent	Citations Directories	Approximate percentage of files cited including duplicate files across numerous versions
	███████████████████████	
'306 Patent	Only cited source code files within ███████████████████████ directories. Specifically, citing to files describing s███████████████████	██████ % of the produced source code
'991 Patent	Only cited source code files within ███████████████ directories. Specifically, citing to files describing ███████████████	██████ % of the produced source code
'493 Patent	███████████████ directories. Specifically, citing to files describing ███████████████	██████ % of the produced source code

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 27, 2019 in Washington, D.C.

Dated: November 27, 2019   By: _____

                                             Saqib J. Siddiqui