

**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

FILED UNDER SEAL

**DECLARATION OF TIFFANY A. MILLER IN SUPPORT OF
MAXELL, LTD.'S SUR-REPLY IN OPPOSITION TO APPLE INC.'S MOTION TO
STAY PENDING DETERMINATION OF *INTER PARTES* REVIEW OF THE
PATENTS-IN-SUIT**

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 Sur-Reply in Opposition to Apple Inc.'s ("Apple") Motion to Stay Pending Determination of *Inter Partes* Review of the Patents-in-Suit. I have personal knowledge of the statements herein, and, if called to do so, I could and would testify competently as to the same.

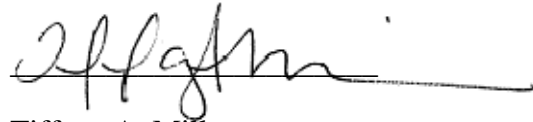
2. Attached as Exhibit D is a true and correct excerpt from Apple's Preliminary Reply filed in connection with IPR2020-00199 (Paper 8) on April 21, 2020.

3. Attached as Exhibit E is a true and correct excerpt from Maxell, Ltd's Objections and Responses to Apple Inc.'s First Set of Interrogatories (Nos. 1-16).

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 April 22, 2020 in Washington, D.C.

Dated: April 22, 2020

By:

A handwritten signature in black ink, appearing to read 'Tiffany A. Miller', written over a horizontal line.

Tiffany A. Miller