

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

MAXELL, LTD.,

Plaintiff

v.

APPLE INC.,

Defendant.

Civil Action NO. 5:19-cv-00036-RWS

**JURY TRIAL DEMANDED**

**DECLARATION OF DR. BENJAMIN B. BEDERSON IN SUPPORT OF APPLE INC.'S  
MOTION FOR PARTIAL SUMMARY JUDGMENT OF NON-INFRINGEMENT OF  
U.S. PATENT NOS. 10,084,991 AND 8,339,493**



I, Dr. Benjamin B. Bederson, declare the following:

1. I am Professor Emeritus of Computer Science at the University of Maryland. I am over the age of eighteen, and I am a citizen of the United States. I have been retained by defendant Apple Inc. (“Apple”) as a technical expert on issues relating to U.S. Patent Nos. 6,928,306 and 10,084,991 (the “991 Patent”). I previously submitted a Rebuttal Expert Report of Dr. Benjamin B. Bederson Regarding Non-Infringement of U.S. Patent Nos. 6,928,306 And 10,084,991 on June 4, 2020. This report contains a true and correct statement of the non-infringement opinions I have formed in this case, and the basis and reasons for them. If called to testify as to this declaration or the contents of the above-referenced report, I can and would testify truthfully and competently.

2. Attached as **Exhibit B** is a true and correct copy of excerpts from the Rebuttal Expert Report of Dr. Benjamin B. Bederson Regarding Non-Infringement of U.S. Patent Nos. 6,928,306 And 10,084,991, dated June 4, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 30, 2020, in Windsor, Massachusetts.

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

Dr. Benjamin B. Bederson