

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

MAXELL, LTD.,

Plaintiff,

vs.

APPLE INC.,

Defendant.

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

**JURY TRIAL DEMANDED**

**DECLARATION OF MELODY DRUMMOND HANSEN IN SUPPORT OF  
APPLE INC.'S OPPOSITION TO MAXELL, LTD.'S MOTION FOR SUMMARY  
JUDGMENT OF NO INVALIDITY UNDER 35 U.S.C. §§ 102 AND 103 OF  
CLAIMS 7, 16, AND 17 FOR U.S. PATENT NO. 10,212,586**

I, Melody Drummond Hansen, hereby declare as follows:

1. I am an attorney at the law firm of O'Melveny & Myers LLP, counsel for Apple, Inc. ("Apple") in this matter filed by Maxell, Ltd. ("Maxell"). I have personal knowledge or am informed of the facts stated herein and if called to testify could and would competently testify thereto.

2. Attached as **Exhibit 1** is a true and correct annotated copy of U.S. Patent No. 10,212,586 ("the '586 Patent").

3. Attached as **Exhibit 2** is a true and correct annotated copy of U.S. Patent No. 6,871,063 ("Schiffer").

4. Attached as **Exhibit 3** is a true and correct annotated copy of U.S. Published Patent Application No. US 2006/0041746 ("Kirkup").

5. Attached as **Exhibit 4** is a true and correct annotated copy of excerpts from the Opening Expert Report of Dr. Daniel A. Menascé Regarding U.S. Patent Nos. 7,116,438 and 10,212,586, dated May 7, 2020.

6. Attached as **Exhibit 5** is a true and correct annotated copy of Appendix D to the Opening Expert Report of Dr. Daniel A. Menascé Regarding U.S. Patent Nos. 7,116,438 and 10,212,586, dated May 7, 2020.

7. Attached as **Exhibit 6** is a true and correct annotated copy of excerpts from the Rebuttal Expert Report of Tim Williams, Ph.D. Concerning Validity of U.S. Patent Nos. 7,116,438 and 10,212,586, dated June 4, 2020.

I declare under the penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California, on this 22nd day of July, 2020.

/s/ Melody Drummond Hansen  
Melody Drummond Hansen