

**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 ALISON T. GELSLEICHTER IN SUPPORT OF
MAXELL, LTD.'S REPLY TO ITS MOTION TO STRIKE
PORTIONS OF DEFENDANT APPLE INC.'S REBUTTAL EXPERT REPORTS
BASED ON UNTIMELY CLAIM CONSTRUCTION POSITIONS**

I, Alison T. Gelsleichter, 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 Reply to its Motion to Strike Portions of Defendant Apple Inc.'s ("Apple") Rebuttal Expert Reports Based on Untimely Claim Construction Positions. 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 21 is a true and correct excerpt from the deposition transcript of Dr. Harry V. Bims dated June 24, 2020.

3. Attached as Exhibit 22 is a true and correct copy of Apple's Petition for *Inter Partes* Review of U.S. Patent No. 6,408,193, Case No. IPR2020-00203, dated December 20, 2019.

4. Attached as Exhibit 23 is a true and correct copy of Apple's Petition for *Inter Partes* Review of U.S. Patent No. 7,116,438, Case No. IPR2020-00201, dated December 19, 2019.

5. Attached as Exhibit 24 is a true and correct excerpt from Apple's Petition for *Inter Partes* Review of U.S. Patent No. 10,212,586, Case No. IPR2020-00202, dated December 19, 2019.

6. Attached as Exhibit 25 is a true and correct excerpt from Apple's Petition for *Inter Partes* Review of U.S. Patent No. 6,580,999, Case No. IPR2020-00409, dated January 13, 2020.

7. Attached as Exhibit 26 is a true and correct copy excerpt from the Declaration of Michael D. Kotzin, Exhibit 1003 to Apple's Petition for *Inter Partes* Review of U.S. Patent No. 6,580,999, Case No. IPR2020-00409, dated January 8, 2020.

8. Attached as Exhibit 27 is a is a true and correct excerpt from Apple's Petition for *Inter Partes* Review of U.S. Patent No. 6,748,317, Case No. IPR2020-00407, dated January 13, 2020.

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 July 23, 2020 in Washington, D.C.

Dated: July 23, 2020

By: Alison T. Gelsleichter

Alison T. Gelsleichter