

**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
SUR-REPLY TO ITS OPPOSITION TO DEFENDANT APPLE INC.'S MOTION
TO STRIKE PORTIONS OF MAXELL'S OPENING EXPERT REPORTS THAT
EXCEED THE SCOPE OF MAXELL'S P.R. 3-1 INFRINGEMENT CONTENTIONS
AND NEW EXPERT THEORIES OFFERED AFTER EXPERT REPORTS**

I, Alison T. Gelslechter, 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 to its Opposition to Defendant Apple Inc.'s ("Apple") Motion to Strike Portions of Maxell's Opening Expert Reports that Exceed the Scope of Maxell's P.R. 3-1 Infringement Contentions and New Expert Theories Offered After Expert Reports. 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 8 is a true and correct excerpt from Maxell's Infringement Contentions Pursuant to Patent Local Rules 3-1 and 3-2 served June 12, 2019 and appendices thereto (collectively, "Infringement Contentions").

3. Attached as Exhibit 9 is a true and correct excerpt from Apple's presentation to the Court for the hearing on Maxell's Motion to Strike Portions of Apple's Invalidity Expert Reports, dated July 15, 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 30, 2020 in Washington, D.C.

Dated: July 30, 2020

By: Alison T. Gelsleichter

Alison T. Gelsleichter