

**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
OPPOSED MOTION FOR LEAVE TO SUPPLEMENT INFRINGEMENT
CONTENTIONS TO ADD NEWLY RELEASED PRODUCTS**

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 Opposed Motion for Leave to Supplement Infringement Contentions to Add Newly Released Products. 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 A is a true a correct copy of a press release available on Apple’s website at the following link:

<https://www.apple.com/newsroom/2019/09/iphone-11-pro-iphone-11-pro-max-iphone-11-and-apple-watch-series-5-arrive-in-stores/>

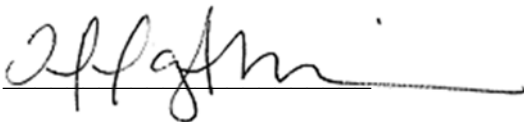
3. Attached as Exhibit B is a true a correct copy of a press release available on Apple’s website at the following link:

<https://www.apple.com/newsroom/2019/09/apple-introduces-new-version-of-the-most-popular-ipad-starting-at-329/>

4. Attached as Exhibit C is a true a correct copy of a letter sent from Maxell's counsel to Apple's counsel on September 23, 2019.

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 October 7, 2019 in Washington, D.C.

Dated: October 7, 2019

By: 
Tiffany A. Miller