UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

NEODRON LTD.,	
Plaintiff,	Case No. 1:19-cv-00819-ADA
v.	
DELL TECHNOLOGIES INC.,	
Defendant.	
NEODRON LTD.,	
Plaintiff,	Case No. 1:19-cv-00873-ADA
v.	
HP, INC.,	
Defendant.	
NEODRON LTD.,	
Plaintiff,	Case No. 1:19-cv-00874-ADA
v.	
MICROSOFT CORPORATION,	
Defendant.	

NEODRON LTD.,

                Plaintiff,

      v.

AMAZON.COM, INC.,

                Defendant.

Case No. 1:19-cv-00898-ADA

NEODRON LTD.,

                Plaintiff,

      v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

                Defendant.

Case No. 1:19-cv-00903-ADA

**OMNIBUS DECLARATION OF REZA MIRZAIE IN SUPPORT OF
PLAINTIFF NEODRON LTD.'S OPENING CLAIM CONSTRUCTION BRIEFS FOR
GROUP 1 – TOUCH SENSOR PATENTS AND
GROUP 3 – TOUCH PROCESSING PATENTS**

I, Reza Mirzaie, state as follows:

I am a member of the State Bar of California and an attorney at the law firm of Russ August & Kabat, counsel for Plaintiff Neodron Ltd. ("Neodron") in the above-captioned actions. I have personal knowledge of the facts set forth in this declaration, and, if called upon to testify, could and would testify competently thereto.

1.   Attached as **Exhibit 1** is a true and correct copy of the Declaration of Richard A. Flasck in support of Plaintiff Neodron Ltd.'s Opening Claim Construction Briefs

2.   Attached as **Exhibit 2** is a true and correct copy of the Curriculum Vitae of Richard A. Flasck.

3.   Attached as **Exhibit 3** is a true and correct copy of U.S. Patent No. 8,946,574

4.   Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 9,086,770

5.   Attached as **Exhibit 5** is a true and correct copy of U.S. Patent No. 9,823,784

6.   Attached as **Exhibit 6** is a true and correct copy of U.S. Patent No. 10,088,960

7.   Attached as **Exhibit 7** is a true and correct copy of U.S. Patent No. 7,821,502

8.   Attached as **Exhibit 8** is a true and correct copy of U.S. Patent No. 8,102,286

9.   Attached as **Exhibit 9** is a true and correct copy of U.S. Patent No. 10,365,747

10.   Attached as **Exhibit 10** is a true and correct copy of the definition of "surface" by Lexico, last visited April 5, 2020, with the following bates: NEO-DELL00002896-NEO-DELL00002900

11.   Attached as **Exhibit 11** is a true and correct copy of the definition of "surface" by Merriam-Webster, last visited April 5, 2020, with the following bates: NEO-DELL00002901-NEO-DELL00002909

12.   Attached as **Exhibit 12** is a true and correct copy of the definition of "coupled" by Lexico, last visited April 5, 2020, with the following bates: NEO-DELL00002817-NEO-DELL00002820

13.   Attached as **Exhibit 13** is a true and correct copy of the definition of "coupled" by Merriam-Webster, last visited April 5, 2020, with the following bates: NEO-DELL00002821-NEO-DELL00002834

14.   Attached as **Exhibit 14** is a true and correct copy of the definition of "mesh" by Lexico, last visited April 5, 2020, with the following bates: NEO-DELL00002847-NEO-DELL00002851

15.   Attached as **Exhibit 15** is a true and correct copy of the definition of "mesh" by Merriam-Webster, last visited April 5, 2020, with the following bates: NEO-DELL00002852-NEO-DELL00002861

16.   Attached as **Exhibit 16** is a true and correct copy of the definition of "generally" by Lexico, last visited April 5, 2020, with the following bates: NEO-DELL00002835-NEO-DELL00002838

17.   Attached as **Exhibit 17** is a true and correct copy of the definition of "generally" by Merriam-Webster, last visited April 5, 2020, with the following bates: NEO-DELL00002839-NEO-DELL00002846

18.   Attached as **Exhibit 18** is a true and correct copy of the definition of "substantially" by Lexico, last visited April 5, 2020, with the following bates: NEO-DELL00002880-NEO-DELL00002883

19.   Attached as **Exhibit 19** is a true and correct copy of the definition of "substantially" by Merriam-Webster, last visited April 5, 2020, with the following bates: NEO-DELL00002884-NEO-DELL00002895

20.   Attached as **Exhibit 20** is a true and correct copy of Amazon's Identification of Extrinsic Evidence dated April 7, 2020

21.   Attached as **Exhibit 21** is a true and correct copy of an Order from the United States International Trade Commission construing relevant terms dated November 25, 2019

22.   Attached as **Exhibit 22** is an excerpted true and correct copy of a transcript from a *Markman* hearing before the United States International Trade Commission pertaining to relevant terms dated October 22, 2019

23.   Attached as **Exhibit 23** is a true and correct copy of an email thread from James M. Heintz to Reza Mirzaie regarding claim construction dated April 7, 2020 to April 17, 2020.

24.   Attached as **Exhibit 24** is a true and correct copy of Dell's Identification of Extrinsic Evidence dated April 7, 2020

25.   Attached as **Exhibit 25** is a true and correct copy of Microsoft's Identification of Extrinsic Evidence dated April 7, 2020

26.   Attached as **Exhibit 26** is an excerpted true and correct copy of the file history for U.S. Patent No. 9,823,784

27.   Attached as **Exhibit 27** is an excerpted true and correct copy of the Petition for *Inter Partes* Review of U.S. Patent No. 8,946,574 in IPR2020-00459, dated February 14, 2020.

28.   Attached as **Exhibit 28** is a true and correct copy of U.S. Patent No. 4,550,221 to Mabusth, with the following bates: DELLNEOTXPA_000007783-DELLNEOTXPA_000007794.

29.   Attached as **Exhibit 29** is an excerpted true and correct copy of the file history for U.S. Patent No. 7,821,502, Response to Office Action dated November 24, 2009.

30.   Attached as **Exhibit 30** is an excerpted true and correct copy of the file history for U.S. Patent No. 7,821,502, Response to Office Action dated April 19, 2010.

31.   Attached as **Exhibit 31** is a true and correct copy of U.S. Patent No. 9,024,790 to Philipp.

32.   Attached as **Exhibit 32** is a true and correct copy of an email from Nicholas Whitt regarding claim construction dated April 7, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

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