

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

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

LG ELECTRONICS INC. and LG
ELECTRONICS U.S.A., INC.,

Defendants.

CIVIL ACTION NO. 1:20-CV-0034

JURY TRIAL DEMANDED

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

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

Defendants.

CIVIL ACTION NO. 1:20-CV-0034

JURY TRIAL DEMANDED

FIRST SUPPLEMENTAL DECLARATION OF STEVEN M. SEIGEL

Tables of Exhibits

1. Exhibits Attached to March 20, 2020 Declaration in Support of Opening Brief

Ex.	Document Description
1.	U.S. Patent No. 6,411,941 B1 (Mullor, et al.), dated June 25, 2002
	<i>Exhibits 2 to 6: Excerpts of File History of U.S. Patent App. No. 09/164,777 ('941 Patent)</i>
2.	March 28, 2002 – Examiner Notice of Allowance, Amendments, and Interview Summary
3.	Feb. 5, 2002 – Amendments and Response to Jan. 15, 2002 Office Action
4.	Jan. 15, 2002 – Examiner Non-Final Rejection
5.	Dec. 6, 2001 – Amendments and Response to June 22, 2001 Office Action
6.	Nov. 9, 2001 – Examiner Interview Summary
7.	Declaration of Ian Jestice, <i>Ancora Techs., Inc. v. LG Electronics et al.</i> (W.D. Tex.) (March 19, 2020)
8.	Declaration of Ian Jestice, <i>Ancora Techs., Inc. v. Apple Inc.</i> (N.D. Cal.) (April 30, 2002)

9.	Declaration of Ian Jestice, <i>Ancora Techs., Inc. v. HTC et al.</i> (W.D. Wa.) (Aug. 26, 2019)
10.	THE TELECOMMUNICATIONS HANDBOOK (1999)
11.	MICROSOFT PRESS COMPUTER USER'S DICTIONARY (1998)
12.	MICROSOFT COMPUTER DICTIONARY (4th Ed. 1999)
13.	ENCYCLOPEDIA OF COMPUTER SCIENCE (4th Ed. 2000)
14.	PC MAGAZINE
15.	Ancora's Opening <i>Markman</i> Brief, <i>Ancora Techs., Inc. v. Toshiba et al.</i> (C.D. Cal) (Jan. 26, 2009) (excerpts)
16.	U.S. Patent No. 8,572,597 to Herle et al., assigned to Samsung Electronics Co., Ltd.
17.	U.S. Patent No. 9,674,578 to Kim et al., assigned to LG Electronics Inc.

2. Exhibits Attached to First Supplemental Declaration in Support of Responsive Brief

Ex.	Document Description
18.	<i>Excerpt of File History of '941 Patent - Beeble Hardware Stamping Technology Overview (September 2001)</i>
19.	<i>Excerpt of File History '941 Patent - Nov. 14 2001 Remarks Made in Amendment</i>
20.	Zadok et al., <i>PGMake: A Portable Distributed Make System</i> (1994)
21.	Zadok et al., <i>On Incremental File System Development</i> (2006)
22.	Michael B. Jones, <i>Interposition Agent Toolkit</i> (1993)
23.	<i>Excerpt of File History of '941 Patent – Aug. 3, 2009 Decision Granting Reexamination</i>

Declaration

I, Steven M. Seigel, hereby declare as follows:

1. I am an attorney in the law firm of Susman Godfrey, LLP. I am counsel for Plaintiff Ancora Technologies, Inc. (“Ancora”). I am admitted *pro hac vice* to practice before this Court, and I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.

2. I submit this First Supplemental Declaration in support of Ancora's Responsive Construction Brief.

3. For the exhibits described below, some exhibits have been highlighted or otherwise marked for emphasis.

4. Attached to this declaration as **Exhibit 18** is a true and correct copy of *Beeble Hardware Stamping Technology Overview* (September 2001), included as “non-patent literature” in

the File History of U.S. Patent Application No. 09/164,777 which matured into the '941 Patent (the "'941 File History").

5. Attached to this declaration as **Exhibit 19** is a true and correct copy of the applicant's Nov. 14, 2001 Remarks Made in Amendment during prosecution of the '941 Patent.

6. Attached to this declaration as **Exhibit 20** is a true and correct copy of a publication by Erez Zadok et al., entitled *PGMake: A Portable Distributed Make System* (1994).

7. Attached to this declaration as **Exhibit 21** is a true and correct copy of a publication by Erez Zadok et al., entitled *On Incremental File System Development* (2006).

8. Attached to this declaration as **Exhibit 22** is a true and correct copy of a publication by Michael B. Jones entitled *Interposition Agent Toolkit* (1993), which is referenced and cited in Exhibit 21.

9. Attached to this declaration as **Exhibit 23** is a true and correct copy of the August 3, 2009 Decision Granting *Ex Parte* Reexamination of the '941 Patent.

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

Signed this 10th day of April, 2020, at Seattle, WA.

By: /s/ Steven M. Seigel
Steven M. Seigel

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 10th day of April, 2020, with a copy of this document via the Court's CM/ECF system.

/s/ Michelle Wimmer
Michelle Wimmer