

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

AIRE TECHNOLOGY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-01101-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF DREW HOLLANDER IN SUPPORT OF AIRE TECHNOLOGY LTD'S OPPOSITION TO APPLE INC.'S MOTION TO MODIFY STAY ORDER**

I, Drew B. Hollander, hereby declare under the penalty of perjury as follows:

1. I am an attorney at BC Law Group, P.C., counsel of record for Aire Technology Ltd. (“Aire”). I am one of the attorneys responsible for representing Aire in this matter. I have personal knowledge of all facts stated in this declaration and if called as a witness, could and would competently testify to these facts. I respectfully submit this declaration in support of Aire’s opposition to Apple’s motion to modify stay order.

2. The parties have already exchanged and responses to substantive (*i.e.*, non-venue) requests for productions and interrogatories. As of the commencement of this action, Apple has produced over 500,000 pages of documents. Additionally, Aire’s source code experts made six trips to review Apple’s source code, as well as a seventh trip to review third-party source code.

3. Apple served its preliminary invalidity contentions on March 31, 2022. Apple identified over 10 alleged prior art systems as potentially invalidating prior art. Additionally, Apple has advanced § 112 invalidity arguments as to all Asserted Patents.

Executed on this 26th day of January 2023 in Ardsley, NY.

/s/ Drew B. Hollander

Drew B. Hollander