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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

SYNOPSYS, INC., a Delaware Corporation,

Plaintiff,

v.

MAGMA DESIGN AUTOMATION, INC., a Delaware Corporation, AND LUKAS VAN GINNEKEN,

Defendants.

Case No. C04-03923 MMC

DECLARATION OF PATRICK GROENEVELD

1 I, Patrick Groeneveld, declare:

2 1. I make this declaration based on my personal knowledge of the facts stated herein,
3 and, if called as a witness, could and would testify to these facts.

4 2. From 1997 to the present I have been employed by Magma Design Automation,
5 Inc. ("Magma") as a Principal Engineer.

6 3. In November 1996 I attended a presentation by Ralph Otten at the International
7 Conference on Computer Aided Design (ICCAD) in San Jose, California. Ralph Otten's
8 presentation was open to anyone attending the conference and there were no confidentiality
9 restrictions on the presentation. Attached as Exhibit R includes what I believe to be a true and
10 correct copy of the slides presented by Ralph Otten at the conference.

11 4. In April 1999 I attended a panel presentation at the International Symposium on
12 Physical Design (ISPD) Conference in Monterey, California. Presenters on the panel included
13 Lukas van Ginneken of Magma and Raul Camposano of Synopsys, Inc. ("Synopsys"). Attached
14 as Exhibit B is what I believe to be a true and correct copy of the slides presented by Lukas van
15 Ginneken on the panel.

16 5. In mid-1999 I created the first draft of a white paper entitled "Overview of
17 MAGMA's FixedTiming Methodology," to describe some of the concepts related to Magma's
18 products. No later than 1999, this whitepaper was published on the Magma website and freely
19 available to the public. Attached as Exhibit C is a true and correct copy of the whitepaper that
20 was published in 1999. Based on my experience in the EDA industry in which companies closely
21 monitor their competitors' public disclosures of their products and technology, I am certain that
22 Synopsys viewed Exhibit C in 1999.

23 6. In January 2000 I was on a panel organized by Ralph Otten at the Asia South
24 Pacific Design Automation Conference (ASP-DAC) Conference. Also on the panel were Leon
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1 Stok from IBM, Olivier Coudert from Monterey Design Systems, and a representative of
2 Synopsys. Attached as Exhibit D is a true and correct copy of the slides that I presented at the
3 panel. I expressly represented the slides related to technology being developed by Magma. Much
4 of the discussion at the panel focused on the concepts of gain based synthesis and constant delay
5 synthesis. The representative of Synopsys participated in the discussion of these concepts.
6

7 7. In April 2000 I presented information at a panel at the Workshop on Electronic
8 Design Processes (EDP) in Monterey, California. Attached as Exhibit E is a true and correct
9 copy of the slides that I prepared for the panel at the Workshop. I presented the first 22 of the 40
10 slides publicly and I expressly represented that my presentation related to technology being
11 developed by Magma. A representative from Synopsys attended the workshop and my
12 presentation. The program for the EDP workshop, including the panel participants and a link to
13 slides including those that I presented is available publicly on the EDP web site at:
14 <http://www.eda.org/edps/edp00/edp00-program.html>.
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16 8. In June 2000 I presented information at a Tutorial at the Design Automation
17 Conference ("DAC") along with Jason Cong from UCLA, Tony Drumm from IBM, and Olivier
18 Coudert from Monterey Design Systems. In my estimation 200 people attended the Tutorial.
19 Attached as Exhibit F is a true and correct copy of the slides that I presented at the Tutorial. I
20 expressly represented that the slides related to technology being developed by Magma. These
21 slides have been available publicly on my own web site and on a web site operated by Jason Cong
22 shortly after the Tutorial was given. Based on my experience in the EDA industry in which
23 companies closely monitor their competitors' public disclosures of their products and technology,
24 I am certain that Synopsys viewed the slides that I presented before September 2000.
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26 9. In June 2000 I was on a panel at DAC. Attached as Exhibit G is a true and correct
27 copy of the slides I presented to the panel and the attendees. I expressly represented that the
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slides related to technology being developed by Magma. Raul Camposano from Synopsys, who served as a panel member, saw my slides and heard my presentation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 10TH day of June, 2005 in EINDHOVEN.



Patrick Groeneveld