

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED TECHNOLOGIES CORP.,

Plaintiff,

V.

ROLLS-ROYCE PLC and
ROLLS-ROYCE GROUP PLC

Defendants.

Case No. 3:10-CV-01523-SRU

January 13, 2011

DECLARATION OF PETER E. ROOT IN SUPPORT OF DEFENDANT ROLLS-ROYCE GROUP PLC'S CONSENT MOTION TO STAY PROCEEDINGS PURSUANT TO 28 U.S.C. § 1659

I, Peter E. Root, declare as follows:


1. I am a partner at the law firm of Kaye Scholer LLP, counsel for defendant Rolls-Royce Group plc in U.S. International Trade Commission Investigation No. 337-TA-751. The matters set forth in this declaration are based on my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy (excluding exhibits) of the Complaint Under Section 337 of the Tariff Act of 1930, as Amended, submitted to the U.S. International Trade Commission by plaintiff United Technologies Corporation ("UTC") on or about November 5, 2010.

3. Attached hereto as **Exhibit B** is a true and correct copy of the U.S. International Trade Commission's Notice of Investigation No. 337-TA-751, *In the Matter of Certain Turbomachinery Blades, Engines and Components Thereof*, published in the Federal Register on December 14, 2010.

4. Attached hereto as **Exhibit C** is a true and correct copy of my email correspondence dated January 11-12, 2011 with Michael J. Valaik, counsel of record for UTC in the above-captioned case, and Smith R. Brittingham IV, counsel of record for UTC in U.S. International Trade Commission Investigation No. 337-TA-751.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 13th day of January, 2011, in Palo Alto, California.



Peter E. Root