## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

TIMEBASE PTY LTD.,

**Civil No. 07-1687 (JNE/JJG)** 

Plaintiff.

DECLARATION OF MARK STIGNANI

vs.

THE THOMSON CORPORATION, WEST PUBLISHING CORPORATION, and WEST SERVICES, INC.,

Defendants.

## Declaration of Mark Stignani:

- 1. I, Mark Stignani, am Assistant General Counsel, Intellectual Property for the defendants. I have been in-house counsel for the defendants for 10 years.
- 2. As Assistant General Counsel, my duties include supervising this litigation. I have supervised this matter since before the case was filed in January, 2007.
- 3. I have been involved in pre-suit investigation, settlement discussions, discovery, pleadings, motions, strategic direction, and all other aspects of this litigation. I have been in regular communication with the defendants' employees, other in-house counsel, and outside litigation counsel regarding this litigation.
- 4. To the best of my knowledge, all of my knowledge about non-privileged facts regarding meetings and communications between TimeBase and the defendants has been transmitted to the designated Federal Rule of Civil Procedure 30(b)(6) representative for the defendants.

- 5. To the best of my knowledge, all of my knowledge about non-privileged facts regarding notice of the patents and knowledge of the patents has been transmitted to the designated Federal Rule of Civil Procedure 30(b)(6) representative for the defendants.
- 6. To the best of my knowledge, all of my knowledge about non-privileged facts regarding knowledge of documents has been transmitted to the designated Federal Rule of Civil Procedure 30(b)(6) representative for the defendants.
- 7. To the best of my knowledge, all of my knowledge about non-privileged facts regarding contacts with Ms. Muldoon has been transmitted to the designated Federal Rule of Civil Procedure 30(b)(6) representative for the defendants.
- 8. To the best of my knowledge, all of my knowledge about non-privileged facts regarding knowledge of patents or the defendants' licensing practices has been transmitted to the designated Federal Rule of Civil Procedure 30(b)(6) representative for the defendants.
- 9. I understand that one of the topics TimeBase has stated that it wishes to ask me about are the patents on which I am listed as an inventor. Each of those patents, however, relates to work I did at Alliant Techsystems, and is not related to any of Thomson's products or services. These patents are:
  - 5,524,545 "Process and apparatus for photolytic degradation of explosives" 5,516,970 "Process and apparatus for photolytic degradation of explosives" 5,370,845 "Process and apparatus for photolytic degradation of explosives"
  - 5,363,603 "Abrasive fluid jet cutting composition and method"

10. I am not aware of any non-privileged, relevant information that I have that is not also

known by other individuals, many of whom are already being deposed in connection

with this case.

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

Dated: October 11, 2010

/s/ Mark Stignani

Mark Stignani

3