

Exhibit A

DECLARATION OF STEVEN R. PEDERSEN

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

STC.UNM,

Plaintiff,

v.

CV-2010-1077 RB/WDS

INTEL CORPORATION,

Defendant.

DECLARATION OF STEVEN R. PEDERSEN

I, Steve Pedersen, declare under penalty of perjury as follows:

1. I am counsel of record for STC in the above-captioned matter.
2. Prior to filing this suit against Intel, STC enforced the same patent against Samsung and Taiwan Semiconductor Company at the U.S. Int'l Trade Commission.
3. In that proceeding Intel's current counsel, Kecker and Van Nest, represented TSMC.
4. The parties to that case agreed to similar provisions for the inspection of the GDS files, *e.g.*, on a stand-alone computer at a secure site, etc.
5. Both Samsung and TSMC agreed that Dr. Mack could retain a second copy of the key technical documents in his home office.
6. In order to satisfy Samsung's and TSMC's sensitivities, Dr. Mack procured a safe which he used to store the documents.

Date: April 18, 2011

/s/ Steven R. Pedersen