

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BRIGHT RESPONSE, LLC
F/K/A POLARIS IP, LLC

v.

GOOGLE INC., et al.

NO. 2:07CV-371-TJW-CE

**DECLARATION OF ANTONIO SISTOS IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE NUMBER 1**

1. I am an associate with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, and counsel for Google Inc. ("Google"). I have personal, firsthand knowledge of the facts set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of Defendants' Invalidity Contentions, dated August 7, 2008.

3. Attached hereto as Exhibit B is a true and correct copy of the narrative portion of Defendants' Supplemental Invalidity Contentions, dated March 11, 2010.

4. Attached hereto as Exhibit C is a true and correct copy of the narrative portion of Defendants' Supplemental Invalidity Contentions, dated March 19, 2010.

5. Attached hereto as Exhibit D is a true and correct copy of the narrative portion of Defendants' Supplemental Invalidity Contentions, dated May 24, 2010.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the deposition of Amy Rice, dated March 19, 2010.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the deposition on Anthony Angotti, dated November 13, 2009.

8. Attached hereto as Exhibit G is a true and correct copy of Defendants' First Set of Interrogatories, dated November 10, 2008.

9. Attached hereto as Exhibit H is a true and correct copy of the Declaration of Julie Hsu, dated May 31, 2010.

10. Attached hereto as Exhibit I is a true and correct copy of Google's subpoena to FPX LLC, dated August 27, 2009.

11. Attached hereto as Exhibit J is a true and correct copy of Google's subpoena to Douglas Croxall, dated July 22, 2009.

12. Attached hereto as Exhibit K is a true and correct copy of documents produced by third-party Chuck Williams in response to a subpoena served by Plaintiff, which purport to be communications between Mr. Williams and Plaintiff's counsel David Pridham, dated February 4, 2003 through February 19, 2003.

13. Attached hereto as Exhibit L is a true and correct copy of a document sent by Plaintiff to Defendants during this litigation, which purports to be an affidavit of Anthony Angotti dated June 15, 2004.

14. Attached hereto as Exhibit M is a true and correct copy of a document sent by Plaintiff to Defendants during this litigation, which purports to be an affidavit of Amy Rice dated January 12, 2004.

15. Attached hereto as Exhibit N is a true and correct copy of excerpts from the deposition of Bradlee Sheafe, dated June 3, 2010.

16. Attached hereto as Exhibit O is a true and correct copy of excerpts from Dr. Branting's Invalidity Report, dated July 6, 2010.

17. Attached hereto as Exhibit P is a true and correct copy of excerpts from Dr. Rhyne's Rebuttal Report on Validity, dated July 20, 2010.

18. Attached hereto as Exhibit Q is a true and correct copy of a document entitled "EZ Reader User's Guide and Reference Manual," which was produced by third-party JP Morgan.

19. Attached hereto as Exhibit R is a true and correct copy of excerpts from the deposition of Chuck Williams, dated July 15, 2010.

20. Attached hereto as Exhibit S is a true and correct copy the declaration of Phil Klahr, dated April 16, 2010.

21. Attached hereto as Exhibit T is a true and correct copy of an email chain produced by Chuck Williams, dated March 28, 1996.

22. Attached hereto as Exhibit U is a true and correct copy of U.S. Patent No. 5,581,664 to Allen et al.

23. Attached hereto as Exhibit V is a true and correct copy of Exhibit A-69 as produced by Defendants in their Supplemental Invalidity Contentions on May 24, 2010.

24. Attached hereto as Exhibit W is a true and correct copy of excerpts from the deposition of Bradley Allen, dated July 21, 2010.

25. Attached hereto as Exhibit X is a true and correct copy of excerpts from the deposition Karl Branting, dated July 22, 2010.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of July, 2010, at Marshall, Texas.

/s/ Antonio Sistos
Antonio Sistos