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

VERTICAL COMPUTER SYSTEMS, INC.,	§
	§
Plaintiff,	§
	§
v .	§
	§
INTERWOVEN, INC., LG ELECTRONICS	§
MOBILECOMM U.S.A., INC., LG	§
ELECTRONICS INC., SAMSUNG	§
ELECTRONICS CO., LTD., SAMSUNG	§
ELECTRONICS AMERICA, INC.,	§
	§
Defendants.	ş

CIVIL ACTION NO. 2:10-CV-490 TJW

DECLARATION OF STEVEN O'NEILL

§

I, Steven O'Neill, declare as follows:

1. I am over 18 years of age, and am competent to testify as to the matters set

forth herein. I make the following statements based upon my own personal knowledge.

2. I am currently a paralegal at the law firm of Weil, Gotshal & Manges LLP,

counsel to Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., defendants in the above-captioned case.

- 3. On February 24, 2011, I went to the Verizon store in Belmont, California. At that store, Verizon offers the LG Ally Smartphone for sale.
- 4. Attached as Exhibit A is a true and correct copy of a photograph that I took showing the display model of the LG Ally Smartphone.

5. Attached as Exhibit B is a true and correct copy of the promotional material that the Verizon sales person gave to me regarding the LG Ally Smartphone.

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

Executed on February 25, 2011.

Steven O'Neill