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.

CIVIL ACTION NO. 2:10-cv-490

(Eastern District of Texas)

LG ELECTRONICS, INC. AND LG ELECTRONICS MOBILECOMM U.S.A., INC.'S <u>CORPORATE DISCLOSURE STATEMENT</u>

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants LG Electronics, Inc. and LG Electronics Mobilecomm U.S.A., Inc. make the following corporate disclosure:

- Defendant LG Electronics Mobilecomm U.S.A., Inc. is a wholly-owned subsidiary of LG Electronics U.S.A., Inc.
- 2. LG Electronics U.S.A., Inc. is a wholly-owned subsidiary of Defendant LG Electronics, Inc.
- 3. LG Corporation owns 10% or more of Defendant LG Electronics, Inc.'s stock.

Respectfully submitted,

/s/ David J. Healey
David J. Healey
Texas Bar No. 09327980

FISH & RICHARDSON P.C. 1221 McKinney Street, Suite 2800 Houston, Texas 77010 (713) 654-5300 (Telephone) (713) 652-0109 (Facsimile)

healey@fr.com

Aamir Kazi Georgia Bar No. 104235 FISH & RICHARDSON P.C. 1180 Peachtree Street, N.E. 21st Floor Atlanta, GA 30309 (404) 724-2811 (Telephone) (404) 892-5002 (Facsimile) kazi@fr.com

ATTORNEYS FOR DEFENDANTS LG ELECTRONICS MOBILECOMM U.S.A., INC. and LG ELECTRONICS INC.

OF COUNSEL:

Michael J. McKeon Fish & Richardson P.C. 1425 K Street, NW, 11th Floor Washington, DC 20005 (202) 783-5070 (Telephone) (202) 783-2331 (Facsimile) mckeon@fr.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on this 20th day of May, 2011 to all counsel of record who are deemed to have consented to electronic service via the Court's EM/ECF system per Local Rule CV-5(a)(3).

/s/ Stacci H. Mahadeo