

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

MIRROR WORLDS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 6:08-CV-88 LED

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim Plaintiff,

v.

MIRROR WORLDS LLC,
MIRROR WORLDS TECHNOLOGIES,
INC.,

Counterclaim Defendants.

**DECLARATION OF SONAL N. MEHTA IN SUPPORT OF APPLE INC.'S
OPPOSITION TO MIRROR WORLDS, LLC'S MOTION TO DISMISS APPLE, INC.'S
INEQUITABLE CONDUCT DEFENSES AND COUNTERCLAIMS**

I, Sonal N. Mehta, declare as follows:

1. I am a member of the State Bar of California and an associate of the law firm of Weil, Gotshal & Manges LLP, counsel of record for Apple, Inc. in this case. I have personal knowledge of the facts stated in this Declaration and, if called upon as a witness, could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Exhibits 13A-13D to Defendant's Invalidity Contentions dated November 3, 2008.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Exhibits 13A-13D to Defendant's [Proposed] Amended Invalidity Contentions dated May 11, 2009
4. Attached hereto as **Exhibit 3** is a true and correct copy of Request for *Ex Parte* Reexamination of U.S. Patent 6,006,227 dated April 23, 2009.
5. . Attached hereto as **Exhibit 4** is a true and correct copy of Request for *Ex Parte* Reexamination of U.S. Patent 6,638,313 dated April 23, 2009.
6. Attached hereto as **Exhibit 5** is a true and correct copy of Request for *Inter Partes* Reexamination of U.S. Patent 6,725,427 dated April 23, 2009.
7. Attached hereto as **Exhibit 6** is a true and correct copy of Request for *Inter Partes* Reexamination of U.S. Patent 6,768,999 dated April 23, 2009.
8. Attached hereto as **Exhibit 7** is a true and correct copy of Order Granting Request for *Ex Parte* Reexamination of U.S. Patent 6,006,227 dated June 1, 2009.
9. Attached hereto as **Exhibit 8** is a true and correct copy of Order Granting Request *Ex Parte* Reexamination of U.S. Patent 6,638,313 dated June 2, 2009.
10. Attached hereto as **Exhibit 9** is a true and correct copy of Order Granting Request *Inter Partes* Reexamination of U.S. Patent 6,725,427 dated July 1, 2009.
11. Attached hereto as **Exhibit 10** is a true and correct copy of Order Granting Request *Inter Partes* Reexamination of U.S. Patent 6,768,999 dated May 22, 2009.
12. Attached hereto as **Exhibit 11** is a true and correct copy of Office Action for U.S. Patent 6,725,427 dated September 28,2009.
13. Attached hereto as **Exhibit 12** is a true and correct copy of Office Action for U.S. Patent 6,768,999 dated May 22, 2009.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Apple Inc.'s [Proposed] Third Amended Answer, Affirmative Defenses and Counterclaims.

15. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from Christopher Hatchell's February 5, 2009 deposition transcript.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the redline to Apple Inc.'s Third Amended Answer, Affirmative Defenses and Counterclaims.

Executed on this 16th day of October at Redwood Shores, California.

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

Dated: October 16, 2009

Respectfully submitted,

/s/ Sonal N. Mehta _____
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on this 16th day of October, 2009. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Sonal N. Mehta
Sonal N. Mehta