

**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 MOTION
FOR PARTIAL SUMMARY JUDGMENT OF INVALIDITY FOR INDEFINITENESS
UNDER 35 U.S.C. § 112 ¶ 2**

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 A** is a true and correct copy of *Fargo Electronics, Inc. v. Iris Ltd., Inc.*, No. 04-1017 (JRT/FLN), 2005 WL 3241851 (D.Minn. Nov. 30, 2005).

3. Attached hereto as **Exhibit B** is a true and correct copy of *Maurice Mitchell Innovations, L.P. v. Intel Corporation.*, No. 2:04-CV-450, 2006 WL 3447632 (E.D.Tex. Nov. 22, 2006).

4. Attached hereto as **Exhibit C** is a true and correct copy of *Maurice Mitchell Innovations, L.P. v. Intel Corporation.*, No. 2007-1108, 249 Fed.Appx. 184, 2007 WL 2777968 (C.A.Fed. Sep. 24, 2007).

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the transcript of the deposition of John Levy, taken December 11, 2009.

6. Attached hereto as **Exhibit E** is a true and correct copy of the Declaration of John Levy, Ph.D. Regarding Claim Construction, dated November 27, 2009.

7. Attached hereto as **Exhibit F** is a true and correct copy of the Expert Report of Dr. Feiner re: Claim Construction of U.S. Patent Nos. 6,006,227; 6,638,313; 6,725,427; 6,768,999.

8. Attached hereto as **Exhibit G** is a true and correct copy of the Memorandum Opinion and Order from *i4i Ltd. Partnership v. Microsoft Corp.*, No. 6:07CV113, (E.D. Tex.), dated April 10, 2008.

9. Attached hereto as **Exhibit H** is a true and correct copy of U.S. Patent No. 6,006,227, entitled "*Document Stream Operating System*," by Freeman et. al.

10. Attached hereto as **Exhibit I** is a true and correct copy of U.S. Patent No. 6,725,427, entitled “*Document Stream Operating System with Document Organizing and Display Facilities*,” by Freeman et. al.

Executed on this 22nd day of December 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: December 22, 2009

Respectfully submitted,

/s/ Sonal N. Mehta
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