

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

<p>MIRROR WORLDS, LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>APPLE INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Civil Action No. 6:08-cv-88 LED</p>  <p>JURY TRIAL DEMANDED</p>
<p>APPLE INC.,</p> <p style="text-align: center;">Counterclaim Plaintiff,</p> <p style="text-align: center;">v.</p> <p>MIRROR WORLDS, LLC, MIRROR WORLDS TECHNOLOGIES, INC.,</p> <p style="text-align: center;">Counterclaim Defendants.</p>	

**DECLARATION OF JEFFREY G. RANDALL IN SUPPORT OF APPLE INC.’S  
OPPOSITION TO MIRROR WORLDS TECHNOLOGIES INC.’S MOTION FOR  
SUMMARY JUDGMENT OF INVALIDITY OR U.S. PATENT NO. 6,613,101**

I, Jeffrey G. Randall, hereby declare as follows:

1. I am a partner at the law firm of Paul, Hastings, Janofsky & Walker LLP, counsel for Defendant and Counterclaim Plaintiff Apple Inc. (“Apple”). The facts stated in this Declaration are true and correct of my own personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from Mirror Worlds Technologies, Inc.'s Responsive Claim Construction Brief on U.S. Patent No. 6,613,101, filed January 9, 2010 (Docket No. 161).

3. Attached hereto as Exhibit 2 is a true and correct copy of Apple Inc.'s Reply Claim Construction Brief on U.S. Patent No. 6,613,101 (the "Piles" Patent), filed January 18, 2010 (Docket No. 164).

4. Attached hereto as Exhibit 3 is a true and correct copy of Appeal Brief in Support of Appellants' Appeal to the Board of Patent Appeals and Interferences from the prosecution history for U.S. Patent No. 6,243,724, and bearing production numbers APMW0025579 – APMW0025636.

5. Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent No. 6,613,101 B2.

6. Attached hereto as Exhibit 5 is a true and correct copy of Apple Inc.'s Opening Claim Construction Brief on U.S. Patent No. 6,613,101 (the "Piles" Patent), filed December 7, 2009 (Docket No. 150).

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the prosecution history for U.S. Patent No. 6,243,724, bearing production numbers APMW0025565 – APMW0025566.

8. Attached hereto as Exhibit 7 is a true and correct copy of U.S. Patent No. 5,287,448, bearing production numbers APMW0013192 – APMW0013202.

9. Attached hereto as Exhibit 8 is a true and correct copy of U.S. Patent No. 5,060,135, bearing production numbers APMW0001020 – APMW0001048.

10. Attached hereto as Exhibit 9 is a true and correct copy of a Response to Office Action from the prosecution history for U.S. Patent No. 6,243,724, bearing production numbers APMW0025487 – APMW0025491.

11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the prosecution history for U.S. Patent No. 6,243,724, bearing production numbers APMW0025709 – APMW0025710.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Expert Report of John Levy, Ph.D. Regarding Invalidity of U.S. Patent No. 6,613,101, dated May 20, 2010.

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the Expert Report of John Levy, Ph.D. Regarding Validity, dated June 4, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 22nd day of July, 2010.

/s/ Jeffrey G. Randall  
Jeffrey G. Randall

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