

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

Eolas Technologies Incorporated, §
Plaintiff, § Civil Action No. 6:09-CV-00446-LED
vs. §
Adobe Systems Inc., Amazon.com, Inc., § JURY TRIAL
Apple Inc., Argosy Publishing, Inc., §
Blockbuster Inc., CDW Corp., §
Citigroup Inc., eBay Inc., Frito-Lay, Inc., §
The Go Daddy Group, Inc., Google Inc., §
J.C. Penney Company, Inc., JPMorgan §
Chase & Co., New Frontier Media, Inc., §
Office Depot, Inc., Perot Systems Corp., §
Playboy Enterprises International, Inc., §
Rent-A-Center, Inc., Staples, Inc., Sun §
Microsystems Inc., Texas Instruments Inc., §
Yahoo! Inc., and YouTube, LLC §
Defendants. §

JOINT SUBMISSION OF JURY MATERIALS

Plaintiff Eolas Technologies Corporation ("Plaintiff") and Adobe Systems Inc., Amazon.com, Inc., CDW Corp., Citigroup Inc., The Go Daddy Group, Inc., Google Inc., J.C. Penney Company, Inc., Staples, Inc., Yahoo! Inc. and YouTube, LLC ("Defendants"), hereby submit the following jury materials:

Attached as Exhibit A hereto are the parties' Joint Proposed Preliminary Jury Instructions, with bracketed and highlighted individual proposals.

Attached as Exhibit B hereto are the parties' Joint Proposed Final Jury Instructions, with bracketed and highlighted individual proposals and appendices A, B, and C.

Attached as Exhibit C hereto is Plaintiff's Proposed Verdict Form.

Attached as Exhibit D hereto is Defendant Adobe's Proposed Verdict Form.

Attached as Exhibit E hereto is Defendant Amazon's Proposed Verdict Form.

Attached as Exhibit F hereto is Defendant CDW's Proposed Verdict Form.

Attached as Exhibit G hereto is Defendant Go Daddy's Proposed Verdict Form.

Attached as Exhibit H hereto is Defendants Google's and YouTube's Proposed Verdict Form.

Attached as Exhibit I hereto is Defendant J.C. Penney's Proposed Verdict Form.

Attached as Exhibit J hereto is Defendant Staples' Proposed Verdict Form.

Attached as Exhibit K hereto is Defendant Yahoo!'s Proposed Verdict Form.

The parties reserve the right to amend, supplement, or modify these proposed jury materials as the case proceeds toward the final pre-trial conference and trial, and as the parties continue to meet and confer regarding these materials. Additionally, the parties do not waive any objections to issues that are the subject of pending motions, including *Daubert* motions, motions to strike, motions for summary judgment, and motions *in limine*.

DATED: January 16, 2012.

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). This document was served on all counsel by email on January 16, 2012.

/s/ John Campbell

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