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

Eolas Technologies Incorporated,

Plaintiff,

vs.

Adobe Systems Inc., Amazon.com, Inc., Apple 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.

Civil Action No. 6:09-cv-446

JURY TRIAL

DECLARATION OF ROSEMARY SNIDER IN SUPPORT OF EOLAS' MOTION TO COMPEL DISCOVERY FROM ADOBE SYSTEMS, INC. REGARDING INVESTMENT LICENSING AGREEMENTS WITH INTELLECTUAL VENTURES ENTITIES

യാ അന്ത്രത്ത്യ പുത്തത്തെന്നു പുത്തത്തെന്നു പുത്തത്തെന്നു പുത്തത്തെന്നു പുത്തത്തെന്നു പുത്തത്തെന്നു പുത്തത്തെന്ന

- I, Rosemary Snider, do state and declare as follows:
- I am an attorney with the law firm of McKool Smith PC (McKool Smith), counsel for Plaintiff Eolas Technologies Incorporated (Eolas) in this action. I make this declaration in support of Eolas' Motion to Compel Discovery from Adobe Systems Inc. Regarding Investment Licensing Agreements With Intellectual Ventures Entities. Unless otherwise stated, the matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.
- 2. Attached hereto as Exhibit A is a true and correct copy of a document titled Intellectual Ventures Overview printed from Intellectual Ventures' website.

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- 3. Attached hereto as Exhibit B is a true and correct copy of a document titled Global Licensing Overview printed from Intellectual Ventures' website.
- 4. Attached hereto as Exhibit C is a true and correct copy of a document titled Products and Services printed from Intellectual Ventures' website.
- 5. Attached hereto as Exhibit D is a true and correct copy of a document titled Licensing printed from Intellectual Ventures' website.
- 6. Attached hereto as Exhibit E is a true and correct copy of a document titled Notice of Transaction Pursuant to Corporation Code Section 25102(f) regarding Invention Investment Fund II, LLC.
- 7. Attached hereto as Exhibit F is a true and correct copy of a document titled Defendants' Certificate of Interested Entities or Persons Pursuant to Civil Local Rule 3-16 F.R.C.P. 7.1, filed in *Xilinx, Inc. v. Invention Investment Fund I, LP*, in Case No. 11-cv-0671-SI, in the U.S. District Court in the Northern District of California.
- 8. Attached hereto as Exhibit G is a true and correct copy of a letter from Mr. Josh Budwin to Mr. David Healey, dated May 20, 2011, in this matter.
- 9. Attached hereto as Exhibit H is a true and correct copy of an email from Mr. Budwin to Ms. Mehta Sonal et al., dated June 6, 2011, in this matter.
- 10. Attached hereto as Exhibit I is a true and correct copy of an email from Mr. Healey to Mr. Budwin et al., dated June 10, 2011, in this matter.
- 11. Attached hereto as Exhibit J is a true and correct copy of an email from Mr. Healey to Mr. Budwin et al., dated June 16, 2011, in this matter.
- 12. Attached hereto as Exhibit K is a true and correct copy of an email from Mr. Donahey Teague to Mr. Budwin et al., dated June 17, 2011, in this matter.

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13. Attached hereto as Exhibit L is a true and correct copy of an email from Mr. Christopher Mierzejewski to Ms. Rebecca Hermes et al., dated June 17, 2011, in this matter.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on June 20, 2011, in Dallas, Texas.

Rosemary Snider Snider

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