The Honorable Ricardo S. Martinez 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 MICROSOFT CORPORATION, a Washington) 10 corporation, No. CV07 936RSM 11 Plaintiff, **DECLARATION OF ALAN J.** 12 HEINRICH IN SUPPORT OF v. IMMERSION'S REPLY IN SUPPORT 13 IMMERSION CORPORATION, a Delaware OF ITS MOTION TO COMPEL RESPONSES TO REQUEST FOR corporation, 14 PRODUCTION NOS. 53, 54 AND 71 AND Defendant. REFERENCED IN RESPONSE TO 15 **INTERROGATORY NO. 7** 16 NOTED ON MOTION CALENDAR: March 28, 2008 17 18 I, Alan J. Heinrich, declare as follows: 19 1. I am a partner at the law firm of Irell & Manella LLP, co-counsel of record for 20 defendant Immersion Corporation ("Immersion") in the above captioned action. I am a member 21 in good standing of the California State Bar and am admitted to practice before this Court in this 22 case pro hac vice. I have personal knowledge of the facts set forth in this Declaration and, if 23 called as a witness, could and would testify competently to such facts under oath.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the unofficial deposition transcript of Patrick Reutens, which deposition was taken on March 24, 2008. I have not yet received the official deposition transcript for Mr. Reuten's deposition.

24

25

26

1	3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the
2	deposition transcript of Jennifer Liu, which deposition was taken on December 20, 2007.
3	I declare under penalty of perjury under the laws of the United States of America that the
4	foregoing is true and correct.
5	Executed on March 28, 2008, at Los Angeles, California.
6	By /s/ Alan J. Heinrich
7	Alan J. Heinrich
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22 23	
23 24	
25	
25 26	
20	

1	<u>CERTIFICATE OF SERVICE</u>
2	The undersigned attorney certifies that on the 28th day of March, 2008, I electronically
3	filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:
4	Paul J. Kundtz (pkundtz@riddellwilliams.com)
5	Blake Marks-Dias (bmarksdias@riddellwilliams.com)
6	Wendy E. Lyon (wlyon@riddellwilliams.com) Riddell Williams P.S.
7	1001 Fourth Avenue Plaza, Suite 4500 Seattle, WA 98154-3600
8	Attorneys for Plaintiff
9	
10	/s/ David R. Kaplan David R. Kaplan
11	Irell & Manella LLP
12	1800 Avenue of the Starts, Suite 900 Los Angeles, CA 90067-4276
	Telephone: (310) 277-1010
13	Facsimile: (310) 203-7199
14	
15	Byrnes & Keller LLP
16	1000 Second Avenue, 38th Floor Seattle, WA 98104
17	Telephone: (206) 622-2000
17	Facsimile: (206) 622-2522
18	Attorneys for Defendant Immersion Corporation
19	
20	
21	
22	
23	
24	
25	
26	