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Attorneys for Defendants and Counterclaim Plaintiffs
RESEARCH IN MOTION LIMITED and
RESEARCH IN MOTION CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MFORMATION TECHNOLOGIES, INC., a Delaware corporation,

Plaintiff and Counterclaim Defendant,

v.

RESEARCH IN MOTION LIMITED, a Canadian corporation

AND

RESEARCH IN MOTION CORPORATION, a Delaware corporation,

Defendants and Counterclaim Plaintiffs.

Case No. 5:08-CV-04990-JW

Jury Trial Demanded

DECLARATION OF MEREDITH ZINANNI IN SUPPORT OF RIM'S OPPOSITION TO MFORMATION'S MOTION TO EXCLUDE PORTIONS OF THE MARCH 4, 2011 EXPERT REPORT OF DEFENDANTS' EXPERT, DR. ANTHONY ACAMPORA

Judge: The Honorable James Ware

I, Meredith Zinanni, state and declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, and serve as counsel for Defendants Research In Motion Limited and Research In Motion Corporation (collectively, "RIM") in the above-captioned case. I am over twenty-one years of age and not under any legal disability. I submit this declaration in support of RIM'S Opposition To Mformation's Motion To Exclude Portions Of The March 4, 2011 Expert Report Of Defendants' Expert, Dr. Anthony Acampora. I have personal knowledge of the following facts and, if called as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of a document titled "Products, partnerships extend enterprise to mobile devices," dated September 1999. The document bears bates numbers RIM-MF2632906-2907.

3. Attached hereto as Exhibit 2 is a true and correct copy of a document titled "Computer Associates to Offer Highly Manageable Wireless Application Infrastructure By Leveraging Alliances with 3Com and PageNet," dated July 26, 1999. This document bears bates numbers RIM-MF2632890-2891.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from Unicenter TNG, Administrator Guide, Release 2.1 (Computer Associates Int'l, Inc. 1997). The original document bears bates numbers CA_MFORM0010043-0762 and has been designated "Attorneys' Eyes Only."

5. Attached hereto as Exhibit 4 is a true and correct copy of a document titled "3Com and Computer Associates Team to Integrate Enterprise Management with Palm Computing Platform," dated July 19, 1999. The document bears bates numbers RIM-MF2632904-2905.

6. Attached hereto as Exhibit 5 is a true and correct copy of a document titled "New IT development can help you manage your fleet," dated August 9, 1999. The document bears bates numbers RIM-MF2632899-2902.

7. Attached hereto as Exhibit 6 is a true and correct copy of a document titled "Computer Associates Announces UniFleet, Automotive Industry's Most Advanced Fleet

Management," dated March 1, 1999. The document bears bates numbers RIM-MF2632896-2898.

8. Attached hereto as Exhibit 7 is a true and correct copy of a document titled "Computer Associates Helps put the West McLaren Mercedes Team in the Winners' Circle," dated November 13, 1998. The document bears bates numbers RIM-MF2632894-2895.

9. Attached hereto as Exhibit 8 is a true and correct copy of a document titled "Look What Unicenter Is Managing Now," dated 1999. This document bears bates numbers RIM-MF2640774.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from Unicenter TNG Framework, Administrator Guide v2.1 (Computer Associates Int'l, Inc. 1997). The original document bears bates numbers RIM-MF2593046-3213.

11. Attached hereto as Exhibit 10 is a table summarizing the evidence relied on by Dr. Acampora and cited in the March 4, 2011 Expert Report of Dr. Anthony Acampora and Exhibits D, E, and G thereto, for all of the paragraphs of Dr. Acampora's March 4, 2011 Expert Report that Mformation contests in its motion, (Dkt. 419), including documents and testimony. It has been designated "Confidential - Attorneys' Eyes Only."

12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the January 6, 2011, Rule 30(b)(6) deposition of Salvatore Lazzaro. The transcript of this deposition has been designated "Confidential - Attorneys' Eyes Only."

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the March 31, 2010, Rule 30(b)(6) deposition of Joe Owen. The transcript of this deposition has been designated "Confidential - Attorneys' Eyes Only."

14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the January 26, 2011 deposition of Chris Foley. The transcript of this deposition has been designated "Confidential - Attorneys' Eyes Only."

I declare under penalty of perjury under the laws of the United States and the State of Illinois that the foregoing is true and correct and that this declaration was executed by me on September 2, 2011 in Chicago, Illinois.

/s/ Meredith Zinanni
Meredith Zinanni

CERTIFICATE OF SERVICE

I hereby certify on this 2nd day of September, 2011 that a copy of the foregoing was filed electronically through the Court's CM/ECF system, with notice of case activity automatically generated and sent electronically to all parties.

DATED: September 2, 2011

KIRKLAND & ELLIS LLP

Respectfully submitted,

/s/ *Lesley Ahlberg*
Lesley Ahlberg
Intellectual Property Legal Assistant

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