IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTELLECTUAL VENTURES I LLC Plaintiff, v. RICOH AMERICAS CORPORATION and RICOH ELECTRONICS, INC. Defendants.	C.A. No. 13-cv-474-SLR-SRF **JURY TRIAL DEMANDED**

DECLARATION OF STEFANI C. SMITH IN SUPPORT OF INTELLECTUAL VENTURES'S BRIEF IN SUPPORT OF ITS MOTIONS FOR PARTIAL SUMMARY JUDGMENT OF NO INVALIDITY

I, Stefani C. Smith, declare as follows:

1. I am an attorney at the law firm of Tensegrity Law Group LLP, counsel of record for Plaintiff Intellectual Ventures I LLC ("IV") in the above-captioned matter. I am an attorney in good standing licensed to practice in the State of California and admitted to practice before this Court *pro hac vice* in the above-captioned matter. I submit this declaration in support of Intellectual Ventures's Brief In Support Of Its Motions For Partial Summary Judgment Of No Invalidity. I am personally familiar with the facts stated herein, and, if called as a witness, could testify competently hereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of U.S. Patent No. 5,444,728, bearing production numbers IVR00007221-7235.

3. Attached hereto as **Exhibit 2** is a true and correct copy of an English translation of Japanese Unexamined Patent Application Publication No. H04-356986 ("Ono"), bearing production numbers PRIORART_00002005-2011.

4. Attached hereto as **Exhibit 3** is a true and correct copy of U.S. Patent No. 6,130,761, bearing production numbers IVR00007154-7162.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from Appendix B to the Expert Report of Dr. Mark N. Horenstein Regarding Infringement of U.S. Patent Nos. 5,444,728 and 6,130,761 ("Horenstein Open. Rep."), dated April 8, 2016. Dr. Horenstein swore to the truth and correctness of this expert report in his Declaration of Mark N. Horenstein In Support Of IV's Summary Judgment Briefs, submitted herewith, and authorized IV to include his report and excerpts thereof as exhibits in support of IV's brief.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the Expert Report of Dr. Martin Walker, Ph.D., Regarding the Invalidity of U.S. Patent Nos. 5,444,728 and 6,130,761 ("Walker Open. Rep."), dated April 8, 2016.

7. Attached hereto as **Exhibit 6A** is a true and correct copy of excerpts from Appendix A to the Rebuttal Expert Report of Mark N. Horenstein Regarding Validity of U.S. Patent Nos. 5,444,728 and 6,130,761 ("Horenstein Reb. Rep."), dated May 6, 2016. Dr. Horenstein swore to the truth and correctness of this expert report in his Declaration of Mark N. Horenstein In Support Of IV's Summary Judgment Briefs, submitted herewith, and authorized IV to include his report and excerpts thereof as exhibits in support of IV's brief.

8. Attached hereto as **Exhibit 6B** is a true and correct copy of excerpts from Appendix B to the Rebuttal Expert Report of Mark N. Horenstein Regarding Validity of U.S. Patent Nos. 5,444,728 and 6,130,761 ("Horenstein Reb. Rep."), dated May 6, 2016. Dr. Horenstein swore to the truth an correctness of this expert report in his Declaration of Mark N. Horenstein In Support Of IV's Summary Judgment Briefs, submitted herewith, and authorized IV to include his report and excerpts thereof as exhibits in support of IV's brief.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the Supplemental Expert Report of Dr. Martin Walker, Ph.D., Regarding The Invalidity of U.S. Patent Nos. 5,444,728 and 6,130,761 ("Walker Supp. Rep."), dated May 20, 2016.

10. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the Errata to the Expert Reports of Dr. Martin Walker, Ph.D., Regarding U.S. Patent Nos. 5,444,728 and 6130,761 ("Walker Errata"), served on June 7, 2016.

11. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from Ricoh's *Markman* Presentation slides, dated November 13, 2015.

12. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the IEEE Standard Dictionary of Electrical and Electronics Terms 3rd Ed. (1984).

13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the McGraw-Hill Dictionary of Scientific and Technical Terms 4th Ed. (1989)

14. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from The Illustrated Dictionary of Electronics 3rd Ed. (1985).

15. Attached hereto as **Exhibit 13** is a true and correct copy of excerpt from The Oxford Large Print Dictionary (1992).

16. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from Merriam-Webster's Collegiate Dictionary (1998).

17. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts from Dictionary of Computing 2nd Ed. (1986).

18. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from The New IEEE Standard Dictionary of Electrical and Electronics Terms 5th Ed. (1993).

19. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from the deposition of Martin G. Walker, dated June 7, 2016.

20. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from the deposition of Mark N. Horenstein, dated June 2, 2016.

21. Attached hereto as **Exhibit 19** is a true and correct copy of an English translation of Japanese Unexamined Patent Application Publication No. H07-226831 ("Kitahara"), bearing production numbers PRIORART_00002227-2235.

22. Attached hereto as **Exhibit 20** is a true and correct copy of an English translation of Japanese Unexamined Patent Application Publication No. H03-074961 ("Ozaki"), bearing production numbers PRIORART_00002207-2212.

23. Attached hereto as **Exhibit 21** is a true and correct copy of U.S. Patent No. 5,150,227 ("Koshiyouji"), bearing production numbers PRIORART_00004060-4075.

24. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the prosecution history of U.S. Patent No. 6,130,761, bearing production numbers IVR00001647-1748.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, and that this declaration is executed on July 15, 2016, in Redwood Shores, CA.

/s/ Stefani C. Smith
Stefani C. Smith