IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JOAO CONTROL & MONITORING SYSTEMS, LLC, *Plaintiff*, v. VOLKSWAGEN GROUP OF AMERICA, INC., and BENTLEY MOTORS, INC., *Defendants*.	Civil Action No. 1:14-cv-00517-GMS CONSOLIDATED WITH Civil Action No. 1:14-cv-00523-GMS JURY TRIAL DEMANDED

DECLARATION OF RYAN JOSEPH SHEEHAN IN SUPPORT OF DEFENDANT'S MOTION TO STAY

I, Ryan Joseph Sheehan, declare as follows:

1. I am an associate with the law firm of Kenyon & Kenyon LLP, counsel for defendants Volkswagen Group of America, Inc. and Bentley Motors, Inc. ("VWGoA" and "Bentley") in the above-captioned case, and am a member in good standing of the bars of the States of New York and Connecticut. I submit this declaration in support of Defendants' Motion to Stay, filed herewith. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify competently as to them.

2. Attached hereto as Exhibit 1 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 5,917,405 (Control No. 90/013,300), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

3. Attached hereto as Exhibit 2 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,549,130 (Control No. 90/013,301), downloaded on April 24, 2015 from the United States

Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

4. Attached hereto as Exhibit 3 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,542,076 (Control No. 90/013,302), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

5. Attached hereto as Exhibit 4 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

6. Attached hereto as Exhibit 5 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 5,917,405 (Control No. 90/013,300), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

7. Attached hereto as Exhibit 6 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,549,130 (Control No. 90/013,301), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

8. Attached hereto as Exhibit 7 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent

No. 6,542,076 (Control No. 90/013,302), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

9. Attached hereto as Exhibit 8 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

10. Attached hereto as Exhibit 9 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 5,917,405 (Control No. 90/013,300), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

11. Attached hereto as Exhibit 10 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,549,130 (Control No. 90/013,301), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

12. Attached hereto as Exhibit 11 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,542,076 (Control No. 90/013,302), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

13. Attached hereto as Exhibit 12 are true and correct copies of excerpts from the

United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

14. Attached hereto as Exhibit 13 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 5,917,405 (Control No. 90/013,300), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

15. Attached hereto as Exhibit 14 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,549,130 (Control No. 90/013,301), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

16. Attached hereto as Exhibit 15 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 6,542,076 (Control No. 90/013,302), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

17. Attached hereto as Exhibit 16 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

18. Attached hereto as Exhibit 17 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 5,917,405 (Control No. 90/013,300), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

19. Attached hereto as Exhibit 18 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 5,917,405 (Control No. 90/013,300), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

20. Attached hereto as Exhibit 19 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

21. Attached hereto as Exhibit 20 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at http://portal.uspto.gov/pair/PublicPair.

22. Attached hereto as Exhibit 21 are true and correct copies of excerpts from the United States Patent and Trademark Office records concerning the reexamination of U.S. Patent No. 7,397,363 (Control No. 90/013,303), downloaded on April 24, 2015 from the United States Patent and Trademark Office, Patent Application Information Retrieval website, available at

http://portal.uspto.gov/pair/PublicPair.

23. Attached hereto as Exhibit 22 are true and correct copies of excerpts of a letter dated February 18, 2013 regarding "Patent Infringement Claims By Joao Control & Monitoring Systems, LLC," received by Defendants.

24. Attached hereto as Exhibit 23 are true and correct copies of excerpts of a letter dated March 5, 2013 regarding "Patent Infringement Claims By Joao Control & Monitoring Systems, LLC," received by Defendants.

25. Attached hereto as Exhibit 24 are true and correct copies of excerpts of a letter dated April 22, 2013 regarding "Patent Infringement Claims By Joao Control & Monitoring Systems, LLC," received by Defendants.

26. Attached hereto as Exhibit 25 is a true and correct copy of a printout of a document entitled "*Ex Parte (EP)* and *Inter Partes (IP)* Proceedings Fiscal Years 2012-2013," downloaded on April 24, 2015 from the United States Patent and Trademark Office website, *available at* http://www.uspto.gov/patents/stats/crudatareport.pptx.

27. Attached hereto as Exhibit 26 is a true and correct copy of "PLAINTIFF'S DISCLOSURE OF ACCUSED INSTRUMENTALITIES AND IDENTIFICATION OF CLAIMS," served March 30, 2015 in this litigation.

Dated: April 27, 2015

/s/ Ryan Joseph Sheehan
Ryan Joseph Sheehan