IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ADVANCED MEDIA NETWORKS, LLC, *Plaintiff,* v. CELLO PARTNERSHIP D/B/A VERIZON WIRELESS, *Defendant.*	C.A. No. 1:14-cv-01495-GMS **JURY TRIAL DEMANDED**
ADVANCED MEDIA NETWORKS, LLC, *Plaintiff,* v. T-MOBILE US, INC.; AND T-MOBILE USA, INC., *Defendants.*	C.A. No. 1:14-cv-1518-GMS **JURY TRIAL DEMANDED**
ADVANCED MEDIA NETWORKS, LLC, *Plaintiff,* v. SPRINT COMMUNICATIONS, INC., SPRINT CORPORATION, BOOST WORLDWIDE, INC., VIRGIN MOBILE USA, INC., VIRGIN MOBILE USA, L.P., CLEARWIRE CORPORATION, AND CLEARWIRE COMMUNICATIONS, L.L.C. *Defendants.*	C.A. No. 1:15-cv-0142-GMS **JURY TRIAL DEMANDED**

DECLARATION OF RICHARD AGOSTINELLI IN SUPPORT OF PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO STAY PENDING *EX PARTE* REEXAMINATION PROCEEDINGS

I, Richard Agostinelli, declare under penalty of perjury:

1. I am the founder and chief executive officer of Advanced Media Networks, LLC, formerly NeTune Inc., and a managing director for both Advanced Media Networks, LLC and its affiliate MediaPOINTE, Inc.'s holding company (collectively "AMN").

2. I have made significant investments to fund Advanced Media Networks' formation, early business operations, and the prosecution of its patents. The costs and delays caused by the continuing, unfounded reexaminations of these patents has prevented AMN from fully benefiting from my investments. At 74 years of age, I am running out of time to witness the full success that AMN would otherwise have, and to realize my return on this investment in order to provide for the financial security of my family.

3. I respectfully submit this declaration in support of AMN's opposition to defendants' motion to stay litigation pending outcome of pending reexaminations.

4. Advanced Media Networks, LLC was formed by a group of engineers in 1998 for the express purpose of practicing its Mobile Telecomputer Network technology, which are disclosed in U.S. Patent Nos. 5,960,074 ("the '074 Patent") and 6,445,777 ("the '777 Patent"). AMN is headquartered in Los Angeles, California and has additionally maintained a 12,600 square foot research and development facility in Ventura County for the last fifteen years.

5. Since its inception, AMN has developed all of its own technology and has provided design, consulting, implementation and training services for both terrestrial and satellite subsystems as described in the '074 and '777 Patents and other AMN intellectual property.

6. AMN is a small organization that has maintained a staff of between 15 and 20 people over the past five years, most of which are highly skilled engineers dedicated to building and improving AMN's technology.

7. AMN's revenue is derived from a combination of the sale of products based on, and the licensing of others use of, its technology.

8. Much of AMN's revenue is used to fund research and development. AMN spends millions of dollars per year directly on research and development and associated general and administrative expenses on such activities.

9. AMN's products, which are sold under the trademark "MediaPOINTE®," are covered by the claims of several of its patents, including the '074 Patent, and are marked as such on its products and literature. For example, AMN's "MediaPOINTE® HD Portal" captures or streams live events and allows users to share content and view other captured events elsewhere on the user's network or over the internet wirelessly. *See* Attachment A. It is marked with several patents, including the '074 Patent. *Id.*

10. The "MediaPOINTE® HD Portal *plus*," which works similarly to the "MediaPOINTE® HD Portal" discussed above, combines multiple sources (i.e. cameras, PC's, etc.) into one multi-image recording that can be played on any PC or mobile device. Its Wi-Fi Hub technology, which is based on AMN's patents including the '074 Patent, allows users to control, monitor, and stream content wirelessly. *See* Attachment B.

11. The "HD Portal – Portable System Kit" includes all of the necessary components needed for users to take advantage of AMN's Wi-Fi Hub technology, which is based on AMN's patents including the '074 Patent, and allows users to upload and publish content on websites. *See* Attachment C.

12. AMN's "TAC-CR", also marked with the '074 Patent, allows users to wirelessly conduct and stream live multipoint video conferences, auto record conferences and videos from internal or remote cameras, and auto upload and delete recordings for remote command

operations. *See* Attachment D.

13. The "TAC HD," is a portable wireless all-in-one video recording and streaming system that is marked with and practices claims of several of AMN's patents, including the '074 Patent. *See* Attachment E.

14. The "TAC-CR3," which practices and is marked with the '074 Patent, is a Tactical Command and Control Center (NOC) that wirelessly hosts and streams live video, data and multipoint video conferences. *See* Attachment F. It automatically records video calls, tactical data, live streams and/or video from internal or remote cameras and allows for remote command operations. *Id.*

15. The "TAC-C," provides a mobile Wi-Fi that users can use to connect with others within a network and incorporates video conferencing and multipoint capabilities. *See* Attachment G. It also practices and is marked with the '074 Patent. *Id.*

16. AMN's clients include government agencies, private and public educational facilities and businesses, health care providers and religious organizations. For example, government agencies utilize AMN's Tactical Video Command and Control Centers, which are portable network operation centers (NOC) that create Wi-Fi networks for command operations. AMN manufactures several tactical communications systems with various different levels of capability, all placarded with the '074 and '777 Patents, such as those explained above.

17. AMN has also built and deployed auto-aligning satellite antenna systems, for which it also holds multiple patents, and integrated managed networks in the aerospace, maritime and energy markets for large, well-known companies and has deployed such systems and services in defense applications for various agencies.

18. One of AMN's systems (the "ShowRunner" system) provides access to secure

broadband satellite and microwave networks and services at remote locations similar to the embodiments described and claimed in the '074 and '777 Patents.

19. Additionally, AMN pioneered the use of mobile satellite network services in the television and motion picture industry, which is key to driving the production processes on sets today. It has worked closely with Hollywood Studios providing mobile Wi-Fi networks on location for productions such as the Harry Potter series of motion pictures, Blackhawk Down, Spiderman, and numerous other motion picture and television productions, and continues to offer these services to the motion picture industry.

20. AMN's technology is also used for capturing lectures, presentations, training and live events. These include portable video recording, streaming and conferencing systems which provide operational control, streaming and on-demand distribution of content between a wireless local area network (WLAN) and a wide area network (WAN) through an internal Wi-Fi hub.

21. U.S. aerospace and government institutions utilize AMN's tactical systems for field training and armed services command operations. AMN's technology is also utilized in educational, enterprise and government applications around the world.

22. Further, AMN is a certified dealer of mobile Wi-Fi products and services offered by Inmarsat, Inc., including but not limited to, inflight Wi-Fi services which were the subject of AMN's litigation against Inmarsat for infringement of the '074 and '777 Patents. These products and services compete with other mobile and portable Wi- Fi system offerings in, without limitation, the transportation, maritime, energy, broadcast, defense and enterprise markets.

I declare the foregoing to be true under the penalty of perjury on this 20th day of July 2015.

Richard Agostinelli