IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ST. CLAIR INTELLECTUAL PROPERTY CONSULTANTS, INC. Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG TELECOMMUNICATIONS AMERICA, L.P., MATSUSHITA ELECTRIC INDUSTRIAL CO., LTD., MATSUSHITA ELECTRIC CORPORATION OF AMERICA, VICTOR COMPANY OF JAPAN, LTD., JVC COMPANY OF AMERICA, NOKIA CORPORATION, NOKIA, INC., HEWLETT-PACKARD COMPANY, EASTMAN KODAK COMPANY, Defendants.	)	Civil Action No. 04-1436 JJF **JURY TRIAL DEMANDED**

PLAINTIFF ST. CLAIR INTELLECTUAL PROPERTY CONSULTANTS, INC.'S INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)

Plaintiff St. Clair Intellectual Property Consultants, Inc. ("St. Clair"), by its undersigned counsel, hereby submits the following Initial Disclosures, pursuant to Fed. R. Civ. P. 26(a)(1), Local Rule 16.3, and the Pre-Trial Order to be entered. St. Clair makes these Initial Disclosures based on information now reasonably available to it, and reserves the right to supplement these disclosures if necessary.

A. PERSONS WITH KNOWLEDGE

At this time, St. Clair believes the following individuals are likely to have discoverable information that St. Clair may use to support its claims. The following list is limited to those persons that St. Clair is specifically aware of at the present time. St. Clair believes there are

additional employees and former employees of each of the Defendants and that there may be third parties who have knowledge that supports St. Clair's claims, the specific nature and identity of which is not yet known to St. Clair but includes at least the design, function, use, sale, and marketing of Defendants' products.

The undersigned counsel represents or may represent some of the witnesses listed for purposes of St. Clair's claims. Defendants' counsel should therefore direct any communication to the listed witnesses represented by counsel through the undersigned.

Marc Roberts
497 Cape Alan Drive
Henderson, NV 89052
(702) 263-2605
A named co-inventor of each of the asserted patents.

Jerry Speasl
4172 Grant Court
Pleasanton, CA 94566
(925) 484-0459
A named co-inventor of each of the asserted patents.

Matt Chikosky
4381 Whippoorwill Drive
Hermitage, PA 16148
(724) 342-9993
A named co-inventor of each of the asserted patents.

Gordon K. Harris, Jr., Esq.
Harness, Dickey & Pierce, P.L.C.
5445 Corporate Drive
Troy, MI 48098
(248) 641-1600
Prosecuting attorney for the '010, '757 and '899 patents.

Ed Chung
St. Clair Intellectual Property Consultants, Inc.
16845 Kercheval Avenue, Suite Number Two
Grosse Pointe, Michigan 48230-1551
(313) 884-8427

Thomas Baumgarten
St. Clair Intellectual Property Consultants, Inc.
16845 Kercheval Avenue, Suite Number Two
Grosse Pointe, Michigan 48230-1551
(313) 884-8427

St. Clair further identifies the following additional individuals, with their last-known titles and addresses, who are likely to have discoverable information that St. Clair may use to support its claims or defenses.

Charles R. Donohoe
Vice President and General Patent Counsel
Samsung Electronics Co., Ltd.
10th Floor, Samsung Main Building
250-2-Ka, Taepyung-Ro, Chung-Ku
Seoul, Korea
C.P.O. Box 8780

I-Ching Chen
Executive Director
Samsung Electronics Co., Ltd.
San #24 Nongseo-Lee, Kiheung-Eup
Yongin-Gun, Kyungki-Do Korea

Sang-Wook Kim
Executive Director
Technology Planning Division
Semiconductor Devices Business
Samsung Electronics Co., Ltd.
San #24 Nongseo-Lee, Kiheung-Eup
Yongin-Gun, Kyungki-Do Korea

Seong-Soo Kim
Manager
International Cooperation Part
Technology Planning Team
Semiconductor Devices Business
Samsung Electronics Co., Ltd.
San #24 Nongseo-Lee, Kiheung-Eup
Yongin-Gun, Kyungki-Do Korea

Kab-Tae Han
Senior Manager, Group Head
Intellectual Property Group II
Technology Planning Team
Digital Multimedia R&D Center
416 Maetan 3-dong, Paldal-ku, Suwon-City
Kyungki-do, 442-742, Korea

Jun Won Lee
Senior Manager
Intellectual Property Team
Telecommunication & Network Business
Samsung Electronics Co., Ltd.
416 Maetan 3-dong, Paldal-ku, Suwon-City
Kyungki-do, 442-742, Korea

Jongtae Moon
Manager
Patent Group 1
Intellectual Property Team
Digital Media R&D Center
Digital Media Network
Samsung Electronics Co., Ltd.
416 Maetan 3-dong, Yeogtong-gu, Suwon-City
Kyungki-do, 442-742, Korea

Satoshi Imahara
International Sales & Marketing Department
Audio-Video Systems Division
Matsushita Communication Industrial Co., Ltd.
600 Saedo-cho, Kidori-ku, Yokohama 226, Japan

Akio Kuki
Councilor
Corporate Planning Office
Matsushita Electric Industrial Company, Ltd.
1006 Kadoma, Kadoma-shi, Osaka, 571 Japan

Tamotsu Matsumura
General Manager
Information Equipment Group
Information & Communications Research Lab
Matsushita Electric Industrial Co., Ltd.
1006 Kadoma, Kadoma-shi, Osaka, 571 Japan

Hiroaki Horai
Vice President
Intellectual Property Rights Operation Company
Matsushita Electric Industrial Co., Ltd.
1-3-7, Shiromi, Chuo-ku
Osaka 540-6319, Japan

Tokio Nohara
Associate Director and General Manager
Legal & Intellectual Property Department
Victor Company of Japan, Ltd.
3-12, Moriya-cho, Kanagawa-ku
Yokohama, 221-8528 Japan

Tetsuyki Watanabe
Director
Licensing Center
IPR Operations Company
Matsushita Electric Industrial Co., Ltd.
1-3-7, Shiromi, Chuo-ku
Osaka 540-6319, Japan

Naoki Hashimoto
Assistant Councilor
Legal Affairs Group
Licensing Center
IPR Operations Company
Matsushita Electric Industrial Co., Ltd.
1-3-7, Shiromi, Chuo-ku
Osaka 540-6319, Japan

J. Nagata
JVC Victor Company of Japan, Ltd.
Legal & Intellectual Property Department 12
3-Chome Moriya-Cho, Kanagawa-ku
Yokohama, 221-8528, Japan

M. Yamashita
JVC Victor Company of Japan, Ltd.
Legal & Intellectual Property Department 12
3-Chome Moriya-Cho, Kanagawa-ku
Yokohama, 221-8528, Japan

Y. Ishihara
JVC Victor Company of Japan, Ltd.
Legal & Intellectual Property Department 12
3-Chome Moriya-Cho, Kanagawa-ku
Yokohama, 221-8528, Japan

M. Ogawa
JVC Victor Company of Japan, Ltd.
Legal & Intellectual Property Department 12
3-Chome Moriya-Cho, Kanagawa-ku
Yokohama, 221-8528, Japan

Morton Amster
Amster, Rothstein & Ebstein LLP
90 Park Avenue
New York, NY 10016

John D. Meyers
Department Manager
Printing Technology Department
Hewlett-Packard Laboratories Division
1501 Page Mill Road
Palo Alto, CA 94304

Peter Tong
Patent Counsel
Patent Department
Hewlett-Packard Company
Mail Stop IL5
1501 Page Mill Road
Palo Alto, CA 94304

Patrick Murphy
Corporate Counsel
Hewlett-Packard Company
3404 East Harmony Road, ms 79
Fort Collins, CO 80528

David Lewis
Manager, Marketing & Sales
North America & Europe
Eastman Kodak Company
120 Corporate Woods, Suite 300
Mail Drop 1455
Rochester, NY 14623

David M. Woods
Patent Legal Staff
Eastman Kodak Company
343 State Street
Rochester, NY 14650

Pamela R. Crocker
Group Patent Counsel
Imaging Electronics Group
Eastman Kodak Company
343 State Street
Rochester, NY 14650

St. Clair also believes that its experts, to be disclosed consistent with the Scheduling Order to be entered, are likely to have discoverable information that St. Clair may use to support its claims. St. Clair expects to discover additional witnesses whose specific identities are not yet known to St. Clair who may have discoverable information that St. Clair may use to support its claims.

B. DESCRIPTION OF DOCUMENTS

At this time, St. Clair believes that the following categories of documents and things in the possession of St. Clair or its retained counsel may be used to support St. Clair's claims or defenses. In making these Initial Disclosures, St. Clair does not waive applicable privileges or protections from disclosure, including the attorney-client privilege or attorney work product doctrine nor the right to designate confidential materials for appropriate protection under the local rules and any protective order to be entered.

- United States Patent No. 5,138,459 ("'459 patent") entitled "Electronic Still Video Camera With Direct Personal Computer (PC) Compatible Digital Format Output," issued on August 11, 1992;

- United States Patent No. 6,094,219 ("'219 patent") entitled "Electronic Still Video Camera With Direct Personal Computer (PC) Compatible Digital Format Output," issued on July 25, 2000;
- United States Patent No. 6,233,010 ("'010 patent") entitled "Electronic Still Video Camera With Direct Personal Computer (PC) Digital Format Output," issued on May 15, 2001;
- United States Patent No. 6,323,899 ("'899 patent") entitled "Process For Use In Electronic Camera," issued on November 27, 2001;
- The prosecution history files of the United States Patent and Trademark Office for the above-listed patents-in-suit;
- References cited in the prosecution history files of the United States Patent and Trademark Office for the above-referenced patents in suit;
- Copies of the recorded assignment of the '459 patent to St. Clair;
- Three (3) PCC video tapes;
- Documents relating to the marketing and sale of Defendants' digital cameras (e.g., marketing and financial materials, product descriptions, product instructions and advertisements);
- Information relating to certain of Defendants' products or services, including, but not limited to: samples of Defendants' products, operating guides/user manuals for Defendants' digital cameras and digital camcorders, and operating guides/user manuals for various storage mediums;
- Selected pages from Defendants' websites;
- Correspondence between St. Clair and Defendants regarding St. Clair's Patents;

- Various computer systems and software packages for demonstration of the use of Defendants' products;
- Correspondence from Konica Corporation to St. Clair dated November 28, 2001;
- Samples of various storage media, including, but not limited to, floppy disks, memory sticks, CDs, smart media and floppy disk adaptors.
- Documents regarding Defendants' design and development of digital cameras;
- Documents showing the features and operations of all models of digital camera;
- Documents relating to St. Clair's title to the patents-in-suit;
- Patents that cite the patents-in-suit and their file histories;
- Orders and verdicts in St. Clair Intellectual Property Consultants, Inc. v. Sony Corp. et al., United States District Court for the District of Delaware, Civil File No. 01-557-JJF.;
- Orders and verdicts in St. Clair Intellectual Property Consultants, Inc. v. Canon et al., United States District Court for the District of Delaware, Civil File No. 03-241-JJF;
- All licenses entered into regarding the patents-in-suit to date;
- Evidence of commercial success with embodiments of the claimed inventions.

Except as previously produced to Defendants and subject to any claims of privilege, the preceding categories of documents are available for inspection and copying at the law offices of Robins, Kaplan, Miller & Ciresi L.L.P. during regular business hours (8:30 a.m. to 5:30 p.m., Monday through Friday) upon reasonable notice. St. Clair expects to discover documents and things in possession or control of Defendants or third parties, the specific identity of which are not yet known to St. Clair, that may be used in support of St. Clair's claims or defenses.

C. COMPUTATION OF DAMAGES

St. Clair has experienced economic and irreparable harm as a result of Defendants' infringement of one or more of the patents-in-suit. Pursuant to 35 U.S.C. § 283, St. Clair seeks injunctive relief from Defendants' continued infringement of any and all of the patents in suit. In addition, pursuant to 35 U.S.C. § 284, St. Clair is seeking damages adequate to compensate it for Defendants' infringement of the asserted patents, but in no event less than a reasonable royalty for the use made of the inventions, together with pre- and post-judgment interest and costs as fixed by the Court. St. Clair may also show that by continuing to make, sell, use and offer for sale its inventions, Defendants are engaged in willful and deliberate infringement which justifies increased damages and which may qualify this as an exceptional case supporting the award of reasonable attorney's fees pursuant to 35 U.S.C. § 285.

As to damages, it is difficult at this time for St. Clair to make any computation of damages based upon either reasonable royalty, lost profit or other additional awards absent further discovery and disclosure by Defendants (or to identify with specificity the non-privileged documents reasonably available that relate to these categories of damages). St. Clair should not be expected to provide a calculation of damages which depends upon information in Defendants' position. St. Clair reserves the right to modify its damages theories and calculations or to seek damages under different theories as appropriate in view of information to be discovered in this case and in view of further anticipated expert opinions on the subject of damages. St. Clair also reserves the right to seek a post-judgment equitable accounting of damages for the period of infringement following the period of damages established by St. Clair at trial.

D. INSURANCE AGREEMENTS

St. Clair is aware of no insurance agreements pertinent to this litigation.

St. Clair expressly reserves the right to supplement the disclosures in each Section, including the identification of individuals, identification of additional documents and materials and St. Clair's computation of any category of damages claimed, along with documents or other evidentiary material upon which such computation is based, if such information come to its attention through further investigation, discovery or otherwise.

Of Counsel:

Ronald J. Schutz, Esquire
Jake M. Holdreith, Esquire
Becky R. Thorson, Esquire
Carrie M. Lambert, Esquire
Kimberly G. Miller, Esquire
ROBINS, KAPLAN, MILLER & CIRESI LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402
(612) 349-8500

SEITZ, VAN OGTROP & GREEN

/s/ George H. Seitz, III

By:_____
George H. Seitz, III, Esquire (No. 667)
James S. Green, Esquire (No. 481)
Patricia P. McGonigle, Esquire (No. 3126)
222 Delaware Avenue, Suite 1500
P.O. Box 68
Wilmington, DE 19899
(302) 888-0600
gseitz@svglaw.com

Attorneys for St. Clair Intellectual Property Consultants, Inc.

CERTIFICATE OF SERVICE

I, George H. Seitz, III, Esquire, hereby certify that on this 3rd day of June 2005, I electronically filed the ***Plaintiff St. Clair Intellectual Property Consultants, Inc.'s Initial Disclosures Pursuant to Rule 26(a)(1)*** with the Clerk of Court using CM/ECF which will send notification of such filing to counsel of record.

/s/ George H. Seitz

George H. Seitz, III (ID No. 667)
gseitz@svglaw.com