UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNIVERSITY OF SOUTH FLORIDA RESEARCH FOUNDATION, INC.,

Plaintiff/Counterclaim Defendant,

Case No. 8:16-cv-01194-MSS-TGW

vs.

FUJIFILM MEDICAL SYSTEMS U.S.A., INC.,

Defendant/Counterclaimant.
_____/

DECLARATION OF JACOB A. SNODGRASS IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT FUJIFILM MEDICAL SYSTEMS U.S.A., INC.'S MOTION TO COMPEL RESPONSE TO INTERROGATORY NO. 7

I, Jacob A. Snodgrass, declare as follows:

1. I am an attorney of record in this case to Defendant/Counterclaimant FUJIFILM Medical Systems U.S.A., Inc. ("Fujifilm"). I have personal knowledge of the facts stated herein and if called upon could testify to them.

2. I submit this declaration in support of Fujifilm's Motion to Compel Response to Interrogatory No. 7.

3. On January 26, 2017, counsel for USFRF and counsel for Fujifilm met and conferred to discuss, among other things, USFRF's response to Fujifilm's Interrogatory No. 7. I was present during this meet and confer. During this meet and confer, counsel for USFRF pledged to supplement USFRF's response to Interrogatory No. 7 by February 2, 2017.

4. On February 23, 2017, counsel for USFRF and I met and conferred. During that conference, I indicated that Fujifilm intended to file a motion to compel and inquired into USFRF's position on the motion. USFRF indicated that it would oppose the motion.

5. On February 15, 2017, the parties served their respective Initial Identification of Disputed Claim Terms. In these, Fujifilm identified forty-nine terms for construction, and USFRF identified twenty-nine terms for construction.

6. Attached hereto as Exhibit A is a true and correct copy of Fujifilm's First Set of Interrogatories (Nos. 1-14), served on October 28, 2016.

7. Attached hereto as Exhibit B is a true and correct copy of USFRF's Responses and Objections to Fujifilm's First Set of Interrogatories, served on November 28, 2016.

8. Attached hereto as Exhibit C is a true and correct copy of USFRF's Supplemental Response and Objections to Interrogatory No. 7, served on February 2, 2017.

9. Attached hereto as Exhibit D is a true and correct copy of an e-mail chain between counsel for USFRF and counsel for Fujifilm dated January 11-19, 2017.

10. Attached hereto as Exhibit E is a true and correct copy of an e-mail chain between counsel for USFRF and counsel for Fujifilm dated February 2-21, 2017.

11. Attached hereto as Exhibit F is a true and correct copy of USFRF's Infringement Contentions, served on January 3, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 3rd day of March, 2017 at Washington, D.C.

s/Jacob A. Snodgrass
Jacob A. Snodgrass

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically and served on all counsel of record on March 3, 2017 via the Court's ECF system.

s/Jacob A. Snodgrass
Jacob A. Snodgrass