

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**NOVELPOINT SECURITY LLC,**

**Plaintiff,**

v.

**SAMSUNG ELECTRONICS AMERICA,  
INC., ET AL.,**

**Defendants.**

Case No. 2:12-cv-100

**LEAD CASE**

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**NOVELPOINT SECURITY LLC,**

**Plaintiff,**

v.

**HEWLETT-PACKARD COMPANY,**

**Defendant.**

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Case No. 2:12-cv-104

**PATENT CASE**

**JURY TRIAL DEMANDED**

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**DECLARATION OF DAVID C. REARDON IN SUPPORT OF PLAINTIFF'S  
RESPONSE IN OPPOSITION TO DEFENDANT  
HEWLETT-PACKARD COMPANY'S MOTION TO TRANSFER VENUE**

1. My name is David C. Reardon. I submit this Declaration in support of Plaintiff NovelPoint Security LLC's Response to Defendant Hewlett-Packard Company's Motion to Transfer Venue.

2. I am over 18 years of age, and I am fully competent to make this sworn declaration. I have personal knowledge of the facts stated in this declaration, and they are all true and correct.

3. I am the named inventor of U.S. Patent No. 5,434,562 (the "562 Patent") and U.S. Patent No. 6,212,635 (the "635 Patent").

4. I have assigned my rights in the '562 and '635 Patents to NovelPoint Security LLC ("NovelPoint"), the plaintiff in this case.

5. As part of my agreement with NovelPoint, I have a contractual obligation that requires me to render assistance to NovelPoint in enforcing any rights under the '562 and '635 Patents, which includes providing all relevant documents and things to NovelPoint and giving testimony in the venue where NovelPoint brings suit if NovelPoint makes such a request.


6. I have used my best efforts to provide to NovelPoint, at its principal place of business in Allen, Texas, the originals of all the documents that I had that are relevant to the '562 and '635 Patents or this case. If I later discover that I have additional relevant documents or things, I will also promptly provide the originals to NovelPoint at its principal place of business in Allen, Texas.

7. I live in St. Charles, Missouri. This location is closer to Marshall, in the Eastern District of Texas (582.6 miles), than to Houston, in the Southern District of Texas (849.3 miles), and it would be more convenient for me to appear at the trial of this case in the Eastern District of Texas than if it were in the Southern District of Texas. *See* Exhibit A attached hereto.

8. I am ready and willing to appear in person in Marshall, Texas, as a witness in the trial of this case. I do not consider this to be an inconvenience to me in any sense.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2012.

  
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David C. Reardon

**EXHIBIT A**  
**to**  
**Reardon Declaration**



# Mileage Calculator

The Rand McNally mileage calculator will help you determine the mileage between any two destinations.

## Enter Starting Point

**A** St. Charles MO

## Enter Ending Point

**B** Marshall TX

[Get Mileage](#)

Mileage	Time
<b>582.6 miles</b>	<b>9 hrs 25 min</b>

[Clear Result](#)

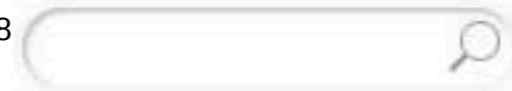
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# Mileage Calculator

The Rand McNally mileage calculator will help you determine the mileage between any two destinations.

## Enter Starting Point

**A** St. Charles MO

## Enter Ending Point

**B** Houston TX

[Get Mileage](#)

Mileage	Time
<b>849.3 miles</b>	<b>12 hrs 38 min</b>

[Clear Result](#)

[Get Directions for This Route](#)

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