

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

W.L. GORE & ASSOCIATES, INC. and  
GORE ENTERPRISE HOLDINGS, INC.,

Plaintiffs,

v.

MEDTRONIC, INC., MEDTRONIC USA,  
INC., and MEDTRONIC VASCULAR  
INC.,

Defendants.

C.A. No. 10-cv-00441-MSD-DEM

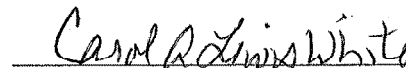
**DECLARATION OF CAROL A. LEWIS WHITE IN SUPPORT OF  
PLAINTIFFS' BRIEF IN SUPPORT OF THEIR MOTION TO  
SUPPLEMENT THE SECOND AMENDED COMPLAINT**

I, Carol A. Lewis White, declare as follows:

1. I am an intellectual property counsel with W. L. Gore & Associates, Inc. (“W. L. Gore”). I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. For several months, W. L. Gore has been planning a corporate restructuring to improve the effectiveness of its U.S. and global business operations. That restructuring is for business reasons and is unrelated to the ongoing litigation with Medtronic.
3. In accordance with that plan, on January 27, 2012, W. L. Gore gave its unanimous written consent for its wholly-owned subsidiary, Gore Enterprise Holdings, Inc. (“Gore Holdings), to dissolve and to distribute all of its assets to W. L. Gore.
4. As authorized by that unanimous written consent, on January 27, 2012, the board of directors of Gore Holdings resolved to liquidate and dissolve Gore Holdings and to distribute all of Gore Holdings’ assets to W. L. Gore.
5. That distribution is underway, and on January 30, 2012, Gore Holdings assigned several hundred patents and patent applications, including United States Patent No. 8,510,870, to W. L. Gore. That assignment included the right for W. L. Gore to seek damages for past infringement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of February, 2012 at Newark, DE.

  
Carol A. Lewis White