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7 *Attorneys for Defendants*

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
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13 CLIFTON W. MARSHALL, et al.,

14 Plaintiffs,

15 v.

16 NORTHROP GRUMMAN  
CORPORATION, et al.

17 Defendants.  
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Case No. 16-CV-6794 AB (JCx)

**SUPPLEMENTAL DECLARATION  
OF NANCY ROSS IN SUPPORT  
OF DEFENDANTS' COMBINED  
REPLIES TO PLAINTIFFS'  
RESPONSIVE STATEMENTS OF  
FACT AND RESPONSES TO  
PLAINTIFFS' STATEMENT OF  
ADDITIONAL FACTS**

Date: June 7, 2019

Time: 10:00 a.m.

Judge: Hon. André Birotte Jr.

**SUPPLEMENTAL DECLARATION OF NANCY ROSS**

I, Nancy G. Ross, declare and state as follows:

1. I am an attorney with the law firm of Mayer Brown LLP, attorneys of record for defendants in the above-captioned matter. If called upon as a witness, I could and would competently testify to the fact set forth below, as I know it to be true based on my own personal knowledge or based upon my review of the files and records produced in discovery in this matter.

2. Attached hereto as **Exhibit 111** is a true and correct copy of excerpts of the deposition of Catherine Cleveland, dated July 24, 2018. Filed provisionally under seal.

3. Attached hereto as **Exhibit 112** is a true and correct copy of excerpts of the deposition of Dennis Newberry, dated June 5, 2018. Filed provisionally under seal.

4. Attached hereto as **Exhibit 113** is a true and correct copy of an excerpt of the deposition of Rajender Chandhok, dated June 7, 2018. Filed provisionally under seal.

5. Attached hereto as **Exhibit 114** is a true and correct copy of an excerpt of the deposition of Steve Pomerantz, dated October 29, 2018. Filed provisionally under seal.

6. Attached hereto as **Exhibit 115** is a true and correct copy of excerpts of the deposition of Albert Tsao, dated June 6, 2018. Filed provisionally under seal.

7. Attached hereto as **Exhibit 116** is a true and correct copy of excerpts of the deposition of Michael Lyster, dated June 28, 2018. Filed provisionally under seal.

8. Attached hereto as **Exhibit 117** is a true and correct copy of the Expert Rebuttal Report of Steven K. Gissiner, dated October 15, 2018. Filed provisionally under seal.

9. Attached hereto as **Exhibit 118** is a true and correct copy of excerpts of the deposition of Stephen Rubino, dated August 22, 2018. Filed provisionally under seal.

10. Attached hereto as **Exhibit 119** is a true and correct copy of Martin Schmidt's Recordkeeping Fee Damages spreadsheet. Filed provisionally under seal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of May, 2019, at Chicago, Illinois.

/s/Nancy G. Ross

# **EXHIBIT 111**

## **(Filed Under Seal)**

# **EXHIBIT 112**

## **(Filed Under Seal)**

# **EXHIBIT 113**

## **(Filed Under Seal)**

# **EXHIBIT 114**

## **(Filed Under Seal)**

# **EXHIBIT 115**

## **(Filed Under Seal)**



# **EXHIBIT 116**

## **(Filed Under Seal)**

# **EXHIBIT 117**

## **(Filed Under Seal)**

# **EXHIBIT 118**

## **(Filed Under Seal)**

# **EXHIBIT 119**

## **(Filed Under Seal)**