

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

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

TOUCHSTREAM TECHNOLOGIES, INC.,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC., et al.,

Defendants.

Lead Case No. 2:23-cv-00059-JRG

**CONTAINS RESTRICTED
CONFIDENTIAL – ATTORNEYS’
EYES ONLY INFORMATION**

TOUCHSTREAM TECHNOLOGIES, INC.,

Plaintiff,

v.

**COMCAST CABLE COMMUNICATIONS,
LLC, D/B/A XFINITY, et al.,**

Defendants.

Member Case No. 2:23-cv-00062-JRG

**DECLARATION OF CHRISTOPHER BAKEWELL
IN SUPPORT OF CHARTER’S NOTICE OF TRIAL CONFLICT**

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I, Christopher Bakewell, declare:

1. I am a Vice President and officer of Charles River Associates, where I provide consulting services involving valuation, licensing and related issues in connection with technology-rich business and intellectual property.
2. I was retained by the Charter Defendants (“Charter”) in this matter as a damages expert and provided an expert report which includes opinions on each of the Georgia-Pacific factors related to a hypothetical negotiation, the date of the hypothetical negotiation, lump sum versus a running royalty, apportionment and the application to method claims. My expert report is the result of extensive review of the discovery record in this matter and I was deposed with respect to the opinions contained in my report.
3. I understand that I will testify at trial in this matter as Charter’s damages expert witness on the opinions contained in my report.
4. I have also been retained as an economic expert in the case *Fundamental Innovation Systems International LLC v. Anker Innovations Ltd.*, No. 1:21-cv-00339-RGA, (D. Del.) on behalf of the Defendant, Anker Innovations Ltd. There is a week-long trial scheduled in the District Court of Delaware from March 3rd and through March 7th.

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

Dated: February 6, 2025

Respectfully submitted,



Christopher Bakewell