

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 DAVID G. BELL
IN SUPPORT OF CHARTER'S NOTICE OF TRIAL CONFLICT

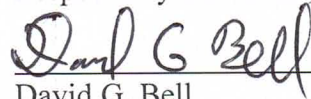
I, David G. Bell, declare:

1. I am a former employee of several subsidiaries of Charter Communications, Inc. and current Vice President of Software at Prime Robotics.
2. In 2002, I began working as a Software Developer at Time Warner Cable, Inc.
3. I was promoted to Chief Architect, then Technical Fellow and responsible for designing software and supervising teams to write code to offer cable TV services. In 2009, I was a Chief Architect in the engineering team at Time Warner Cable supporting the development of the app and supporting infrastructure that matured into the app which I understand is the basis of Touchstream Technologies, Inc.'s infringement allegation. I remained at Time Warner Cable when it became part of Charter in 2016.
4. I understand that Charter expects me to testify at trial in this matter as a fact witness to explain development and functionality of the app and its accused Send To TV feature.
5. I am not available for trial between March 13 and March 20, 2025 because I will be in Ireland with my wife chaperoning over 100 students, including my son, from the Legacy High School Lightning Band. The students have been invited to march in the 2025 St. Patrick's Day Parade in Dublin. The trip has been planned since February 22, 2023.

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

Dated: February 6, 2025

Respectfully submitted,



David G. Bell
Broomfield, Colorado