# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.: 08-5348 (ADM/JSM)

THOMAS J. PETTERS, ET AL.,

Defendants.

## NOTICE OF FILING OF THE DECLARATION OF CHRISTOPHER O. GREEN IN FURTHER SUPPORT OF LG ELECTRONICS, INC.'S EXPEDITED MOTION TO INTERVENE

NOW COMES Intervenor LG Electronics, Inc. ("LGE") and hereby files this

Notice of Filing of the attached Declaration of Christopher O. Green in Further Support

of LGE's Expedited Motion to Intervene.

During the motion hearing held on December 5, 2008, the parties discussed with the Court the existence of an indemnity agreement between Polaroid Corporation and Proview.<sup>1</sup> At that point, counsel for Receiver Douglas E. Kelley expressed some confusion regarding the existence of the indemnity obligation. Accordingly, LGE submits the attached declaration and exhibits to clarify the existence of that obligation.

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<sup>&</sup>lt;sup>1</sup> "Proview" herein refers to Proview Technology, Inc., Proview International Holdings, Ltd, and/or Proview Technology (Shenzhen) Co., Ltd.

### Dated: December 8, 2008 FISH & RICHARDSON P.C.

## By: /s/Nagendra Setty

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