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12	UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRICT OF CALIFORNIA		
14	SAN JOSE DIVISION		
15	ELAN MICROELECTRONICS	Case No. C-09-01531 RS (PVT)	
16	CORPORATION,	DECLARATION OF NATHAN	
17	Plaintiff and Counterclaim Defendant,	GREENBLATT IN SUPPORT OF ELAN MICROELECTRONICS	
18	V.	CORP.'S ADMINISTRATIVE MOTION TO FILE PAPERS UNDER	
19	APPLE INC.,	SEAL [D.I. 137]	
20	Defendant and Counterclaim	JURY TRIAL DEMANDED	
21	Plaintiff.	Hon. Richard Seeborg	
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	DECLARATION OF NATHAN GREENBLATT ISO ADMINISTRATIVE MOTION TO FILE PAPERS UNDER SEAL	Case No. C-09-01531 RS (PVT)	

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I, Nathan Greenblatt, declare:

1. I am an attorney with the law firm of Weil, Gotshal & Manges LLP,
counsel of record for Defendant and Counter-Claimant Apple Inc. ("Apple") in the abovecaptioned matter. I submit this declaration based on personal knowledge and following a
reasonable investigation. If called upon as a witness, I could competently testify to the truth of
each statement herein.

7 2. I have reviewed Exhibits B, D, E, M, R, S, T, and U to the Declaration of
8 Sean P. DeBruine in Support of Elan's Opposition to Apple Inc.'s Motion to Dismiss ("DeBruine
9 Declaration").

3. Exhibit B to the DeBruine Declaration contains excerpts from the
 deposition of Mark Della Bona, a former Apple employee, that contains information about
 confidential Apple license agreements and Mr. Della Bona's work at Apple. This information
 contains sensitive business information which could harm Apple if publicly disclosed.

4. Exhibits D and E to the DeBruine Declaration contain engineering
specifications relating to the GlidePoint® product that are labelled as "Confidential and
Proprietary." Apple received permission from outside counsel for Cirque to produce those
documents as confidential pursuant to the terms of the protective order in this case.

18 5. Exhibits T and U to the DeBruine Declaration contain information
19 reflecting a confidential business agreement between Apple and third party Proxima, Inc. These
20 exhibits contain sensitive business information that could harm Apple and/or Cirque Corp. (the
21 successor to Proxima, Inc.) if publicly disclosed.

22 6. Exhibits M, R, and S appear to be newspaper articles with some
23 annotations. Apple is withdrawing its confidentiality designation for Exhibits M, R, and S.

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

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Executed on July 22, 2010, at Redwood Shores, California.

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DECLARATION OF NATHAN GREENBLATT ISO ADMINISTRATIVE MOTION TO FILE PAPERS UNDER SEAL /s/ Nathan Greenblatt Nathan Greenblatt