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11 Apple Inc.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15 ELAN MICROELECTRONICS  
16 CORPORATION,

17 Plaintiff and Counterclaim  
18 Defendant,

19 v.

20 APPLE INC.,

21 Defendant and Counterclaim  
22 Plaintiff.

Case No. C-09-01531 RS (PVT)

**DECLARATION OF SONAL N.  
MEHTA IN SUPPORT OF APPLE  
INC.'S REPLY'S IN SUPPORT OF  
MOTION TO DISMISS ELAN  
MICROELECTRONICS CORP.'S  
INEQUITABLE CONDUCT DEFENSE  
AND COUNTERCLAIM**

JURY TRIAL DEMANDED

Hon. Richard Seeborg

August 5, 2010, 1:30 p.m.  
Courtroom 3, 17th Floor

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I, Sonal N. Mehta, 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 above-captioned 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.

2. Attached hereto as Exhibit A is a true and correct copy of selected pages from the transcript of the May 25, 2010 deposition of Mr. Mark Della Bona, designated as "Confidential" (REDACTED).

3. Attached hereto as Exhibit B is a true and correct copy of selected pages from the transcript of the September 4, 2008 deposition of Mr. George E. Gerpheide, designated as "Confidential-Attorneys Eyes Only" (REDACTED).



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

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

/s/ Sonal N. Mehta  
Sonal N. Mehta