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Attorneys for Plaintiff and Counterdefendant
 ELAN MICROELECTRONICS
 CORPORATION

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ELAN MICROELECTRONICS
 CORPORATION,

Plaintiff,

v.

APPLE, INC.,

Defendant.

Case No. 09-cv-01531 RS (PSG)

**DECLARATION OF PALANI P.
 RATHINASAMY IN SUPPORT OF
 ELAN MICROELECTRONICS
 CORPORATION'S MOTION TO
 COMPEL APPLE TO SUPPLEMENT
 ITS RESPONSE TO ELAN'S
 INTERROGATORY NO. 13**

AND RELATED COUNTERCLAIMS

DATE: June 28, 2011
 TIME: 10:00 a.m.
 Courtroom 5
 Hon. Paul S. Grewal

1 I, Palani P. Rathinasamy, declare as follows:

2 1. I am an associate with the law firm of Alston & Bird LLP, counsel to Elan in this
3 action. I have personal knowledge of the following facts and, if called to testify, I could and
4 would testify competently to the matters stated herein.

5 2. Attached as Exhibit A is a true and correct copy of Plaintiff Elan Microelectronics
6 Corporation's Second Set of Interrogatories to Defendant Apple Inc. [Nos. 13-15].

7 3. Attached as Exhibit B is a true and correct copy of Apple Inc.'s Responses and
8 Objections to Elan Microelectronics Corporation's Second Set of Interrogatories to Apple Inc.
9 [Nos. 13-15] (**filed under seal**).

10 4. Attached as Exhibit C is a true and correct copy of an e-mail sent on March 15,
11 2011 from Elan's Counsel, Palani P. Rathinasamy, to Apple's Counsel, Nathan Greenblatt.

12 5. Attached as Exhibit D is a true and correct copy of an e-mail sent on March 24,
13 2011 from Apple's Counsel, Nathan Greenblatt, to Elan's Counsel, Palani P. Rathinasamy.

14 6. Attached as Exhibit E is a true and correct copy of an e-mail sent on March 29,
15 2011 from Apple's Counsel, Sonal Mehta, to Elan's Counsel, Palani P. Rathinasamy (**filed under**
16 **seal**).

17 7. Attached as Exhibit F is a true and correct copy of Apple Inc.'s Supplemental
18 Response and Objections to Elan Microelectronics Corporation's Interrogatory No. 13 (**filed**
19 **under seal**).

20 8. Attached as Exhibit G is a true and correct copy of an e-mail sent on April 1, 2011
21 from Elan's Counsel, Jane Bu, to Apple's Counsel, Derek Walter (**filed under seal**).

22 9. Attached as Exhibit H is a true and correct copy of an e-mail sent on May 11, 2011
23 from Elan's Counsel, Palani P. Rathinasamy, to Apple's Counsel, Derek Walter (**filed under seal**).

24 10. Attached as Exhibit I is a true and correct copy of an e-mail sent on May 2, 2011
25 from Elan's Counsel, Palani P. Rathinasamy to Apple's Counsel, Derek Walter (**filed under seal**).

26 11. Attached as Exhibit J is a true and correct copy of an e-mail sent on May 6, 2011
27 from Apple's Counsel, Derek Walter, to Elan's Counsel, Palani P. Rathinasamy (**filed under seal**).

28 12. Attached as Exhibit K is a true and correct copy of a screenshot taken from Apple's

1 website (<http://support.apple.com/kb/SB12>) on May 24, 2011.

2 13. Attached as Exhibit L is a true and correct copy of Apple schematics bearing the
3 production range APEL1092555-57 (**filed under seal**).

4 14. Attached as Exhibit M is a true and correct copy of an Apple internal e-mail
5 bearing the production number APEL0501275 (**filed under seal**).

6 15. I conducted in good faith a telephonic meet and confer with Apple's Derek Walter
7 on April 5, 2011 and exchanged multiple e-mails with Apple's counsel in an effort to obtain
8 supplementation of Elan's Interrogatory No.13 without Court action.

9
10 I declare under penalty of perjury under the laws of the United States that the foregoing is
11 true and correct.

12 Executed this 24th day of May, 2011 at Menlo Park, California.

13
14 DATED: May 24, 2011

Respectfully submitted,

15 ALSTON & BIRD LLP

16
17 By: /s/ Palani P. Rathinasamy

Palani P. Rathinasamy

Attorneys for Plaintiff

18 ELAN MICROELECTRONICS CORPORATION
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