

# EXHIBIT 30

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**From:** Bu, Jane [mailto:Jane.Bu@alston.com]  
**Sent:** Monday, May 23, 2011 5:46 PM  
**To:** Walter, Derek  
**Cc:** Apple Elan WGM Service; Elan Apple Team  
**Subject:** Elan/Apple-- 353 patent inventor deposition

Derek:

From our investigation, unfortunately, all of the '353 patent inventors are no longer employed by Elan. Alston+Bird is not currently representing any of these individuals either. Therefore, Elan has no control over their availability to appear for a deposition or any other proceedings for this case. We, however, do not agree a stipulation as you proposed below is necessary at this time, nor a motion to compel will be useful. Elan simply is unable to mandate a non-Elan employee to appear in the Northern District of California for a deposition. With that said, we do not object Apple taking the testimony of these individuals. We have located their last known addresses in Taiwan (listed below) should Apple still wishes to pursue their depositions.

**邱延誠 Yen-Chang (Godwin) Chiu**

台北縣林口鄉仁愛村 23 鄰公園路 231 號 10F-1  
10F-1, No.231, Gong Yuan Road, Linkou District, New Taipei City, Taiwan 244

**林世祺 Shih-Chi (Edward) Lin**

台南縣麻豆鎮大埤里 5 鄰博愛路 22 號  
No. 22, Bo Ai Road, Madou District, Tainan City, Taiwan 721

**簡永烈 Yung-Lieh (Kelvin) Chien**

桃園縣桃園市東門里 8 鄰中興街 9 號  
No. 9, Chung Hsing Street, Taoyuan City, Taoyuan County, Taiwan 330

**葉丁豪 Ting-Hao Yeh**

台南市東平路 252 巷 5 號  
No. 5, Lane 252, Tung Ping Road, Tainan City, Taiwan 701

Best,

Jane

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**From:** Walter, Derek [mailto:Derek.Walter@weil.com]  
**Sent:** Tuesday, May 10, 2011 9:37 AM  
**To:** Bu, Jane  
**Cc:** Apple Elan WGM Service; Elan Apple Team  
**Subject:** RE: Elan/Apple--Mr. Chiu's deposition notice

Jane:

In your email below, you state that Elan has "no control over [Mr. Chiu's] availability to appear for a deposition." Is this true for the other named inventors on the '353 patent as well? Likewise, is it the case that Alston & Bird is not representing any of the named inventors on the '353 patent?

Pursuant to the parties' agreement set forth in the September 30, 2009 CMC statement, Elan was to make named inventors that do not reside in the United States voluntarily available for deposition in the Northern District of California. To the extent Elan is now unwilling or unable to do this for the inventors on the '353 patent, it is Apple's

position that they may not later appear, live or by declaration, at trial or any other proceedings. Please confirm that Elan will agree to a stipulation and order stating that it may not rely on the testimony of Mr. Chiu or any of the other '353 patent named inventors, live or in writing, at trial or in any other proceeding in this case. To the extent Elan will not agree to such a stipulation and order, Apple will move to compel the deposition of the '353 patent named inventors, which Elan previously agreed to provide in the September 30, 2009 CMC statement.

Thanks,

Derek

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**From:** Bu, Jane [mailto:Jane.Bu@alston.com]  
**Sent:** Tuesday, April 26, 2011 2:58 PM  
**To:** Walter, Derek  
**Cc:** Apple Elan WGM Service; Elan Apple Team  
**Subject:** Elan/Apple--Mr. Chiu's deposition notice

Derek:

Please note that Mr. Godwin Chiu is no longer employed by Elan, and Elan has no control over his availability to appear for a deposition. We are trying to locate his last known address in Taiwan and will provide such information to you shortly. To the extent Apple still wishes to pursue Mr. Chiu's deposition, you should proceed in accordance with the applicable international procedure for a third party subpoena.

Best,

Jane

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**From:** Walter, Derek [mailto:Derek.Walter@weil.com]  
**Sent:** Tuesday, April 26, 2011 11:18 AM  
**To:** Bu, Jane  
**Cc:** Elan Apple Team; Apple Elan WGM Service  
**Subject:** RE: Elan/Apple--Mr. Hamlin's deposition

Jane:

We are checking on Mr. Hamlin's availability and will try to provide you with a date shortly.

Last week we noticed the deposition of Godwin Chiu to begin on May 11. We would like to proceed on that date, with the deposition continuing through at least the 12th. Please confirm that you will provide Mr. Chiu for deposition on those dates so that we may finalize arrangements for the interpreter. To the extent you are not available to provide him then, please let us know as soon as possible so that we may make alternative arrangements.

Thanks,

Derek

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**From:** Bu, Jane [mailto:Jane.Bu@alston.com]  
**Sent:** Tuesday, April 19, 2011 4:18 PM  
**To:** Mehta, Sonal

Cc: Elan Apple Team; Apple Elan WGM Service

Subject: Elan/Apple--Mr. Hamlin's deposition

Sonal: last year we attempted to schedule a deposition with Mr. Hamlin for the Northern District Court case. On the eve of the deposition, Apple informed us that Mr. Hamlin has discovered additional personal files relevant to this case and requested additional time to review the files. We would like to reschedule Mr. Hamlin's deposition. Can you check his availability and propose a few dates? In the meantime, please confirm that Apple has completed its production of all documents, including Mr. Hamlin's personal files, that will be relevant to this case and his testimony.

Thanks,

Jane

*Jane H. Bu*

*Alston & Bird LLP  
275 Middlefield Road | Suite 150 | Menlo Park, CA 94025  
650-838-2019 Direct  
650-838-2001 Fax*

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