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10 Apple Inc.

11   UNITED STATES DISTRICT COURT

12   NORTHERN DISTRICT OF CALIFORNIA

13   SAN FRANCISCO DIVISION

14 ELAN MICROELECTRONICS   Case No. C-09-01531 RS (PSG)
    CORPORATION,
15   **DECLARATION OF NATHAN
                                           GREENBLATT IN SUPPORT OF
16   Plaintiff and Counterclaim   ADMINISTRATIVE MOTION TO
            Defendant,   FILE APPLE INC.'S OPPOSITION TO
17   ELAN MICROELECTRONICS
        v.   CORP.'S MOTION FOR PARTIAL
18   SUMMARY JUDGMENT UNDER
    APPLE INC.,   SEAL**
19
            Defendant and Counterclaim
20   Plaintiff.
                                           JUDGE: Hon. Richard Seeborg
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DECLARATION OF NATHAN GREENBLATT IN SUPPORT
OF ADMINISTRATIVE MOTION TO FILE UNDER SEAL   Case No. C-09-01531 RS (PSG)

1   I, Nathan Greenblatt, declare:

2   I am an attorney with the law firm of Weil, Gotshal & Manges LLP, counsel of

3 record for Defendant and Counter-Claimant Apple Inc. ("Apple") in the above-captioned matter.

4 I submit this declaration based on personal knowledge and following a reasonable investigation.

5 If called upon as a witness, I could competently testify to the truth of each statement herein.

6   1.   I prepared the redacted version of Apple Inc.'s Opposition to Elan

7 Microelectronics Corp.'s Motion for Partial Summary Judgment of Infringement of U.S. Patent

8 No. 5,825,352 ("Apple's Opposition"). Based on my review, the redacted portions contain

9 confidential technical information regarding the operation of Apple's products, as well as internal

10 codenames, which could harm Apple if publicly disclosed.

11   2.   I prepared the redacted version of the Declaration of Ravin Balakrishnan in

12 Support of Apple's Opposition. Based on my review, the redacted portions contain confidential

13 technical information regarding the operation of Apple's products, as well as internal codenames,

14 which could harm Apple if publicly disclosed.

15   3.   I have reviewed **Exhibit A** [May 24, 2011 Dezmelyk Dep.] to the Walter

16 Declaration. Based on my review, the exhibit consists predominantly of technical information

17 related to the operation of Apple products, which could harm Apple if publicly disclosed.

18   4.   I prepared the redacted version of **Exhibit D** [May 24, 2011 Dezmelyk Dep., Exh.

19 13] to the Walter Declaration. Based on my review, the redacted portions consists of technical

20 information related to the operation of Apple products, which could harm Apple if publicly

21 disclosed.

22   5.   I have reviewed **Exhibit G** [Aug. 27, 2006 letter from Elantech Devices Corp. to

23 Apple Inc.] to the Walter Declaration. Based on my review, exhibit consists of confidential

24 correspondence between Apple and Elan that could have an adverse impact on Apple if publicly

25 disclosed.

26   6.   I have reviewed **Exhibit H** [Aug. 22, 2007 letter from J. Whitt to S. DeBruine] to

27 the Walter Declaration. Based on my review, exhibit consists of confidential correspondence

28 between Apple and Elan that could have an adverse impact on Apple if publicly disclosed.

1   7.   I have reviewed **Exhibit L** [Nov. 11, 2010 Westerman Dep.] to the Walter

2 Declaration. Based on my review, the exhibit consists predominantly of technical information

3 related to the operation of Apple products, which could harm Apple if publicly disclosed.

4

5   I declare under the penalty of perjury under the laws of the United States of

6 America that the foregoing is true and correct.

7   Executed on June 2, 2011, at Redwood Shores, California.

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9   */s/ Nathan Greenblatt*
                                               Nathan Greenblatt
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