

# **EXHIBIT A**

1 Yitai Hu (SBN 248085) (yitai.hu@alston.com)  
2 Sean P. DeBruine (SBN 168071) (sean.debruine@alston.com)  
3 S.H. Michael Kim (SBN 203491) (michael.kim@alston.com)  
4 C. Augustine Rakow (SBN 254585) (augie.rakow@alston.com)  
5 ALSTON + BIRD LLP  
6 Two Palo Alto Square  
7 3000 El Camino Real, Suite 400  
8 Palo Alto, California 94306  
9 Telephone: 650-838-2000  
10 Facsimile: 650-838-2001

11 Attorneys for Plaintiff  
12 ELAN MICROELECTRONICS CORPORATION

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

16 ELAN MICROELECTRONICS ) Case No. 09-cv-01531 RS  
17 CORPORATION, )  
18 Plaintiff, )  
19 v. ) **PLAINTIFF ELAN MICROELECTRONICS**  
20 APPLE, INC., ) **CORPORATION'S FIRST REQUEST FOR**  
21 Defendant. ) **DOCUMENTS AND THINGS TO APPLE,**  
22 ) **INC.**  
23 ) **[NOS. 1-65]**  
24 )  
25 )  
26 )  
27 )  
28 )

**PROPOUNDING PARTY: Plaintiff ELAN MICROELECTRONICS CORPORATION**

**RESPONDING PARTY: Defendant APPLE, INC.**

**SET NUMBER: ONE**

1 **REQUEST FOR PRODUCTION NO. 15:**

2 All documents and things concerning or relating to the Elan Patents or related patents or patent  
3 applications, including, but not limited to, all documents comprising or relating to any infringement,  
4 non-infringement, validity, invalidity, enforceability, or non-enforceability analysis, testing, or  
5 evaluation of the patent.

6 **REQUEST FOR PRODUCTION NO. 16:**

7 For each Apple Patent, all documents and things concerning, referring, or relating to each  
8 corresponding application, continuation application, continuation-in-part application, divisional  
9 applications, re-examination certificate, re-issue or foreign patent or foreign patent application  
10 counterpart, or other related patents, including, but not limited to any prosecution history pertaining  
11 thereto.

12 **REQUEST FOR PRODUCTION NO. 17:**

13 Two functional samples of each Apple Product, along with any manuals or other documents  
14 provided to purchasers of that product.

15 **REQUEST FOR PRODUCTION NO. 18:**

16 Two functional samples of any devices made or sold by Apple that embody any claim of the  
17 Apple Patents, along with any manuals or other documents provided to purchasers of that product.

18 **REQUEST FOR PRODUCTION NO. 19:**

19 All documents and things comprising or relating to the construction or interpretation of the claim  
20 term(s) or scope of the Elan Patents.

21 **REQUEST FOR PRODUCTION NO. 20:**

22 All documents and things concerning the design, research, development, and/or testing of  
23 Apple's Products.

24 **REQUEST FOR PRODUCTION NO. 21:**

25 Documents concerning or relating to the structure, function, or operation of the Apple Product(s),  
26 including, but not limited to specifications, data sheets, drawings, diagrams, circuits, schematics,  
27 notebooks, project reports, workbooks, lab books, notes, code, memoranda, test plans, test results, CAD,  
28 simulation files, and marketing and sales materials.