EXHIBIT B

MATTHEW D. POWERS (Bar No. 104795)
matthew.powers@weil.com
EDWARD R. REINES (Bar No. 135960)
edward.reines@weil.com
SONAL N. MEHTA (Bar No. 222086)
sonal.mehta@weil.com
WEIL, GOTSHAL & MANGES LLP
Silicon Valley Office
201 Redwood Shores Parkway
Redwood Shores, CA 94065
Telephone: (650) 802-3000
Facsimile: (650) 802-3100

Attorneys for Apple Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

ELAN MICROELECTRONICS CORPORATION, Plaintiff and Counterclaim Defendant, v. APPLE INC., Defendant and Counterclaim Plaintiff.	Case No. C-09-01531 RS APPLE INC.'S RESPONSES AND OBJECTIONS TO ELAN MICROELECTRONICS CORPORATION'S FIRST REQUEST FOR DOCUMENTS AND THINGS TO APPLE, INC. [NOS. 1-65] Hon. Richard Seeborg Demand for Jury Trial

Pursuant to Federal Rule of Civil Procedure 34, Defendant and Counterclaim Plaintiff Apple Inc. ("Apple") hereby objects and responds to Plaintiff and Counterclaim Defendant Elan Microelectronics Corporation's ("Elan") First Requests for Documents and Things to Apple, Inc. [Nos. 1-65] ("Requests"), as follows:

GENERAL OBJECTIONS

Apple makes the following General Objections to the Requests, which apply to each Request therein regardless of whether a General Objection is specifically incorporated into a response to a particular request.

such documents exist in its possession, custody, or control.

REQUEST NO. 20:

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

RESPONSE TO REQUEST NO. 20:

In addition to its General Objections, Apple objects to this Request to the extent it calls for information protected by the attorney-client privilege, work product doctrine or any other applicable privilege or immunity. Apple further objects to this Request as overbroad and unduly burdensome and because it requests information not relevant to a claim or defense in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its objections, Apple will produce non-privileged documents sufficient to show the design, development, and/or testing of the relevant functionalities in the accused Apple products, to the extent such documents exist in its possession, custody, or control.

REQUEST NO. 21:

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

RESPONSE TO REQUEST NO. 21:

In addition to its General Objections, Apple objects to this Request to the extent it calls for information protected by the attorney-client privilege, work product doctrine or any other applicable privilege or immunity. Apple further objects to this Request as overbroad and unduly burdensome and because it requests information not relevant to a claim or defense in this action and not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to each Request to the extent that it seeks confidential source code information where the relevant operation or functionality can be determined without reference to the source code. Apple will make source code for relevant operations or functionalities that are not otherwise ascertainable available for inspection after the Court has entered a protective order governing the inspection of

source code.   Apple objects to this Request to the extent it seeks publicly available documents or information equally accessible to Elan.

Subject to and without waiving its objections, Apple will produce non-privileged documents sufficient to show the structure, function, or operation of the relevant functionalities of the accused Apple products, to the extent such documents exist in its possession, custody, or control.

REQUEST NO. 22:

The source code for each version of software, including firmware, relating to the touch pad or touch screen aspects of the Apple Products.

RESPONSE TO REQUEST NO. 22:

In addition to its General Objections, Apple objects to this Request to the extent it calls for information protected by the attorney-client privilege, work product doctrine or any other applicable privilege or immunity. Apple further objects to this Request as overbroad and unduly burdensome and because it requests information not relevant to a claim or defense in this action and not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to each Request to the extent that it seeks confidential source code information where the relevant operation or functionality can be determined without reference to the source code.

Subject to and without waiving its objections, Apple will make source code for relevant operations or functionalities that are not otherwise ascertainable available for inspection after the Court has entered a protective order governing the inspection of source code.

REQUEST NO. 23:

All documents referring or relating to the source code, including but not limited to programming documentation, specifications, flow charts, schematic drawings, design documents, or other documents referring or relating to the source code's structure or logic.

RESPONSE TO REQUEST NO. 23:

In addition to its General Objections, Apple objects to this Request to the extent it calls for information protected by the attorney-client privilege, work product doctrine or any other applicable privilege or immunity. Apple further objects to this Request as overbroad and unduly