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 11 ELAN MICROELECTRONICS
 CORPORATION

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ELAN MICROELECTRONICS
 CORPORATION,
 Plaintiff and Counterdefendant,
 v.
 APPLE, INC.,
 Defendant and Counterplaintiff.

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

**DECLARATION OF JANE H. BU IN
 SUPPORT OF PLAINTIFF ELAN
 MICROELECTRONICS
 CORPORATION'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 ELAN'S OPPOSITION TO APPLE,
 INC.'S MOTION TO COMPEL AND
 SUPPORTING DOCUMENTS**

AND RELATED COUNTERCLAIMS

1 I, Jane H. Bu, declare as follows:

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

5 2. In accordance with Civil Local Rule 79-5, Elan seeks to file under seal portions of its
6 Opposition to Apple, Inc.’s (“Apple’s”) Motion to Compel and Exhibits 9-11 to the Declaration of
7 Jane H. Bu in Support of Elan’s Opposition to Apple’s Motion to Compel.

8 3. Elan’s Opposition to Apple’s Motion to Compel and is partially redacted. The
9 redacted portions disclose confidential information relating to Elan employees, Elan’s corporate
10 structure and corporate policy, and sensitive business information including Elan’s sales and
11 financial information and sales and financial database systems, that could harm Elan if publicly
12 disclosed. In accordance with Civil Local Rule 79-5, only minimum and necessary redactions
13 regarding Elan’s sales and financial information are made to protect sealable information.

14 4. Exhibit 9 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to Apple’s
15 Motion to Compel is partially redacted. The redacted portions disclose confidential information
16 regarding sensitive business information including Elan’s sales and financial information, that could
17 harm Elan if publicly disclosed. In accordance with Civil Local Rule 79-5, only minimum and
18 necessary redactions regarding Elan’s sales and financial information are made to protect sealable
19 information.

20 5. Exhibit 10 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to
21 Apple’s Motion to Compel is partially redacted. The redacted portions disclose confidential
22 information relating to Elan employees and Elan’s corporate structure and corporate policy, that
23 could harm Elan if publicly disclosed. In accordance with Civil Local Rule 79-5, only minimum
24 and necessary redactions regarding Elan’s sales and financial information are made to protect
25 sealable information.

26 6. Exhibit 11 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to
27 Apple’s Motion to Compel is partially redacted. The redacted portions disclose confidential
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1 information regarding sensitive business information including Elan's sales and financial database
2 systems, that could harm Elan if publicly disclosed. In accordance with Civil Local Rule 79-5, only
3 minimum and necessary redactions regarding Elan's sales and financial information are made to
4 protect sealable information.

5 7. In accordance with Civil Local Rule 79-5, Elan seeks to file under seal Exhibits 1, 5,
6 6 to the Declaration of Jane H. Bu in Support of Elan's Opposition to Apple's Motion to Compel.

7 8. Exhibit 1 to the Declaration of Jane H. Bu in Support of Elan's Opposition to Apple's
8 Motion to Compel consists predominantly of confidential information regarding sensitive business
9 information including Elan's and third parties' sales and financial information, that could harm Elan
10 if publicly disclosed.

11 9. Exhibit 5 to the Declaration of Jane H. Bu in Support of Elan's Opposition to Apple's
12 Motion to Compel consists predominantly of confidential communication between Elan and Apple
13 regarding Apple's infringement of Elan's patent, and the document is designated by Apple as
14 "confidential."
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16 10. Exhibit 6 to the Declaration of Jane H. Bu in Support of Elan's Opposition to Apple's
17 Motion to Compel consists all confidential information relating to Elan's internal corporate IP
18 policy, that could harm Elan if publicly disclosed.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct.

21 Executed this 14th day of June, 2011 at Menlo Park, California.

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/s/ Jane H. Bu
Jane H. Bu

Attorney for Plaintiff and Counterclaim Defendant
Elan Microelectronics Corporation