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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 ELAN
 MICROELECTRONICS
 CORPORATION'S OPPOSITION TO
 APPLE, INC.'S MOTION TO COMPEL**

AND RELATED COUNTERCLAIMS

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

2 1. I am an attorney 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. Attached as Exhibit 1 is a true and correct copy of the relevant excerpts of Mr. Ian
6 Chung’s Deposition Transcript, taken on November 15 and 16, 2011 (**filed under seal**).

7 3. Attached as Exhibit 2 is a true and correct copy of the relevant excerpts of Elan’s
8 Supplemental Response to Apple’s Interrogatory No. 11, dated June 24, 2010.

9 4. Attached as Exhibit 3 is a true and correct copy of a letter dated April 7, 2006 from
10 Elan’s representative to Synaptics’ representative regarding the parties’ infringement claims
11 against each other produced in this case.

12 5. Attached as Exhibit 4 is a true and correct copy of Elan’s Initial Rule 26 Disclosure,
13 served on September 2, 2009.

14 6. Attached as Exhibit 5 is a true and correct copy of Elan’s letter to Apple, Inc.
15 (“Apple”) regarding the 352 Patent, dated August 27, 2006 (**filed under seal**).

16 7. To date, Elan has produced Mr. Ian Chung, Mr. Maco Tang, Mr. Steven Bisset, Mr.
17 Wayne Chang and Mr. I.H. Yeh for deposition in the Northern District of California.

18 8. Attached as Exhibit 6 is a true and correct copy of the certified English translation
19 of Elan’s Patent Policy, dated 2001 (**filed under seal**).

20 9. Attached as Exhibit 7 is a true and correct copy of relevant excerpts of Elan’s June
21 9th, 2011 Objections and Responses to Apple’s Rule 30(b)(6) Deposition Notice.

22 10. Attached as Exhibit 8 is a true and correct copy of my email to Apple counsel Mr.
23 Nathan Greenblatt regarding issues of Apple’s Motion to Compel, dated June 13, 2011.

24 11. On June 14, 2011, Elan produced partially redacted patent summaries, with
25 production numbers ELN1312136 through ELN1312142, prepared by Mr. Nick Lin.

26 12. Attached as Exhibit 9 is a true and correct copy of the Declaration of Mr. Ian
27 Chung in Support of Elan’s Opposition to Apple’s Motion to Compel, dated June 14, 2011
28 (**partially sealed**).

1 13. Attached as Exhibit 10 is a true and correct copy of the Declaration of Mr. Wayne
2 Chang in Support of Elan's Opposition to Apple's Motion to Compel, dated June 14, 2011
3 **(partially sealed)**.

4 14. Attached as Exhibit 11 is a true and correct copy of the Declaration of Ms. Liling
5 Lai in Support of Elan's Opposition to Apple's Motion to Compel, dated June 14, 2011 **(partially**
6 **sealed)**.

7 15. Attached as Exhibit 12 is a true and correct copy of the Declaration of Ms. Hsiao-
8 Ling Fan in Support of Elan's Opposition to Apple's Motion to Compel, dated June 14, 2011.

9 16. Elan has already produced its sales spreadsheets to Apple and is continuing to
10 produce additional sales and pricing information as the data is being generated and collected from
11 Elan's financial systems.

12 I swear under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct. Executed this 14th day of June, 2011 at Menlo Park, California.

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/s/ Jane H. Bu
Jane H Bu