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10 Attorneys for Plaintiff and Counterdefendant  
 11 ELAN MICROELECTRONICS  
 CORPORATION

12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO DIVISION  
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17 ELAN MICROELECTRONICS  
 CORPORATION,  
 18  
 19 Plaintiff and Counterdefendant,  
 20 v.  
 21 APPLE, INC.,  
 22 Defendant and Counterplaintiff.

Case No. 09-cv-01531 RS (PSG)  
**DECLARATION OF JENNIFER LIU IN  
 SUPPORT OF PLAINTIFF ELAN  
 MICROELECTRONICS  
 CORPORATION'S REPLY TO APPLE,  
 INC.'S OPPOSITION TO ELAN'S  
 MOTION FOR PARTIAL SUMMARY  
 JUDGMENT OF INFRINGEMENT**

23  
 24 AND RELATED COUNTERCLAIMS  
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Date: July 14, 2011  
 Time: 1:30 p.m.  
 Courtroom 3  
 Hon. Richard Seeborg

1 I, Jennifer Liu, 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. Attached as Exhibit A is a true and correct copy of excerpts of McGraw-Hill  
6 Dictionary of Scientific and Technical Terms, Third Edition (1984).

7 3. Attached as Exhibit B is a true and correct copy of U.S. Patent No. 5,648,642 to  
8 Robert J. Miller and Stephen J. Bisset, entitled “Object Position Detector” (ELN125114-47).

9 4. Attached as Exhibit C is a true and correct copy of U.S. Patent No. 5,463,388 to  
10 Robert Boie, Laurence Ruedisueli, and Eric Wanger, entitled “Computer Mouse Or Keyboard Input  
11 Device Utilizing Capacitance Sensors” (APEL0007902-13).

12 5. Attached as Exhibit D is a true and correct copy of U.S. Patent No. 4,550,221 to  
13 Scott Mabusth, entitled “Touch Sensitive Control Device” (APEL0007616-27).

14 6. Attached as Exhibit E is a true and correct copy of U.S. Patent No. 4,736,191 to Karl  
15 E. Matzke and Paul W. Schick, entitled “Touch Activated Control Method And Apparatus”  
16 (ELN015428-44).

17 7. Attached as Exhibit F is a true and correct copy of U.S. Patent No. 4,374,381 to  
18 Henry H. Ng and Frederick R. Schmidt, entitled “Touch Terminal With Reliable Pad Selection.”

19 8. Attached as Exhibit G is a true and correct copy of Appendix E to the Expert Report  
20 of Dr. Ravin Balakrishnan Regarding Invalidity of U.S. Patent No. 5,825,352 filed in the parties’  
21 parallel case in the United States International Trade Commission, dated November 4, 2010.

22 9. Attached as Exhibit H is a true and correct copy of article by R.S. Fearing entitled  
23 “Tactile Sensing Mechanisms,” published in the International Journal of Robotics Research, vol. 9,  
24 no. 3, pp. 3-23, dated June 1990 (APEL0007541-63).

25 10. Attached as Exhibit I is a true and correct copy of a document produced by Apple in  
26 this matter bearing bates numbers APEL0707393-407 (**filed under seal**).

27 11. Attached as Exhibit J is a true and correct copy of a document produced by Apple in  
28 this matter bearing bates number APEL0501220 (**filed under seal**).

1 12. Attached as Exhibit K is a true and correct copy of a letter sent on August 27, 2006  
2 from Elantech Devices Corporation's ("Elantech's") general manager, Daisuke Shudo, to Apple, Inc  
3 ("Apple"), produced by Apple in this matter bearing bates number APEL0058579 (**filed under seal**).

4 13. Attached as Exhibit L is a true and correct copy of a letter sent on October 23, 2006  
5 from Elantech's counsel, Sean P. DeBruine, to Apple's in-house counsel, Carlyn Clause, produced  
6 by Apple in this matter bearing bates numbers APEL0058583-84 (**filed under seal**).

7 14. Attached as Exhibit M is a true and correct copy of a letter sent on January 4, 2007  
8 from Elantech's counsel, Ming-Tao Yang, to Apple's in-house counsel, Jayna R. Whitt, produced by  
9 Apple in this matter bearing bates numbers APEL0058591-95 (**filed under seal**).

10 15. Attached as Exhibit N is a true and correct copy of Apple Inc.'s Disclosure of  
11 Proposed Terms and Claim Elements for Construction, dated December 21, 2009.

12 16. Attached as Exhibit O is a true and correct copy of Apple Inc.'s Disclosure of  
13 Preliminary Claim Constructions and Extrinsic Evidence, dated January 11, 2010.

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15 I declare under penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct.

17 Executed on June 16, 2011 at Menlo Park, California.

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22 */s/ Jennifer Liu*  
23 Jennifer Liu  
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**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X (B) regarding signatures, I, Jennifer Liu, attest that concurrence in the filing of this document has been obtained.

/s/ Jennifer Liu

Jennifer Liu

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