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 ELAN MICROELECTRONICS  
 11 CORPORATION

12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO DIVISION  
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17 ELAN MICROELECTRONICS  
 18 CORPORATION,  
 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 DEFENDANT APPLE  
 INC.’S ADMINISTRATIVE MOTION  
 TO FILE UNDER SEAL APPLE INC.’S  
 REPLY IN SUPPORT OF MOTION TO  
 COMPEL**

23  
 24 AND RELATED COUNTERCLAIMS  
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I, Jennifer Liu, declare as follows:

1. I am an attorney with the law firm of Alston & Bird LLP, counsel to Plaintiff Elan Microelectronics Corporation (“Elan”) in this action. I now submit this declaration pursuant to Civil Local Rule 79-5 in support of Defendant Apple Inc.’s Administrative Motion to File Under Seal Apple Inc.’s Reply in Support of Motion to Compel (Dkt No. 305).

2. I have reviewed the redacted version of Apple Inc.’s Reply Brief in Support of Its Motion to Compel (1) Discovery Relating to Elan’s U.S. Sales; (2) Documents Improperly Withheld on the Basis of Privilege; and (3) Inventor Depositions (“Apple’s Reply in Support of Motion to Compel”). Based on my review, the redacted portions contain sensitive business information including Elan’s product sales and downstream customer information, as well as confidential information relating to Elan employees and Elan’s corporate structure and corporate policy, that could harm Elan if publicly disclosed.

3. I have reviewed Exhibit B to the Declaration of Derek C. Walter in Support of Apple’s Reply Brief in Support of Its Motion to Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of Privilege; and (3) Inventor Depositions. Based on my review, the document contains sensitive business information including downstream customer and product information, that could harm Elan if publicly disclosed.

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

Executed this 28th day of June, 2011 at Menlo Park, California.

*/s/ Jennifer Liu*  
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Jennifer Liu

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