

1 MATTHEW D. POWERS (Bar No. 104795)  
 matthew.powers@weil.com  
 2 JARED BOBROW (Bar No. 133712)  
 jared.bobrow@weil.com  
 3 SONAL N. MEHTA (Bar No. 222086)  
 sonal.mehta@weil.com  
 4 DEREK C. WALTER (Bar. No. 246322)  
 derek.walter@weil.com  
 5 NATHAN GREENBLATT (Bar No. 262279)  
 nathan.greenblatt@weil.com  
 6 WEIL, GOTSHAL & MANGES LLP  
 Silicon Valley Office  
 7 201 Redwood Shores Parkway  
 Redwood Shores, CA 94065  
 8 Telephone: (650) 802-3000  
 Facsimile: (650) 802-3100  
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10 Attorneys for Defendant and Counterclaim Plaintiff  
 Apple Inc.

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 ELAN MICROELECTRONICS CORPORATION,  
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 16 Plaintiff and Counterclaim Defendant,  
 17 v.  
 18 APPLE INC.,  
 19 Defendant and Counterclaim Plaintiff.  
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Case No. C-09-01531 RS (PSG)

**DECLARATION OF SONAL MEHTA  
 IN SUPPORT OF APPLE INC.'S  
 MOTION TO COMPEL ELAN'S  
 COMPLIANCE WITH THE PARTIES'  
 AGREEMENT THAT ELAN  
 EMPLOYEES WILL BE PRESENTED  
 FOR DEPOSITION IN THE  
 NORTHERN DISTRICT OF  
 CALIFORNIA**

Date: August 2, 2011  
 Time: 10:00 a.m.  
 Judge: Hon. Paul Singh Grewal  
 Ctrm: 5, 4th Floor

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I, Sonal Mehta, declare:

1. I am an attorney with the law firm of Weil, Gotshal & Manges LLP, counsel of record for Apple Inc. (“Apple”) in the above-captioned matter. I submit this declaration based on personal knowledge and following a reasonable investigation.

2. In September 2009 and January 2011, I negotiated the terms of the parties’ joint initial and further CMC statements, respectively, with counsel for Elan. Both of these CMC statements included an agreement that the parties would make employees and inventors voluntarily available for deposition in the Northern District of California. At no point during the negotiation of these CMC statements did Elan suggest that the parties’ agreement was limited only to Elan’s claims in this action.

3. Attached hereto as Exhibit A is a true and correct copy of an e-mail thread last dated June 13, 2011.

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

Executed on June 28, 2011 at Redwood Shores, California.

*/s/ Sonal Mehta*  
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Sonal Mehta