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9 Attorneys for Defendant and Counterclaim Plaintiff
 Apple Inc.

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

13 ELAN MICROELECTRONICS
 CORPORATION,
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 Plaintiff and Counterclaim
 15 Defendant,
 16 v.
 17 APPLE INC.,
 18 Defendant and Counterclaim
 Plaintiff.
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Case No. C-09-01531 RS (PSG)
DECLARATION OF NATHAN GREENBLATT IN SUPPORT OF PLAINTIFF ELAN MICROELECTRONICS CORPORATION'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL PORTIONS OF THE SUPPLEMENTAL DECLARATION OF ROBERT DEZMELYK IN SUPPORT OF ELAN'S REPLY TO APPLE'S OPPOSITION TO ELAN'S MOTION FOR PARTIAL SUMMARY JUDGMENT OF INFRINGEMENT OF UNITED STATES PATENT NO. 5,825,352 AND SUPPORTING DOCUMENTS

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1 I, Nathan Greenblatt, declare:

2 I am an attorney with the law firm of Weil, Gotshal & Manges LLP, counsel of
3 record for Defendant and Counter-Claimant Apple Inc. (“Apple”) in the above-captioned matter.
4 I submit this declaration based on personal knowledge and following a reasonable investigation,
5 in support of “Plaintiff Elan Microelectronics Corporations Administrative Motion to File Under
6 Seal Portions of the Supplemental Declaration of Robert Dezmelyk in Support of Elan’s Reply to
7 Apple’s Opposition to Elan’s Motion for Partial Summary Judgment of Infringement of United
8 States Patent No. 5,825,352 and Supporting Documents” (Dkt. No. 323). If called upon as a
9 witness, I could competently testify to the truth of each statement herein.

10 1. I reviewed Exhibit A to the “Declaration of Palani P. Rathinasamy in Support of
11 Plaintiff Elan Microelectronics Corporation’s Reply to Apple Inc.’s Opposition to Elan’s Motion
12 for Partial Summary Judgment of Infringement” (Dkt. No. 322) (filed under seal). Based on my
13 review, the exhibit consists predominantly of confidential information regarding Apple's
14 products, which could harm Apple if publicly disclosed.

15 2. I reviewed the redacted version of the “Supplemental Declaration of Robert
16 Dezmelyk in Support of Elan’s Reply to Apple’s Opposition to Elan’s Motion for Partial
17 Summary Judgment of Infringement of United States Patent No. 5,825,352” (“Supplemental
18 Dezmelyk Declaration”) that was provided to me by staff of counsel for Elan on July 5, 2011 at
19 7:19 p.m. Based on my review, the redacted portions of the Supplemental Dezmelyk Declaration
20 contain confidential information regarding the operation of Apple products which could harm
21 Apple if publicly disclosed. Based on my review, the following additional portions of the
22 Supplemental Dezmelyk Declaration that were not redacted in the version provided to me also
23 contain confidential information regarding the operation of Apple products, and should be
24 redacted: page 1, lines 20-21 (“the algorithm . . . or minima”); page 1, lines 25-28 (“to set . . .
25 valid minima.”); page 2, lines 6-11 (“Apple considered . . . of the touch sensor.”).

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