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 ELAN MICROELECTRONICS  
 11 CORPORATION

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN FRANCISCO DIVISION  
 15

17 ELAN MICROELECTRONICS  
 CORPORATION,  
 18  
 Plaintiff and Counterdefendant,  
 19  
 v.  
 20 APPLE, INC.,  
 21  
 Defendant and Counterplaintiff.  
 22

Case No. 5:09-cv-01531 RS (PSG)  
**DECLARATION OF JANE H. BU IN  
 SUPPORT OF ELAN  
 MICROELECTRONICS  
 CORPORATION’S MOTION TO  
 COMPEL DISCOVERY RELATED TO  
 APPLE iOS APPLICATIONS FOR THE  
 ACCUSED PRODUCTS**

23 AND RELATED COUNTERCLAIMS  
 24

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

2 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 1. Attached as Exhibit A is a true and correct copy of relevant excerpts of Apple  
6 Inc.’s Objections and Responses to Elan Microelectronics Corporation’s Third Set of Requests for  
7 Production of Documents and Things to Defendant Apple, Inc. [Nos. 73-99], dated May 12, 2011.

8 2. Attached as Exhibit B is a true and correct copy of relevant excerpts of Apple Inc.’s  
9 Objections and Responses to Elan Microelectronics Corporation’s Third Set of Interrogatories to  
10 Apple, Inc. [Nos. 16-23], dated May 12, 2011.

11 3. Attached as Exhibit C is a true and correct copy of a letter from me to Apple’s  
12 counsel, Ms. Sonal Mehta, dated June 11, 2011.

13 4. Attached as Exhibit D is a true and correct copy of email correspondences between  
14 me and Apple’s counsel, Mr. Derek Walter, dated from June 10 to July 13, 2011.

15 5. Attached as Exhibit E is a true and correct copy of the relevant excerpts of Apple’s  
16 responses to Elan’s 30(b)(6) Deposition Topics dated June 24, 2011.

17 6. Attached as Exhibit F is a true and correct copy of an email from me to Mr. Walter,  
18 dated July 6, 2011.

19 7. Attached as Exhibit G is a true and correct copy of Apple’s ad produced by Apple  
20 as APEL0033632.

21 8. Attached as Exhibit H is a true and correct copy of Apple’s website print out  
22 *available at* <http://www.apple.com/iphone/ios4>.

23 9. Attached as Exhibit I is a true and correct copy of Apple Insider’s website print out  
24 *available at*  
25 [http://www.appleinsider.com/articles/11/07/11/ios\\_app\\_store\\_downloads\\_grow\\_61\\_average\\_app\\_](http://www.appleinsider.com/articles/11/07/11/ios_app_store_downloads_grow_61_average_app_price_up_14.html)  
26 [price\\_up\\_14.html](http://www.appleinsider.com/articles/11/07/11/ios_app_store_downloads_grow_61_average_app_price_up_14.html).

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

