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 11 ELAN MICROELECTRONICS  
 CORPORATION

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN FRANCISCO DIVISION  
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17 ELAN MICROELECTRONICS  
 CORPORATION,  
 18  
 Plaintiff and Counterdefendant,  
 19  
 v.  
 20  
 APPLE, INC.,  
 21  
 Defendant and Counterplaintiff.  
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Case No. 5:09-cv-01531 RS (PSG)  
**DECLARATION OF JANE H. BU IN  
 SUPPORT OF ELAN  
 MICROELECTRONICS  
 CORPORATION'S MOTION TO  
 COMPEL DISCOVERY ON VARIOUS  
 ISSUES**

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 (“Apple’s”) Objections and Responses to Elan Microelectronics Corporation’s Third Set of  
7 Requests for Production of Documents and Things to Defendant Apple, Inc. [Nos. 73-99], dated  
8 May 12, 2011.

9 2. Attached as Exhibit B is a true and correct copy of correspondences between  
10 Apple’s counsel, Mr. Derek Walter and me, between June 17, 2011 and July 25, 2011 concerning  
11 Apple’s discovery deficiencies.

12 3. Attached as Exhibit C is a true and correct copy of an email from me to Apple’s  
13 counsel, dated July 12, 2011 requesting Apple to produce all third party subpoenas and  
14 communications with Elan’s customers.

15 4. Attached as Exhibit D is a true and correct copy of relevant excerpts of Apple  
16 Inc.’s First Supplemental Responses and Objections to Elan Microelectronics Corporation’s First  
17 Request for Documents and Things to Apple, Inc., dated January 26, 2010.

18 5. Attached as Exhibit E is a true and correct copy of correspondences between my  
19 colleague Mr. Sean DeBruine and Apple counsel requesting the production of Apple’s  
20 communications with Elan customers and potential customers.

21 6. Attached as Exhibit F is a true and correct copy of email correspondences between  
22 my colleague Mr. Palani Rathinasamy and Apple’s counsel Mr. Walter regarding Apple’s  
23 objections to Elan RFPs 101-104 (*filed partially under seal*).

24 7. Attached as Exhibit G is a true and correct copy of Apple’s Objections and  
25 Responses to Elan’s Fourth Set of Request for Documents dated July 14, 2011 (*filed partially*  
26 *under seal*).

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

