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Apple Inc.
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ELAN MICROELECTRONICS CORPORATION,

Plaintiff and Counterclaim Defendant,
v.

APPLE INC.,
Defendant and Counterclaim Plaintiff.

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 PAPERS IN SUPPORT OF ITS MOTION TO COMPEL DISCOVERY ON VARIOUS ISSUES (DKT. NO. 359)

I, Nathan Greenblatt, declare:
I am an attorney at Weil, Gotshal \& Manges LLP, counsel of record for Defendant and Counter-Claimant Apple Inc. ("Apple") in the above-captioned matter. I now submit this declaration pursuant to Civil Local Rule 79-5(d) in support of "Plaintiff Elan Microelectronics Corporation's Administrative Motion To File Under Seal Portions of Papers in Support of Its Motion to Compel Discovery on Various Issues." (Dkt. No. 359).

1. I have reviewed Exhibit $\mathrm{F}^{1}$ to the Declaration of Jane H. Bu (partially redacted), which was provided to me via email by Mr. Sissel Browder on Tuesday, July 26, 2011 at 9:27 p.m. Based on my review, the redacted portions of the document contain confidential codenames for Apple products and testing tools which could harm Apple if publicly disclosed.
2. I have reviewed Exhibit G to the Declaration of Jane H. Bu (partially redacted), which was provided to me via email by Mr. Sissel Browder on Tuesday, July 26, 2011 at 9:27 p.m. Based on my review, the redacted portions of the document contain confidential codenames for Apple products and testing tools which could harm Apple if publicly disclosed.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that the foregoing is executed on August 1, 2011, at Redwood Shores, California.

DATED: August 1, 2011
Respectfully submitted,
WEIL, GOTSHAL \& MANGES LLP
/s/ Nathan Greenblatt
Nathan Greenblatt
Attorney for Defendant and Counter-Claimant, Apple Inc.

1 The Exhibits provided to me on July 26, 2011 are labeled as Exhibits F and G. The same exhibits are cited in Elan's Motion to Compel (Dkt. No. 357) and the accompanying Bu Declaration as Exhibits F and G. Thus, I believe that Elan's Motion for Administrative Relief (Dkt. No. 359), which refers to Exhibits G and H, contains typographical errors and should request permission to file under seal Exhibits F and G.

