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12 Attorneys for Defendant and Counterclaim Plaintiff
 13 Apple Inc.

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

17 ELAN MICROELECTRONICS
 CORPORATION,
 18
 Plaintiff and Counterclaim
 19 Defendant,
 20 v.
 21 APPLE INC.,
 22 Defendant and Counterclaim
 Plaintiff.
 23

Case No. C-09-01531 RS (PSG)

**DECLARATION OF NATHAN
 GREENBLATT IN SUPPORT OF
 ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL APPLE INC.'S
 MOTION FOR PARTIAL SUMMARY
 JUDGMENT OF NON-
 INFRINGEMENT OF ELAN'S '352
 PATENT BY APPLE'S CURRENT
 PRODUCTS**

JUDGE: Hon. Richard Seeborg

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 If called upon as a witness, I could competently testify to the truth of each statement herein.

6 1. I prepared the redacted version of Apple Inc.’s Motion for Partial Summary
7 Judgment of Non-Infringement of Elan’s ‘352 Patent by Apple’s Current Products (“Apple’s
8 Motion”). Based on my review, the redacted portions contain confidential technical information
9 regarding the operation of Apple’s products, as well as internal codenames, which could harm
10 Apple if publicly disclosed.

11 2. I have reviewed **Exhibit 2** to the Declaration of Derek Walter in Support of
12 Apple’s Motion (“Walter Declaration”). Based on my review, the exhibit consists predominantly
13 of confidential technical information regarding the operation of Apple’s products, as well as
14 internal codenames, which could harm Apple if publicly disclosed.

15 3. I have reviewed **Exhibit 4** to the Walter Declaration. Based on my review, the
16 exhibit consists predominantly of confidential technical information regarding the operation of
17 Apple’s products, as well as internal codenames, which could harm Apple if publicly disclosed.

18 4. I have reviewed **Exhibit 5** to the Walter Declaration. Based on my review, the
19 exhibit consists predominantly of confidential technical information regarding the operation of
20 Apple’s products, as well as internal codenames, which could harm Apple if publicly disclosed.

21 5. I have reviewed **Exhibit 6** to the Walter Declaration. Based on my review, the
22 exhibit consists predominantly of confidential technical information regarding the operation of
23 Apple’s products which could harm Apple if publicly disclosed.

24 6. I have reviewed **Exhibit 7** to the Walter Declaration. Based on my review, the
25 exhibit consists of a diagram portions of which reveal confidential technical information
26 regarding the operation of Apple’s products, which could harm Apple if publicly disclosed.

27 7. I have reviewed **Exhibit 8** to the Walter Declaration. Based on my review, the
28 exhibit consists of a computer animation that reveals confidential technical information regarding

1 the operation of Apple's products, which could harm Apple if publicly disclosed.

2 8. I have reviewed **Exhibit 9** to the Walter Declaration. Based on my review, the
3 exhibit consists of a computer animation that reveals confidential technical information regarding
4 the operation of Apple's products, which could harm Apple if publicly disclosed.

5 9. I have reviewed **Exhibit 10** to the Walter Declaration. Based on my review, the
6 exhibit consists predominantly of confidential technical information regarding the operation of
7 Apple's products, as well as internal codenames, which could harm Apple if publicly disclosed.

8 10. I have reviewed **Exhibit 11** to the Walter Declaration. Based on my review, the
9 exhibit consists predominantly of confidential technical information regarding the operation of
10 Apple's products, as well as internal codenames, which could harm Apple if publicly disclosed.

11 11. I have reviewed **Exhibit 12** to the Walter Declaration. Based on my review, the
12 exhibit consists predominantly of confidential technical information regarding the operation of
13 Apple's products, as well as internal codenames, which could harm Apple if publicly disclosed.

14 12. I have reviewed **Exhibit 13** to the Walter Declaration. Based on my review, the
15 exhibit consists predominantly of confidential technical information regarding the operation of
16 Apple's products, as well as internal codenames, which could harm Apple if publicly disclosed.

17 13. I prepared the redacted version of the Declaration of Ravin Balakrishnan in
18 Support of Apple's Motion. Based on my review, the redacted portions contain confidential
19 technical information regarding the operation of Apple's products, as well as internal codenames,
20 which could harm Apple if publicly disclosed.

21 14. I have reviewed **Exhibit 1** to the Balakrishnan Declaration. Based on my review,
22 the exhibit consists predominantly of confidential technical information regarding the operation
23 of Apple's products, as well as internal codenames, which could harm Apple if publicly
24 disclosed.

25 15. I have reviewed **Exhibit 10** to the Balakrishnan Declaration. Based on my review,
26 the exhibit consists predominantly of confidential technical information regarding the operation
27 of Apple's products, as well as internal codenames, which could harm Apple if publicly
28 disclosed.

