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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

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I, Nathan Greenblatt, declare:

I am an attorney with the law firm of Weil, Gotshal & Manges LLP, counsel of record for Defendant and Counter-Claimant Apple Inc. (“Apple”) in the above-captioned matter. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could competently testify to the truth of each statement herein.

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

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

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

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

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

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

7. I have reviewed **Exhibit 8** to the Walter Declaration. Based on my review, the

1 exhibit consists of a computer animation that reveals confidential technical information regarding
2 the operation of Apple's products, which could harm Apple if publicly disclosed.

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

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

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

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

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

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

26 15. I have reviewed **Exhibit 10** to the Balakrishnan Declaration. Based on my review,
27 the exhibit consists predominantly of confidential technical information regarding the operation
28

1 of Apple's products, as well as internal codenames, which could harm Apple if publicly
2 disclosed.

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

7 17. I have reviewed **Exhibit 12** to the Balakrishnan Declaration. Based on my review,
8 the exhibit consists predominantly of confidential technical information regarding the operation
9 of Apple's products which could harm Apple if publicly disclosed.

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

14 19. I have reviewed **Exhibit 14** to the Balakrishnan Declaration. Based on my review,
15 the exhibit consists of a computer animation that reveals confidential technical information
16 regarding the operation of Apple's products, which could harm Apple if publicly disclosed.
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18 I declare under the penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct.

20 Executed on September 13, 2011, at Redwood Shores, California.

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23 /s/ Nathan Greenblatt
Nathan Greenblatt