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 8 Counterclaim-Defendant APPLE INC

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN JOSE DIVISION

15 APPLE INC., a California corporation,

16 Plaintiff,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity; SAMSUNG  
 19 ELECTRONICS AMERICA, INC., a New York  
 corporation; SAMSUNG  
 20 TELECOMMUNICATIONS AMERICA, LLC, a  
 Delaware limited liability company,

21 Defendants.  
 22

Case No. 11-cv-01846-LHK (PSG)

**DECLARATION OF RAVIN  
 BALAKRISHNAN, PH.D., IN  
 SUPPORT OF APPLE'S OPENING  
 SUPPLEMENTAL CLAIM  
 CONSTRUCTION BRIEF**

23 **PUBLIC REDACTED VERSION**  
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I, Ravin Balakrishnan, Ph.D., declare as follows:

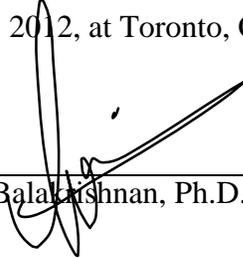
I am a tenured Professor in the Department of Computer Science at the University of Toronto, and have been asked by counsel for Apple Inc. (“Apple”) to provide analysis of the source code for the “Tablecloth” application that has been asserted as prior art to U.S. Patent No. 7,469,381. I submit this declaration in support of Apple’s Opening Supplemental Claim Construction Brief.

1. Unless otherwise indicated, I have personal knowledge of the matters stated herein. If called as a witness, I would testify to the facts set forth below.

2. I reviewed the source code for the “Tablecloth” application contained on the hard drive produced by third party Mitsubishi Electric Research Laboratories (“MERL”) bearing the Bates number MERL00000001.

3. That source code refers to [REDACTED]  
[REDACTED]  
[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 5th day of July, 2012, at Toronto, Canada.

  
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/s/ Ravin Balakrishnan, Ph.D.