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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 SUBMITTED UNDER SEAL
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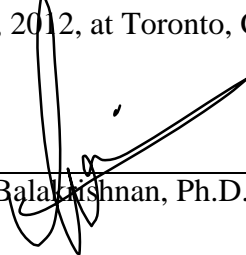
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I, Ravin Balakrishnan, Ph.D., declare as follows:

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 two separate copies of the Windows desktop image that are depicted when Tablecloth is executed. They are identified as “image1” and “image2”, and each is treated distinctly in various processes.

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.

/s/ 

 Ravin Balakrishnan, Ph.D.