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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE**

OpenTV, Inc., NagraVision, SA, and Nagra  
France S.A.S.,

*Plaintiffs,*

v.

Apple Inc.,

*Defendant.*

Case No. 5:15-CV-02008-EJD

**DECLARATION OF MELODY  
DRUMMOND HANSEN IN SUPPORT  
OF APPLE, INC.'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
DEFENDANT'S MOTION TO  
PRECLUDE AND CERTAIN  
SUPPORTING EXHIBITS**

1 I am an attorney admitted to practice in the Northern District of California. I represent  
2 Defendant Apple, Inc. in the above captioned matter. This declaration is accurate to the best of  
3 my knowledge. I have personal knowledge of the facts stated below. I am of sound mind and  
4 capable of testifying to the facts below.

5 “Defendant’s Motion to Preclude Reliance on Certain Invention Dates and to Strike  
6 Certain Allegations” (“Motion to Preclude”), as well as supporting Exhibits 2, 7, and 8 attached  
7 to that motion, are hereby requested sealed only because they contain information that Plaintiffs  
8 have designated “Highly Confidential - Attorneys’ Eyes Only” pursuant to the Protective Order in  
9 force in this action. *See* Dkt. 66. Exhibits 2, 7, and 8 are so designated in their entirety. The  
10 Motion to Preclude is only requested sealed in part, as indicated by the blue highlighting in the  
11 unredacted version attached to the administrative motion to file under seal, because it contains  
12 information from Exhibits 2, 7, or 8.

13  
14 Dated: April 13, 2016

15 By: /s/ Melody Drummond Hansen

16 Melody Drummond Hansen  
17 State Bar No. 278786

18 *Attorney for Defendant Apple Inc.*  
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DECLARATION OF MELODY