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AM&S TRADE SERVICES, LLC  
 CARLOS MOORE, PRESIDENT

June 6, 2006

**VIA HAND DELIVERY**

Marilyn R. Abbott, Secretary  
 U.S. International Trade Commission  
 500 E Street, S.W., Room 112A  
 Washington, D.C. 20436

Re: Certain Portable Digital Media Players and  
 Components Thereof Inv. No. 337-TA-

2006 JUN -6 PM 4:34  
 RECEIVED  
 U.S. INTERNATIONAL TRADE COMMISSION

Dear Secretary Abbott:

Enclosed for filing on behalf of Complainant Apple Computer, Inc. ("Apple" or "Complainant") are the following documents in support of Apple's request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended. A request for confidential treatment of Confidential Exhibit 27 is included with this filing.

Accordingly, Complainant submits the following documents for filing:

1. **An** original and twelve (12) copies of the Amended Complaint<sup>1</sup> and original and six (6) copies of the accompanying exhibits 25-28 and 30-32, with the Confidential Exhibits segregated from the other material submitted (original and one (1) copy unbound, without tabs). (Rules 201.6(c), 210.4(f)(3)(i), and 210.8(a));

<sup>1</sup> The Amended Complaint is unverified but Apple anticipates filing a verification on or before June 8, 2006.

Sony Corp., et al., v. Creative  
 Technology Ltd., IPR2016-01407

**EXHIBIT**  
 Creative-2022

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June 6, 2006  
Page 2

2. Two (2) additional copies of both the Amended Complaint and accompanying non-confidential exhibits for service upon each proposed respondent. (Rules 210.4(f)(3)(i), 210.8(a), and 210.11(a));
3. Two (2) additional copies of the Confidential Exhibit for service upon respondents' counsel after appropriate notices of appearance and subscriptions to the protective order have been filed;
4. An uncertified copy of United States Patent No. 6,282,646 ("the '646 patent"), with legible copies of the patent included in the original and all copies of the Complaint as Exhibit 25. A certified copy of the '646 patent has been requested and will be forthcoming;
5. **An** uncertified copy of the assignments for the '646 patent is enclosed as Exhibit 26. A certified copy of Exhibit 26 has been requested and will be forthcoming;
6. One (1) additional copy of the Amended Complaint and the accompanying non-confidential exhibits for service upon the Embassy of Singapore in Washington, D.C. (19 C.F.R. §§ 210.8(a) and 210.11(a)(1));
7. Pursuant to 19 C.F.R. § 210.12(c), an uncertified copy of the '646 patent prosecution history is provided in Appendix G. A certified copy of the '646 prosecution history has been requested and will be forthcoming. One unstapled copy of the prosecution history is provided for scanning purposes. The two additional required copies of the '646 patent prosecution history are provided on CD-Rom. The cited references to the '646 patent is provided in Appendix H. The three additional required copies of the technical references are provided on CD-Rom.
8. A listing of the licensees of the '646 patent may be found in Confidential Exhibit 27. Copies of the standard license agreement were provided with the June 1, 2006 filing, pursuant to 19 C.F.R. § 210.12(c), as Confidential Exhibit 8.
9. Physical Exhibit 2, provided herewith, is a sample of the accused product.

#### Request for Confidential Treatment

In accordance with Commission Rules 201.6(b) and 210.5(d), 19 C.F.R. §§ 201.6 and 210.5, Complainants request confidential treatment for the business information contained in Confidential Exhibits 27. A nonconfidential version of Exhibit 27 is provided with the original

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and six sets of exhibits for the Commission, the two sets of exhibits for the respondents and the one sets of exhibits for the embassy.

The information for which confidential treatment is sought is proprietary information not otherwise publicly available. Specifically, Exhibit 27 contains proprietary information in the declarations of investigators used to collect information to support the Complaint and the Appendices contain proprietary licensing information.

The information described above qualifies as confidential business information pursuant to Rule 201.6(a) because:

- a. it is not available to the public;
- b. unauthorized disclosure of such information could cause substantial harm to Complainants' competitive position and;
- c. the disclosure of which could impair the Commission's ability to obtain information necessary to perform its statutory function.

Please do not hesitate to contact this office if you have any questions.

Very truly yours,

  
V. James Adduci II

VJA:sjf  
Enclosures  
AP700106-2.doc

UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.

In the Matter of

CERTAIN PORTABLE DIGITAL MEDIA  
PLAYERS AND COMPONENTS  
THEREOF

Investigation No. **337-TA-\_\_\_**

FIRST AMENDED COMPLAINT OF APPLE COMPUTER, INC. UNDER  
SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

COMPLAINANT

Apple Computer, Inc.  
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Cupertino, CA 95014  
Telephone: (408) 996-1010

PROPOSED RESPONDENTS

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