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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-

OFF CONTROL OF THE 34

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 Complaint¹ 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));

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

EXHIBIT

Creative-2022



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

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- 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. 1 Infinite Loop Cupertino, CA 95014 Telephone: (408) 996-1010

PROPOSED RESPONDENTS

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Telephone: 65-6895-4000 Facsimile: 65-6895-4999

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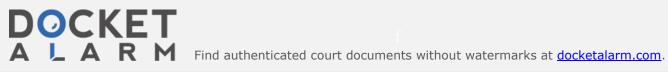
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