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16   UNITED STATES DISTRICT COURT

17   CENTRAL DISTRICT OF CALIFORNIA

18   EASTERN DIVISION

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IN THE MATTER OF THE SEARCH OF AN APPLE IPHONE SEIZED DURING THE EXECUTION OF A SEARCH WARRANT ON A BLACK LEXUS IS300, CALIFORNIA LICENSE PLATE 35KGD203	ED No. CM 16-10 (SP) **DECLARATION OF CRAIG FEDERIGHI IN SUPPORT OF APPLE INC.'S REPLY IN SUPPORT OF MOTION TO VACATE ORDER COMPELLING APPLE INC. TO ASSIST AGENTS IN SEARCH** **Hearing:** Date: March 22, 2016 Time: 1:00 p.m. Place: Courtroom 3 or 4 Judge: Hon. Sheri Pym

Gibson, Dunn &
Crutcher LLP

1   I, Craig Federighi, declare:

2   1.   I am over the age of eighteen years and am competent and authorized to

3   make this declaration. I have personal knowledge of the facts set forth below. If

4   called as a witness, I would and could testify to the statements and facts contained

5   herein, all of which are true and accurate to the best of my knowledge and belief.

6   2.   I have worked at Apple Inc. ("Apple") for almost ten years in total, since

7   2009 and previously between 1996 and 1999. I have been Senior Vice President of

8   Software Engineering for nearly four years. In that role, I oversee the development of

9   Apple's iOS operating system for mobile devices as well as its OS X operating system

10   for laptop and desktop computers, and also supervise Apple's common operating

11   system engineering teams. Through my experience in that role, I am familiar with the

12   security features of iOS.

13   3.   I received a Master of Science degree in Computer Science and a

14   Bachelor of Science in Electrical Engineering and Computer Science from the

15   University of California, Berkeley.

16   4.   Apple designed the iPhone with users' security in mind. Our customers

17   rely on Apple to protect the incredibly personal information on their iPhones, which is

18   under siege by criminals and other malicious actors. We have tried to make the iPhone

19   as difficult as possible for third parties to hack, so that if the device falls into the wrong

20   hands, the data of our customers, including individuals, businesses and governments,

21   remains safe.

22   5.   Apple uses the same security protocols everywhere in the world.

23   6.   Apple has never made user data, whether stored on the iPhone or in

24   iCloud, more technologically accessible to any country's government. We believe any

25   such access is too dangerous to allow. Apple has also not provided any government

26   with its proprietary iOS source code. While governmental agencies in various

27   countries, including the United States, perform regulatory reviews of new iPhone

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Crutcher LLP

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1   releases, all that Apple provides in those circumstances is an unmodified iPhone

2   device.

3   7.   It is my understanding that Apple has never worked with any government

4   agency from any country to create a "backdoor" in any of our products or services.

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6   I declare under penalty of perjury under the laws of the United States of

7   America that the foregoing is true and correct.

8   Executed this 15th day of March 2016 in Cupertino, California.

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10 By: _Craig Federighi_
    Craig Federighi

11   Senior Vice President, Software
    Engineering

12   Apple Inc.

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