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16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA  
18 EASTERN DIVISION

19 IN THE MATTER OF THE SEARCH  
20 OF AN APPLE IPHONE SEIZED  
DURING THE EXECUTION OF A  
21 SEARCH WARRANT ON A BLACK  
LEXUS IS300, CALIFORNIA  
22 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

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  
28

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.  
5

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.  
9

10 By:   
11 Craig Federighi  
12 Senior Vice President, Software  
13 Engineering  
14 Apple Inc.  
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