

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

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15 **UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**

18 **UNWIRED PLANET LLC, a Nevada limited**  
 19 **liability company,**

20 **Plaintiff,**

21 **v.**

22 **APPLE INC., a California corporation,**

23 **Defendant.**

**CIVIL ACTION NO.**

**3:13-cv-04134-VC (JCS)**

**STIPULATION OF  
 RESOLUTION OF  
 UNWIRED PLANET'S  
 MOTION TO COMPEL  
 (DKT. NO. 262)**

1 Pursuant to the Court's Order on November 6, 2014 (Dkt. No. 270), Plaintiff Unwired Planet  
2 LLC ("Unwired Planet") and Defendant Apple Inc. ("Apple"), by and through their designated  
3 counsel, respectfully submit this Stipulation of Resolution of Unwired Planet's Motion to Compel  
4 (Dkt. No. 262). The parties conducted a meet-and-confer on November 5, 2014, and addressed the  
5 requests that Unwired Planet considered to be outstanding from its letter of October 14, 2014 (*see*  
6 Dkt. No. 262-7, Lu Decl., Ex. A). The parties resolved any remaining disputes regarding these  
7 requests, which in turn resolves Unwired Planet's motion, by reaching the following agreements and  
8 understandings:

- 9 1. Request 9(b): Apple confirmed that, to the best of its understanding, the "AppKit" code  
10 Apple produced is for the Mac OSX platform, and not for iOS. Unwired Planet agreed that  
11 this information satisfies request 9(b).
- 12 2. Requests 9(d), 22, 24, and 21: Apple will supplement by producing client-side and server-  
13 side code for Find My iPhone and iTunes related to APNS to the extent not already  
14 produced. Unwired Planet confirms that it is no longer seeking any additional code in  
15 response to these requests other than the aforementioned Find My iPhone and iTunes code.
- 16 3. Request 4(c): Apple agrees to produce the code for request 4(c), which has been updated by  
17 Unwired Planet to reflect the correct name of the requested function.
- 18 4. Requests 4(a) and 4(b) have been produced.
- 19 5. Request 16(d) has been produced. Apple contends requests 16(a)-(c) have been produced,  
20 but Unwired Planet believes code invoking the functions has not been produced, but agrees  
21 to continue its analysis of the produced code in that regard. If it is confirmed that code  
22 responsive to request 16(a)-(c) has not yet been produced, Apple agrees to produce it. With  
23 regard to 16(e), Apple represents there is no code invoking that function based on its current  
24 understanding of the code.
- 25 6. Request 14 (in connection with Unwired Planet's 10/16/2014 email): Apple will supplement  
26 its production of [REDACTED] code and agrees that the total produced [REDACTED] code is fairly  
27 representative of the time frame that Unwired Planet accuses of infringement, such  
28 agreement to be negotiated and formally documented by the parties under separate cover.  
Apple will provide the approximate dates that the versions of [REDACTED] code that Apple has made  
available for inspection went into production if that information is not apparent in the source  
code itself. Based on the above understanding, Unwired Planet confirms that it is no longer  
seeking additional versions of [REDACTED] code.
7. Request 19: Unwired Planet indicated that requests 19(a)-(c) have been satisfied, but that  
19(d) is outstanding. Apple explained that it believes code for 19(d) was produced already.

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Unwired Planet agrees to continue its analysis of the produced code in this regard. If it is confirmed that code responsive to request 19(d) has not yet been produced, Apple agrees to produce it.

8. Requests 2 & 30: Apple will produce native files for requests 2 & 30.
9. Request 29: Apple will produce code corresponding to request 29.
10. Request 23: Apple has produced responsive code that satisfies this request as it relates to [REDACTED]. Apple also confirmed to the best of its current understanding that it has produced the complete source code for the client-side iTunes app. The remainder of request 23 has been resolved in connection with the parties' agreement mentioned above with respect to requests 9(d), 22, 24, and 21,
11. Requests 6-8: Apple has agreed to produce code responsive to this request but has encountered technical difficulties due to archiving, and will produce the code within 10 days of the parties' meet and confer.
12. Request 11:
  - a. Apple has produced client-side code responsive to this request for Safari, Siri, Find My iPhone, Find My Friends, Camera, and "location database harvesting." Unwired Planet indicated that it had not located the client-side code for Camera and Find My Friends that Apple has made available, and Apple agreed to provide the folder names corresponding to that code.
  - b. Apple agrees to produce supplemental client-side code responsive to this request for Find My Friends.
  - c. For server-side code, Apple represents that it will produce the server-side code for Find My iPhone and Find My Friends.
  - d. For client-side code for Maps, Compass, and Genius for Apps, Apple confirmed that it has that production in process.
  - e. For "iCloud," Apple represents that, to the best of its current understanding, there is no separate "iCloud" code for interacting with Location Services.
  - f. Apple represents that, to the best of its current understanding, it has produced framework code for [REDACTED] and Weather, and will produce the framework code for Map Kit. Unwired Planet agrees that it is withdrawing its request for the framework code for Social and [REDACTED] in exchange for Apple agreeing to produce a Rule 30(b)(6) witness to testify as to the interaction between those frameworks and Location Services.
13. Request 25: Apple has produced responsive code that satisfies this request.
14. Request 27: Unwired Planet agrees to withdraw this request in exchange for Apple agreeing to produce a Rule 30(b)(6) representative to testify as to whether third-party chips on iOS devices provide inputs to or receives inputs from the Core Location framework, and if they do, to provide an explanation of such functionality.

1 Dated: November 6, 2014

MCKOOL SMITH HENNIGAN, P.C.

2  
3 By /s/ John B. Campbell, Jr. \_\_\_\_\_

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Dated: November 6, 2014

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**ATTESTATION OF CONCURRENCE IN FILING**

In accordance with the Northern District of California’s General Order No. 45, Section X(B),

I attest that concurrence in the filing of the document has been obtained from Steven Kalogeras.

Dated: November 6, 2014

MCKOOL SMITH HENNIGAN, P.C.

By /s/ John B. Campbell, Jr. \_\_\_\_\_

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