

Appendix A

Apple's April 5, 2012 Subpoena to Google	Previous Subpoenas from Apple
1. A copy of the Android mobile platform, in source code form, provided to Samsung for use in the Samsung Galaxy Nexus.	<p>All Source Code and Software Documentation that Google provides or has provided to HTC. (I.T.C. 710, Aug. 10, 2010, No. 11.)</p> <p>All Source Code and Software Documentation that Google provides or has provided to HTC. (N.D. Ill. 11-8540, May 20, 2011, No. 14.)</p> <p>All Source Code and Software Documentation that Google provides or has provided to Motorola. (I.T.C. 750, May 16, 2011, No. 7.)</p> <p>All Source Code and Software Documentation that Google provides or has provided to HTC. (I.T.C. 797, Feb. 2, 2012, No. 10.)</p>
2. A copy of the Android mobile platform, in source code form, used by Samsung in the Samsung Galaxy Nexus.	<p>All Source Code and Software Documentation for each of the Accused Products, including but not limited to Android 1.5, 1.6, 2.1, 2.2, 2.3, 3.0, and 4.0 and any proprietary Source Code. (I.T.C. 797, Feb. 2, 2011, No. 8.)</p> <p>All Source Code and Software Documentation for each of the Motorola Accused Products, including but not limited to Android 1.5, 1.6, 2.1, and 2.2, and any proprietary Source Code. (I.T.C. 710, Aug. 10, 2010, No. 9.)</p> <p>All Source Code and Software Documentation for each of the Motorola Accused Products, including but not limited to Android 1.5, 1.6, 2.1, 2.2, 2.3, and 3.0 and any proprietary Source Code. (N.D. Ill. 11-8540, May 20, 2011, No. 14.)</p> <p>All Source Code and Software Documentation for each of the Motorola Accused Mobile Devices, including but not limited to Android 1.5, 1.6, 2.1, 2.2, 2.3, and 3.0 and any proprietary Source Code. (S.D. Fla. 10-23580, Nov. 3, 2011, No. 5.)</p> <p>All Source Code and Software Documentation for each of the Motorola Accused Mobile Devices, including but not limited to Android 1.5, 1.6, 2.1, 2.2, 2.3, and 3.0 and any proprietary Source Code. (I.T.C. 750, May 16, 2011, No. 6.)</p>

Appendix A

Apple's April 5, 2012 Subpoena to Google	Previous Subpoenas from Apple
<p>3. Documents sufficient to show any and all differences between the Android mobile platform source code provided in response to Request No. 1 and the Android 4.0 Ice Cream Sandwich code publicly available from https://android.google.com/platform/manifest, or through the process described at http://source.android.com/source/downloading.html.</p>	<p>Documents and Things sufficient to fully describe, for each Motorola Accused Product, the existence and nature of any differences between the Open Source Android code available at http://source.android.com/source/download.html and the Android Platform Source Code provided by Google to Motorola. (N.D. Ill. 11-8540, May 20, 2011, No. 11.)</p> <p>Documents and Things sufficient to fully describe, for each Motorola Accused Mobile Device, the existence and nature of any differences between the Open Source Android Code available at http://source.android.com/source/download.html and the Android Platform Source Code provided by Google to Motorola. (S.D. Fla. 10-23580, Nov. 3, 2011, No. 5.)</p> <p>For each Accused HTC Android Product, Documents sufficient to show any and all differences in the Open Source Android code available at http://source.android.com/source/download.html and the Android Platform Source Code provided by Google to HTC. (ITC 710, Aug. 27, 2010, No. 18.)</p> <p>Documents and Things sufficient to fully describe, for each Motorola Accused Mobile Device, the existence and nature of any differences between the Open Source Android code available at http://source.android.com/source/download.html and the Android Platform Source Code provided by Google to Motorola. (I.T.C. 750, May 16, 2011, No. 5 (Deposition Topic).)</p> <p>Document sufficient to show any and all differences in the Open Source Android code available at http://source.android.com/source/download.html and the Android Source Code provided by Google to HTC. (I.T.C. 797, Feb. 2, 2012, No. 19.)</p>

Appendix A

Apple's April 5, 2012 Subpoena to Google	Previous Subpoenas from Apple
4. All documents that comprise, refer, or relate to communications between you and Samsung relating to Android, including but not limited to the version of the Android mobile platform as used in the Samsung Galaxy Nexus.	<p>Documents and Things sufficient to fully describe all communications between Google (or anyone acting on behalf of Google) and Motorola Solutions or Motorola Mobility (or anyone acting on behalf of Motorola Solutions or Motorola Mobility) regarding the Android platform; the Motorola Accused Mobile Devices; or Apple. (S.D. Fla. 10-23580, Nov. 3, 2011, No. 2.)</p> <p>Any correspondence or materials exchanged with HTC regarding the hardware and/or Software design or architecture of any Accused HTC Android Products. (I.T.C. 710, Aug. 27, 2010, No. 10.)</p> <p>Documents and Things sufficient to fully describe all communications between Google (or anyone acting on behalf of Google) and Motorola Solutions, Motorola Mobility (or anyone acting on behalf of Motorola Solutions or Motorola Mobility) regarding the Android Platform; the Motorola Accused Mobile Devices; or Apple. (I.T.C. 750, May 16, 2011, No. 2.)</p> <p>Any correspondence or materials exchanged with HTC regarding the hardware and/or Software design/architecture of any Accused Products. (I.T.C. 797, Feb. 2, 2012, No. 9.)</p>

Appendix A

Apple's April 5, 2012 Subpoena to Google	Previous Subpoenas from Apple
5. All documents that comprise, refer, or relate to communications between you and Samsung relating to Apple, including but not limited to communications relating to Apple's products incorporating any version of the iOS operating system.	<p>Documents and Things sufficient to fully describe all communications between Google (or anyone acting on behalf of Google) and Motorola Solutions, Motorola Mobility (or anyone acting on behalf of Motorola Solutions or Motorola Mobility) regarding the Android Platform; the Motorola Accused Products; or Apple. (N.D. Ill. 11-8540, May 20, 2011, No. 2.)</p> <p>Documents and Things sufficient to fully describe all communications between Google (or anyone acting on behalf of Google) and Motorola Solutions or Motorola Mobility (or anyone acting on behalf of Motorola Solutions or Motorola Mobility) regarding the Android platform; the Motorola Accused Mobile Devices; or Apple. (S.D. Fla. 10-23580, Nov. 3, 2011, No. 2.)</p> <p>All Communications between Google and HTC regarding the Android Platform; the Accused HTC Android Products; Apple; any Apple Product, including but not limited to any MacBook, iPhone, or iPad; or any litigation involving both Apple and HTC, including but not limited to ITC Investigation Nos. 337-TA-710 and 337-TA-721. (I.T.C. 710, Aug. 27, 2010, No. 1.)</p> <p>All Communications between Google and any Entity regarding the Asserted Patents; Apple; any Apple product, including but not limited to any MacBook, iPhone, or iPad; or the features or functionalities of the Android Platform. (I.T.C. 710, Aug. 27, 2010, No. 3.)</p>

Appendix A

Apple's April 5, 2012 Subpoena to Google	Previous Subpoenas from Apple
<p>6. All documents that comprise, refer or relate to communications between you and Samsung relating to Slide to Unlock, Text Correction, Unified Search, and/or Special Text Detection software, features, or functionality, including but not limited to any version of any such software, features, or functionality used in the Samsung Galaxy Nexus or in any version of Android.</p>	<p>All communications between Google and Samsung concerning any Samsung Accused Product(s) or Android and the display and operation of a user interface status bar or a notification in a status bar. (N.D. Cal. 11-1846, Feb. 15, 2012, No. 7.)</p> <p>Documents and Things sufficient to fully describe all communications between Google (or anyone acting on behalf of Google) and Motorola Solutions, Motorola Mobility (or anyone acting on behalf of Motorola Solutions or Motorola Mobility) regarding the Android Platform; the Motorola Accused Mobile Devices; or Apple. (S.D. Fla. 10-23580, Nov. 3, 2011, No. 2.)</p> <p>Document and Things sufficient to fully describe all communications between Google (or anyone acting on behalf of Google) and Motorola (or anyone acting on behalf of Motorola) concerning any of the Apple Patents-in-Suit or this action. (I.T.C. 750, May 16, 2011, No. 16.)</p>
<p>7. Documents sufficient to show the design, development, and implementation in Android 4.0 Ice Cream Sandwich of the Slide to Unlock, Text Correction, Unified Search, and Special Text Detection software, features, or functionality.</p>	<p>Documents and Things sufficient to fully describe the development, use, and implementation of all process(es) and/or functionality(ies) in the Android Platform for locking and unlocking the touchscreen. (N.D. Ill. 11-8540, May 20, 2011, No. 18.)</p> <p>The development, use and implementation of the process(es) and/or functionality(ies) in the Android Platform for locking and unlocking a touchscreen, including but not limited to the gesture-to-unlock and pattern unlock functionalities. (I.T.C. 750, May 16, 2011, No. 12 (Deposition Topic).)</p>

Appendix A

Apple's April 5, 2012 Subpoena to Google	Previous Subpoenas from Apple
8. Documents sufficient to show the design of, development of, implementation of, and/or decision to implement in any version of Android the Slide to Unlock, Text Correction, Unified Search, and/or Special Text Detection software, features, or functionality.	<p>Documents and Things sufficient to fully describe the development, use, and implementation of all process(es) and/or functionality(ies) in the Android Platform for locking and unlocking the touchscreen, including but not limited to gesture-to-unlock and pattern unlock functionalities. (S.D. Fla. 10-23580, Nov. 3, 2011, No. 15.)</p> <p>The development, use and implementation of the process(es) and/or functionality(ies) in the Android Platform for locking and unlocking a touchscreen, including but not limited to the gesture-to-unlock and pattern unlock functionalities. (I.T.C. 750, May 16, 2011, No. 12 (Deposition Topic).)</p> <p>The development, use and implementation of the process(es) and/or functionality(ies) that recognize and allow data structures such as telephone numbers, email addresses, physical addresses, and Internet universal resource locators (URLs) to be selected as hyperlinks in the messaging applications in the Android Platform, including but not limited to the Gmail, Email, text messaging, instant messaging (IM) and multimedia messaging service (MMS) applications. (N.D. Ill. 11-8540, May 20, 2011, No. 23.)</p> <p>All Documents Relating to the Android Platform's performance of actions on detected structures, including but not limited to detected street addresses, phone numbers, and email addresses. (I.T.C. 710, Aug. 10, 2010, No. 138.)</p> <p>All Documents Relating to the functionality in the Android Platform that causes text, including but not limited to street addresses, phone numbers, and email addresses, to be highlighted, underlined, bolded or otherwise emphasized on the user display of a device or computer operating on the Android Platform. (I.T.C. 710, Aug. 10, 2010, No. 138.)</p>

Appendix A

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<p>9. All documents relating to any efforts or attempts, including the analysis and decision-making to engage in such efforts or attempts, to design around or otherwise imitate without directly copying Apple's products that incorporate any version of the iOS operating system as well as the Slide to Unlock, Text Correction, Unified Search, and/or Special Text Detection software, features, or functionality.</p>	<p>Documents sufficient to show any plan or attempt to design any Motorola Accused Product or the Android Platform to avoid infringement of the Apple Patents-in-Suit. (N.D. Ill. 11-8540, May 20, 2011, No. 10.)</p> <p>Documents sufficient to show any plan or attempt to design any Motorola Accused Device or the Android Platform to avoid infringement of the Apple Patents-in-Suit. (I.T.C. 750, May 16, 2011, No. 4.)</p> <p>All Documents Relating To any plan or effort to design any Accused Product or the Android Platform to avoid infringement of the Asserted Patents. (I.T.C. 797, Feb. 2, 2012, No. 5.)</p> <p>All communications between Google and Samsung concerning actual or potential modification(s) of Android or of the Samsung Accused Product(s) to avoid infringement of the Patents-in-Suit. (N.D. Cal. 11-1846, Feb. 15, 2012, No. 3.)</p> <p>All Communications between Google and HTC or any HTC related entity Relating To any reverse engineering or competitive analysis or testing of any Apple product or technology. (I.T.C. 797, Feb. 2, 2012, No. 55.)</p> <p>All Documents Relating to any plan or effort to design any Accused HTC Android Product or the Android Platform to avoid infringement of the Asserted Patents. (I.T.C. 710, Aug. 10, 2010, No. 6.)</p>

Appendix A

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<p>10. All documents relating to any analysis, review, consideration, evaluation, inspection, tear-down report, or copying of any Apple product, including but not limited to Apple's products that incorporate any version of the iOS operating system as well as the Slide to Unlock, Text Correction, Unified Search, and Special Text Detection software, features, or functionality.</p>	<p>Evaluations, competitive analyses and/or reverse engineering by You or by third parties Relating To or concerning Apple's iPhone, iPad, or iPod touch products and/or iOS operating system or any features, functions, or systems thereof. (I.T.C. 797, Feb. 2, 2012, No. 52 (Deposition Topic).)</p> <p>All Communications between Google and any entity regarding the Asserted Patents; Apple; any Apple product, including but not limited to any MacBook, iPhone, or iPad; or the features or functionalities of the Android Platform. (I.T.C. 710, Aug. 10, 2010, No. 3.)</p>
<p>11. All documents constituting, reflecting, or otherwise relating to any analysis, review, research, survey, consideration, or evaluation of the importance to consumers and consumer purchasing decisions of Slide to Unlock, Text Correction, Unified Search, and/or Special Text Detection on a phone or other mobile device.</p>	<p>For each Motorola Accused Product, all promotional and sales materials, planning and strategy Documents, focus group information, press releases, market analyses, analyst reports, and competitive analyses. (N.D. Ill. 11-8540, May 20, 2011, No. 8.)</p> <p>For each Accused Product, all promotional and sales materials, planning and strategy Documents, focus group information, press releases, market analyses, analyst reports, and competitive analyses. (I.T.C. 797, Feb. 2, 2012, No. 6.)</p> <p>All Documents and Things Relating To or concerning user usage and preference for any Scrolling Feature, Overscrolling Feature, Gesturing Feature and Orientation Change Feature as implemented in each version of the Android Platform provided by Google to HTC or in any Google-developed application program that Google provides to HTC, including, without limitation, any such application programs Installed by Default by HTC. (I.T.C. 797, Feb. 2, 2012, No. 50.)</p>

Appendix A

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12. All documents constituting, reflecting, or otherwise relating to any analysis, review, research, survey, consideration, or evaluation of the importance to consumers and consumer purchasing decisions of the ability or capability to search the Internet on a phone or other mobile device.	For each Motorola Accused Product, all promotional and sales materials, planning and strategy Documents, focus group information, press releases, market analyses, analyst reports, and competitive analyses. (N.D. Ill. 11-8540, May 20, 2011, No. 8.)