UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

GPNE CORP.,

Plaintiff,

v.

APPLE, INC.,

Defendant.

Case No.: 12-CV-02885-LHK

PROPOSED VERDICT FORM

The parties shall file any objections to the proposed verdict form by Monday, October 20, 2014, at 8:15 p.m. Objections should not exceed 1 page in length.

IT IS SO ORDERED.

Dated: October 20, 2014

LUCY H. KOH
United States District Judge

When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

We, the jury, unanimously agree to the answers to the following questions and return them under the instructions of this Court as our verdict in this case.

I. INFRINGEMENT

1. For each of the following products, has GPNE proven by a preponderance of the evidence that Apple has infringed Claim 44 of the '492 patent as to GPRS:

Please answer in each cell with "Infringed" (for GPNE) or "Not infringed" (for Apple). GPNE does not accuse the below Apple products of infringement of Claim 44 of the '492 patent as to LTE.

Apple Product	Literal Infringement (GPRS only)	Doctrine of Equivalents (GPRS only)
iPhone 4 (A1332)		
iPhone 4S (A1387)		
iPhone 5 (A1428)		
iPad 2 (A1396)		
iPad 3 (A1430)		
iPad mini (A1454)		

2. For each of the following products, has GPNE proven by a preponderance of the evidence that Apple has infringed Claim 19 of the '954 patent as to GPRS:

Please answer in each cell with "Infringed" (for GPNE) or "Not infringed" (for Apple). GPNE does not accuse the below Apple products of infringement of Claim 19 of the '954 patent as to LTE.

Apple Product	Literal Infringement (GPRS only)	Doctrine of Equivalents (GPRS only)
iPhone 4 (A1332)		
iPhone 4S (A1387)		
iPhone 5 (A1428)		
iPad 2 (A1396)		
iPad 3 (A1430)		
iPad mini (A1454)		

3. For each of the following products, has GPNE proven by a preponderance of the evidence that Apple has infringed Claim 22 of the '954 patent as to GPRS and/or LTE:

Please answer in each cell with "Infringed" (for GPNE) or "Not infringed" (for Apple). Do not provide an answer for any cell that is blacked out.

Apple Product		**Literal Infringement**	**Doctrine of Equivalents**
iPhone 4 (A1332)	GPRS		
	LTE		
iPhone 4S (A1387)	GPRS		
	LTE		
iPhone 5 (A1428)	GPRS		
	LTE		
iPhone 5 (**A1429**)	GPRS		
	LTE		
iPad 2 (A1396)	GPRS		
	LTE		
iPad 3 (A1430)	GPRS		
	LTE		
iPad 3 (A1403)	GPRS		
	LTE		
iPad mini (A1454)	GPRS		
	LTE		
iPad mini (A1455)	GPRS		
	LTE		

II. INVALIDITY

4. Has Apple proven by clear and convincing evidence that GPNE's patent claims are invalid?

Please answer in each cell with "Invalid" (for Apple) or "Valid" (for GPNE).

GPNE Asserted Claim	Invalid or Valid
'954 patent, Claim 19	
'954 patent, Claim 22	
'492 patent, Claim 44	

III. DAMAGES (IF APPLICABLE)

If you find that Apple infringed any valid claim of the asserted patents, you must then determine the amount of money damages to be awarded to GPNE to compensate GPNE for Apple's infringement.

5. What is the total dollar amount that GPNE is entitled to receive from Apple on the claims on which you have ruled in favor of GPNE?

$_____

6. For the total dollar amount in your answer to Question 5, please indicate whether you calculated the amount based on a lump sum royalty or a per unit royalty by writing down either "lump sum royalty" or "per unit royalty" on the line below.

_____

If you answered "lump sum royalty" to Question 6, you do not need to answer Question 7. If you answered "per unit royalty" to Question 6, please answer Question 7.

7. For the "per unit royalty," please provide the dollar breakdown for each product in the chart below.

Apple Product	Damages (in total dollars)
iPhone 4 (A1332)	**$**
iPhone 4S (A1387)	**$**
iPhone 5 (A1428)	**$**
iPhone 5 (A1429)	**$**
iPad 2 (A1396)	**$**
iPad 3 (A1430)	**$**
iPad 3 (A1403)	**$**
iPad mini (A1454)	**$**
iPad mini (A1455)	**$**

The individual amounts in each cell of Question 7 should add up to the total you have listed in your answer to Question 5.

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The Presiding Juror should then sign and date the verdict form in the spaces below and notify the Bailiff that you have reached a verdict. The Presiding Juror should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

DATED: _____, 2014 By:_____
Presiding Juror